



Our Commitment to Your Privacy

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Privacy Protection Commitment

Why does Hydro-Québec have a Privacy Protection Commitment?

Your personal information plays a vital role in some of our business processes, and we need it to carry out our mission. Your **satisfaction** and our **respect** for your privacy guide our activities on a daily basis, and we have adopted the Privacy Protection Commitment (the “Commitment”) to ensure that we fulfill our **responsibilities** in this regard.

The Commitment is one of the cornerstones of our [Privacy Protection Program](#). The objective of the program is to ensure that Hydro-Québec meets its legal obligations under the *Act respecting Access to documents held by public bodies and the Protection of personal information* (the “Access Act”). Hydro-Québec’s Commitment aims to establish and maintain your **confidence** in our privacy practices.

In the interests of **transparency**, we are sharing this Commitment with you.

What is personal information?

Personal information is information concerning an **individual** that allows this person to be identified either directly or indirectly.

Your professional experience, your bank account numbers, your communication preferences and your energy habits are examples of personal information.

What does the Commitment apply to?

The Commitment determines how Hydro-Québec handles the personal information of its customers, of external candidates applying for positions posted on its website and of any other person, regardless of the medium used (e.g., paper documents, sound recordings, databases).

The Commitment does not apply to personal information the law considers to be public, such as name, job title, occupation or business contact information.

The Commitment does not apply to personal information belonging to members of the Hydro-Québec team because their information is protected by other safeguards.

Lastly, the Commitment does not apply to our subsidiaries that handle personal information as part of their activities. Wholly owned subsidiaries are subject to safeguards specific to their own activities.

Who is responsible for implementing the Commitment?

Members of the Hydro-Québec team are informed of the Commitment and must refer to it on a regular basis. A training and awareness program has been implemented throughout the organization to ensure that everyone has a thorough understanding of the Commitment and can apply its principles when carrying out their functions.

We also ensure that service providers with whom we share your personal information as part of our activities respect the Commitment. Please refer to the [Disclosure of personal information to a third party](#) section to learn more about these measures.

How does Hydro-Québec fulfill its obligations concerning my personal information?

To implement the Commitment and our legal obligations, we have adopted a [Privacy Protection Program](#). This program, managed by a team of experts in the field, and to which several company stakeholders contribute, demonstrates that protecting your privacy is important to us. For more information, we encourage you to read the program document.

Every year, we conduct a review of our privacy protection activities and publish the results in our [Annual Report](#).

Collecting information

What are Hydro-Québec's practices concerning the collection of personal information?

How does Hydro-Québec collect my personal information?

In most cases, we collect your personal information directly from you:

- When you contact customer services
- When you use your Customer Space or our website
- As part of the programs you are participating in
- When you answer surveys or register for our digital communications
- When you consume electricity in your home
- When you visit our facilities

Your personal information is usually collected by members of Hydro-Québec's team. However, a third party sometimes does this for us, for example, when we conduct surveys. In this case, we ask our service provider to inform you when it collects your personal information on behalf of Hydro-Québec.

Your personal information may also be collected by us from third parties, including public bodies, data leasing partners or companies we work with in the course of our activities.

What types of personal information does Hydro-Québec collect?

We've organized the types of personal information into different categories and provided examples. Some information is generated as part of our relationship with you.

Important: If you share personal information with us regarding other people (for instance, family members or other customers responsible for the contract), you must ensure that they have been informed and that they have provided their consent in this regard.

Category	Examples
Information needed to identify you	• First and last names, contact information, such as phone number, service address, billing address and email address
Information about your service contract and your customer relationship	• Consumption data, consumption history, consumption profile • Written communication with you, including emails, comments and survey responses • Information about your participation in our programs • Note about our communications with you, recording of phone calls with customer services
Information about your finances	• Payment methods, billing history, amounts due
Information about your use of our digital platforms and our applications¹	• IP address, cookies • Data entered into HTML forms • Data collected when using mobile applications
Other categories	• Information about the hiring process (e.g., résumé, transcripts, if applicable, your information related to the reliability and integrity background check) • Information about your health when necessary, within the context of prioritizing service restoration (life-support devices); some health-related information may be required as part of a hiring process • Information used by Hydro-Québec to meet its legal obligations (e.g., social insurance number to issue tax statements following your participation in a government program)

1. For more information, please refer to the [Terms of Use governing Digital Platforms and Confidentiality Policy](#).

Why does Hydro-Québec collect my personal information?

We collect and use your personal information so we can carry out our mission, and in particular to:

- Communicate with you.
- Process your application to jobs we've posted.
- Supply Hydro-Québec's regular services.
- Manage our various programs or activities, including energy efficiency programs.
- Maintain the security and reliability of the power grid and accurately forecast energy demand for Québec.
- Ensure the continued effectiveness and quality of our business processes.
- Understand your experience as a customer or job applicant in order to ensure that it is a positive one.
- Offer information and content that may be useful to you, promote our services and programs, understand your level of satisfaction and share our energy efficiency offers.
- Meet our legal and regulatory obligations.
- Take the necessary measures during emergencies where your life, health or safety, or that of your loved ones, is at risk.
- Detect or prevent crimes and offences against our infrastructure or property, and in particular concerning electricity theft.

We collect personal information only for the specific purposes concerned.

When we collect your personal information, we let you know how it will be used. For example, you can read the [Terms of Use governing Digital Platforms and Confidentiality Policy](#) on our website to learn more about the type of personal information we collect when you navigate our website and how we use this information.

Am I required to provide my personal information to Hydro-Québec?

When we ask for your personal information, we let you know (unless it is obvious from the context) whether the information is mandatory and the implications of your refusal to provide the information.

For example, you are required to identify yourself and provide your contact information so that we can create your customer account. However, it is entirely your choice whether or not you wish to respond to our surveys.

Use of personal information

What are Hydro-Québec's practices concerning the use of personal information?

We use your personal information for the purposes indicated at the time it is being collected. On occasion, however, we might wish to use your personal information for other purposes. In this case, we will ask for your permission in advance.

Please note that there are certain situations where we are authorized by law to use your personal information without your consent.

Example: We are allowed to use information regarding your electricity consumption to determine whether you are eligible for a new energy efficiency program that would save you money. We are authorized to do so because it is clearly to your advantage.

We may use your personal information by combining it with data we hold in order to create value and do better, especially in terms of a successful economic and energy transition. Here are some ways we may use it:

Adapt our ways of doing things to make our activities more efficient (e.g., simplifying and streamlining our practices, process automation)	Provide reliable, simple, affordable service (e.g., improve our terms of service and rate offerings, enhance our communications, platforms and digital tools)	Help guide the energy transition by contributing to the development of the government's roadmap for decarbonization.
Increase system reliability (e.g., stability, capacity, forecasting, optimization, planning, studies, new technologies)	Help our customers make better use of energy (e.g., understand needs, preferences, behaviours and habits, offer personalized advice and guidance, develop and provide incentives, offers and programs)	Work with stakeholders (e.g., businesses, universities and associations, research centres and major global energy companies) to innovate

Please note that for studies, research or statistical purposes, we are permitted by law to use your information through de-identification methods.

What measures does Hydro-Québec take to ensure that my personal information is accurate, complete and up to date?

We make sure to use the most recent information you have provided.

You have an important role in keeping your personal information up to date, and we provide methods for you to update or correct it as needed.

To update your customer information, you can [contact our customer services](#) or go to your [Customer Space](#). To update information about a job application, you can [consult your file](#) [In French only].

If you believe we are using personal information that is inaccurate, incomplete or ambiguous, you can [ask for a correction](#).

Disclosure of personal information to a third party

What are Hydro-Québec's practices concerning the sharing of personal information?

We share your personal information with third parties when you request it or consent to it.

However, there are certain cases provided by law where we are allowed to share your personal information with third parties without your consent. In all cases, we ensure that only the necessary information is shared.

Disclosure to our contractors or service providers

Our activities sometimes require us to share your personal information with third parties so they can carry out specific tasks or functions on our behalf. In this situation, we might be required to share your personal information with third parties without your consent, for example:

- Cloud service providers
- Payment service providers
- Collection service providers
- External legal advisors
- Survey companies

Disclosure to individuals or organizations we work with

We may share your personal information without your consent while working with individuals or organizations, for example, in carrying out the energy transition.

Disclosure to third parties for study, research or statistical purposes

We may also share your personal information with individuals or organizations from universities, associations or research communities without your consent in order to conduct a study, do research or produce statistics.

Disclosure to other third parties

We might be required to share your personal information with other third parties without your consent, for example:

- Regulatory authorities, ministries, departments and government agencies who request it based on powers granted by law or when this information is required for the application of a law
- Police departments, if the information is necessary for an investigation they are conducting or if the information is the subject of a search warrant or production order
- A court that orders us to provide the information

How does Hydro-Québec ensure that its service providers are properly protecting my personal information?

In cases where we share your personal information with service providers so they can perform the necessary services, our written contracts with them clearly state our requirements concerning the measures they must take to protect your information, which must be as strict as our own. Among other things, we ensure that our service providers use your personal information solely to provide the services required.

Is my personal information communicated to other provinces or countries?

Yes. However, before doing so, we assess the risks of such communication to ensure that your personal information will be adequately protected. The government departments and agencies of these jurisdictions, like those in Québec and Canada, may access your personal information in accordance with their local laws.

Consent

When and how does Hydro-Québec ask for my consent concerning my personal information?

We ask for your written or verbal consent in situations where required by law, namely when we wish to collect or use personal information that you are not required to provide. However, there are certain cases provided by law where we are allowed to use your personal information without asking for your consent, namely when such use is compatible with the purposes for which the information was collected or when its use is clearly to your benefit.

To ensure that your consent is fully informed:

- We will send you the information you need to make an informed decision in advance, and we will do this in a clear and concise manner.
- We will explain to you why we need your information, how it will be used, as well as the implications of refusing to provide your consent or withdrawing it.
- We will indicate the process for withdrawing your consent.

Security protection

What security measures does Hydro-Québec have in place to protect my personal information?

Because your trust is so important to us, we implement generally recognized security standards to protect your personal information for the entire period your information is in our possession.

When deciding which measures to apply, we ensure that they are reasonable given certain factors, including the sensitivity of the personal information in question and the context in which it will be used.

Our security measures fall into three main categories:

1. Technological security measures

Examples: firewall, management of access privileges, encryption or de-identification of information, logging and monitoring of actions of Hydro-Québec team members concerning your personal information.

2. Physical security measures

Examples: locked filing cabinets and restricted access to premises

3. Organizational security measures

Examples: policies, procedures, training and awareness concerning information security, reliability/integrity checks, identification and authentication procedures when you contact us or use our secure electronic services, such as your Customer Space or job candidate file

We review these security measures regularly to ensure they are applied properly and continue to be fully effective and appropriate given the evolution of our systems and of information technologies.

We have also established procedures for detecting and managing confidentiality incidents that may affect your personal information. Members of the Hydro-Québec team are required to report any suspected or actual incident.

Do I have a role to play in the security of my personal information?

Absolutely!

When managing access to the secure sections of the website available to you (for example, your Customer Space or your job candidate file), it is essential that you choose a **strong password that only you know**. This can help prevent potential problems. Your password must be **complex** enough to prevent someone from guessing it based on information found on social media or the Internet, for example. We recommend that you create a password consisting of a mix of uppercase and lowercase letters, special characters and numbers, and avoid any personal references (in other words, do not use your name, date of birth, etc.). You should also change your password regularly and make sure it is different from passwords you use on other sites.

What should I do if I believe personal information held by Hydro-Québec about me has been compromised?

If you have reason to believe your personal information has been compromised, please contact our access to information and privacy team. Their contact information is provided under the question [*Who should I contact if I have questions about the Commitment?*](#)

Retention of personal information

How long does Hydro-Québec keep my personal information?

We keep your personal information for the amount of time we need it to carry out our activities and offer you services. Then, we keep it for an additional period of time provided in our retention rules, which we have adopted and which have been approved by the Bibliothèque et Archives nationales du Québec. This additional time allows us to meet certain legislative and regulatory requirements, or to enter such information into evidence in the event that we are party to legal proceedings.

If you have questions concerning the retention period that applies to a specific situation, please contact our access to information and privacy team. Their contact information is provided under the question [*Who should I contact if I have questions about the Commitment?*](#)

Your rights

What are my rights concerning my personal information?

You have the right to **access** your personal information. Only you can exercise this right, unless you authorize the disclosure of your personal information to a third party.

In addition, if you believe that we hold personal information about you that is inaccurate, incomplete or ambiguous, or if you believe that we have collected, used, communicated or retained this information contrary to the Access Act, you have the right to request that we correct your information or that we stop collecting, using, communicating or retaining the information in ways you consider are against the law.

The law provides certain cases limiting your exercise of these rights. We will advise you in such situations.

If you send us a request to that effect, we could require that you identify yourself and provide us with proof of identity to ensure that the request actually comes from you.

If you wish to exercise your rights, we recommend that you begin by consulting your Customer Space or job candidate file. Much of your information can be found there, and you can update it.

For questions concerning your personal information as a customer, do not hesitate to contact [customer services](#).

To update your personal information related to your job application, go to the section entitled *Mes documents et informations sur le profil* [My Documents and Profile Information] in your file.

You may send a request in writing at any time to one of Hydro-Québec's officers responsible for access to documents and protection of personal information. The contact information is provided below:

Hydro-Québec

C. P. 10000, succ. pl. Desjardins

Tour Est, 12e étage

Complexe Desjardins

Montréal (Québec) H5B 1H7

Responsable.Acces@hydroquebec.com

What can I do if I'm concerned about my personal information is being used?

If you believe that your personal information has not been dealt with in compliance with our commitment or if you wish to make a complaint about our personal information protection practices, you can email the team responsible for access to information and privacy protection at PVP_Support@hydroquebec.com.

We will analyse your complaint and follow up as appropriate.

Does Hydro-Québec review the Commitment from time to time?

Yes, we review the Commitment at least every five years to ensure that it accurately describes our privacy protection practices. We also update the Commitment following certain events, such as amendments to applicable legislation or modifications to our activities.

We indicate changes to our Commitment through visual elements on our website, and we summarize the changes as well as their implications.

Who should I contact if I have questions about the Commitment?

You can contact our access to information and privacy team at PVP_Support@hydroquebec.com

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