
Privacy Policy

Policy No.: COrg-PO-003
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Applicability

This policy applies to all staff as well as to anyone acting as an agent or contractor on behalf of SaskWater.

Policy Statement

SaskWater's Privacy Policy spells out the commitment of SaskWater and the rights of customers regarding personal information. This policy outlines why SaskWater asks for personal information, how SaskWater keeps personal information confidential and how individuals can acquire their information from SaskWater.

In addition to SaskWater's Privacy Policy, SaskWater may also be subject to the requirements of applicable legislation and regulations and the orders of any court or other lawful authority. Annually, Human Resources ensures a review, with each employee, of the code of business conduct and confidentiality provisions that require the safeguarding and proper use of all types of information handled by SaskWater. SaskWater has strict controls over the protection and use of personal information within our systems.

Background

Saskatchewan's Crown Investments Corporation (CIC) has developed a formal Privacy Framework setting out the rights and obligations respecting the treatment of personal information for all Crown Corporations. This Framework complies with the *Canadian Standards Association Model Code for the Protection of Personal Information*.

Since 1991, Saskatchewan has had *The Freedom of Information and Protection of Privacy Act*. This Act sets forth the statutory obligations on SaskWater with respect to the handling of personal information and provides a strong legislative basis upon which to build privacy policies and procedures.

Policy Details

SaskWater's Privacy Policy governs the behaviour of our employees, contractors and agents acting on SaskWater's behalf. All employees who have access to personal information will receive training on the handling of such information. New employees receive training on privacy as a fundamental part of their initial company orientation. On an annual basis, all employees must review the handling of personal information in accordance with SaskWater policies and procedures and are expected to conform to SaskWater privacy policies and procedures at all times. Additionally, all third party contractors must establish procedures dealing with personal information obtained through the contract in accordance with

SaskWater's Privacy Policy and procedures. SaskWater will keep its employees and agents informed of privacy policies and procedures and reinforce the importance of privacy.

Personal Information

Personal information is information about an identifiable individual. The individual may be a customer, employee or any other person in respect to whom the corporation has obtained information. Personal information can include information SaskWater has obtained about product and service agreements, billing data, credit history or complaints. Publicly available information, such as a public directory listing of your name, address, telephone number, title and electronic address, as well as certain information exempted by legislation, are not considered to be personal information.

Collecting Information to Serve Customers Better

SaskWater works with customers to provide services that meet their needs on an ongoing basis and also desires to maintain ongoing relationships in order to understand the customer's needs and to meet those needs as they change.

SaskWater may collect personal information for the following purposes.

- a) To establish and maintain responsible commercial relations with customers and to provide customers with ongoing service;
- b) To understand customers needs and eligibility for products and services;
- c) To recommend particular products and services to meet customer needs;
- d) To develop, enhance, market or provide products and services;
- e) To manage and develop SaskWater 's business and operations, including personnel and employment matters; and
- f) To meet legal and regulatory requirements.

Obtaining and Verifying Personal Information

SaskWater obtains personal information about individuals directly from those individuals. SaskWater may obtain information from another source with the individual's consent. Should authorization from a customer be withheld SaskWater may not be able to meet the requests of the customer.

Wherever possible, SaskWater will obtain express consent for the collection and use of personal information. Written consent is required for disclosure of personal information unless disclosure is permitted by law.

Customers may withhold personal information in part or in whole; however, customers must understand that such a choice may affect the ability of SaskWater to provide service initially or on an ongoing basis.

Accessing Personal Information

Individuals, whether customers, employees or others, can review or verify personal information held by SaskWater and find out to whom it has been disclosed. There may be a charge to obtain the information requested. Personal information will not be disclosed where it is exempt from disclosure or disclosure is prohibited by law.

Should SaskWater be unable to provide access to personal information, an explanation will be provided.

Releasing Personal Information

SaskWater has a strict policy not to provide personal information to any party outside of SaskWater, except where disclosure to a third party is necessary to provide SaskWater programs and services and where that third party is bound to meet the standards set in the SaskWater Privacy Policy.

Where SaskWater uses the services of other companies to provide services to SaskWater or to SaskWater customers, contracts will be executed requiring those companies to maintain the same or a higher level of privacy standards as those required by SaskWater. Strict confidentiality provisions will be incorporated into any contracts SaskWater executes with these companies. The information turned over by SaskWater shall only be used for the purposes described in the contract and shall be returned to SaskWater on completion of the work or destroyed. When personal information is provided to third parties, only information that is required in the circumstances is provided.

Third parties include:

- (i) An agent acting on behalf of SaskWater, such as a company hired to perform installation or maintenance on our behalf;
- (ii) A collection agency, for the express purpose of the collection of past due bills.

SaskWater may also be required by law to disclose personal information under certain circumstances, such as:

- (i) Law enforcement agencies, in emergencies, for internal security matters, or where required by court order or search warrant or where permitted by law; and
- (ii) Emergency services, in emergency situations. SaskWater will take reasonable steps to keep a record of information that is disclosed to a third party or to the customer for routine purposes. In cases where SaskWater is legally obligated to disclose personal information SaskWater will keep a record of the release including what, when, why and to whom the information was released.

Sharing Information

SaskWater will not share personal information with any other entity without prior written consent, except as permitted by law.

Keeping Information Accurate

SaskWater is committed to collecting and maintaining accurate personal information for use in its programs and services. To do so it is necessary that customers and employees play an active role by notifying SaskWater of changes in their personal information. Should amendments be required SaskWater will make every effort to promptly update personal information.

Safeguards and Keeping Information Confidential

SaskWater will take precautions to ensure the safeguarding of personal information, whether it is stored electronically or in paper format.

In accordance with the Information Technology Security Policy and the Records Classification Plan and Retention Schedule, controls are in place to protect against unauthorized use, alteration, duplication, destruction, disclosure, loss or theft or unauthorized access to personal information.

SaskWater has physical, organizational and electronic security for personal information held by it through the use of secure locks on filing cabinets and doors, restricted access to information processing and storage areas, system partitioning, password protection, pass keys to secure areas and encryption of transmitted data among others.

Retention and Disposition of Personal Information

SaskWater has procedures in place for destroying, deleting, or disposing of physical documents containing personal information when it is no longer required for the purposes for which it was collected, as set out in SaskWater's Records Classification Plan and Retention Schedule, or by law, to prevent unauthorized use or disclosure.

Customer Choice

The customer has the choice not to provide to SaskWater some or all of their personal information. A customer may also withdraw their consent to use their personal information, which SaskWater had previously obtained, so long as there are no legal limitations. Withdrawing consent or information may inhibit SaskWater's ability when providing products and services.

Use of Cookies

SaskWater's web site does not collect aggregated site-visitation statistics using cookies. Should cookies be utilized, all information SaskWater collects using cookies will be consistent with this code.

Chief Privacy Officer

Unresolved concerns with respect to the treatment of personal information by SaskWater, may be addressed by writing to SaskWater's Chief Privacy Officer, who has overall responsibility for the corporation's compliance with this policy and applicable privacy restrictions.

Further Information

Questions about this document should be directed to SaskWater's Chief Privacy Officer.

Definition(s)

Personal Information: See *The Freedom of Information and Protection of Privacy Act*, Saskatchewan, subsections 24(1) and (2).

References

The Freedom of Information and Protection of Privacy Act, Saskatchewan.
CIC Crown Privacy Framework (2020)
Information Technology Use Policy
Information Technology Security Policy
Records Classification Plan and Retention Schedule

Appendix A - Summary of Privacy Principles

Principle 1- Accountability

SaskWater is responsible for personal information under its control and has designated a Chief Privacy Officer who is accountable for the company's compliance with the following principles.

Principle 2 - Identifying Purposes for Collection of Personal Information

SaskWater shall identify the purposes for which personal information is collected at or before the time the information is collected.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

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

Principle 4 - Limiting Collection of Personal Information

SaskWater shall limit the collection of personal information to that which is necessary for the purposes identified by the company. SaskWater shall collect personal information by fair and lawful means.

Principle 5 - Limiting Use, Disclosure and Retention of Personal Information

SaskWater does 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. SaskWater shall retain personal information only as long as necessary for the fulfillment of those purposes.

Principle 6 - Accuracy of Personal Information

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

Principle 7 - Security Safeguards

SaskWater protects personal information by security safeguards appropriate to the sensitivity of the information.

Principle 8 - Openness Concerning Policies and Practices

SaskWater shall make readily available to customers and employees specific information about its policies and practices relating to the management of personal information.

Principle 9 - Customer and Employee Access to Personal Information

SaskWater shall inform a customer or employee of the existence, use and disclosure of his or her personal information upon request and shall give the individual access to that information, except in certain circumstances. A customer or employee can challenge the accuracy and completeness of the information and have it amended as appropriate.

Principle 10 - Challenging Compliance

A customer or employee can address a challenge concerning compliance with the above principles to the Chief Privacy Officer who is accountable for SaskWater's compliance with SaskWater's Privacy Policy and the CIC Privacy Framework.