

POLICY NO:	313	TITLE:	Privacy
SECTION:	Corporate Services		
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AUTHORITY:	CEO	REFERENCE:	
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POLICY STATEMENT

Aquatera Utilities Inc. and each subsidiary of Aquatera Utilities Inc. (hereafter referred to as the "Aquatera Group") is committed to safeguarding the personal information entrusted to it. Personal information is managed in accordance with Alberta's *Freedom of Information and Protection of Privacy Act*, RSA 2000, c F-25 ("FOIP") and other applicable laws. This policy outlines the principles and practices the Aquatera Group will follow in protecting personal information and applies to the management of personal information in any form whether oral, electronic or written.

This policy applies to the Aquatera Group, third parties engaged to do business on its behalf and to any person providing services on its behalf.

TERMS OF THE POLICY

What is personal information?

Personal information is information in the Aquatera Group's possession about an identifiable individual, such as customers, stakeholders, general public, shareholders, employees, potential employees, officers and directors of the Aquatera Group. Personal information which may fall under the policy includes:

- Name, address, telephone numbers, e-mail address;
- Social Insurance Number, gender, date of birth, driver's license number or other photo- identification;
- Family members' information;
- Emergency contact names, addresses and telephone numbers;
- Pension information;
- Banking information.

What personal information does the Aquatera Group collect?

The Aquatera Group collects only the personal information required for the purpose of providing services to its customers and/or for the purpose of employment relationships, including personal information needed to:

- open and manage an account
- deliver requested products and services
- enroll a customer in a program or service

- assess suitability for enrolling in services
- contact customers about business opportunities, service disruptions, appointments, payment arrangements and arrears
- follow up with customers to determine satisfaction with products and services
- notify customers of upcoming events of interest
- to establish and maintain responsible employment relations with employees
- to meet legal and regulatory requirements
- other purposes permitted or required by law

The Aquatera Group normally collects personal information directly from its customers and employees but may collect information from other persons with an individual's consent or as authorized by law.

The Aquatera Group informs individuals before or at the time of collecting personal information, and of the purposes for which it is collecting the information. However, the Aquatera Group does not provide this notification when an individual volunteers information for an obvious purpose (for example, producing a credit card for payment of services, or completing an application).

Video and Audio Surveillance

The Aquatera Group is committed to the safety of all customers and employees who attend Aquatera Group's worksites. The Aquatera Group may use overt surveillance (video and audio) to observe workplaces for the following purposes:

- To ensure the safety and security of employees and members of the public where risks to individuals or property may be present
- To reduce, deter or eliminate incidents of vandalism and illegal or inappropriate conduct, and investigation of the same post-incident

The Aquatera Group will ensure that appropriate, obvious signage is posted at any Aquatera Group worksite where surveillance may be used. The signage will identify the type of surveillance used at that location, in addition to being located in a place easily observable to any person who may be observed and/or recorded via the surveillance.

Use of Service Providers outside Canada

In the event the Aquatera Group transfers or intends to transfer personal information to a service provider outside of Canada, the Aquatera Group will provide notification at the time of collection of personal information or prior to the information being transferred. Individuals may contact the Aquatera Group's Chief Financial Officer for information on the Aquatera Group's policies and practices with respect to service providers outside of Canada.

Consent to the Collection of Personal Information

Except where FOIP permits otherwise, the Aquatera Group will not collect personal information about an individual without that individual's consent. When obtaining consent, the Aquatera Group will ensure that an individual is informed of the purpose for which personal information is being collected.

In accordance with FOIP, an individual's consent may not be required for certain collection of

personal information, for example, for certain legal, medical or security reasons.

The Aquatera Group will not, as a condition of supplying a product or service, require an individual to consent to the collection, use or disclosure of personal information beyond what is necessary to provide the product or service or for the operating programs and activities of the Aquatera Group.

An individual may withdraw or vary consent at any time, subject to legal or contractual restrictions and reasonable notice. Unless the consequences of the withdrawal or variance are obvious, the Aquatera Group will inform the individual of the consequences of withdrawing or varying consent.

How does the Aquatera Group use and disclose personal information?

Except where FOIP provides otherwise, the Aquatera Group will use and disclose personal information only for the purposes for which the information was collected and any use and disclosure consistent with that purpose. For example, customer contact information will be used to deliver services and communicate with individuals. FOIP also allows the Aquatera Group to use that contact information for the purpose of collecting a debt owed to the organization, should that be necessary.

Retention and Destruction of Personal Information

The Aquatera Group will only retain personal information for as long as it is necessary to retain such information for business or legal purposes in accordance with its bylaws, resolutions or other legal instrument under which it acts, or for the minimum retention period as required by FOIP, whichever period is greater. Once the applicable retention period for records containing personal information has expired, the Aquatera Group will destroy those records.

How does the Aquatera Group safeguard personal information?

The Aquatera Group will protect personal information in its custody or control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure and destruction.

The Aquatera Group is responsible for personal information in the Aquatera Group's custody and control. The Aquatera Group has designated its Chief Financial Officer as the person who is responsible for establishing policy, investigating potential privacy breaches, breach notification and ensuring the Aquatera Group's compliance with applicable privacy legislation.

When the Aquatera Group engages the services of a third party, the Aquatera Group will be responsible for the third party's compliance with this policy with respect to those services.

Notification of Unauthorized Access, Use or Disclosure

The Aquatera Group will notify the appropriate authorities and/or affected individuals of any unauthorized access, use or disclosure of personal information within the Aquatera Group's custody or control in contravention of FOIP.

Access to Records

Upon written request by an individual and subject to any exception to disclosure pursuant to FOIP, the Aquatera Group will provide access to any record in its custody or under its control, including a record containing the individual's personal information.

The Aquatera Group may be required to refuse to provide access to records in certain circumstances including if the disclosure would be harmful to the business interests of a third party, to the personal privacy of a third party, to an individual's safety or public safety, to law enforcement, or to intergovernmental relations.

Requests for access to a record are to be forwarded to the Chief Financial Officer who will determine whether the requested disclosure will be granted or refused in accordance with FOIP.

A written response to the request will be provided to the applicant within 30 days, or such extended time limit as may be permitted under FOIP.

Correction of Personal Information

Upon request by an individual and subject to any exception pursuant to FOIP, the Aquatera Group will correct an error or omission in an individual's personal information that is in the custody or under the control of the Aquatera Group.

Requests for correction of personal information are to be forwarded to the Chief Financial Officer who will determine what response is to be made to the request in accordance with FOIP.

Written notice to the individual that the correction has been made, or an annotation or linkage has been made pursuant to FOIP will be given within 30 days after the request is received.

Questions and Concerns

If you have a question or concern about any collection, use or disclosure of information by the Aquatera Group, please contact:

Brian Mbesha, Chief Financial Officer

Aquatera Utilities Inc.

11101 - 104 Avenue

Grande Prairie, AB, T8V 8H6

Phone: 780.357.5942

Fax: 780.830.7430

Email: bmbesha@aquatera.ca

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

Office of the Information and Privacy Commissioner (Edmonton)

#410, 9925 - 109 Street

Edmonton, Alberta T5K 2J8

Phone: 780-422-6860

Toll Free: 1-888-878-4044

Fax: 780-422-5682

Office of the Information and Privacy Commissioner (Calgary)

Suite 2460, 801 6 Avenue SW

Calgary, Alberta T2P 3W2

Phone: 403-297-2728

Toll Free: 1-888-878-4044

Fax: 403-297-2711

Email: generalinfo@oipc.ab.ca

Website: www.oipc.ab.ca

DISCLAIMER

This document is the property of Aquatera Utilities Inc. for authorized use only and is subject to change at anytime. All users are reminded to exercise due caution, when referencing printed copies or previously downloaded copies, as these are uncontrolled documents and may not accurately reflect what is currently posted.

FOIP REQUEST TO ACCESS INFORMATION

This form will be used to determine if Aquatera Utilities Inc. can provide you with the information you have requested by way of a Routine Disclosure. This is not a tool to make a formal FOIP request. To make a formal FOIP request, a \$25 initial fee is required. By making a formal FOIP request you may ask the Information and Privacy Commissioner of Alberta to review the decision to disclose or refuse disclosure of requested records.

Contact Information

Mr.	Mrs.	Ms.	Last Name	First Name
Name of Company or Organization (if applicable)				
Mailing Address				
City or Town		Province		Postal Code
Telephone (daytime)	Telephone (evening)	Fax Number	Email Address	

What kind of information would you like to access? Please check one.

- General Information
- Personal Information

How would you like to access the information? Please check one.

- Receive a Copy
- Examine the Record

The personal information on this form is collected under the *Freedom of Information and Protection of Privacy Act* and will be used to respond to your request to access information. Please forward any questions or concerns to the FOIP Coordinator, Brian Mbesha, at 11101 104 Avenue, Grande Prairie AB, T8V 8H6. Phone 780.357.5942 or email bmbesha@aquatera.ca.

About the Information Requested

Please provide a detailed description of the record(s) you want to access.

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What is the time period of the record(s); if possible, please provide specific dates.

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Please state the purpose for which the information will be used and/or the name and section number of an act/enactment of Alberta or Canada that requires this particular disclosure of information.

--

Your Signature

Signature	Date

Aquatera Utilities Inc. FOIP Office use only:

Date Received	Inquiry Number

The personal information on this form is collected under the *Freedom of Information and Protection of Privacy Act* and will be used to respond to your request to access information. Please forward any questions or concerns to the FOIP Coordinator, Brian Mbesha, at 11101 104 Avenue, Grande Prairie AB, T8V 8H6. Phone 780.357.5942 or email bmbesha@aquatera.ca.

Request to Access Information

Instructions

You can access many public body records without making a request under the Freedom of Information and Protection of Privacy Act (the FOIP Act). To determine whether you need to make a request under the Act or if you need help completing the form, contact the FOIP Coordinator of the public body to which you are making the request.

About You

In this part of the form enter:

- Your last name, first name and preferred title, if any;
- The name of the company or organization you are representing, if applicable;
- Your complete mailing address and daytime and evening telephone numbers so that the public body can contact you about your request;
- A fax number or email address, if any, where correspondence can be sent.

About your request

If you need help to find out what records a public body has, contact the FOIP Coordinator for the public body.

1. What kind of information do you want to access? Check **general** or **personal** information.

General information is information other than personal information (see below). For example, it would include information about a third party. **Do not include your credit card information in the mail or fax.**

- There is an initial fee of \$25.00.
- For a request to a public body, please consult with the FOIP Coordinator for payment information.
- The public body provides you with an estimated cost before processing begins.
- If the total cost of processing your request is more than \$150.00, you are asked to pay a 50% deposit.
- The records are provided when the fee is paid in full.

Personal information is your own personal information or the personal information of an individual you are entitled to represent.

- You must provide proof of your identity before records containing your personal information are released to you.
- If you are requesting records for another person, you must provide proof that you have authority to act for that person (e.g. guardianship or trusteeship order, power of attorney).
- There is no initial fee for accessing your own personal information
- If the cost of photocopying is more than \$10.00, you will be notified of the fee.

Continuing **request** is a single request that is processed more than once at predetermined time intervals over a period of up to two years.

- Contact the FOIP Coordinator of the public body if you are making a continuous request.
- The initial fee is \$50.00.
- You must pay any additional costs as the information becomes available.

2. To which public body are you making the request?

Enter the name of the public body that you believe has the records that you are requesting.

3. Do you want to receive a copy of the record OR examine the record?

Check appropriate box indicating whether you want to receive a copy of the record or examine the record.

About the information you want to access

1. What record do you want to access?

- Be as specific as possible in describing the records.
- If you need more space, continue your description on a separate sheet of paper and attach it to this request form.

If requesting your own personal information, give:

- Your full name;
- Any other names that you have previously used;
- Any identifying number that relates to the records, such as your employee number, case number or other identification number.

If requesting another person's information, give:

- The person's full name;
- Any other name that person may have used on the records;
- Any identifying numbers for the person, if you know them.

If you are requesting records for another person, you will have to provide proof that you have authority to act for that person.

2. What is the time period of the records?

Enter the specific dates or date ranges of the records you want to access (e.g. if you want records for the period of January 1, 2005 to August 31, 2007, enter those dates. If you want records from August 2008 to present, enter "August 2008 to present.").

Your Signature

Sign and date the form.

Where to send your request:

Send your completed form, and initial fee if applicable, to the FOIP Coordinator of the public body that has the records you wish to access. For contact information, consult the directory of Public Bodies available on the FOIP website at foip.alberta.ca.