



Privacy Policy

August 1, 2022

Our Commitment to Privacy

FortisOntario values your privacy and we strive to ensure that our customers are aware that their privacy is of the utmost importance to us.

This privacy policy (the "policy") applies to the collection, use, and disclosure of personal information by FortisOntario in order for us to provide safe and reliable electrical services to our valued customers. By accepting services from us or providing us with your personal information after having been given notice of this policy, you are accepting the practices described in this policy, as they may be amended from time to time by us.

This policy will inform you about our practices and procedures concerning the collection, use, disclosure, protection, and retention of your personal information in compliance with our privacy obligations under the federal *Personal Information Protection and Electronic Document Act* ("PIPEDA"). This policy does not create or confer upon any individual any rights, or impose upon FortisOntario any obligations outside of, or in addition to, any rights or obligations imposed by PIPEDA.

In support of this policy and our commitment to privacy, we have appointed a Privacy Officer who is responsible for overseeing FortisOntario's compliance with its obligations under PIPEDA. FortisOntario requires all of its employees, directors and officers to protect and handle personal information in accordance with the rules set forth under PIPEDA and our privacy policy, and with respect to our electricity distribution customers in accordance with our electricity distribution licence issued by the OEB, and with our Conditions of Service.

Our Definitions

In order to assist you in understanding this policy, this section provides you with definitions of key terms used throughout the policy.

"FortisOntario", "we", "us", or "our" means collectively FortisOntario Inc. and its wholly-owned subsidiaries and affiliates (including Canadian Niagara Power Inc., Algoma Power Inc., Cornwall Street Railway Light and Power Company Limited, and Wataynikaneyap Power PM Inc.)

"personal information" means any information in any form about an identifiable individual, such as age, name, address, email, phone number, ID numbers, driver's license, income, billing and consumption records, service and equipment, payment history, credit information

"you" or "your" means customers, prospective customers, former customers, website users, or other individuals (other than employees) whose personal information is in our possession

1. Collection of Personal Information

FortisOntario will identify the purposes for which we collect, use and share your personal information before or at the time of collection, such as when you apply for electricity services from us.

We may collect personal information from you in person, at one of our offices, over the telephone, by corresponding with you, including via mail and email, through applications you submit to us, through our website, or by reference to this policy or our Conditions of Service.

Upon request, persons collecting personal information will explain the purposes for which your personal information is being collected, used, and/or disclosed or refer the individual to a designated person within FortisOntario who will explain the purposes for which your personal information is being collected, used, and/or disclosed.

We limit the collection of personal information to that which is necessary for the purposes identified and we collect the information by fair and lawful means. We may also collect information from third parties such as credit bureaus to manage business and credit risk; collect outstanding debt; detect, prevent, manage, and investigate or protect against fraud or other unauthorized or illegal activity.

If we wish to use your personal information for new purposes other than those outlined in this policy, we will notify you and obtain the appropriate consent before doing so.

Information we may collect from our customers

The type of information we usually collect and maintain in your customer file may include your name, mailing and local address, e-mail address, telephone number, date of birth, credit history, account and transaction history, driver's license number, and other relevant information related to the provision of electrical services.

2. Use of Personal Information

FortisOntario uses your personal information for purposes reasonably required to carry out our business, including internally among FortisOntario employees. These purposes include to:

- develop, evaluate, enhance and provide FortisOntario services and products including to establish, deliver and maintain electricity services
- market and promote our services and products to you including to notify customers about new and existing programs, events, causes or any other matters sponsored by FortisOntario
- recommend particular products and services to meet customer needs
- confirm and authenticate your identity to respond to inquiries, maintain responsible business relationships and partnerships, and ensure that your information is correct and accurate
- establish and maintain communication with investors, business partners, and stakeholders
- bill, process, and collect payment, including for pre-authorized payments and e-billing

- to contact you and respond to your enquiries and requests and/or to monitor and assess quality of service (for example, we may monitor and/or record telephone communications for quality assurance and training purposes)
- determine eligibility for products and services, including performing credit reviews to determine creditworthiness
- perform analytics (including by rendering personal information anonymous), administer surveys, or request feedback to improve and manage our relationship with you
- understand customers' energy needs, demands, usage, and preferences
- establish programs and processes to ensure energy safety, conservation, and efficiency
- maintain the safety and security of FortisOntario's operations and facilities
- manage and develop FortisOntario business and operations
- meet legal, regulatory, and contractual obligations
- fulfil other purposes related to any of the above

The above purposes for which we may collect, use and disclose your personal information, which are not exhaustive, are a necessary part of your relationship with FortisOntario.

3. Sharing of Personal Information

We share your personal information within FortisOntario for the business purposes set out above. We share your personal information with third parties only in the ways that are described in this policy or are specified in applications or agreements with you, or without your consent as required or permitted by law. Otherwise, we will obtain your consent to disclose the same personal information for any new purpose.

Due to the structure of the electricity sector in Ontario, it may be necessary to share your billing and consumption information with third party billing and settlement agencies, such as where you have signed a separate contract with a retailer. Our billing, settlement and regulatory relationships with third parties are governed by our license and regulatory codes that are established by the OEB.

FortisOntario may disclose your personal information to contractors or other companies and third parties to perform services for FortisOntario that involve access to your personal information.

Q.

When do you share my information with third parties?

A.

In some instances, if you are an electricity distribution customer, your personal information will be shared with third parties to provide:

- services on our behalf (such as customer service, outage management, data storage, data cleansing, and conservation and demand management related services), and/or
- us with other types of services to help us deliver and/or improve the services we provide (for example, auditing services, data analysis, billing, risk assessments, consulting, and advisory services).

These third parties may be located outside of Ontario or Canada. Our third-party service providers are contractually obligated by us to keep your personal information secure and to use personal information provided by us only for the purpose of providing services to us, however our service providers may be located in jurisdictions where the laws may not be the same as the laws of Canada in respect of the disclosure of personal information.

We may also de-identify, aggregate or anonymize information about our customers to identify trends, manage our business, develop statistical information, understand how we are performing, or develop relevant products, services or offers. Such information may also be shared with third parties for other analytical purposes, but will not personally identify any individual and therefore is not subject to this policy.

4. Retention of Personal Information

FortisOntario keeps personal information only as long as it remains necessary or relevant for the identified purposes, and to resolve disputes, enforce our agreements or as required by law.

Depending on the circumstances, where personal information has been used to inform a decision about a customer, we will retain, for a period of time that is reasonably sufficient to allow for access by the customer, either the actual information or the rationale for making the decision.

We may also retain personal information after the end of our business relationship, including to maintain communications with you, understand customer preferences and behaviours, analyze and improve our processes and develop new products and services.

FortisOntario maintains reasonably prudent controls and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.

5. Consent and Choice

FortisOntario will obtain meaningful consent before or when we collect your personal information, except in some cases where consent is not required like debt collection, court order, or required by law.

In obtaining consent, FortisOntario will use reasonable efforts to ensure that a customer is advised of the identified purposes for which personal information will be used or disclosed, including reference to this policy.

By accepting electricity distribution and related services from us, your consent to the collection, use and disclosure of your personal information for the purposes of providing you with such distribution and related services and all other purposes described within this policy and in our Conditions of Service is implied.

In determining the appropriate form of consent, FortisOntario will consider the sensitivity of the personal information and the reasonable expectations of its customers.

A customer may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. In some situations, FortisOntario may continue to collect, use and/or disclose your personal information after you have withdrawn consent, such as to collect payment and meet legal or regulatory obligations. In some circumstances, if you withdraw consent, FortisOntario may no longer be able to provide you with services or products and/or continue a business relationship.

Forms of consent

Your consent may be express (provided in writing, verbally, or electronically by you or through an authorized representative) or implied, depending on the circumstances. For example, we may obtain your express consent by way of an application form, through a check box on our website or through one of our customer service agents

6. Accuracy

FortisOntario will endeavour to ensure that personal information it has control of is accurate, complete, and up-to-date as is necessary for the purposes for which it was obtained. While we will do our best to base our decisions involving personal information on accurate information, we rely on individuals to disclose all material information and to inform us of any relevant changes to their personal information.

7. Safeguarding Personal Information

Keeping your personal information confidential and secure is a priority for us. FortisOntario is accountable for the protection of personal information within our possession or control, including all personal information held by us or transferred to a third party for processing.

FortisOntario will take reasonable steps to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Personal information under FortisOntario's control is protected by physical, organizational and technological safeguards appropriate to the sensitivity of the information that has been collected, the amount, distribution and format of the information, and the method of storage.

Please note that our website may contain links to other websites. When you click on a link to another site, you leave the FortisOntario site and this privacy policy does not apply to any third-party site linked on our website. If you access such websites, either directly or via the FortisOntario site, you should review the privacy policy of each site.

Q.

How does FortisOntario keep my personal information safe and secure?

A.

FortisOntario maintains physical security over its premises and also maintains computer and network security. FortisOntario requires its employees to respect the confidentiality of any personal information held by FortisOntario. Only those employees of FortisOntario who require access for business reasons, or whose duties reasonably so require, are granted access to personal information.

8. Accessing or Correcting Personal Information

You may make a formal written request to the FortisOntario Privacy Officer for information regarding the type, use and disclosure of personal information that FortisOntario has in its possession or control. You can request corrections of any inaccurate personal information that we have about you. We may require proof of identity prior to providing access to your personal information. FortisOntario may charge a nominal fee for responding to such request, and if so, give you notice in advance of any costs for processing your request.

FortisOntario may refuse to provide you with access to your personal information where permitted or required by law or regulatory authorities. If we deny your request for access to your personal information, we will advise you in writing of the reason for the refusal. Some examples of the reasons why we may not be able to provide you with access to your personal information include, but are not limited to:

- Where providing access would likely reveal personal information about a third party
- Where the information cannot be disclosed for legal, security or commercial proprietary reasons
- Where the information is subject to solicitor-client or litigation privilege

If you wish to challenge a decision, you can contact the Privacy Commissioner's Office at priv.gc.ca or call 1-800-282-1376.

9. Use of Cookies

In general, FortisOntario does not collect personal information that can identify you when browsing our website. However, certain non-identifying information such as an IP address, cookies, Internet tags and navigational data may be collected. This information is used to improve the content of our website and to

enhance the user experience. Specifically, FortisOntario uses cookies to track user traffic patterns through its website.

A cookie is a small data file that a website may write to your hard drive when you visit. A cookie file can contain information (such as a user ID) that the website can use to track the pages you have visited and to record your preferences for future visits.

In addition, FortisOntario may use third party cookies that track how you use our website in order to target advertisements to you on other websites. You may block cookies by adjusting your internet browser settings, although this may interfere with the functionality of the FortisOntario website. For more information on blocking cookies or targeted advertising, visit the Digital Advertising Alliance of Canada page at: <http://youradchoices.ca/choices/>.

Effective Date and Revisions

This policy is effective as of August 1, 2022

FortisOntario will review this policy periodically, and may make changes to this policy from time to time, for various reasons including to reflect changes in legal or regulatory obligations or in the manner in which we deal with your personal information. An amended privacy policy will be posted to our website, www.fortisontario.com, when it comes into effect.

Contact Us

If you have any questions or concerns with this policy or your personal information, please address them to the following:

FortisOntario Inc.
1130 Bertie Street
P.O. Box 1218
Fort Erie, ON, L2A 5Y2

Attention: Privacy Officer
Email: privacyofficer@fortisontario.com