

Date Issued: January 1, 2018

Prepared By: J. C. Roberts

Date Revised: April 28, 2022

Revised By: C. A. Gorgeatt

Approved by: Michelle Francis
Vice President, Finance and
Chief Financial Officer

Jason Roberts
President and Chief Executive Officer

INTRODUCTION:

Maritime Electric Company, Limited (“**Maritime Electric**” or the “Corporation”) is committed to respecting the privacy of your personal information. This Privacy Policy (the “**Policy**”) describes some of the personal information that we may collect from or about you, how we use it and to whom it may be disclosed.

This Policy applies to anyone who seeks to be, is or was (i) employed by Maritime Electric or (ii) a member of the Corporation’s Board of Directors (for the purposes of this Policy, each referred to as an “**Employee**”).

This Policy does not create or confer upon any individual any rights, or impose upon Maritime Electric any obligations outside of, or in addition to, any rights or obligations created by applicable federal and provincial privacy laws in Canada (the “**privacy laws**”). It is the Corporation’s policy to comply with these laws. If there is any inconsistency between this Policy and the privacy laws, this Policy shall be interpreted to give effect to, and comply with, but not substitute, those privacy laws.

WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual (“**Personal Information**”). We may collect Personal Information from you, including your name, home address, telephone numbers, e-mail address, date of birth, employee identification number and marital status and any other information that is voluntarily disclosed by you. We may also collect Personal Information about you contained in:

- resumes and/or applications;
- references and interview notes;
- photographs;
- offer letters and employment contracts;
- payroll information forms, including social insurance number, pay cheque deposit information and wage and benefit information;
- forms relating to employee health and welfare benefits, including short- and long-term disability benefits, life insurance, optional life insurance, accidental death and dismemberment insurance and medical and dental care; and
- beneficiary and emergency contact information.

Generally, Maritime Electric prefers to collect Personal Information directly from you. However, we may use the services of third parties in our business and may receive Personal Information about you from them. Where your Personal Information is held by a third party, we will generally advise you and, where appropriate, obtain your permission before we seek such information.

WORK PRODUCT AND MONITORING

Employee work product, regardless of format belongs to Maritime Electric. Such work product and the tools used to create it are monitored by the Corporation. Employees should not have any expectation of privacy with respect to information contained in such work product.

We may also monitor Employee activities (including phone calls, smart phone usage, internet usage and e-mail). This is not meant to suggest that Employees will in fact be monitored or their actions subject to surveillance. It is meant to bring to your attention that such monitoring *may* occur and *may* result in the collection of Personal Information about you. Employees should not have any expectation of privacy with respect to their use of Maritime Electric equipment or resources including incidental personal use.

HOW DO WE USE AND DISCLOSE YOUR PERSONAL INFORMATION?

The Personal Information we collect is used and disclosed for the following purposes:

- determining eligibility for initial employment or board membership including the verification of references and qualifications;
- administering pay and benefits;
- processing work-related claims (e.g. workers' compensation, insurance claims, fitness reimbursement, etc.), and to determine eligibility for, provide, administer and document leaves or absences from work;
- establishing training and/or development requirements;
- considering promotions or changes in jobs;
- conducting performance reviews and determining performance requirements;
- monitoring your compliance with any agreements with Maritime Electric and the Corporation's policies, including managing performance and investigating misconduct;
- gathering evidence for disciplinary action or termination;
- assessing qualifications for a particular job or task;
- establishing a contact point in the event of an emergency (such as next of kin);
- compiling directories and telephone lists;
- protecting the rights and assets of Maritime Electric, including the security of Company-held information;
- assisting the Corporation in any dispute, mediation, arbitration, litigation or investigation involving Maritime Electric or you in any capacity;
- protecting the safety of a person or group of persons or to deal with emergency situations;
- facilitating travel planning;
- any use or disclosure that is permitted or required by law or regulatory requirements including without limitation, compliance with: (i) securities law, stock exchange rules and continuous disclosure obligations; (ii) auditing and reporting obligations; (iii) applicable labour or employment statutes; and (iv) valid legal processes such as search warrants, subpoenas or court orders;
- any other similar or related purposes that are reasonably necessary for the proper management of Maritime Electric's business, including to establish, manage or terminate your employment or board relationship with Maritime Electric; and
- any additional purposes that we advise you of and, where your consent is required by law, in respect of which we have obtained your consent.

We may share your Personal Information with our parent company, affiliates, Employees, consultants, agents and other parties who need it to assist us in establishing, managing or terminating our relationship with you, including third parties that provide services to us or on our behalf and third parties that assist us in the provision of services to you (e.g. payroll and benefits processing). We will use reasonable commercial efforts including, where appropriate, contractual obligations to implement appropriate security measures to protect your Personal Information consistent with our policies and any data security obligations applicable to us as your employer. We will seek to ensure that such parties use your Personal Information only for specified purposes in accordance with our instructions and that your Personal Information is kept secure.

We may also disclose your Personal Information to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders. When we disclose your Personal Information to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum Personal Information necessary in the circumstances.

Your Personal Information may also be used, disclosed or transferred to another party in connection with a change in ownership of, or the grant of a security interest in, all or a part of Fortis (or a Fortis subsidiary including Maritime Electric) through, for example, an asset or share sale, or other form of business combination, merger or joint venture, or a financing transaction, provided that such party is bound by appropriate confidentiality agreements or obligations and is required to handle your Personal Information in a manner consistent with the provisions of this Policy.

We may transfer your Personal Information across provincial or national borders to fulfil any of the above purposes. Where Personal Information is transferred outside of Canada, the laws of those jurisdictions may not provide the same level of privacy protection as Canada and may result in that information becoming accessible to law enforcement and national security authorities of those jurisdictions.

CONSENT

To the extent your consent is required by law, we will assume, unless you advise us otherwise, that you have consented to Maritime Electric collecting, using and disclosing your Personal Information in the way and for the purposes stated above (including any other purposes stated or reasonably implied at the time such Personal Information was provided to us).

We will only use your Personal Information for the purposes we collected it for. If we need to use your Personal Information for an unrelated purpose, we will notify you and, if required by law, seek your consent. We may use your Personal Information without your knowledge or consent where required by applicable law or regulation.

Where you have provided your consent to the collection, use and transfer of your Personal Information, you may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. All communications regarding such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer, whose contact information is provided below.

LIMITS ON COLLECTION, USE, DISCLOSURE AND RETENTION

Unless otherwise consented to by you or required by law, we will limit the collection, use and disclosure of your Personal Information as reasonably necessary for the purposes set out in this Policy.

Your Personal Information will be stored, retained and/or destroyed as required by law. Maritime Electric will destroy, erase or make anonymous collected Personal Information once it is reasonable to conclude that retention is no longer needed for the purposes set out above.

Maritime Electric may retain your Personal Information as long as necessary or appropriate to carry out the purpose(s) for which it was collected or as may be required or permitted by law.

ACCURACY

Maritime Electric will make all reasonable effort to ensure that collected Personal Information is accurate, complete and as up-to-date as necessary for the purposes for which it is used. We rely on you to ensure that certain information, such as your address or telephone number, is accurate, complete and up-to-date.

If your Personal Information on file at Maritime Electric is inaccurate or incomplete, or if it changes, you should notify the responsible individual within Maritime Electric. In such cases, we may change or append a supplement of your Personal Information.

SAFEGUARDS AND DATA BREACH NOTIFICATION

Maritime Electric seeks to maintain, either directly or through affiliates or third parties, physical, technical and procedural safeguards that are appropriate to the sensitivity of the Personal Information in question. Such safeguards are designed to protect Personal Information from loss and unauthorized access, disclosure, copying, use or modification. Maritime Electric will review and update such safeguards from time to time to ensure ongoing Personal Information security.

The security of your Personal Information is important to us. Employees must advise our Privacy Officer immediately of any incident involving the loss of, or unauthorized access to or disclosure of, Personal Information in our custody or control.

Maritime Electric will comply with applicable laws in the event of a data breach or breach of security safeguards. This includes reporting (in the prescribed form) any such breach to the Office of the Privacy Commissioner of Canada and notifying any affected individuals where it is reasonable to believe that the breach creates a real risk of significant harm to any such individuals.

Maritime Electric will maintain detailed records of every breach of its security safeguards for a minimum of 24 months after the determination that a breach has occurred.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You can review and verify the existence, use and disclosure of Personal Information we hold relating to you, including information about the ways in which that information is being used and a description of the individuals and organizations to whom that information has been disclosed. You may also request that we make corrections to Personal Information that we hold relating to you. Such requests should be made in writing to our Privacy Officer. Following receipt of the written request, we will make the information available within thirty (30) days or provide written notice where additional time is required to fulfil the request.

When requesting access to your Personal Information, we may seek information from you to enable us to confirm your identity and right to access, and to search for and provide you with the Personal Information you have requested. If you need assistance in preparing your request, please contact our Privacy Officer.

All our energy.
All the time.



Corporate Procedure

Title: Privacy Policy

Procedure No.: 800024 Date Revised: Apr. 28, 2022 Page: 4 of 4

Your right to access Personal Information that we hold relating to you is not absolute and, in some situations, we may not be able to provide access to certain Personal Information. This may be the case where, for example, disclosure would reveal Personal Information about another individual, the Personal Information is protected by solicitor/client privilege, the information was collected for the purpose of an investigation (including under our *Policy on Reporting Allegations of Suspected Improper Conduct and Wrongdoing* ("Whistleblower Policy")) or where disclosure of the information would reveal confidential information that, if disclosed, could harm the Corporation's competitive position or reputation. As well, there are circumstances where law allows or requires us to refuse to provide Personal Information we hold relating to you. Also, the requested Personal Information may have been destroyed, erased or made anonymous under our record retention obligations and practices.

If we cannot provide you with access to your Personal Information, we will endeavor to inform you of the reasons, subject to any legal restrictions.

INQUIRIES OR CONCERNS?

We have designated a Privacy Officer who is accountable for our compliance with privacy laws and this Policy. The Privacy Officer's contact information is as follows:

Privacy Officer
Maritime Electric
PO Box 1328, 180 Kent St
Charlottetown PE C1A 7N2

Phone: 902-629-3686
Email: privacyofficer@maritimeelectric.com

If you have questions, concerns, requests or complaints about how we manage your Personal Information, please contact our Privacy Officer. We will endeavour to answer your questions and advise you of any steps taken to address the issues you have raised. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

POLICY REVIEW

This Policy shall be reviewed periodically.

From time to time, we may make changes to this Policy to reflect changes in legal obligations or in the manner in which we deal with Personal Information, and we will provide you with access to the new Policy when we make any updates.