



EPCOR Water Services Inc. Drainage Utility Access to Information and Privacy Policy

Policy

EPCOR Water Services Inc. (EWSI) is committed to transparency with regard to our Drainage Utility information that is accessible to the public. We are further committed to the protection of your personal information, and proper procedures in the collection and use of your personal information. The Access to Information and Privacy Practices below describes how the public can gain access to our information, how we use personal information, and the circumstances under which we share information in accordance with the guidelines set out in the *Freedom of Information and Protection of Privacy Act* (FOIP).

Guiding Principles

EWSI is committed to the following principles aimed to provide an individual with an appropriate balance between access to information and protection of personal information:

- You, the 'public', have a right of access to certain records held by EWSI.
- EWSI must protect your personal privacy and will follow established rules and guidelines in collecting, using and disclosing your personal information to others.
- You have the right to see your personal information held by EWSI about yourself.
- You have the right to request corrections to your personal information held by EWSI, generally.

Where an inaccuracy or error in your personal information is confirmed and corrected by EWSI, EWSI will take reasonable steps to notify any third party or public body to who the personal information may have been disclosed in the year prior to the correction.

Accessing Information

How to make an Access to Information Request

Complete an Access to Information Request using the access to information form provided by EWSI.

1. Enter your name, address and phone number;
 - If applicable enter company name
 - Fax and e-mail are optional
2. Indicate if you are requesting general or personal information;

- General – enclose initial fee of \$25.00
 - Personal – no initial fee required
 - For either type of request, please indicate if you would like to examine the records or receive a copy of the records
3. Giving as much detail as possible, describe the records you would like to access, the department of EWSI that you believe holds the records and include the time period for the records.
 4. Please sign, date and send your request to the Access to Information Coordinator with fees, if applicable.

You may be required to provide sufficient information to permit EWSI to identify the existence, use, or disclosure of your personal information, and to verify your identity. The personal information that you provide in this request will only be used for that purpose.

Do I have to make an Access to Information Request to obtain any type of information from EWSI?

No. EWSI routinely makes information available to the general public without requiring a formal request. Before you make a formal request for information, please visit www.epcor.com to determine if the record you are looking for has already been published. If the record has not been published, please contact EWSI's Access to Information Coordinator to determine whether the information is readily available without a formal request.

If I make an Access to Information Request, will I get all of the information that I requested?

You will receive all information that EWSI can legally release. EWSI will follow the guidelines set out in FOIP that do not allow it to release certain information. When an exemption to disclosure exists, the applicant will be informed under why the information is exempt.

Is there a cost to make an Access to Information Request?

When submitting a request for your own personal information, there is no initial fee charged.

When requesting information that is not your own personal information, you must pay an initial fee of \$25.00. A request requiring this fee will not be processed until the fee is received. If you don't enclose the fee, your request will be opened, but processing will not begin until the initial fee has been received by the Access to Information Coordinator at EWSI. The Access to Information Coordinator will inform you in writing that the request is on hold, waiting delivery of the fee.

Are there additional fees charged after the initial fee?

EWSI will follow the fee guidelines set out in FOIP. A personal request will have a fee assessed for photocopies if the cost of the copies requested exceeds \$10.00. The charge for copies is \$0.25 per page, therefore 41 or more pages will result in fees and you will be required to pay for all copies received.

For other requests, fees are charged when the cost of processing the request exceeds \$150.00 which includes search time, preparation and review time and copies.

Applicants will be provided with an estimate of fees prior to processing, at which time an applicant can decide to continue or narrow the request, etc. A deposit of 50% of the fee estimate is required before the request can be processed, the remainder of the actual fees is due at the time of receipt of the information.

What is a clarification of request?

If it is unclear what records are being requested, the Access to Information Coordinator will contact the applicant for more details on the information being requested. This clarification enables more accurate and complete processing of a request.

Do I have to tell EWSI why I want the information?

No. However, under certain circumstances it may be helpful to provide the reason, as it would enable EWSI to process your request more efficiently.

Doing Business with EWSI

Do I have to give EWSI my personal information?

To obtain services from EWSI, you may have to provide your personal information to EWSI. However, EWSI can collect only the personal information that is needed to provide the service.

Does EWSI have to tell me what use they will make of my personal information?

Yes. When personal information is collected from an individual, notice should be given about what use is made of their personal information, the authority for collecting this information and the name and contact information of an employee who can answer additional questions a person may have on this collection. Also, the information is to be collected directly from the individual in most circumstances, but certain exceptions are allowed.

What can I do if EWSI breaches my privacy?

If you feel that EWSI has breached your privacy, you have the right to request an investigation into the matter by EWSI's Access to Information Coordinator and, if not satisfied with the result of this investigation, you may request the Information and Privacy Commissioner of Alberta to investigate the potential breach.

Who does EWSI give my personal information to?

Your personal information may be transferred (or otherwise made available) to our affiliates and other third parties who provide services on our behalf. We use third parties to host and manage our website, to "back up" and store our electronic records, and to respond to customer inquiries in providing the services. Our service providers are given the information they need to perform their designated functions, and are not authorized to use or disclose personal information for their own marketing or other purposes.

Your personal information may be maintained and processed by us, our affiliates and other third party service providers in the US or other jurisdictions. In the event that personal information is transferred to the US or other foreign jurisdiction, it will be subject to the laws of that jurisdiction and may be disclosed to or accessed by the courts, law enforcement and governmental authorities in accordance with those laws.

Under what circumstances can EWSI release my personal information?

We and our service providers may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise required or permitted by applicable Canadian, US or other law or legal process. Your personal information may also be disclosed where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.

How long does EWSI keep information?

Personal Information is retained by EWSI for so long as reasonably needed in relation to the purpose for which the Personal Information was obtained. Personal Information may also be retained in anticipation of an investigation or legal proceeding.

For electronic records, personal information will be identified and deleted from EWSI's filing system and any external electronic storage. EWSI may render personal information "non-identifying" so that it can no longer be used to identify an individual, and retain the anonymous record.

When records containing personal information are no longer needed, they are approved for deletion and destruction in accordance with our Records Management Policy. Where an electronic record has been backed up, the deletion of the record will be handled in accordance with the retention policies of EWSI's storage service provider.

How does EPCOR safeguard its information?

We have implemented reasonable administrative, technical and physical measures in an effort to safeguard the personal information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. We restrict access to your personal information on a need-to-know basis to employees and authorized service providers who require access to fulfill their job requirements.

What personal information does EPCOR have possession of?

EWSI maintains a directory of personal information banks which can be accessed at www.epcor.com.

Email and Other Electronic Messages

Senders of messages should be aware that:

1. personal and other information contained in electronic correspondence (or printed versions thereof) may be disclosed; and

2. the anonymity or confidentiality of the sender and the information contained within the correspondence cannot be guaranteed. Electronic messages reside on a system outside of those domain names owned by EWSI, but deemed to be in the custody and control of EWSI may also be releasable.

Updates to the Access to Information and Privacy Policy

We may update this Access to Information and Privacy Policy to reflect changes to our privacy practices. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

EWSI welcomes your comments and questions regarding this Privacy Policy and the use of your personal information. If you have any questions or concerns please contact our Access to Information Coordinator, whose contact information is listed below.

Appendix "A"

Title: Access to Information Coordinator & Privacy Officer

Name: Kathleen Zeissler

2000 – 10423 -101 Street NW
Edmonton, AB T5H 0E8

Telephone: 780 412-6962

Toll Free: 1-866-316-6962

Fax: 780 441-7118

Email: infoaccess@epcor.com