
 Personal Information Privacy Policy - Customers CS-004	DEPARTMENT:		INQUIRIES TO:	TOPIC:	
	All		Finance	Personal Information Privacy - Customers	
	ISSUED:		REVIEW DATE:		APPROVED BY:
	September 2014		August 2017		 President & CEO

1.0 Our Privacy Commitment

- 1.1 Yukon Energy Corporation is committed to maintaining the security, confidentiality and privacy of your personal information. As a public utility, Yukon Energy has always respected your privacy and has strived to be an open and accessible organization. This Privacy Policy documents our on-going commitment to you and has been developed in compliance with the federal *Personal Information Protection and Electronic Documents Act* (“*PIPEDA*”) which applies to the collection, use and disclosure of personal information by Yukon Energy. Yukon Energy is also subject to the privacy protection provisions of the *Yukon Access to Information and Protection of Privacy Act* (“*ATIPPA*”) except where those provisions conflict with Yukon Energy’s obligations under *PIPEDA*.

2.0 Scope

- 2.1 This Policy addresses personal information about individuals and does not apply to the information collected, used or disclosed with respect to corporate or commercial entities. However, such information is protected by other Yukon Energy policies and practices and through contractual arrangements. For a non-commercial customer “personal information” includes such information as billing records, service and equipment, customer’s credit information and any recorded complaints.
- 2.2 This Policy does not impose any limits on the collection, use or disclosure of the following information by Yukon Energy:
- your business contact information; and
 - publicly available information recognized under *PIPEDA*.

3.0 Definitions

Collection – the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

Consent - the voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent can be given orally or in writing, it is unequivocal and does not require any inference on the part of Yukon Energy. Implied consent exists when Yukon Energy can reasonably infer consent based upon your action or inaction.

Disclosure – making personal information available to a third party.

Personal Information – information about an identifiable individual but does not include business contact information of an individual. Personal information does not include information that is about corporate or commercial entities. It also does not include information that cannot be associated with a specific individual. (e.g. aggregated data).

Third Party – an individual or organization other than Yukon Energy and you.

Use – the treatment and handling of personal information by and within Yukon Energy.

4.0 Accountability

- 4.1 Yukon Energy is accountable and responsible for personal information under its control. Yukon Energy has designated a Privacy Officer who is accountable for Yukon Energy's compliance with this Policy.
- 4.2 Ultimate accountability for Yukon Energy compliance rests with the Yukon Energy's Board of Directors who delegate day-to-day accountability to the Privacy Officer. Other individuals within Yukon Energy may be accountable for the day-to-day collection and processing of personal information or to act on behalf of the Privacy Officer.
- 4.3 Yukon Energy will adopt procedures to protect personal information, receive and respond to complaints and inquiries, train staff regarding policies and procedures and communicate policies and procedures to you, the customer.
- 4.4 Yukon Energy is also responsible for personal information in our control that has been transferred to a third party for processing. Yukon Energy will use contractual or other means to provide a comparable level of protection when a third party is processing your personal information, however such third parties may be located outside of Canada and, in such instances, access to the information is subject to the applicable laws of those jurisdictions.

5.0 Purposes

- 5.1 When collecting information, Yukon Energy will state the purpose of collection and will provide, on request, contact information for the Privacy Officer who can answer questions about the collection.
- 5.2 Yukon Energy collects your personal information and may use or disclose it for the following reasons:
 - to provide and administer services requested and to use/disclose the information for any purpose related to the operation of your account and the provision of requested services;
 - to bill accounts and maintain payment records (including arrangements for pre-authorized payments);

- to provide information to third party service providers, such as account processors and administrators;
- to assess credit risk including by obtaining credit reports and undertaking employment checks;
- to document and address any service issues or complaints ; and to enhance service quality (e.g. by recording telephone calls regarding service issues or complaints in order to serve you better and for internal training)
- to provide information to credit bureaus and other utility providers to update credit information;
- to protect Yukon Energy, yourself and others from fraud, theft, error, dangerous use of electricity and to otherwise safeguard the financial and other interests of Yukon Energy;
- to authenticate your identity;
- to provide information to anyone working with or for Yukon Energy as needed for the operation of an account or the provision of requested services;
- to assist in law enforcement;
- to assist Yukon Energy with legal matters or proceedings, including preparation for same;
- to facilitate a potential merger, amalgamation, sale or financing of assets (or a part thereof) of Yukon Energy or any other corporate change or re-organization, provided parties are bound by appropriate obligations concerning the use and protection of the personal information;
- to address and respond to potential issues related to customer usage of critical, power-dependent, medical equipment during an outage;
- to collect debts owed to Yukon Energy; and
- to comply with legal and regulatory requirements and to act pursuant to legal and regulatory authorizations.

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

6.0 Consent

6.1 Yukon Energy will obtain your consent to collect, use or disclose personal information except where Yukon Energy is authorized or required by *PIPEDA* or other law to do so without consent. For example, Yukon Energy may collect, use or disclose personal information without your knowledge or consent where:

- Yukon Energy is collecting or paying a debt;
- Yukon Energy is obtaining legal advice; or
- Yukon Energy reasonably expects that obtaining consent would compromise an investigation of a breach of an agreement or contravention of a law.

6.2 Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify Yukon Energy that you do not wish your personal information collected/used/disclosed for various purposes after you have received notice of those

purposes) or otherwise. For example, oral consent could be expressed over the telephone when information is being collected; electronically when submitting an application or other information; or in writing when signing an application form.

- 6.3 You may withdraw consent at any time, subject to legal or contractual restrictions, provided that reasonable notice of withdrawal of consent is given to Yukon Energy. On receipt of notice of withdrawal of consent, Yukon Energy will inform you of the likely consequences of the withdrawal of consent, which may include the inability of Yukon Energy to provide certain products or services for which that information is necessary.

7.0 Limits on Collection of Personal Information

- 7.1 Yukon Energy will not collect information indiscriminately and will limit collection of information to that which is reasonable and necessary to provide a product or service and which is reasonable and necessary for the purposes consented to by you. Yukon Energy will also collect information as authorized by *PIPEDA* or other law.

8.0 Limits for Using, Disclosing and Retaining Personal Information

- 8.1 Your personal information will only be used or disclosed for the purposes set out above, for purposes consented to by you and as authorized by *PIPEDA* and other law.
- 8.2 Where Personal Information is used to make a decision affecting a customer, that information will be retained long enough (at least one year) to allow the individual access to the information after the decision has been made and, in the event of an access request or a challenge, long enough to exhaust any recourse an individual may have under the law.
- 8.3 Yukon Energy will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.
- 8.4 Yukon Energy will take due care when destroying personal information so as to prevent unauthorized access to the information.

9.0 Accuracy

- 9.1 Yukon Energy will make a reasonable effort to ensure that personal information it is using or disclosing is accurate and complete. In some cases, Yukon Energy relies on you to ensure that certain information, such as your address or telephone number, is current, complete and accurate.
- 9.2 If you demonstrate the inaccuracy or incompleteness of personal information, Yukon Energy will amend the information as required. If appropriate, Yukon Energy will send the amended information to third parties to whom the information has been disclosed.

- 9.3 When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, Yukon Energy will annotate the personal information under its control with a note that the correction was requested but not made.

10.0 Safeguarding Personal Information

- 10.1 Yukon Energy protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

- 10.2 Yukon Energy will take reasonable steps, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by the third parties who assist in providing services to you. Some specific safeguards include:

- physical measures such as locked filing cabinets;
- organizational measures such as restricting employee access to files and databases as appropriate;
- electronic measures such as passwords and firewalls;
- investigative measures where Yukon Energy has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.

- 10.3 Confidentiality and security are not assured when information is transmitted through e-mail or other wireless communication. Yukon Energy will not be responsible for any loss or damage suffered as a result of a breach of security and/or confidentiality when you transmit information to Yukon Energy by e-mail or other wireless communication or when Yukon Energy transmits such information by such means at your request.

11.0 Openness

- 11.1 Yukon Energy is open about the policies and procedures it uses to protect your personal information. Information about these policies and procedures will be made available in writing and electronically. However, to ensure the integrity of our security procedures and business methods, Yukon Energy will not disclose sensitive information about its policies and procedures.

- 11.2 Yukon Energy will make available a description of the type of personal information held by Yukon Energy, and a general description of its use and disclosure.

12.0 Providing Access

- 12.1 You have a right to access your personal information held by Yukon Energy.
- 12.2 Your information, such as copies of account statements, account applications and service records will be provided upon request and authentication of identity.

- 12.3 Upon written request and authentication of identity, Yukon Energy will provide you with your other personal information under its control, information about the ways in which that information is being used and a description of the individuals and organizations to whom that information has been disclosed.
- 12.4 A reasonable fee may be charged by Yukon Energy for access to your personal information.
- 12.5 Yukon Energy will generally make the information available within 30 days or provide written notice where additional time is required to fulfill the request.
- 12.6 In some situations, Yukon Energy may not be able to provide access to certain personal information. This may be the case where, for example, disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purposes of an investigation or where disclosure of the information would reveal confidential commercial information. Yukon Energy may also be prevented by law from providing access to certain personal information.
- 12.7 Where an access request is refused, Yukon Energy will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

13.0 Compliance

- 13.1 Yukon Energy will, on request, provide information regarding its complaint procedures.
- 13.2 Any inquiries, complaints or questions regarding this Policy should be directed in writing to the Yukon Energy Privacy Officer.

Contact Information:
Yukon Energy Corporation
Attention: Privacy Officer
#2 Miles Canyon Road,
P.O. Box 5920
Whitehorse, Yukon Y1A 6S7
Phone: (867) 393-5300
Fax: (867) 393-5323
E-mail: privacy.officer@yec.yk.ca