

	Personal Information Privacy Policy - Customers CS-004	DEPARTMENT:		INQUIRIES TO:	TOPIC:
		All		Finance	Personal Information Privacy - Customers
		ISSUED:		REVIEW DATE:	APPROVED BY:
		August 2026		July 2029	 Board Chair Resolution #YEC – 26-020

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 respects your privacy and strives to be an open and accessible organization. This policy documents our ongoing commitment to you and has been developed in compliance with the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)* and the Yukon's *Access to Information and Protection of Privacy Act (ATIPP)* which applies to the collection, use and disclosure of personal information by Yukon Energy.

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* or *ATIPP*.

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 expressed 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 including, but not limited to your name, address, telephone number, email address, date of birth, Driver’s License and records showing historical and on-going energy use and consumption. Personal information

does not include business contact information of an individual. Personal information does not include information about corporate or commercial entities. It also does not include information that cannot be associated with a specific individual.

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 CEO and 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.

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 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 electricity account or service and the provision of requested services. Such services may include programs and platforms such as Yukon Energy's MyAccount portal and PeakSmart programs;
 - to share information about proposed or active Yukon Energy electricity projects or operations near you;
 - to bill accounts and maintain payment records;
 - 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 provide information to third party service providers, such as account processors and administrators, and engagement professionals;
 - to assess credit risk including obtaining credit reports;

- to provide information to credit bureaus and other utility providers to update credit information;
- to collect debts owed to Yukon Energy;
- to document and address any service issues or complaints. This may include the recording of telephone calls to ensure accurate records, to assist in addressing any service issues, and for quality assurance;
- to protect Yukon Energy, yourself and others from fraud and error and to safeguard the financial interests of Yukon Energy;
- to authenticate your identity;
- to assist in law enforcement; 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*, *ATIPP* 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 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, or to share information about Yukon Energy projects or operations near you, and which is reasonable and necessary for the purposes consented to by you. Yukon Energy will also collect information as authorized by *PIPEDA*, *ATIPP* 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*, *ATIPP* and other law.
- 8.2 Where personal information is used to make a decision affecting a customer, that information will be retained long enough 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, email 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; and

- 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 or in order to process 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 the right to access your personal information held by Yukon Energy, subject to the matters set out below.

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.

12.8 Under ATIPP, you can also request access to records in Yukon Energy's possession or that have been shared with a third party. Fees will be charged for access requests, in accordance with ATIPP, PIPEDA and applicable regulations.

12.9 In the event of a conflict in application between PIPEDA and ATIPP, with respect to the release of a record, PIPEDA must be followed because of its federal jurisdiction.

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) 393-5337

E-mail: privacyofficer@yec.yk.ca