	POLICY & PROCEDURES MANUAL	09-02
		Issued: October 1994
	PRIVACY POLICY	Revised: February 2023
		Page 1 of 5

1.0 PURPOSE

The purpose of this policy is to outline PUC group of companies (PUC) commitment to ensuring privacy, security and confidentiality of all data.

2.0 SCOPE

This policy has been designed to inform all employees, customers, stakeholders and business partners of PUC's commitment and recognition to our obligation under applicable legislation.

3.0 OBJECTIVE

To provide guidelines on the collection and distribution of personal identifiable information (PII) in accordance with all applicable laws and legislation.

4.0 GUIDING PRINCIPLES

4.1 To be proactive and anticipate risk

4.2 Provide transparency regarding the information being collected and its purpose


4.3 Identify steps to ensure confidentiality and security of information

4.4 Maintain compliance with applicable legislation

5.0 PRIVACY POLICY

The Privacy Act defines PII as "recorded information about an individual and includes any information that is distinguishable and personal in nature." Personal information can include a combination of information which can be used to identify an individual. PUC will maintain its responsibility to protect personal information:

1. Accountability
2. Identifying Purpose
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure and Retention
6. Accuracy
7. Security Safeguards
8. Openness
9. Individual Access
10. Challenging Compliance

	POLICY & PROCEDURES MANUAL	09-02
	PRIVACY POLICY	Issued: October 1994
		Revised: February 2023
		Page 2 of 5

5.1 ACCOUNTABILITY

PUC is accountable for the protection of personal information within the organization’s possession or control including all personal information held by PUC or transferred to a third party for processing.

If you have any questions or concerns regarding personal Information or this Privacy Policy, please address them to:


PUC Services Inc.
500 Second Line East
PO Box 9000
Sault Ste Marie ON, P6A 6P2
Attention: Privacy Officer

5.2 IDENTIFYING PURPOSE

PUC will identify the reasons for collecting personal information before or at the time information is collected. All information collected by PUC will remain confidential and will not be used or disclosed for any purpose other those identified upon collection, unless required by law. If any personal information is to be used or disclosed for a reason other than that identified, PUC will make all reasonable efforts to contact the impacted parties to gain consent.

All personal information may be collected for, but not limited to, the following purposes:

- To establish, deliver and maintain electric and water services;
- To authenticate identity;
- To respond to customer inquiries (by mail, telephone or email or otherwise maintain business relations);
- To bill or collect payment, including providing information to credit bureaus, retailers, banking institutions and other utility providers;
- To determine account eligibility and credit verification;
- To recommend products and services to meet customer needs and determine eligibility for these products and services;
- To develop, enhance, promote, or provide PUC’s products and services;
- To provide parties with information regarding PUC and electricity industry including rates and legislated changes, new or existing programs available to customers, events, or public participation forums;
- To prepare financial records and reports;
- To manage and develop PUC’s business and operations; and
- To meet legal and regulatory requirements.

	POLICY & PROCEDURES MANUAL	09-02
	PRIVACY POLICY	Issued: October 1994
		Revised: February 2023
		Page 3 of 5

5.3 CONSENT

Consent will be obtained from impacted parties either before, or when we collect, use or disclose PII, unless the use or disclosure is authorized or required by law. This consent can be given verbally, in writing, electronically or implied, depending on the level of sensitivity of the information. PUC will make all reasonable efforts to contact the impacted parties whose personal information is to be used or disclosed for a purpose other than what was initially identified upon collection.

A party may withdraw consent at any time, subject to legal or contractual restrictions, with reasonable notice. To withdraw consent, parties may contact PUC. Individuals will be notified of the implications of withdrawing consent and all changes will be documented for future audit.

5.4 LIMITING COLLECTION

PUC limits the amount and type of PII it collects to that which is necessary for the business to operate. PII will be collected using procedures that are fair, transparent and lawful.

PUC may also collect PII from other sources including financial institutions, credit bureaus, personal references, or other third parties provided there is documented consent from the customer to collect this information.

5.5 LIMITING USE, DISCLOSURE, AND RETENTION

PUC will limit the use of personal information collected for those purposes identified in section 5.2 of this policy. Any information that is used outside the purpose of this policy will be subject to a formal review. It may be necessary for PUC to provide information to third parties in accordance with the Affiliate Relationship Code. PUC may have a legal duty or right to disclose PII without the individual's knowledge or consent.


PUC will retain PII the length of time necessary for the identified purpose. PII no longer required for use by the company will be archived or destroyed in alignment with data retention requirements.

5.6 ACCURACY

PUC has procedures in place to ensure the data collected is accurate and up to date. Along with these measures, PUC relies on individuals to inform us of any errors or changes in information.

5.7 SAFEGUARDS

PUC has developed numerous safeguards in order to fulfill our responsibility of maintaining confidentiality of all PII collected. These safeguards are applied to protect PII against loss or theft, and avoid unauthorized access, use or modification of records. These safeguards are applied based on the level of confidential information being stored and will consist of physical, organizational, and technological controls. Procedures and policies pertaining to these security measures are communicated to all employees and third parties. In addition, a cyber security program has been

	POLICY & PROCEDURES MANUAL	09-02
	PRIVACY POLICY	Issued: October 1994
		Revised: February 2023
		Page 4 of 5

implemented to ensure compliance with this policy and all other laws pertaining to the protection of PII.

All employees and third parties of PUC are required to maintain confidentiality as in accordance with PUC’s Code of Conduct. All information or documentation obtained while employed with PUC or working on behalf of PUC will fall under these agreements.

5.8 OPENNESS

The policy will be reviewed annually, and revisions made as necessary. All revisions will be made available through the company website or other forms upon request.

5.9 INDIVIDUAL ACCESS

Any party may request to obtain information on how their PII is being used and disclosed under PUC’s possession and control. Prior to the release of any information, PUC will require the party to produce satisfactory identification in order to confirm identity.

PUC may be unable to provide a party access to their PII where such refusal is permitted under the law or by regulatory authorities.

A party can request information by contacting PUC using the following channels

Telephone: (705)759-6500

Email: privacy.officer@ssmpuc.com


Mail: PUC Services Inc.
 ATTN: Privacy Officer
 500 Second Line E
 PO BOX 9000
 Sault Ste Marie, ON
 P6A 6P2

Information approved for release will be made in applicable timeframes based upon the nature of the request.

5.10 CHALLENGING COMPLIANCE

Any party can challenge compliance with respect to the collection of PII by contacting PUC’s Privacy Officer in writing at the mailing address provided in section 5.9.

The Privacy Officer will be responsible for launching an investigation into potential non-compliance with this policy and its application of respective privacy laws and legislation. An investigation will be conducted in a timely manner appropriate to the severity and complexity of the issue. Upon

	POLICY & PROCEDURES MANUAL	09-02
		Issued: October 1994
	PRIVACY POLICY	Revised: February 2023
		Page 5 of 5

completion of the investigation, the party will be advised of the outcome in accordance with privacy legislation.

It is important to note confidentiality will be maintained throughout the investigation where possible, in accordance with the Act.

6.0 WEBSITE ANALYSIS TOOLS AND THE COLLECTION OF PERSONAL INFORMATION

PUC’s website and online services applications may use “cookies” and other analytical technologies. The purpose of collection of personal information by these technologies will be consistent with the purposes stated above under the heading “Identifying Purpose.”

All parties are free to block the installation of cookies by simply disabling this feature in the browser.

PUC is not responsible for the privacy practices of third parties accessed through links on our website.

Approved: R. Brewer (original on file)

Date: February 10, 2023

President & CEO

Revision #	Date	Description
1	January 2016	Format change, no change to content
2	December 2019	Policy rewrite to reflect new legislative requirements and amalgamate FOI policy
3	August 2022	Policy reviewed and updated
4	February 2023	Annual Policy Review