
	PRIVACY POLICY	Policy #: COR-009
	Department: Corporate	Version #: 1.0
	Approved By: President & CEO	Date Created: June 1/22
	Signature: 	Date Revised: July 4, 2022

1. Purpose

GrandBridge Energy Inc. (GrandBridge) is committed to keeping the personal information of its customers accurate, confidential, secure and private. This Privacy Policy has been designed to outline our commitment to applicable privacy laws and regulations under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and our commitment to the guidelines under the Canadian Standards Association (CSA).

2. Scope

This policy applies to GrandBridge, and its affiliates. This includes all employees, contractors, Directors, customers, prospective customers, Vendors and other individual members of the public whose Personal Information is in our possession or control. This Privacy Policy does not apply to information about business customers who carry on business as corporations, partnerships or other forms of association. GrandBridge does, however, protect the confidentiality of such business customer information in accordance with the law, including the Electricity Act and regulatory codes of conduct issued by our regulator the Ontario Energy Board and contractual agreements.



In requesting service from GrandBridge and providing GrandBridge with your personal information, through the GrandBridge website or otherwise, you are accepting the practices described in this Privacy Policy. The terms in this Privacy Policy may be changed from time to time and should be referred to periodically for changes.

3. Legislation

GrandBridge is governed by the Municipal Freedom of Information and Protection of Privacy Act, Ontario (MFIPPA). The company also aligns to the ten (10) principles for the protection of personal information, was established by the Canadian Standards Association (CSA), Privacy Code. The CSA principles set guidelines to follow in the collection, use and disclosure of personal information collected in the course of doing business and are outlined below.

4. Definitions

- **GrandBridge:** GrandBridge Energy Inc., referred to as GrandBridge, GrandBridge Energy, or the Company.
- **MFIPPA:** Municipal Freedom of Information and Protection of Privacy Act, Ontario.
- **Personal information:** information about an identified or identifiable individual. Personal information may include such information as your name, email address, mailing address, financial information, birth date and other information about you collected through correspondence, electronically, in person or by telephone. Personal information does not include the name, title, or business address or telephone number of an employee of an organization. Personal information does not include information that has been aggregated such that an individual's information cannot be identified.
- **Privacy Breach:** Occurs when personal information is collected, retained, used or disclosed in ways that are not in accordance with MFIPPA. Examples include cybersecurity attacks, lost or stolen documents/technology containing personal information, inadvertently disclosing

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personal information through human error, etc.

- **Management Team Member:** For the purposes of this policy, any Supervisor, Manager, Director, and/or Leadership Team Member.

5. Method

Ten (10) Principles have been set out as guidelines to protect Personal Information.

1) **Principle 1 – Accountability**

GrandBridge is accountable for all Personal Information in its possession or under its control, including all Personal Information transferred to a third party who may perform service on our behalf. GrandBridge shall designate an individual, who will be accountable for the organization’s compliance and who shall be the designated contact between the Privacy Commissioner and receiving and responding to complaints. The Vice President, People & Culture is our designated individual as our Chief Privacy Officer. The President & CEO has ultimate responsibility for the protection of your personal information, while the Chief Privacy Officer is accountable for GrandBridge’s compliance with this privacy policy. In addition, all Directors, Employees, Contractors, Agents and Third Parties share responsibility for adhering to the privacy policies and procedures.

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

GrandBridge Energy Inc., 39 Glebe St. P.O. Box 1060, Cambridge ON N1R 5X6.

Attention: Chief Privacy Officer



Email: Privacy@grandbridgeenergy.com

2) **Principle 2 – Identifying Purposes**

The purposes for which personal information is collected shall be identified; at or before the time the information is collected. As an organization, we shall document the purposes for which personal information is collected. Employees who are collecting information should be able to explain to individuals the purposes for which the information is being collected.

GrandBridge collects the following personal information from customers:

- Name, mailing and service address and other contact information such as telephone numbers and email addresses;
- Banking information and credit card information;
- Customer transactional information with us such as account numbers, account balances and payment history;
- General financial information such as credit reports and credit reference information;
- Identifying information (e.g. date of birth, driver’s license number);
- Medical information for critical list customers to be used in cases of planned power outages; and
- Any other information which is received from you through your correspondence or communications with us.

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All Personal Information that GrandBridge collects, is collected for the following purpose(s):

- To establish, deliver and maintain electricity services;
- To verify our customer’s identity, respond to customer inquiries and otherwise maintain a business relationship with customers;
- To bill and collect payment;
- To accept and process pre-authorized payments;
- To perform credit reviews to assess and update credit worthiness, as required;
- To determine eligibility for products or services;
- To process requests and/or applications for products or services;
- To recommend products or services to meet the customer’s needs;
- To request your participation in surveys or contests;
- you about events or causes sponsored by GrandBridge
- To develop, enhance, promote or provide GrandBridge products and services;
- To provide customers with information about the electricity industry, outages, rates and energy saving programs such as programs that allow you to review your energy consumption online;
- To manage and develop GrandBridge’s business and operations;
- To protect all parties from error and fraud; and
- To meet legal and regulatory requirements.

The above collections, uses and disclosures, which are not exhaustive, are a necessary part of your relationship with GrandBridge Energy.

Unless required by law, GrandBridge shall not use or disclose, for any new purpose, Personal Information that has been collected without first identifying and documenting the purpose and obtaining the consent of the customer.



GrandBridge may:

- Monitor and/or record any telephone conversation with you for quality assurance, training purposes or as our authorization from a customer relating to their account.
- Share information with third-party service providers who perform services on our behalf. These service providers are given only the information necessary to perform those services that we have contracted them to provide.

Principle 3 – Consent

The knowledge and consent of the individual is required for the collection, use or disclosure of personal information, except where inappropriate. For example, when information is being collected for the detection and prevention of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information. The Vice President, People & Culture must pre-approve all exceptions to this procedure before they are initiated.

Consent may be provided orally, in writing, electronically, or implied (such as when you fail to notify

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GrandBridge Energy that you do not consent to collection/use/disclosure for certain purposes after you have received notice of those purposes, for example, through this Policy) or otherwise. The form of the consent sought by our organization may vary, depending upon the circumstances and the type of information. In determining the form of consent, the sensitivity of the information being collected must be considered. In obtaining consent, the reasonable expectations of the individual are also relevant. Consent shall not be obtained through deception. GrandBridge generally shall seek consent to use or disclose Personal information at the same time it collects the information. From time to time, GrandBridge may seek consent to use and disclose Personal Information after it has been collected but before it is used or disclosed for a new purpose.

GrandBridge shall use reasonable efforts to ensure that a customer is advised of the identified purposes for which personal information will be used or disclosed. Individuals can give consent in many ways, for example;



- An application form may be used to seek consent, collect information and inform the individual of the use that will be made of the information. By completing and signing the form, the individual is giving consent to the collection and the specified uses;
- A check-off box may be used to allow individuals to request that their names and addresses not be given to other organizations. Individuals who do not check the box are assumed to consent to the transfer of this information to third parties;
- Consent may be given orally when information is collected over the telephone; or
- Consent may be given at the time that individuals use a product or service.

Careful consideration should be given to the way in which consent is obtained. Generally, seek expressed written consent when the information is likely to be considered sensitive. Consent to release information to a third party and/or to an authorized agent or representative other than as described in our Policy Statement shall be expressed written consent.

In general, the use of products and services delivered by GrandBridge to a customer constitutes implied consent for GrandBridge to collect, use, and disclose Personal Information for all identified purposes. A customer may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. However, refusal to provide such consent, or withdrawal of such consent, may prevent us from providing you with certain products or services for which information is necessary. Customers may contact GrandBridge Energy for more information regarding the implications of withdrawing consent.

Principle 4 – Limiting Collection of Personal Information

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Both the type and the amount of information collected shall be limited to that which is necessary to fulfill the purposes identified. The information shall be collected by fair and lawful means.

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Principle 5 - Limiting Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. GrandBridge will not disclose personal information to any other party without written consent, except where such information is required to be disclosed:

- a. to comply with any legislative or regulatory requirements;
- b. for billing, settlement, or market operations purposes;
- c. for law enforcement purposes; or
- d. to a debt collection agency for the processing of past due accounts.

Only those employees of GrandBridge who require access for business reasons, or whose duties reasonably so require, are granted access to Personal Information about customers.

The company is required by legislation to retain certain corporate records for a specific number of years. Personal information shall be retained in accordance with any legislative requirements and/or as long as necessary for the fulfilment of the original purposes. Personal information that is no longer required to fulfil the identified purposes shall be destroyed, erased or made anonymous. The retention period varies by type of record and is described in the COR-007 Records Management Program.

GrandBridge will only use or disclose Personal Information with other parties, for the purposes that we identify when we collect the information. In these circumstances, the Personal Information that the non-related organization receives is limited to only the Personal Information held by GrandBridge that they need in order to render their service to us. The companies that are provided with personal information are first required to sign an agreement that obligates them to keep the information confidential, secure, and prohibits them from using it for unauthorized purposes.

From time to time, GrandBridge may use third party service providers located in the United States of America (USA). As with other third-party service providers, USA-based service providers are obliged to keep Personal Information confidential and secure, and to use it only for the authorized purpose. Where USA-based service providers are retained, customer information may be available to the government of the USA, or its agencies under a lawful order made in that country.



Records Retention:

To meet the requirements of the Act, the Company is required to maintain a listing of the type of information held and the duration for which that information is held. This listing, referred to as COR-009 Appendix C Personal Information Banks, must be available to the public so that individuals can determine the type of information that the Company might hold about them.

The Company meets this requirement with our established Records Management Program (COR-007)

Principle 6 – Accuracy

Personal Information shall be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used. GrandBridge shall update Personal Information about customers as and when necessary to fulfill the identified purposes or upon notification by the customer. We rely on our customers to help us maintain accurate records by telling us about any changes to their information.

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Principle 7 – Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information. The security safeguards shall protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. GrandBridge has methods in place to protect personal information regardless of the format in which it is held.

The methods of protection include:

- Physical measures, including locked cabinets, fire safe vaults and restricted access to offices; and
- Organization wide measures, including security access clearances and limited access based on needs; and
- Technological measures, including the use of passwords, software/hardware firewalls, security measures and encryptions.
- Contractual obligations with third parties who need access to your personal information requiring them to protect and secure your personal information.



Employees are aware of the importance of maintaining confidentiality of personal information, that importance is further set out in our Code of Conduct, refer to Policy COR-108. In addition, Employees with access to Personal Information are required as a condition of employment to sign a non-disclosure agreement (Appendix COR-009D).

Principle 8 – Openness

Our Company is committed to making this policy easy to understand, accessible, and updated. Changes and updates to the policy will be shared on the corporate website or relayed to customers through a bill insert or bill message, if appropriate.

In general, we are to provide and/or have readily available the following:

- Name, Title and address of individual who is accountable for the organization’s policies and practices and to whom complaints or inquiries can be forwarded. In our company the Chief Privacy Officer is: M. Jane Hale- McDonald, Vice President, People & Culture, 39 Glebe St. P.O. Box 1060, Cambridge ON N1R 5X6.
- The means of gaining access to personal information held by the organization. Generally, requests for personal information should be directed in writing to the Vice President, People & Culture, as our designated Chief Privacy Officer.
- A description of the type of personal information held by the organization, including a general account of its use. A summary listing of information is included in the Records Retention Schedule COR-007A.
- A copy of any brochures or other information that explain the organizations policies, standards or codes. Individuals are directed to information as posted on our corporate website and/or corporate brochures.

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- A summary of what personal information is made available to related organizations (i.e. subsidiaries). In our organization no information is shared between our affiliate Corporations. The Affiliate Code Relationship issued by the Ontario Energy Board prohibits the sharing of information between related companies.

Principle 9 – Individual Access

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. The Act recognizes that in some situations full access may not be possible. For example, providing the information may be prohibitively costly, may contain reference to other individuals, may be information that cannot be disclosed for legal, security or commercial proprietary reasons or is subject to solicitor-client or litigation privilege. We are required to respond to an individual’s request within a reasonable time (30 days) and at minimal cost to the individual.

Principle 10 – Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the Act to the Vice President, People & Culture, as our Chief Privacy Officer accountable for compliance.

Directing Inquiries or Complaints

All requests which indicate that they are being made under the auspices of the Act should be directed to the Chief Privacy Officer, M. Jane Hale-McDonald, Vice President, People & Culture. In addition, requests made under MFIPPA require the requester to submit a monetary fee together with their application.

GrandBridge Energy Inc., 39 Glebe Street, P.O. Box 1060, Cambridge ON N1R 5X6
 Attention: Chief Privacy Officer
 Email: Privacy@grandbridgeenergy.com



Upon receipt of a request, our company will make every effort to respond within 30 days. In cases where responding to the request will result in a significant cost to the utility, the Company will charge for the costs of responding to the request.

In the event an individual is not satisfied with the Company response to their complaint they can contact Ontario’s Information Privacy Commissioner as a final mechanism for resolving the issue.

Responsibilities:

All Employees:

Each employee is responsible to understand and adhere to the terms within this policy. Any employee who thinks personal information has been or may have been misplaced, lost, stolen/hacked, and/or inappropriately disclosed in any way, has an obligation to report the matter immediately to his/her supervisor. The first two priorities following a privacy breach are containment and notification. Depending on the scope of the breach, containment may require multiple individuals and time to accomplish. Notification requires GrandBridge Energy to be able to explain what has happened to

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affected customers, Information and Privacy Commissioner, and potentially, the Waterloo Regional Police or Ontario Provincial Police. Appendix E, Privacy Breach Responsibility Chart, outlines a summary of required steps in the event of a privacy breach. COR-009C Privacy Breach Report must be completed for all privacy breaches, electronic and hard copy, as noted in the Privacy Breach Responsibility Chart. All privacy breach reports and related documents must be kept on file for a period of two years.

Management Team Members:

All Management Team members are responsible for ensuring adherence to this privacy policy as it relates to their department. It is important to ensure privacy standards are met both electronically, through the use of technology, and with hard copy documents. Privacy impacts must be considered when any new process, technology or activity is under review. Any activity, technology, or process requiring third party access to private information must be approved in advance by the CPO by submitting a “Request for Privacy Information Form, Appendix A”. It is also the applicable Management Team member’s responsibility to ensure that any contracts with third party public and private sector organizations through which personal information is collected, used and/or disclosed, includes Appendix COR-009F, Third Party Service Privacy Requirements. In addition, a signed Non-Disclosure Agreement (NDA) (COR-009C) is required prior to commencing work. NDA’s should be forwarded to the Executive Assistant, Administration for filing with the corresponding contract.

Chief Privacy Officer:

The Vice President, Human Resources, is responsible to adhere to all requirements outlined in the act as our Chief Privacy Officer (CPO).

6. Document Review

This document will be reviewed as required by the Chief Privacy Officer.

7. Related Documents or Forms

- Appendix COR-009A: Request for Privacy Information
- Appendix COR-009B: Privacy Breach Report
- Appendix COR-009C: Personal Information Banks
- Appendix COR-009D: Non-Disclosure Agreement
- Appendix COR-009E: Privacy Breach Responsibility Chart
- Appendix COR-009F: Third Party Service Privacy Requirements

8. Revision History

Version Number	Date (mm-dd-yyyy)	Description of Change	Author/Editor
1.0	06/01/2022	Initial Policy for GrandBridge Energy	M. Almeida-Hann