



## **EXTERNAL PRIVACY POLICY**

At FortisAlberta Inc. ("FortisAlberta") we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes some of the personal information that we may collect from or about you, how we use and to whom we disclose that information.

FortisAlberta has developed a series of Privacy Policies in order to address the specific privacy concerns of certain groupings of individuals. Generally, this Privacy Policy applies to all personal information, unless the personal information is related to the employment relationship of an individual who seeks to be, is or was employed by FortisAlberta. Such information is dealt with in the FortisAlberta "*Employee Privacy Policy*".

If you are unsure of which Privacy Policy applies to you, please contact our Privacy Officer for more information.

### **Privacy Policy Effective for Canada**

It is FortisAlberta's policy to comply with the privacy legislation within each jurisdiction in which we operate or undertake activities. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another. This Privacy Policy covers only those activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Policy applies to you, please contact our Privacy Officer for more information.

### **What is Personal Information?**

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of contacting such individual in their capacity as an employee or officer of an organization.

### **What Personal Information do we Collect?**

We collect and maintain different types of personal information in respect of the individuals with whom we interact. Principally, this information is provided to us by your retailer for the purposes of providing electric distribution service to you, which includes both operating the physical assets to distribute electricity to you and the reading of your meter so that your retailer can bill you for electricity consumed. We are not responsible for selling electricity to you.

For example, we may collect, depending upon the nature of your relationship with FortisAlberta:

- contact and identification information, such as your name, address and telephone number;
- service information, such as your billing, rate and consumption history, meter and premise information, trouble call history, and repair and maintenance information;
- financial information, such as your credit history (where you wish to obtain credit from us) or you direct deposit or banking information (so that we can pay you for the products and services we obtain from you);
- product and service related information concerning the products and services that we provide to, or receive from, you; and
- general relationship-management information, including information related to your satisfaction with us, your agreements and preferences and information requested by, or provided to, you.

We value the opinions and suggestions of the individuals with whom we interact. Accordingly, we may also collect market-related information, which may include personal information, concerning market trends and activities impacting our businesses or operations. We may also collect information related to our media, investor and public relations activities and information related to our interactions with financial and other analysts and advisors, and members of the community.

FortisAlberta is a wires company, distributing electricity throughout our Alberta service territory. As a result, we may also collect personal information from individuals participating in and / or impacted by our activities, including information related to the establishment, management and termination of leases, right of way agreements or easements and information related to obtaining government permits and licenses, emergency planning and environmental stewardship.

As a part of the Alberta electric distribution system, FortisAlberta may collect information directly from you or from one of the third parties (such as you electricity retailer) with whom we interact. In addition, we may utilize the services of third parties in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise.

### **Site Security & Monitoring**

In the course of conducting our business, we may monitor the activities of individuals in respect of our operations and our property. For example, some of our locations are equipped with surveillance cameras. These cameras are generally in high risk areas or entrances to our facilities. Where in use, surveillance cameras are there for the protection of employees and third parties, and to protect against theft, vandalism and damage to our goods and property. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority.

This is not meant to suggest that all individuals will in fact be monitored or their actions subject to surveillance. It is meant to bring to your attention that such monitoring *may* occur and *may* result in the collection of personal information from you.

### **Why Do We Collect Personal Information?**

FortisAlberta collects personal information to enable us to manage, maintain, and develop our business and operations, including:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested (for example, we will use your personal information to establish your identity and location so that we may provide you with your connection to the electrical distribution system and the service that you have requested);
- to be able to review the products and services that we provide to you so that we may understand your requirements for our products and services and so that we may work to improve our products and services;
- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to be able to comply with your requests;
- to monitor customer satisfaction;
- to enable us to respond to market trends and needs and to plan for the future;
- to protect us against error, fraud, theft and damage to our goods and property;
- to enable us to undertake our environmental, health and safety activities, including incident planning, response and investigation;
- to enable us to comply with applicable law or regulatory requirements (for example, we may collect personal information to satisfy the obligations imposed on us by Alberta's Energy and Utilities Board); and
- any other reasonable purpose to which you consent.

### **How Do We Use and Disclose Your Personal Information?**

We may use and disclose your personal information:

- for the purposes described in this Privacy Policy; or
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

## **When do we Disclose Your Personal Information?**

We may share your personal information with our employees, contractors, consultants and other parties, located both in and outside of Canada, who require such information to assist us with managing our relationship with you, including: third parties that provide services to us or on our behalf and third parties that assist FortisAlberta in the provision of services to you.

In addition, as FortisAlberta is an electric distribution company, we may exchange personal information with the various third parties, such as a transmission system operator, retailers, rural electrification associations, agents and government agencies, who we work with as part of Alberta's electricity system. That being said, rest assured, we are not in the business of selling, renting or giving away your personal information to third parties for the purpose of allowing others to market their wares or services to you.

In addition, personal information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of or the grant of a security interest in, all or a part of FortisAlberta through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- to protect the rights and property of FortisAlberta;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent.

## **Do You Have Any Choices?**

As a part of the Alberta electric distribution system, FortisAlberta is required to collect certain personal information by law. Where this is the case, the privacy legislation does not generally require FortisAlberta to obtain your consent for the collection, use or disclosure of such personal information.

Where your consent is required, it is important to us that we collect, use or disclose your personal information where we have your consent to do so. Typically, your consent is obtained before or at the time that your personal information is collected. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use

or disclosure. In addition, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

To the extent that your consent is required, we will assume, unless you advise us otherwise, that you have consented to FortisAlberta collecting, using and disclosing your personal information for the purposes stated above (including any other purposes stated or reasonably implied at the time such personal information was provided to us).

Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

### **How is Your Personal Information Protected?**

FortisAlberta endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

### **Updating Your Personal Information**

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes by calling us at 310-WIRE (i.e. 9473).

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

### **Access to Your Personal Information**

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

## **Inquiries or Concerns?**

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Privacy Officer by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

## **Privacy Officer**

We have appointed a Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Privacy Officer is as follows:

Privacy Officer  
320 17th Avenue SW  
Calgary, Alberta Canada T2S 2V1

Phone: (403) 310 – 9473  
Fax: (403) 514 – 5083  
E-mail: [privacyofficer@fortisalberta.com](mailto:privacyofficer@fortisalberta.com)

## **Revisions to this Privacy Policy**

From time to time, we may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Policy on our website ([www.fortisalberta.com](http://www.fortisalberta.com)). We encourage you to refer back to it on a regular basis. This Privacy Policy was last updated on December 20, 2006.

## **Interpretation of this Privacy Policy**

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

This Privacy Policy does not create or confer upon any individual any rights, or impose upon FortisAlberta any obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.