

# Privacy Policy

VCT Group Inc.

February 26, 2021

## Introduction

Respecting and protecting the privacy and confidentiality of customer Personal Information is essential to VCT Group Inc. This Privacy Policy was established to ensure a high standard of privacy and protection of Personal Information in fulfilment of the obligations outlined in the Ontario *Freedom of Information and Protection of Privacy Act* and the federal *Personal Information Protection and Electronic Documents Act*. Our Privacy Policy ensures that VCT Group Inc. respects the sensitivity of Personal Information of its customers, outlining the security processes and procedures we have put in place for their protection. This document is available to all our customers upon request for review.

## Definitions

The following lists some terms used within this document along with their associated meaning.

- References to “VCT Group”, “we”, “us” and “our” mean *VCT Group Inc.*
- VCT Group may choose to engage other individuals or companies to assist VCT Group with customer management and related services. These other parties are referred to as “External Service Providers”.
- “Personal Information” means any information about an identifiable individual, including, but not limited to:
  - Age, name, mailing and permanent address, e-mail and telephone numbers
  - Social insurance numbers, banking information and date of birth
  - Opinions, evaluations, and comments

## Key Principles

VCT Group's Privacy Policy is based on the 10 key principles of privacy from the Personal Information Protection and Electronic Documents Act. The 10 principles are listed here below with accompanying commentary.

### 1. Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

### 2. Identifying Purposes

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

### 3. Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

### 4. Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

### 5. Limiting Use, Disclosure, and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

### 6. Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

### 7. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

### 8. Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

### 9. Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

## 10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

## Implementation of Principles

### 1. Accountability

VCT Group has, at any time, a Privacy Officer who is ultimately responsible for compliance with this Privacy Policy. VCT Group allows only its directors, officers, authorized personnel and External Service Providers to collect, manage and use Personal Information collected from customers as outlined in this Privacy Policy. These representatives engage with Personal Information in order to satisfy responsibilities associated with providing customer management and administrative services. Each individual authorized by VCT Group to access Personal Information is responsible for the Personal Information under their possession and custody, including any information handed out by them to a third-party.

### 2. Identifying Purposes

VCT Group will explain to customers how we intend to use customer Personal Information before or at the time we collect it. VCT Group will only collect customer Personal Information that is relevant to these explained purposes. If VCT Group wishes to use Personal Information for new purposes not outlined before or at the time of collection, VCT Group will obtain permission from users for these new uses.

VCT Group collects customer Personal Information on behalf of the customer generally for the following purposes:

- For VCT Group to establish and maintain commercial relations with the customer
- To manage and develop VCT Group's business and operations; and
- Assist customers with the development and submission of applications, permits, warranties and contracts related to the development and implementation of projects and installation of equipment.

### 3. Consent

When you provide VCT Group with your Personal Information to complete a transaction, verify your credit, place an order, arrange a delivery, or return a purchase, consent to use your information is assumed. VCT Group will not require customers to consent to the use, collection or disclosure of Personal Information beyond the specific purposes in order to use our services. Customers may withdraw consent at any time, subject to legal or contractual restrictions and obligations. We will explain the consequences of withdrawal of consent if it will affect our ability to provide service to the customer.

### 4. Limiting Collection

VCT Group will only collect customer Personal Information needed to provide services to the customer. This type of information usually includes:

- Name
- Address
- E-mail Address
- Telephone number (home, business, mobile, etc.)
- Driver's License and Social Insurance Numbers
- HST and or Business Numbers
- Dates of Birth
- Banking information
- Electricity Account Information (LDC Information, account number, name on account, address on account, type of electrical service, location of meter/panel)
- IESO microFIT/FIT account information (usernames, passwords, reference numbers, application history)

Personal Information may be collected from customers, with their consent, in person, by mail, in office, over the telephone or digital correspondence.

## 5. Limiting Use, Disclosure and Retention

### Within VCT Group

Customer Personal Information will be collected, used and disclosed internally within VCT Group as well as by and among individuals affiliated with External Service Providers in order to perform their job and duties in providing customer services. These operations may include but are not limited to:

- Completion of a sale or transaction with you
- To place orders on your behalf
- To arrange for permits, inspections and licenses with any governing or regulatory authorities
- To deliver products directly to you
- As part of a warranty program
- To apply for and develop FIT, microFIT, net-meter or other required contracts for the generation and sale of renewable energy on behalf of customers
- To contact you for customer service purposes
- Marketing purposes
- To verify your credit, if necessary
- To limit the possibility of fraud where applicable

Use of Personal Information is limited to the purposes to which the customer has given consent, except for circumstances required by law.

### Third Party

There are circumstances that present unavoidable types of disclosure of customer Personal Information as part of VCT Group fulfilling its routine or regulatory obligations. In these circumstances, we provide third parties with only Personal

Information that is required. We will ensure that these third parties are made aware of and comply with VCT Group's Privacy Policy and VCT Group will subject third parties to strict confidentiality provisions. Third parties may include:

- Independent Electricity System Operator (IESO)
- Local Distribution Companies
- Local building departments and the Electrical Safety Authority
- Credit reporting agencies when a credit check is applicable
- Courier services for the purpose of making a delivery
- Market research firms
- Product suppliers
- Advertisers

## 6. Accuracy

VCT Group will ensure within reason that Personal Information shall be as accurate, complete and recent as is necessary to provide services to its customers. While we do our best to update information from various sources, VCT Group relies on customer disclosure of changes in their Personal Information.

## 7. Safeguards: Protecting Personal Information

VCT Group protects customer Personal Information by using physical, organization and digital safeguards appropriate to the sensitivity of information. This helps protect Personal Information against unauthorized access, disclosure, copying, modification or use. The level of security varies depending on the sensitivity of the information. VCT Group reviews its processes periodically to ensure they are properly administered and remain effective. VCT Group protects all customer Personal Information with the methods below:

### Physical

- Printed and electronic sources containing Personal Information will be secured in locked cabinets and premises with restricted access.

### Organizational

- Access to customer personal information is restricted to those individuals that need to have access in order to perform the services for which they are responsible.

### Digital and Technical

- Electronic access to Personal Information will be restricted through use of individual secure login with designated access permissions according the individual's roles and responsibilities.

## 8. Openness

This Privacy Policy is written in plain language to be easily understood by all. It is available online and in paper copy upon request.



solar power



energy management



ev charging

## 9. Individual Access

VCT Group will provide a customer access to the Personal Information relevant to the inquiring customer within a reasonable time, conditional on the customer providing written request and satisfactory proof of identification. Customers also have to the right to know how VCT Group uses their Personal Information.

If we decline a customer's request for access to Personal Information, the customer will be provided a reason in writing by VCT Group. Typically, Personal Information is not provided if providing access would reveal Personal Information of a third party or if the Personal Information cannot be disclosed for legal, security or proprietary reasons.

## 10. Challenging Compliance

If a customer has a challenge or concern regarding VCT Group's compliance with the Privacy Policy, the customer should send their challenge or concern to the Privacy Officer at the location below.

VCT Group Inc.

Attention: Privacy Officer

860 Trillium Drive, 2<sup>nd</sup> Floor

Kitchener, ON N2R1K4

Telephone: 519-279-4630

E-mail: [privacy@vctgroup.com](mailto:privacy@vctgroup.com)

The Privacy Officer will respond to challenges and concerns and work with the customer to find an acceptable solution.

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VCT Group Inc.

860 Trillium Drive, 2<sup>nd</sup> Floor Kitchener, ON N2R1K4

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519.279.4630 [info@vctgroup.com](mailto:info@vctgroup.com)