

Privacy Policy

At GrandBridge Corporation, we are committed to protecting your personal information. This Privacy Policy outlines how we collect, use, disclose, and safeguard your data in accordance with Ontario's Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and the Canadian Standards Association (CSA) privacy principles. Key highlights include:

- <u>Your Information:</u> We collect only the personal data necessary to provide and manage our services—such as contact details, billing information, and identification.
- <u>Your Consent:</u> We obtain your consent before collecting or sharing your information, except where required by law.
- Your Rights: You can access your personal information, request corrections, or withdraw consent at any time.
- Our Safeguards: We use physical, organizational, and technological measures to protect your data.
- <u>Third Parties:</u> We only share your information with trusted service providers under strict confidentiality agreements.
- <u>Transparency:</u> Our Chief Privacy Officer is available to address any questions or concerns about your privacy.

Privacy Statement

At GrandBridge Corporation, we are committed to protecting the personal information of our customers. This Privacy Policy outlines our dedication to upholding the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and the Canadian Standards Association (CSA) privacy principles.

This policy applies to GrandBridge Corporation and its subsidiaries (collectively, the "Corporation"), including all employees, contractors, Directors, customers, prospective customers, vendors, and other individuals whose personal information we collect, use, or manage.

Note: This policy does not apply to information about business customers operating as corporations, partnerships, or other associations. However, we protect such information in accordance with applicable laws, including the Electricity Act, Ontario Energy Board regulations, and contractual obligations.

By using our services or providing personal information to GrandBridge Corporation, you agree to the practices outlined in this policy. We may update this policy periodically, and we encourage you to review it regularly.

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Our Privacy Principles

1. Accountability

We are responsible for all personal information in our possession or under our control, including information handled by third-party service providers. The Vice President, People & Talent Management serves as our Chief Privacy Officer, accountable for the Corporation's compliance with this policy. The President & Chief Executive Officer (CEO) has ultimate accountability for the protection of your personal information. All employees, contractors, and partners share responsibility for upholding our privacy standards.

2. Identifying Purposes

We may collect the following personal information:

- 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 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
- Any other information which is received from you through your correspondence or communications with us

We collect personal information for specific, documented purposes, including:

- Providing and maintaining electricity services
- Verifying identity and managing customer relationships
- Billing, payment processing, and credit assessments
- Recommending and delivering products or services
- Conducting surveys and promotional activities
- Ensuring regulatory compliance and fraud prevention

We collect only the information necessary for these purposes, such as contact details, financial and transactional data, identification, and relevant medical information for planned power outages (e.g., for critical list customers).

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3. Consent

We obtain your consent before collecting, using, or disclosing your personal information, except where inappropriate (e.g., fraud prevention or legal requirements). Consent may be expressed in writing, verbally, electronically, or implied through your use of our services.

You may withdraw consent at any time, subject to legal or contractual restrictions. Please contact us to understand the implications of withdrawing consent.

4. Limiting Collection

We collect only the personal information necessary for the identified purposes, using fair and lawful means.

5. Limiting Use, Disclosure, and Retention

We use and disclose personal information only for the purposes for which it was collected, unless otherwise authorized by law or with your consent. Information may be shared with:

- Regulatory bodies
- Law enforcement
- Debt collection agencies
- Third-party service providers (under strict confidentiality agreements)
- Some service providers may be in the United States, where information may be subject to U.S. laws.

6. Accuracy

We strive to keep your personal information accurate and up to date. Please notify us of any changes to your information. We rely on our customers to help us maintain accurate records by telling us about any changes to their information.

7. Safeguards

We protect personal information using appropriate physical, organizational, and technological safeguards, including:

- Locked storage and restricted office access
- Role-based access controls
- Password protection and encryption
- Confidentiality agreements with third parties

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8. Openness

We are transparent about our privacy practices. This policy is available on our website and may be updated periodically. Changes and updates to the policy will be shared on the corporate website or relayed to customers through a bill insert or bill message, where appropriate.

9. Individual Access

You have the right to access your personal information and request corrections. Requests should be made in writing to our Chief Privacy Officer. We will respond within 30 days and may charge a fee for extensive requests. In some situations, full access may not be possible when the information contains reference to other individuals, for legal, security or commercial proprietary reasons or if subject to solicitor-client or litigation privilege.

10. Challenging Compliance

All requests and concerns about our compliance with this policy should be directed to our Chief Privacy Officer.

GrandBridge Corporation, 39 Glebe Street, P.O. Box 1060, Cambridge ON N1R 5X6

Attention: Chief Privacy Officer

Email: Privacy@grandbridgecorporation.com

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

Attention: Chief Privacy Officer

Email: Privacy@grandbridgeenergy.com

GrandBridge Group, 39 Glebe Street, P.O. Box 1060, Cambridge ON N1R 5X6

Attention: Chief Privacy Officer

Email: Privacy@grandbridgegroup.com

If you are not satisfied with our response, you may contact the <u>Information and Privacy Commissioner of Ontario.</u>

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