Privacy protection program

Last updated: September 22, 2023

Background and scope of our privacy protection program

As mentioned in *Our Commitment to Your Privacy*, we require your personal information to carry out our business processes and fulfill our mission. Our **respect** for your **trust** and your privacy are at the center of the decisions we make every day.

To implement our commitment to your privacy and our obligations under the *Act respecting Access to documents held by public bodies and the Protection of personal information* (CQLR c. A-2.1, hereafter the "Access Act"), we developed a privacy protection program.

The program covers:

- the definition and distribution of the roles and responsibilities of our personnel throughout the life cycle of personal information.
- control measures.
- processes for performance assessment, continuous improvement and accountability.

In the name of **transparency**, the present document will cover the main components of our program.

1. Roles and responsibilities within the organization

President and CEO and persons in charge of the protection of personal information

The **President and CEO** is responsible for ensuring that Hydro-Québec implements and complies with all privacy-related legal requirements.

He has appointed two managers as the **persons in charge of the protection of personal information**: the Vice President – Corporate, Legal and Regulatory Affairs and Chief Governance Officer and the Director – Corporate Affairs and Governance.

These managers assume the responsibilities that the Access Act specifically sets out for the person(s) in charge of the protection of personal information.

In addition to these duties, the two managers were also asked to develop and manage a privacy protection program for Hydro-Québec.

For the latter mandate, the Direction – Affaires corporatives et gouvernance is in charge of:

- Developing privacy protection guidelines.
- Handling requests to access and correct personal information.
- Coordinating the process for managing privacy incidents.

- Training and educating Hydro-Québec's personnel and external resources about privacy matters.
- Developing and managing the framework for privacy impact assessments.

The Direction – Affaires corporatives et gouvernance also provides counsel to Hydro-Québec's structural units to help them adequately manage their privacy risks.

Internal partners

Several internal stakeholders contribute to the privacy protection program.

- The cybersecurity and corporate security teams determine the physical, organizational and technological security measures needed to ensure the protection of personal information and help manage privacy incidents.
- The teams of the Groupe – Technologies numériques develop and implement applications and solutions that improve privacy protection.
- The teams in legal affairs, strategic procurement and contract administration are involved in contractual negotiations with third parties (e.g., suppliers and organizations) with whom personal information needs to be shared.
- The teams in information governance and data governance implement checks and measures to ensure that personal information is adequately used, properly maintained throughout its life cycle and destroyed after the established retention periods.
- The corporate compliance team validates and assures that Hydro-Québec is carrying out its activities in compliance with applicable laws, regulations, standards and guidelines in matters of privacy, and provides reasonable assurance of the state of this compliance to Hydro-Québec's executives and directors.
- The internal audit team conducts audits on the efficiency and effectiveness of Hydro-Québec's activities in matters of privacy and supports the board of directors in ensuring sound governance.

Finally, each Hydro-Québec unit that handles personal information as part of its activities and processes is responsible for managing the risks involved and respecting the guidelines in effect.

Data and Information Governance Committee

The Data and Information Governance Committee is in charge of the responsibilities that the Access Act sets out for a public body's committee on access to information and the protection of personal information. The Committee's roles include:

- Adopting privacy guidelines.

- Adopting the annual training and educational programs related to privacy protection.
- Ensuring the monitoring of the privacy impact assessments for projects related to the acquisition, development or overhaul of information systems or other electronic services involving the collection, use, communication, retention or destruction of personal information.

Finally, this Committee is also responsible for making recommendations to the President and CEO on risk management in matters of privacy.

2. Control measures

Guidelines

To make it easier for all members of our personnel to respect our commitments in the area of privacy, we have adopted different guidelines that take into account the life cycle of personal information.

Our guidelines set out the rules and requirements that Hydro-Québec's different units must respect in different circumstances, including:

- When they **collect** personal information – provide specific information to the person affected, take certain elements into consideration in specific cases, such as when collecting by technological means, etc.
- When they **use** personal information – only use personal information for the purposes for which it was collected, except in cases required by law (e.g., use for secondary purposes, with or without the consent of the person affected), limit access to personal information to only the people that require it to carry out their work tasks, etc.
- When they **communicate**, verbally or in writing, personal information to third parties, with or without the consent of the affected person, including when the information is communicated outside Québec.
- When they want to **retain** or need to **destroy** personal information – apply retention rules adopted by Hydro-Québec, design or acquire systems to help implement these rules and destroy personal information safely.
- When they obtain a person's **consent** to process personal information – specify the criteria for consent to be valid and the terms and conditions for obtaining and withdrawing consent.
- When a **privacy incident** occurs – emphasis on the importance of quickly reporting any situation or incident that could lead to a privacy breach.
- When carrying out specific projects related to the processing of personal information that require that a **privacy impact assessment** be completed beforehand. These projects include the acquisition, development or overhaul of information systems or other electronic services involving the

collection, use, communication, retention or destruction of personal information.

- When conducting a **survey** – specify the requirements to consider before, during and after a survey.
- When handling **biometric** personal information – specify the steps that need to be taken with the Commission d'accès à l'information.

Hydro-Québec's different units must also **take the technological, physical and organizational measures** required to protect personal information throughout its life cycle. To do this, our cybersecurity and corporate security teams make sure to implement recognized security standards in the area of privacy, which are periodically reviewed to account for risk evolution.

Training and education

Hydro-Québec developed a training and education strategy specifically for privacy protection. The strategy aims to provide Hydro-Québec personnel with knowledge catered to their duties and to the risks associated with handling the type of personal information to which they have access.

The Data and Information Governance Committee adopts annual training and educational programs. The activities included in these programs are selected based on:

- The relative importance and nature of the personal information personnel need to access to carry out their duties.
- The sensitivity, volume and ultimate use of the personal information handled by personnel.
- The possible harm to affected persons related to the handling of personal information.

All new Hydro-Québec recruits must complete a mandatory introductory training on privacy protection. In addition, from time to time, certain training activities might be made mandatory for all personnel or certain groups based on the above criteria.

Privacy incident management

Hydro-Québec's personnel are required to report any actual or suspected incident involving personal information. We also have monitoring mechanisms in place to quickly detect events likely to lead to a privacy incident.

Reported incidents are then handled based on a process that calls on different Hydro-Québec teams to resolve the matter quickly and efficiently. The process includes defined roles, responsibilities and decision-making chains. It also sets the requirement of informing the Commission d'accès à l'information and the people

affected, when applicable. Finally, the process includes an assessment phase, which determines the actions needed to prevent similar incidents from recurring.

To ensure continuous improvement and keep our privacy incident management process relevant, we periodically test it with the help of different teams, including our emergency measures, cybersecurity and legal affairs teams.

Managing personal information shared with third parties

Our legal affairs and strategic procurement teams developed a process to ensure that our agreements with suppliers include the clauses necessary to protect the personal information we need to share with them as part of our operations. In addition, all companies to whom we transmit personal information must abide by our Suppliers' Code of Conduct, which covers a number of commitments related to integrity and privacy protection.

Our privacy protection guidelines define the different roles and responsibilities and the steps required to be able to communicate personal information to external partners (e.g., public bodies or researchers). These steps include conducting privacy impact assessments, drafting written agreements and sending notices to the Commission d'accès à l'information.

Making a complaint or exercising your rights regarding your personal information

Privacy-related complaints and requests to access or correct your personal information are handled by our team in charge of access to information, privacy protection and data ethics (Accès à l'information, protection de la vie privée et éthique des données). The team works with the Hydro-Québec units that hold the personal information in question.

Want to make this type of request? Go to Access to information requests to find out more.

Want to make a complaint about how your personal information is managed? You can contact responsable.acces@hydroquebec.com.

3. Performance, improvement and accountability

Our privacy protection program is continually revised and adjusted to keep up with legislative changes and other industry developments. We also have monitoring mechanisms in place to help us quickly detect emerging privacy risks and stay abreast of innovative practices in the field. These mechanisms improve the robustness and performance of our program.

In addition, with the help of our internal audit and corporate compliance teams, we are improving our practices to ensure the effectiveness and efficiency of our internal controls and compliance with privacy-related legal requirements.

Finally, the privacy protection program is the subject of periodic reports to the Committee on the Governance of Corporate Data and Technologies, the management team and the board of directors.

Questions about our program?

Contact the Access to information, privacy protection and data ethics team, at responsable.acces@hydroquebec.com.

You can also consult the Distribution of information page on our website, where we post content related to privacy protection.