

## Priority Submetering Solutions Inc. Privacy Statement

We, at Priority Submetering Solutions Inc. ("PRIORITY", "we" or "us"), value the trust that you have shown in our business and we are committed to maintaining the accuracy, confidentiality, and security of your personal information.

This statement explains how PRIORITY collects, uses, discloses and safeguards the personal information provided to us either directly by you or by a third party. By providing personal information to us or authorizing a third party to do so, you signify your consent to PRIORITY'S collection, use, and disclosure of your personal information in accordance with our privacy policy. For purposes of this statement, "personal information" shall include information that is considered personal information by those laws governing the protection of privacy in the private sector. For further details and to request or view our full Privacy Policy please call 1-866-836-3837 or visit:

[https://prioritymeter.com/content/pdf/documents/Priority-Privacy-Policy\\_-\\_2015\\_Canada.pdf](https://prioritymeter.com/content/pdf/documents/Priority-Privacy-Policy_-_2015_Canada.pdf)

### **What information do we collect?**

The type of personal information we may ask for is dependent on and related to the reason (or purpose) such personal information was provided to us. For instance, when opening a new account with PRIORITY, we will ask for your name, address and telephone numbers where you can be reached. The following is a description of the type of personal information that we ask for:

Email Address	Forwarding Address
Date of Birth	Move In / Out Dates
Void Cheque (for Pre-Authorized Payment)	Driver's Licence, SIN (Optional), Passport,

### **What do we use your information for?**

At PRIORITY, we gather and use personal information as described below:

- to provide you with ongoing reliable and safe services and to bill and collect payment for services;
- to help identify new clients;
- to assist in managing the transitions between customers moving in and out of premises;
- to establish your identification and protect both you and PRIORITY from errors and fraud;
- to verify your identity when you request information about your account by email or telephone;
- to meet legal and regulatory requirements relating to the services or products provided to you;
- to provide you with information about using electricity and other utilities safely and efficiently.

We also use the personal information you have provided to us to communicate with you and safeguard your interests. We will send you important notices and respond to any special needs or enquiries you may have. We only use personal information for the purposes that we have disclosed to you. If for any reason your information is required to fulfill a different purpose, we will obtain your consent before we proceed.

### **How we collect such personal information**

We may gather such personal information from you in person, over the telephone or by corresponding with you via mail, facsimile, the Internet, e-mail, or from third parties (property managers, legal guardians or caregivers) who have authority to disclose such personal information to us. While we try to ensure that every third party who discloses personal information to us has your consent to do so, if you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party. If they do not adequately respond to your inquiries please let us know immediately. The choice to provide us with your personal information, either directly or through a third party, is always yours. However, each of our customers is required to submit a completed Utility Suite Metering Customer Agreement (Move-In) Form. If you choose to withhold particular information, it may limit our ability to provide you with the services or products you requested.

### **Disclosure of Personal Information to Third Parties**

Except as specifically provided for in our privacy policy, we do not disclose any personal information to third parties. The following are instances where we may disclose your personal information to third parties:

- to investigate potentially fraudulent or questionable activities regarding your merchant account(s) or the use of our services;
- if it is in the individual's best interest and consent cannot be obtained in a timely matter (an example being when an individual is seriously ill);
- to an authorized contractor of PRIORITY to perform service work;
- disclosure of personal information to a lawyer;
- to offer you related products and services that might benefit you;

### **Disclosure of Personal Information to Third Parties (continued)**

- in anticipation of and in the course of an actual or potential sale, reorganization, financing, consolidation, merger or amalgamation of our business; and
- when required or permitted by law;
- to a collection agency or to a credit reporting bureau (TransUnion) for non-payment;
- in utility and invoicing related reports provided to the representatives and/or agents of your condominium corporation or the owner of your multi-residential building.

The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances, such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities making the request have legitimate grounds to do so. There are some situations where we are legally permitted to disclose personal information such as employing reasonable and legal methods to enforce our rights or to investigate suspicion of illegal activities.

### **How We Safeguard Your Information**

We use industry standard technologies and maintain current security standards to ensure that your personal information is protected against unauthorized access, disclosure, inappropriate alteration or misuse. Electronic customer files are kept in a highly secured environment with restricted access. Paper-based files are stored in locked filing cabinets with restricted access. We manage our server environment appropriately and our firewall infrastructure is strictly adhered to. Our security practices are reviewed on a regular basis and we routinely employ current technologies to ensure that the confidentiality and privacy of your information is not compromised. When you access your accounts or send information from secured sites, encryption will scramble your data into an unreadable format to inhibit unauthorized access by others. To safeguard against unauthorized access to your accounts, you are required to "sign-on" using a user id and a password to certain secured areas of the PRIORITY web site. Both user id and password are encrypted when sent over the Internet. If you are unable to provide the correct password, you will not be able to access these sections. When you call our customer service centre you will be required to verify your identity by providing personal identifying information as well as your account number.

### **Our Employees and your Personal Information:**

In the course of daily operations, access to private, sensitive, and confidential information is restricted to authorized employees who have a legitimate business purpose and reason for accessing it. For example, when you call us, one of our authorized employees will access your information to verify who you are and to assist you in fulfilling your requests. As a condition of their employment, all employees of PRIORITY are required to abide by the privacy standards we have in place. Employees are informed about the importance of privacy and they are instructed to properly identify each customer so that any customer information to unauthorized individuals or parties is not disclosed.

### **Accessing and Amending Your Information:**

You have the right to access, verify and amend the personal information that we have collected on you. You may access and verify any of your information by calling our customer contact centre at 1-866-836-3837.

### **Web Sites Governed by our Privacy Policy:**

The web site that is governed by the provisions and practices stated in our privacy policy is: [www.priorimeter.com](http://www.priorimeter.com). The PRIORITY web site may contain links to other third-party sites that are not governed by our privacy policy. Although we endeavor to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave the PRIORITY web site. Additionally, we are not responsible for the privacy practices employed by other third-party web sites. Therefore, we suggest that you examine the privacy statements of those sites to learn how your information may be collected, used, shared and disclosed.

### **Governing Law and Dispute Resolution**

Our Privacy Policy, and all related matters are governed solely by the laws of the Ontario, Canada and applicable federal laws of Canada, excluding any rules of private international law or the conflict of laws which would lead to the application of any other laws. Any claim or cause of action you may have arising from, connected with, or relating to our privacy policy, or PRIORITY's handling of your personal information, or any related matters must commence within six (6) months after the claim or cause of action arises, after which time the claim or cause of action is forever barred, regardless of any statute or law to the contrary.