

# BURDEN PROPANE INC.

## Protecting your Privacy

### Burden Propane Inc.'s Personal Information Protection Policy

At Burden Propane Inc. ("Burden Propane") we are committed to providing our customers with exceptional service. As providing service to customers involves Burden Propane collecting, using and disclosing personal information about our customers, protecting our customer's privacy and safeguarding their personal information is one of Burden Propane's highest priorities.

In this policy document we outline the reasons Burden Propane collects and uses customer personal information as well as the principles and practices Burden Propane will follow in protecting a customer's personal information in accordance with applicable privacy legislation, including the *Personal Information Protection Act of British Columbia* (PIPA).

#### Definitions

**Personal Information** is information about an identifiable individual and includes name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, employment information. Personal information does not include Contact Information.

**Contact Information** is information that would enable an individual to be contacted at a place of business and includes the person's name, position or title, business telephone number, business address, business email or business fax number. Contact information is information that is not covered by this policy or PIPA.

**Privacy Officer** means the individual responsible for ensuring that Burden Propane complies with this policy and PIPA.

#### Policy 1: Collecting Personal Information

1.1 Customer's personal information is collected directly by Burden Propane or indirectly through Burden Propane's affiliates or business associates. Information may be collected in person, over the telephone, through the mail or by electronic medium. Unless the purposes for collecting personal information are obvious and the customer voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

1.2 We will only collect customer information that is necessary to fulfill the following purposes:

- Identify customers and process their application for products and services;
- Contact our customers;
- Determine customer eligibility for products and services;
- Deliver and administer the delivery to our customers of products and services;
- Ensure a high standard of service to our customers;

- Open, maintain, service, process, analyze, audit and collect on customer accounts and process payments;
- Assess, verify and update customer credit worthiness on an on going basis;
- Identify customer preferences and contact our customers directly about products and services that may be of interest;
- Conduct customer surveys in order to enhance the provision of our services and for mail-outs and the marketing of our services or products;
- Respond to customer questions or concerns; and
- Comply with legal and regulatory requirements.

### **Policy 2: Using and Disclosing Personal Information**

2.1 Burden Propane will only use or disclose customer personal information where necessary to fulfill the purposes identified in this policy and at the time of collection or for a purpose reasonably related to those purposes. Burden Propane will not use or disclose customer personal information for any additional purpose unless we obtain consent to do so.

2.2 Burden Propane will only handle customer personal information in a manner that a reasonable person would consider appropriate in the circumstances.

2.3 Burden Propane will not sell customer lists or personal information to other parties unless we have consent to do so.

### **Policy 3: Consent**

3.1 Burden Propane will obtain customer consent to collect, use or disclose personal information except where, as noted below in paragraph 3.4, we are authorized to do so without consent.

3.2 Customer consent may be provided orally, in writing, electronically, through an authorized representative, or it may be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and our customer voluntarily provides personal information for that purpose. Consent may also be implied where our customer is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products and the customer does not opt-out.

3.3 Subject to certain exceptions (for example, the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation) our customers may withhold or withdraw consent for Burden Propane to use their personal information in certain ways. A customer's decision to withhold or withdraw their consent to certain uses of personal information may restrict Burden Propane's ability to provide the customer with particular services or products or to fill an order for products or services. If so, Burden Propane will, where possible, explain the situation to assist the customer to make the decision.

3.4 Burden Propane may collect, use or disclose personal information without the customer's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;

- When the personal information is available from a public source (e.g., a telephone directory);
- When Burden Propane requires legal advice from its lawyer;
- For the purposes of collecting a debt;
- To protect Burden Propane from fraud; and
- To investigate an anticipated breach of an agreement or a contravention of law.

#### **Policy 4: Retaining Personal Information**

4.1 If Burden Propane uses customer personal information to make a decision that directly affects the customer Burden Propane will retain that personal information for at least one year so that the customer has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, Burden Propane will retain customer personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose and will remove from its systems personal information that Burden Propane no longer requires.

#### **Policy 5: Ensuring Accuracy of Personal Information**

5.1 Burden Propane will make reasonable efforts to ensure that customer personal information is accurate and complete where it may be used to make a decision about the customer or disclosed to another organization.

5.2 Customers may request correction to their personal information to ensure the accuracy and completeness of that information. A request to correct personal information must be made in writing and provide sufficient detail for Burden Propane to identify the personal information and the correction being sought. A request to correct personal information should be forwarded to our Privacy Officer.

5.3 If personal information is demonstrated to be inaccurate or incomplete, Burden Propane will correct the information as required and send the corrected information to any organization to which it disclosed the personal information in the previous year. If the correction is not made, Burden Propane will note the customers' correction request in the file.

#### **Policy 6: Securing Personal Information**

6.1 Burden Propane is committed to ensuring the security of customer personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. The following security measures will be followed to protect customer personal information:

- Use of locked filing cabinets;
- Physically securing offices where personal information is held;
- The use of user IDs, passwords, encryption, firewalls;
- Restricting employee access to personal information as appropriate (i.e., only those that need to know will have access);
- Requiring any service providers to provide comparable security measures.

6.2 Burden Propane will use appropriate security measures when destroying customer's personal information such as shredding documents, deleting electronically stored information.

6.3 Burden Propane will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

**Policy 7: Providing Customers Access to Personal Information**

7.1 Customers have a right to access their personal information, subject to certain limited exceptions. A request to access personal information must be made to Burden propane in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to our Privacy Officer.

7.2 Upon request, Burden Propane will tell customers how it uses their personal information and, if applicable, to whom it has been disclosed.

7.3 Burden Propane will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

7.4 A minimal fee may be charged for providing access to personal information. Where a fee may apply, Burden Propane will inform the customer of the cost and ask the customer whether Burden Propane should proceed with the request.

7.5 If a customer's request for personal information is refused in full or in part, Burden Propane will notify the customer in writing, providing reasons for refusal and the recourse available to the customer.

**Policy 8: Questions and Complaints: The Role of the Privacy Officer**

8.1 The Privacy Officer is responsible for ensuring Burden Propane complies with this policy and applicable privacy legislation, including PIPA. *This policy may be updated periodically.*

8.2 Customers should direct any complaints, concerns or questions regarding Burden Propane's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the customer may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Burden Propane's Privacy Officer:

Mr. John Bestwick  
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Harrison Hot Springs,  
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