

SaskEnergy Privacy Policy

A. PURPOSE STATEMENT

- The purpose of this Privacy Policy is to provide flexible guidelines that can be adapted to meet the demands of changing technology and varying consumer expectations regarding privacy. This policy is adopted to address the safeguarding of the privacy and confidentiality of personal information collected, used, disclosed and disposed of by SaskEnergy in the course of carrying on business with you. SaskEnergy will continue to stay current in the critical issue of privacy, and may update this policy from time to time, so please review it periodically.

B. ELIGIBILITY AND APPLICATION

- This policy applies to SaskEnergy Incorporated and its subsidiary companies, including TransGas Limited and SaskEnergy International (referred to collectively as "SaskEnergy").
- SaskEnergy is subject to The Freedom of Information and Protection of Privacy Act of Saskatchewan, (referred to as "FOIPPA")
- Personal information pertaining to SaskEnergy's employees, superannuates, customers, contractors, as well as personal information held by the subsidiaries of SaskEnergy, shall be considered private and confidential. SaskEnergy undertakes to implement and maintain the provisions of this policy in respect of the management of Personal Information.
- A separate policy regarding management of Personal Information of employees of SaskEnergy and its subsidiaries is also in effect.

C. WHAT IS PERSONAL INFORMATION?

- Personal Information covered under this Privacy Policy imports the definition from Section 24 of FOIPPA, which is paraphrased as follows:

"Personal Information" means Personal Information about an identifiable individual that is recorded in any form, and includes:

- (a) Information that relates to the race, creed, religion, colour, sex, sexual orientation, family status or marital status, disability, age, nationality, ancestry or place of origin of the individual;
- (b) Information that relates to the education or the criminal or employment history of the individual

or information relating to financial transactions in which the individual has been involved;

- (c) repealed.(d) Any identifying number, symbol or other particular assigned to the individual;
- (e) The home or business address, home or business telephone number, fingerprints or blood type of the individual;
- (f) The personal opinions or views of the individual except where they are about another individual;
- (g) Correspondence sent to a government institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to the correspondence that would reveal the content of the original correspondence, except where the correspondence contains the views or opinions of the individual with respect to another individual;
- (h) The views or opinions of another individual with respect to the individual;
- (i) Information that was obtained on a tax return or gathered for the purpose of collecting a tax;
- (j) Information that describes an individual's finances, assets, liabilities, net worth, bank balance, financial history or activities or credit worthiness; or
- (k) The name of the individual where:
 - (i) it appears with other Personal Information that relates to the individual; or
 - (ii) the disclosure of the name itself would reveal Personal Information about the individual.

D. THE 10 FAIR INFORMATION PRINCIPLES

This Privacy Policy is designed to comply with the requirements of provincial privacy legislation, including FOIPPA. In addition, the 10 CSA Fair Information Principles which form the basis of the federal government's Personal Information Protection and Electronic Documents Act (referred to as "PIPEDA") have been adapted and incorporated into this Privacy Policy wherever possible. These adapted principles are as follows:

1. **Accountability:** SaskEnergy is responsible for Personal Information under its control and shall designate an individual or individuals who are accountable for SaskEnergy's compliance with the remaining principles.
2. **Identifying Purposes:** The purposes for which Personal Information is collected shall be identified by SaskEnergy at or before the time the information is collected.

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3. **Consent:** The knowledge and consent of the individual are required for the collection, use or disclosure of Personal Information, except where inappropriate or permitted by law, including FOIPPA.
 4. **Collection:** The collection of Personal Information shall be limited to that which is necessary for the purpose identified by SaskEnergy. Information shall only be collected by fair and lawful means.
 5. **Disclosure and Disposition:** Personal Information shall not be used or disclosed by SaskEnergy for purposes other than that for which it was collected, *or use that is consistent with that purpose*, except with the consent of the individual or as required by law. SaskEnergy shall retain Personal Information only so long as is *required by law* or necessary to fulfill the purposes for which it was collected.
 6. **Accuracy:** Personal Information shall be accurate and kept as up to date as is reasonably possible, and necessary for the purposes which SaskEnergy has collected it.
 7. **Safeguarding:** All Personal Information shall be protected by SaskEnergy by using safeguards appropriate to the sensitivity of the information.
 8. **Openness:** SaskEnergy shall make readily available to individuals specific information about its policies and practices relating to the management of Personal Information.
 9. **Individual's Access:** Upon request to SaskEnergy, 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. An individual shall have the right to challenge SaskEnergy with regard to the accuracy and completeness of the information and to have it amended as appropriate.
 10. **Challenging Compliance:** An individual shall be able to address a challenge concerning compliance with any of these principles to the designated individual or individuals accountable for SaskEnergy's compliance with these principles, in accordance with the procedures outlined in this policy.
- individual affected, except where the law provides otherwise.
- **Collect Only What is Needed:** SaskEnergy will attempt to limit collection of Personal Information to that which is necessary for the proper functioning of its business or required to deliver a product or service to the individual in accordance with the stated purposes as they relate to the programs or activities of SaskEnergy.
 - **What information does SaskEnergy Collect?** SaskEnergy may, from time to time, collect financial and other Personal Information about you, when you apply for an account or establish any other relationship with SaskEnergy during the course of our business dealings with you. This information may be obtained from your account application, references you provide, our records, credit reporting agencies, other financial institutions, other service providers SaskEnergy selects to provide services to you and from other suppliers of services of or benefits made available to you. With your consent, SaskEnergy and its affiliated companies may collect Personal Information from you in person, over the telephone, by mail, through the internet or on applications, whether in writing, verbally or electronically. For example, the types of information SaskEnergy may collect may include your:
 - name;
 - service address;
 - mailing address;
 - email address;
 - telephone number;
 - place of employment and work contact number;
 - Air Miles™ collector numbers;
 - credit history;
 - transaction history;
 - verification identification – for example, your driver's license, hospitalization number, date of birth or mother's maiden name, (so that SaskEnergy can be sure we are dealing with you);
 - your personal bank account information, (for example, if you opt for pre-authorized bill payment with us);
 - your Social Insurance Number, if you apply for financing loans from SaskEnergy we require this distinct identifier to verify your credit history, and financial status;
 - information about your transaction and account history with us, including your

E. RULES FOR COLLECTION, USE, DISCLOSURE AND DISPOSITION

1. COLLECTION OF PERSONAL INFORMATION

- **Manner of Collection:** SaskEnergy will, where reasonably practicable, collect Personal Information about an individual from the

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communications to us concerning your account;

- other general information we may obtain about you;
- contact name and information of your agent, landlord or adults living in premises;
- resumes, contact information and other information required to conduct business relationships and procure services provided by suppliers and contractors to SaskEnergy.

- **Your choices:** You may choose to not provide us with any of your Personal Information; however, if you make this choice, we may not be able to provide you with the product, service or information that you requested, or conduct business with you.

2. USE OF PERSONAL INFORMATION

- **Manner of Use:** SaskEnergy shall use Personal Information under its control only for the purpose for which that information was obtained or collected, or for a use that is consistent with that purpose.
- **How we use your information:** SaskEnergy may use your Personal Information for the following purposes, including:
 - to identify you;
 - to establish and maintain a responsible commercial relationship with you, and to provide you with ongoing services or to receive services from you;
 - to determine eligibility for products and services;
 - to process your application for services or credit;
 - to provide requested information about products or services;
 - to open, service, process and maintain your account and respond to your requests;
 - to assess and update your credit worthiness on an ongoing basis, (for example, if you apply for a gas line financing loan);
 - to protect you against error and fraud;
 - for billing and accounting services relating to our products and services;
 - for customer communication, service and administration;
 - for claims administration and collection of debts owing to SaskEnergy, (for example, to share or exchange reports and information with collection agents, credit reporting agencies, credit bureaus and any other

similar type of firm to verify the accuracy of Personal Information) ;

- for internal, external and regulatory audit purposes; and/or
- to comply with legal and regulatory requirements.

- **Statistics:** We may also use the information you provide to us for analytical purposes, to generate statistics and aggregate reports, which will not contain any identifiable personal information. Your identity will be kept anonymous. We use statistics gathered at an aggregated level to determine usage patterns and help us improve our products and services.
- **Future Needs:** We may also use Personal Information to assess your future needs and to offer products and services that may better meet those needs from ourselves, our affiliates or reputable organizations selected by us. Personal Information may also be used for other purposes, subject to obtaining your prior consent for such use.

3. YOUR CONSENT

- **Consent:** SaskEnergy will collect, use and disclose your Personal Information as described in this policy with your consent, where applicable, except where otherwise permitted or required by law.
- **Express and Implied:** Your consent may be obtained in various ways. We may obtain your express consent or we may determine that consent has been implied by the circumstances. (For instance, you choose to continue with a service when given the opportunity to opt out). Where reasonably possible, we will attempt to get your consent directly from you. Express consent could be in writing (for example, signed consent, email or application form), or verbally, in person or over the telephone. When we receive Personal Information from you that enables us to provide you with the requested product or service, or carry on a business relationship, your consent to allow us to deal with that Personal Information in a reasonable manner would be implied.
- **Choice:** Providing us with your Personal Information is always your choice. When you request services from us, or provide services to us, we ask that you provide information that enables us to respond to your request. In doing

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so, you consent to our collection, use and disclosure to appropriate third parties of such Personal Information for the purposes described in this policy. You also authorize us to use and retain this Personal Information for as long as it may be required for the purposes described. Your consent remains valid even after our relationship with you has ended. SaskEnergy will assume that unless we hear otherwise from you, that you wish SaskEnergy to continue to collect, use, and disclose your Personal Information in accordance with this Privacy Policy. You may provide us with written notice that such consent is limited or withdrawn; subject to legal, contractual or practical restrictions and reasonable notice. You may choose to have your name removed from our telephone, mail or e-marketing lists; however, you will still receive marketing information with your regular account mailings. By withdrawing your consent, or not providing it in the first place, you may limit or even prevent us from being able to provide you with the product or services desired or from carrying on a business relationship with you.

- **Exceptions:** In certain circumstances, there are legal exceptions where we do not need to obtain your consent or explain the purpose for collection, use or disclosure of Personal Information. These are set out in *FOIPPA*. For example, this exception would apply where there is an emergency that threatens the life, health or security of an individual, or where we must comply with a court order.

4. DISCLOSURE OF PERSONAL INFORMATION

Confidentiality: Safeguarding your privacy is integral to the way we conduct our operations and provide you with service every day. Our employees are required to follow procedures with respect to maintaining the confidentiality of our customer's Personal Information.

- **Security:** SaskEnergy undertakes to provide appropriate security measures to protect against inadvertent disclosure of Personal Information on its computer systems, devices, files and records. Additionally, we maintain physical, electronic and procedural safeguards to protect the information. This includes performing ongoing evaluations of our systems containing customer information and making changes when appropriate.

SaskEnergy protects the security and confidentiality of Personal Information with safeguards appropriate to the sensitivity of the information.

- **Sharing Information:** Your Personal Information is not sold or rented to any parties outside of the SaskEnergy corporate family, without your consent. We do share this information with the companies we select as our business partners, and who supply services to us. SaskEnergy's policy is not to disclose Personal Information in its possession or under its control for any purpose other than that for which it was collected or consistent with that purpose, except in the following types of circumstances:
 - Where the individual affected, or a person SaskEnergy reasonably believes to be an agent acting on the individual's behalf gives consent;
 - In order to administer the delivery of products and services to you, we may need to share your Personal Information with various service providers, agents or entities, including credit reporting agencies, other financial institutions, provincial and municipal governments (for the collection of a debt) data storage providers, data and payment processors, cheque printers, statement producers, claim processors, third party call centres (such as the emergency services call centre which jointly serves SaskPower and SaskEnergy), account administrators, a collection agency or a party used to determine credit worthiness, for purposes stated to perform various functions for us. However, we require them to honor our privacy principles in the handling of Personal Information and to use the information disclosed only for the purposes for which it was collected; and/or
 - We may share your Personal Information with other businesses within SaskEnergy's affiliated companies, or where you request, to organizations or agencies collaborating with SaskEnergy to provide products or services, such as members of the SaskEnergy Network Dealership.
- **Without Consent:** Where the law requires or allows for the disclosure of Personal Information without the consent of the individual affected, SaskEnergy may disclose such Personal Information necessary to comply with regulatory or legal processes. This may include use or disclosure of Personal Information:

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- To protect, promote or defend the company's interest in civil proceedings or in proceedings involving criminal activity, fraud or misrepresentation;
- To protect SaskEnergy's rights or property, or take emergency action to protect the personal safety of the public; or
- Where request is made by law enforcement agencies, the Ombudsman, Privacy Commissioner or other legally empowered entities.

- **Privacy Impact Assessments:** All major modifications to existing business processes, business systems and new business processing initiatives that have any bearing on Personal Information must have a privacy impact assessment performed. This process will be in a form approved by the Chief Privacy Officer and is intended to identify areas of potential non-compliance with the requirements of this Privacy Policy.

5. DISPOSITION OF PERSONAL INFORMATION

- **Retention Periods:** SaskEnergy retains customer information only as long as it is needed for the products and services you are using, to offer you new products and services, or to meet any physical, legal or operational requirements

Record retention schedules are established to meet these legal requirements. The retention schedules are timetables which determine how long records are required to be retained in order to meet their physical, legal and operational requirements. When these requirements are met, the information no longer needed is destroyed.

Records for which retention schedules have not yet been approved under *The Archives Act 2004* are stored in secure facilities off site pending such approvals.

- **Destruction:** When Personal Information is no longer required for the purpose for which it was collected or its retention is no longer required or allowed by law, SaskEnergy will routinely destroy that information using an appropriate secure method in accordance with approved retention and destruction policies.

F. TRAINING AND AWARENESS

- **Privacy awareness training:** SaskEnergy personnel are required to complete mandatory privacy training courses, and general staff education and training to enhance awareness of responsibilities and commitments towards the proper handling of customer's Personal Information in accordance with SaskEnergy's policies and procedures.

G. YOUR PERSONAL INFORMATION: PROCESSES FOR GETTING IT RIGHT

1. ACCURACY

- **Let Us Know:** It is important that your Personal Information is accurate and complete. Having accurate information about you enables us to give you the best possible service. We rely on you to keep us informed of any changes such as your address or phone number, or other circumstances. You may access, verify and amend your Personal Information using the processes set out below.
- **Keeping Current:** To help us keep your Personal Information up to date, we encourage you to notify us of any inaccuracies, corrections, or outdated information you identify that requires amendment. Please contact us at the Customer Services Office nearest you or at the phone number listed on your account statement.
- **Updates:** We will use reasonable efforts to communicate the corrections and changes where applicable, to other parties who may have inadvertently received incorrect or out of date Personal Information you may have provided to us. (For example, if you advise SaskEnergy of a change to your bank account number, this will be communicated between banks to keep you enrolled in SaskEnergy's Pre-Authorized Payment Plan).

2. RIGHT OF CORRECTION

- **Request:** Individuals who have accessed a record that contains their Personal Information, which they believe is still inaccurate after above initial attempts to correct same have been taken, are entitled to request in writing to SaskEnergy's

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Chief Privacy Officer, a correction of the Personal Information contained in that record if they believe there is an error or omission in it, or to have a notation be made on the record of their request.

- **Response:** SaskEnergy will advise the individual making such request within 30 days of that request that the correction has been made or notation attached to the record.
- **Extension of Time:** Where correction of the record requires consultations, third party notice, or affects a large number of records and documents, or where completion of the correction work would unreasonably interfere with SaskEnergy's daily operations, SaskEnergy's Chief Privacy Officer may extend the correction period of time not exceeding 30 additional days, upon notice to the individual affected.

3. OPENNESS

- **Where to Find It?** SaskEnergy's Privacy Policy is available to customers and the public on our website or through our Customer Services Representatives at any local SaskEnergy office.
- **Updating the Policy:** We may add, modify or remove portions of this Privacy Policy when we feel it is appropriate to do so. If we change our policy, we will post those changes on our website in a timely manner so that you are always aware of what information we collect and how we use it. You may determine when this policy was last updated by referring to the modification date found on the Privacy Policy document.

4. INDIVIDUAL ACCESS TO YOUR PERSONAL INFORMATION

- **Your Request:** You may access to and verify the accuracy of your Personal Information. At the time of your request, we will need specific information from you to verify your identity before we can respond to your request for access to your Personal Information.
- **Process:** An individual may request in writing to be informed of the existence, use, and disclosure of Personal Information pertaining to him or her. SaskEnergy will provide appropriate access to such information that it holds within 30

days of your written application for access to your Personal Information to SaskEnergy's Chief Privacy Officer, or such further time extension as would be permissible under *FOIPPA*. If SaskEnergy determines not to provide access to Personal Information, we will provide an explanation.

- **Exceptions to Access:** SaskEnergy may refuse to disclose to an individual Personal Information that is evaluative or opinion material compiled solely for the purpose of determining the individual suitability, eligibility or qualifications for employment or for awarding of any government contracts or other benefits where the information is provided explicitly or implicitly in confidence. SaskEnergy must also refuse access where such disclosure would contravene *FOIPPA*. Likewise, SaskEnergy may refuse to disclose such information where, in its discretion, it believes it is authorized to do so.
- **Appeal:** Where you are unsatisfied with the decision of SaskEnergy's Chief Privacy Officer respecting either access to or correction of your information, or where the response is not provided in a timely manner, you may apply for a review of the matter with Saskatchewan's Information Privacy Commissioner. The website address is: www.oipc.sk.ca. The mailing address is:

Saskatchewan Information and Privacy
Commissioner
#503, 1801 Hamilton Street
Regina, Saskatchewan S4P 4B4

5. CONCERNS, INQUIRIES OR REQUESTS

- **Contact:** We welcome your comments about our Privacy Policy. Please contact us regarding any concern, inquiry or request about privacy and usage that were not answered here. You may address these concerns, in writing to us at:

Chief Privacy Officer
SaskEnergy Incorporated
1000 – 1777 Victoria Avenue
Regina, Saskatchewan S4P 4K5
Email: privacy@saskenergy.com

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6. LINKS TO OTHER WEBSITES

- SaskEnergy's website may contain links to other sites that are not governed by this Privacy Policy. Links may include those who are business partners, vendors and other agencies. Please be aware that SaskEnergy is not responsible for the privacy practices of other websites.
- Please note that when you click on one of these links, you are moving to another website. It is important for you to read the privacy statement and terms of use for each site you visit to ensure that you are comfortable with how they might use your Personal Information. SaskEnergy provides links to you only as a convenience, and the inclusion of any link does not imply endorsement, investigation, verification or approval of such websites, products, services or publications by SaskEnergy.