

Frontier Energy
Personal Information Protection Policy

Frontier Energy (a division of Battle River Cooperative REA Ltd. (also known as Battle River Power Coop)) is committed to safeguarding the personal information entrusted to us by our members and employees. We manage your personal information in accordance with Alberta's *Personal Information Protection Act* and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to Frontier Energy, Battle River Cooperative REA Ltd., and to any person providing services on our behalf.

A copy of this policy is provided to any member or employee upon request.

What is personal information?

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, legal land location, e-mail address, account number, financial information, etc.

What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our members. This includes, but is not limited to, personal information needed to:

- Open and manage an account
- Deliver requested products and services
- Send out association membership information
- Meet regulatory requirements
- Process preauthorized debit payments
- Notify members of upcoming outages
- Administer our Member Benefit Program

We normally collect member information directly from our members. We may collect your information from other persons with your consent or as authorized by law.

We inform our members, before or at the time of collecting personal information, of the purposes for which we are collecting the information. However, we don't provide this notification when a client volunteers information for an obvious purpose (for example, providing a name and mailing address for billing purposes when opening an account).

Consent

We ask for consent to collect, use or disclose member personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We assume your consent to continue to use, and where applicable disclose personal information that we have already collected for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask members to provide their consent preferably in writing (by signing a consent form) or by exception orally (in person, by telephone).

A member may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose member personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is reasonable for an investigation or legal proceeding, to collect a debt owed to our organization, in an emergency that threatens life, health or safety, or when the personal information is from a public telephone directory.

How do we use and disclose personal information?

We use and disclose member personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may use member contact information to administer the member's utility account. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

Personal employee information

Personal employee information is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, a performance review, etc.

We can collect, use and disclose your personal employee information without your consent only for the purposes of establishing, managing or ending the employment relationship. We will provide current employees with prior notice about what information we collect, use or disclose and our purpose for doing so.

What personal employee information do we collect, use and disclose?

We collect, use and disclose personal employee information to meet the following purposes:

- Determining eligibility for employment, including verifying qualifications and references
- Establishing training and development requirements
- Assessing performance and managing performance issues if they arise
- Administering pay and benefits
- Processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims)
- Complying with applicable laws (e.g. Canada Income Tax Act, Alberta Employment Standards Code)

We only collect, use and disclose the amount and type of personal employee information that is reasonable to meet the above purposes. The following is a list of personal employee information that we may collect, use and disclose to meet those purposes:

- Contact information such as your name, home address, telephone number
- Employment or volunteer information such as your resume (including educational background, work history and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, workplace performance evaluations, emergency contacts, etc.
- Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short and long term disability, etc.
- Financial information, such as pay cheque deposit information and tax-related information
- Other personal information required for the purposes of our employment relationship

We will inform our employees of any new purpose for which we will collect, use, or disclose personal employee information; or we will obtain your consent before, or at the time, the information is collected.

How do we safeguard personal information?

We make every reasonable effort to ensure that member and employee information is accurate and complete. We rely on our members and employees to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

We protect member and employee personal information in a manner appropriate for the sensitivity of the information. This includes, but is not limited to, safety measures such as confidentiality agreements, building security monitoring, maintaining IT network security and restricting access to personal information on a need-to-know basis. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We retain member and employee personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

We use appropriate security measures when destroying member and employee personal information, including shredding paper records and permanently deleting electronic records.

Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody, or under the control, of Frontier Energy, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to our Privacy Officer. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by Battle River Cooperative REA Ltd., or about a request for access to your own personal information, please contact:

Privacy Officer
Frontier Energy
Box 1420, Camrose AB T4V 1X3
1-877-428-3972

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 - 6 Avenue, SW
Calgary, Alberta
T2P 3W2

Phone: 403-297-2728
Email: generalinfo@oipc.ab.ca

Toll Free: 1-888-878-4044
Website: www.oipc.ab.ca