

CAPITAL POWER CORPORATION

Our Commitment to the Protection of Personal Information and Privacy

TABLE OF CONTENTS

I. OUR COMMITMENT TO PRIVACY	1
II. INTRODUCTION	1
III. SUMMARY OF PRINCIPLES.....	1
A. Accountability	1
B. Identifying Purposes	2
C. Consent	2
D. Limiting Collection	2
E. Limiting Use, Disclosure and Retention	2
F. Accuracy	2
G. Safeguards.....	2
H. Openness	2
I. Individual Access.....	2
J. Challenging Compliance.....	2
IV. CPC's PRIVACY PRACTICES FOR THE PROTECTION OF PERSONAL INFORMATION	3
A. Accountability.....	3
B. Identifying Purposes for Collection	3
C. Obtaining Consent for Collection, Use or Disclosure	4
D. Limiting Collection of Personal Information.....	4
E. Limiting Use, Disclosure, and Retention of Information	4
F. Accuracy of Personal Information	5
G. Security Safeguards	5
H. Openness Concerning Policies and Practices	5
I. Individual Access to Personal Information.....	6
J. Challenging Compliance.....	7

I. OUR COMMITMENT TO PRIVACY

This Privacy Policy is a demonstration of Capital Power Corporation's commitment to the protection of personal information and privacy.

It has always been Capital Power Corporation's priority to safeguard all personal information provided to it in the course of business. We are committed to meeting, and where possible, exceeding, the requirements of all applicable privacy legislation that relates to Capital Power Corporation's businesses (the "Privacy Legislation").

Within this Privacy Policy, "Personal Information" means information about an identifiable individual. Personal Information does not include publicly available information such as a public directory listing of an individual's name, address or phone number; business contact information such as an individual's name, position name or title, business telephone number, business address, business e-mail, business fax number and other similar business information; or aggregated information that cannot be associated with a specific individual.

This Privacy Policy will apply to Capital Power Corporation and all of its subsidiaries (hereinafter called "CPC").

At CPC, Personal Information is maintained as strictly confidential. Unless an individual authorizes CPC to disclose Personal Information, or the disclosure of that Personal Information without consent is required or permitted by law, we will not disclose Personal Information to any third parties.

II. INTRODUCTION

CPC has a longstanding policy of protecting the Personal Information and privacy of individuals in all our business operations. The object of this Privacy Policy is to promote responsible practices in the management of Personal Information in accordance with the provisions of the applicable Privacy Legislation. CPC will continue to review this Privacy Policy to ensure that it remains current with changing legal requirements and evolving technology.

III. SUMMARY OF PRINCIPLES

CPC is committed to the ten principles mandated in Privacy Legislation governing the collection, use and disclosure of Personal Information. These principles form the foundation of this Privacy Policy:

A. Accountability

CPC is responsible for Personal Information under its control and shall designate an individual or individuals to be accountable for CPC's compliance with the principles set out in this Privacy Policy and in Privacy Legislation.

B. Identifying Purposes

CPC will identify the purposes for which Personal Information is collected at or before the time the Personal Information is collected.

C. Consent

CPC will obtain the consent of an individual for the collection, use or disclosure of his or her Personal Information as required by Privacy Legislation.

D. Limiting Collection

CPC will limit the collection of Personal Information to that which is necessary for the purposes it identifies. CPC will only collect information by fair and lawful means.

E. Limiting Use, Disclosure and Retention

CPC will not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or as required by law or law enforcement and in emergency situations. CPC will only retain Personal Information as long as necessary for the fulfillment of those purposes or as required by law.

F. Accuracy

CPC will endeavour to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.

G. Safeguards

CPC will protect Personal Information by security safeguards appropriate to the sensitivity of the information.

H. Openness

CPC will make readily available to individuals specific information about its policies and practices relating to the management of Personal Information.

I. Individual Access

Upon a written request, CPC will inform an individual of the existence, use, and disclosure of his or her Personal Information and allow access to that information, in accordance with Privacy Legislation.

J. Challenging Compliance

An individual will be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for CPC's compliance with this Privacy Policy and the Privacy Legislation.

IV. CPC'S PRIVACY PRACTICES FOR THE PROTECTION OF PERSONAL INFORMATION

A. Accountability

CPC is responsible for Personal Information under its control and shall designate an individual or individuals to be accountable for CPC's compliance with the principles set out in this Privacy Policy and in Privacy Legislation.

1. Responsibility for ensuring compliance with the provisions of this Privacy Policy rests with the designated Privacy Officer of CPC.
2. CPC is responsible for safeguarding Personal Information in its possession or control. CPC will use appropriate means to provide a comparable level of protection when Personal Information is being processed by a third party.
3. The Privacy Officer will have responsibility for giving effect to the Privacy Policy, which responsibility shall include:
 - (a) implementing procedures to protect Personal Information and to oversee CPC's compliance with this Privacy Policy;
 - (b) establishing procedures to receive and respond to inquiries and complaints regarding Personal Information;
 - (c) training staff and communicating to staff about CPC's policies and practices; and
 - (d) developing employee communications to explain CPC's policies and practices.

The name, title and contact information of the person currently designated as CPC's Privacy Officer is contained within Appendix "A" attached hereto.

B. Identifying Purposes for Collection

CPC will identify the purposes for which Personal Information is collected at or before the time the information is collected.

1. CPC will document the purposes for which Personal Information is collected and will only collect Personal Information for the identified purposes.
2. CPC will specify to the individual, orally, electronically or in writing, the identified purposes at or before the time Personal Information is collected. Upon request, persons collecting Personal Information will explain these identified purposes or refer the individual to the Privacy Officer of CPC who will explain the purposes.

3. In accordance with Privacy Legislation, CPC will identify and document any new purposes for which previously collected Personal Information may need to be used and disclosed and obtain the consent of the individual where applicable.

C. Obtaining Consent for Collection, Use or Disclosure

CPC will obtain the consent of an individual for the collection, use or disclosure of his or her Personal Information as required by Privacy Legislation.

1. CPC will seek consent to use and disclose Personal Information at the same time it collects the information or in accordance with Privacy Legislation.
2. In obtaining consent, CPC will ensure that an individual is advised of the identified purposes for which Personal Information will be used or disclosed. Purposes will be stated in a manner that can be reasonably understood by the individual.
3. In determining the appropriate form of consent, CPC will consider the sensitivity of the Personal Information; the reasonable expectations of the individuals involved; and the requirements of Privacy Legislation.

D. Limiting Collection of Personal Information

CPC will limit the collection of Personal Information to that which is necessary for the purposes it identifies. CPC will only collect information by fair and lawful means.

1. CPC will collect, use and disclose Personal Information in accordance with Privacy Legislation and will limit the amount and type of Personal Information collected to that which is necessary to fulfill identified purposes.
2. CPC collects Personal Information primarily from its employees, but CPC may also collect Personal Information from other sources to meet the requirements of its business.

E. Limiting Use, Disclosure, and Retention of Information

CPC will not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or as required by law or law enforcement and in emergency situations. CPC will only retain Personal Information as long as necessary for the fulfillment of those purposes or as required by law.

1. CPC will keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law.
2. CPC will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to Personal Information that is no longer necessary or relevant for the identified purposes or

required by law to be retained. Such information will be destroyed, erased or made anonymous.

3. CPC will maintain a record of the third parties that Personal Information is disclosed to in accordance with this Privacy Policy.

F. Accuracy of Personal Information

CPC will endeavour to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.

1. CPC employees shall ensure that their Personal Information, particularly information that deals with benefit entitlement or status, is kept current, and accurately reported.
2. CPC will update Personal Information as and when necessary to fulfill the identified purposes or upon notification by the individual.

G. Security Safeguards

CPC will protect Personal Information by security safeguards appropriate to the sensitivity of the information.

1. CPC will protect Personal Information against loss or theft, as well as unauthorized access, disclosure, use, modification or destruction, through appropriate security measures. The nature of the safeguards will vary depending on the sensitivity of information collected.
2. CPC will ensure that individuals about whom it has collected Personal Information shall have access to their Personal Information when requested. CPC will respect the confidentiality of that Personal Information and comply with this Privacy Policy in maintaining its security.
3. Contractors, consultants, and third-party service providers will be contractually bound to comply with CPC policies that reference protection of Personal Information and privacy.
4. CPC will use care in the disposal or destruction of Personal Information, to prevent unauthorized parties from gaining access to the Personal Information.

H. Openness Concerning Policies and Practices

CPC will make readily available to individuals specific information about its policies and practices relating to the management of Personal Information.

1. The information that CPC makes available about its policies and practices will be easy to understand, and will include:

- (a) the name or title, and the address, of the person(s) who is accountable for CPC's policies and practices regarding the management of Personal Information and to whom complaints or inquiries can be forwarded;
- (b) the means of gaining access to Personal Information held by CPC;
- (c) a copy of information that explain CPC's policies, standards or codes;
- (d) the type of Personal Information made available to related organizations;
and
- (e) a description of the type of Personal Information held by CPC, including a general account of its use.

I. Individual Access to Personal Information

Upon a written request, CPC will inform an individual of the existence, use, and disclosure of his or her Personal Information and allow access to that information.

1. Upon written request, CPC will provide individuals with the opportunity to review the Personal Information that CPC has collected regarding them, in accordance with the requirements of Privacy Legislation.
2. In certain circumstances, as specified in Privacy Legislation, CPC may not be able to provide access to all the Personal Information that it holds about an individual. For example, CPC may not provide access to information if doing so would likely reveal Personal Information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, CPC may not provide access to Personal Information if disclosure would reveal confidential commercial information; if the information is protected by solicitor client privilege; if the information was generated in the course of a formal dispute resolution process; or, if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law. If, upon a request being made by an individual, access to his or her Personal Information cannot be provided, CPC will provide the reasons for denying access.
3. In order to safeguard Personal Information, an individual will be required to provide sufficient identification information to permit CPC to authorize access to the Personal Information held regarding that individual. Any such identification information will be used only for this purpose.
4. Individuals can obtain information or seek access to their Personal Information by contacting the Privacy Officer.

J. Challenging Compliance

An individual will be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for CPC's compliance with this Privacy Policy and Privacy Legislation.

1. CPC will maintain procedures for addressing and responding to all inquiries or complaints from individuals about CPC's handling of Personal Information.
2. CPC will inform individuals about the existence of these procedures as well as the availability of complaint procedures.
3. CPC will investigate all complaints concerning compliance with this Privacy Policy. If a complaint is found to be justified, CPC will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. An individual will be informed of the outcome of the investigation regarding his or her complaint.
4. CPC will promptly correct or complete any Personal Information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness will be noted in the file in which the Personal Information is contained. Where appropriate, CPC will notify third parties having access to the Personal Information in question about any amended information or the existence of any unresolved differences.
5. An individual that has concerns with CPC's privacy practices should contact CPC's Privacy Officer using the contact information set out in Appendix "A" attached hereto.

APPENDIX "A"
Designated Privacy Officer

Responsibility for ensuring compliance with the provisions of this Privacy Policy rests with Capital Power Corporation's Privacy Officer.

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