



## Privacy Policy

### 1. Purpose and Scope

Provident Energy Management Inc. ("**Provident**") is committed to maintaining the privacy, security and accuracy of our customers' Personal Information in accordance with Canadian privacy laws and regulations. Provident has adopted this Privacy Policy (the "**Policy**") to affirm that commitment.

Provident collects, uses and discloses Personal Information about its Representatives, customers, contractors, suppliers and others with whom it deals with in the ordinary course of its business operations.

This Policy does not create or confer upon any individual any rights, or impose upon Provident any rights of obligations outside of or in addition to, any rights of obligations imposed by Canada's federal and provincial privacy legislation, as applicable. If in a specific case, there is any inconsistency between this Policy and applicable legislation, this Policy shall be interpreted in respect of that case, to give effect to and comply with that privacy legislation.

Provident will review and revise this Policy from time to time to reflect changes in legal or regulatory obligations or changes in the manner in which it deals with Personal Information.

### 2. Definitions

- i. "**Business Contact Information**" means information that is used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business or profession such as the individual's name, position name or title, work address, work telephone number, work fax number or work electronic address.
- ii. "**Personal Information**" means information about an identifiable individual but does not include Business Contact Information;
- iii. "**Representatives**" means any employee, director, officer, agent or contractor of Provident

### 3. Collection of Personal Information

Provident collects and maintains Personal Information about individuals with whom it interacts in the course of its activities, including:

- i. Customer Personal Information, which includes but is not limited to, names, addresses, phone numbers, email addresses, driver's licences, powers of attorney, authorized account representative information, computer information including IP addresses, eligibility for government assistance, utilities consumption information, meter reading information, banking information, invoice and payment history, whether an individual's suite is rented or owned, suite ownership and occupant information and any other information voluntarily provided to Provident;
- ii. Business Relationship and Operations Information, which includes but is not limited to information collected in connection with service requests, contact information, recorded customer complaints



Provident typically collects Personal Information directly from the individual that it pertains to. However, Provident may from time to time collect Personal Information from third parties that hold Personal Information that Provident requires for the purposes of conducting its business operations, administering its contracts, providing services, responding to complaints and collecting payment from those responsible for utility bill payments. These third parties include but are not limited to building owners, condominium corporations, developers, co-operative corporations, landlords, property managers and collections agencies. Provident will endeavor to ensure that such information has been collected with the appropriate consent.

Provident may otherwise collect Personal Information about an individual without their knowledge or consent where permitted or required by applicable law.

#### **4. Purpose of Collection**

Provident collects Personal Information to carry out its business and operations and to enable it to provide services to its customers and clients, including but not limited to:

- i. Establishing, managing, carrying out and terminating business relationships with customers, employees, master consumers (as defined in the Unit Submetering Code), condominium corporations, building owners, developers and landlords;
- ii. Maintaining and improving our products and services, including by administering surveys;
- iii. Business development and market research;
- iv. Complying with individual requests;
- v. Complying with applicable law or regulatory requirements;
- vi. Collecting amounts invoiced by Provident;
- vii. Protecting the rights, property and safety of Provident or its stakeholders; and
- viii. Any other reasonable purpose required by Provident and to which an individual consents.

#### **5. Disclosure of Personal Information**

Provident does not disclose Personal Information to third parties without consent or legal authority to do so. Provident does not sell Personal Information to third parties. Provident may disclose Personal Information in the following circumstances:

- i. With its service providers and business partners that assist Provident in the operation and development of its business;
- ii. To condominium corporations, building owners, landlords, Master Consumers (as defined in the Unit Submetering Code), or their agents including their property managers and other service providers;
- iii. Where information is publicly available;
- iv. In connection with collecting amounts invoiced by Provident;
- v. Complying with applicable law or regulatory requirements;



- vi. To protect the rights, property or safety of Provident or its stakeholders;
- vii. Where it is relevant to a business transaction, such as the sale of part or all of Provident, a corporate re-organization or an investment opportunity; or
- viii. Where Provident has otherwise obtained an individual's consent.

When Provident shares Personal Information with a third party, we require them to protect such information and limit use and disclosure of the Personal Information.

Provident, its service providers and its business partners may store or process Personal Information outside the jurisdiction of the individual who provided the Personal Information. In those circumstances, Personal Information may be subject to local laws and law enforcement requirements.

## **6. Protection and Retention of Personal Information**

Provident maintains physical, technical and procedural safeguards that are appropriate to the sensitivity of the Personal Information in question. These safeguards include passwords and other electronic security measures; locked or limited access to premises and security monitoring of the premises.

Except as otherwise permitted or required by applicable law or regulation, Provident retains Personal Information only for as long as it is necessary to fulfill the purposes for which the Personal Information was collected (including, for the purpose of meeting any legal, accounting, regulatory or other reporting requirements or obligations. Instead of destroying or erasing Personal Information, Provident may instead make it anonymous such that it cannot be associated to a specific individual.

## **7. Accessing and Updating Personal Information**

In order to efficiently and effectively provide services, Provident asks that individuals keep Provident informed of changes to their Personal Information. Individuals may request access to Personal Information Provident stores about them. To review, verify or correct Personal Information, contact our Privacy Officer using the information below.

When making an access request, Provident may require specific information to confirm the requestor's identity and charge a fee to access the Personal Information. Provident will inform the requestor of the amount of the fee in advance. Provident will endeavour to provide the requested information within a reasonable time and no later than 30 days following the request.

Provident may not provide the requested information in cases where applicable laws or regulatory requirements allow or require Provident to refuse a Personal Information access request, such as when:

- the cost of providing the information is prohibitive;
- the information refers to other individuals;
- if the information no longer exists, has been erased or anonymized;
- the information is subject to solicitor-client or litigation privilege; and
- the information cannot be disclosed for legal, security or commercial proprietary reasons.

If Provident cannot provide an individual access to Personal Information, it will endeavour to inform the individual of the reasons why access has not been granted, provided it is lawfully able to do so.



## 8. Consent

Provident may obtain consent through this Policy or through other means (such as express consent given verbally or in writing). By providing Personal Information to Provident, you acknowledge and agree that you have consented to the collection, use and disclosure practices set out in this Policy relating to your personal information. An individual may withdraw their consent at any time, subject to reasonable notice and legal or contractual restrictions. A change in or withdrawal of consent may limit Provident's ability to provide services.

## 9. Contact Information

An individual with questions about (a) this Policy; (b) access to Personal Information; (c) the collection, use, management or disclosure of Personal Information; or (d) changing or withdrawing consent, may contact Provident's Privacy Officer at:

Provident Energy Management Inc.  
20 Floral Parkway, Concord, Ontario, L4K 4R1  
Attn: Privacy Officer  
Email: [PrivacyOfficer@pemi.com](mailto:PrivacyOfficer@pemi.com)

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