

NOVEMBER 5, 2017

GreenON Installations Program

Privacy Frequently Asked Questions

This FAQ describes the personal information the Independent Electricity System Operator (“IESO”) may collect in connection with the GreenON Installations program (the “Program”), how we use that information, and with whom we may share it. It also lets you know how you can reach us to review and update your personal information, or discuss any questions or concerns that you may have about our privacy practices.

For information about IESO’s general personal information practices, please refer to our privacy policy at www.ieso.ca/en/privacy.

What is the Program trying to achieve?

The Program aims to reduce greenhouse gas emissions by providing and installing smart thermostats. As well, a Home Energy Report will be prepared for you that contains additional energy and water conservation and greenhouse gas reduction tips and recommendations.

Under what authority is IESO permitted to collect and use personal information?

IESO is a not-for-profit corporation without share capital established under the [Electricity Act, 1998](#). The [Ontario Energy Board Act, 1998](#) and sections 6(1)(i) and 6(1)(p) of the *Electricity Act, 1998*, give us the authority to collect and use personal information about you and your energy-related activities. The IESO complies with the privacy protection rules contained in Ontario’s [Freedom of Information and Protection of Privacy Act](#) (“FIPPA”).

We have been directed by the Minister of Energy to administer the Program on behalf of the Ontario Climate Change Solutions Deployment Corporation (“Green Ontario Fund”) established by the Ministry of the Environment and Climate Change. The Green Ontario Fund is a not-for-profit provincial agency that invests proceeds from Ontario’s carbon market into climate actions that help people and businesses reduce greenhouse gas emissions and use cleaner technology to power their homes and workplaces.

Privacy Overview

Participation in the Program is voluntary. No personal information will be collected without your consent. Personal information will be collected at various stages throughout the Program. The first stage is registration. Registration is completed online by providing your contact information and details about your property. Following registration, your application will be processed to ensure you qualify for the Program. The second step is to confirm your participation in the Program by completing and signing a Participation Agreement. The Participation Agreement collects more detailed information about your property and obtains your consent for participation in the Program, including the installation of a smart thermostat and the completion of a home energy report. The third step is the in-home installation of your selected smart thermostat and the completion of a home energy report. More information about the processing of your personal information throughout the Program is provided below.

What types of personal information does IESO collect and use and how does IESO use that information?

We collect and use information about Program participants in order to:

- i. administer and evaluate the impact of the Program,
- ii. provide you with a Home Energy Report that contains additional energy and water conservation and greenhouse gas reduction tips and recommendations,
- iii. communicate with you, and
- iv. develop and implement other energy efficiency and greenhouse gas reduction programs.

We use the Program application form to collect your contact details and information about you and your property. When contacting you to schedule the installation of the smart thermostat at your home, we will ask you to identify your preferred thermostat.

On the Participation Agreement and during the in-home installation, we will collect information about your property, your appliances and other energy consuming consumer products, prior and potential renovations and your participation in other home energy audits, assessments or programs.

We may also follow up with you after the installation to get your views and opinions of the Program.

If you feel the need to contact one of our call centres, we will collect the information you disclose to us so that we can respond to your questions or comments. We may make an audio recording of your call for quality control purposes.

From whom do we collect the personal information?

The information for this Program is primarily collected directly from you, such as when you apply for the Program, when you complete the Participation Agreement, and during the installation of your new smart thermostat. In some cases, you may provide IESO with information about other individuals (such as residents of your property), subject to their informed consent.

Following the in-home installation of the smart thermostat, we will also collect electricity and natural gas usage data directly from utility companies to determine greenhouse gas reductions. However, this data is “masked” so that we cannot attribute the usage directly back to you.

What personal information will IESO be collecting from or disclosing to the manufacturers of smart thermostats?

We will not collect your personal information from, or disclose your information to, the thermostat manufacturers.

The smart thermostat manufacturers provide the opportunity for you to register your thermostat with them in order to activate additional features. It is important that you review the privacy policy and terms of use applicable to the smart thermostat that you choose. These documents will govern your registration and use of the thermostat and the collection, use or disclosure of your information by the thermostat manufacturer. You can find these documents on the manufacturers’ websites.

What personal information will IESO be sharing with third parties?

We may provide your personal information to Green Ontario Fund to be used for the same purposes that we collect your information. You may access or obtain a copy of Green Ontario Fund's privacy policy at <https://www.ontario.ca/page/privacy-statement> or contact Green Ontario Fund at:

Green Ontario Fund
c/o Ministry of the Environment and Climate Change
Attention: Director, Environmental Innovations Branch
40 St. Clair Avenue West, 14th Floor
Toronto, ON M4V 1M2
Phone: 416-325-8068

The Green Ontario Fund is a corporation without share capital established by Ontario [Regulation 46/17](#) (the "Regulation") under the [Development Corporations Act](#). Section 5 of the Regulation requires the Green Ontario Fund to develop programs to reduce greenhouse gas emissions from buildings (including residences) and the production of goods, and monitor the outcomes of such programs. Section 5 of the Regulation provides legislative authority to undertake collections of personal information that are necessary for the Green Ontario Fund to meet its legislative mandate. The Green Ontario Fund complies with the privacy protection rules contained in FIPPA.

IESO may disclose information about you and your participation in the Program for regulatory or audit purposes or otherwise as permitted by law, including to the Ministry of the Environment and Climate Change.

We may disclose to your utility companies that you are a participant in the Program and other limited information (e.g., your address, thermostat model and installation date) that they need to provide us with "masked" information required to determine greenhouse gas reductions.

Throughout the Program's life cycle, in order to administer the Program, we may authorize our service providers to collect your information on our behalf and may transfer other personal information about you to such organizations or other third parties who provide services on our behalf. For example, we will use service providers to arrange for and administer the in-home installation of smart thermostats, produce home energy reports, and operate the Program-related call centers, surveys and process complaints. These service providers are not authorized by us to use or disclose your information except as necessary to perform services on our behalf or to comply with legal requirements. Our service providers are required to maintain administrative, technical and physical safeguards to protect against unauthorized disclosure, use, alteration and destruction of your personal information in their possession.

What choices do you have?

Your choices include:

- i. whether to register for the Program,
- ii. whether to participate in the Program by signing the Participation Agreement,
- iii. selection of your preferred smart thermostat from the three models supported by the Program (subject to compatibility),
- iv. whether to enable the Wi-Fi functionality on your preferred smart thermostat by activating it through the manufacturer's website,
- v. whether to respond to a post-installation survey to obtain your feedback regarding the Program and installation of the smart thermostat, and

- vi. whether to receive future updates and information from us or the Green Ontario Fund regarding other energy efficiency programs.

What obligations do you have regarding other individuals?

We rely on you to obtain informed consent from other individuals, including occupants of the property, if their information may be collected, used or disclosed in connection with the Program. IESO will provide you with a Landlord or a Tenant Consent Form, if applicable.

How can you access and update or correct your personal information in the custody or control of the IESO?

We will, upon written request, provide you with access to your personal information and an opportunity to request that we update or correct your information that is demonstrated to be inaccurate. These rights are subject to certain exemptions under FIPPA, such as when disclosure would reveal someone else's personal information.

For access to your personal information held by the manufacturer of your smart thermostat, please contact the manufacturer directly.

How can you contact IESO?

If you would like to access, update or correct your personal information, or if you have any questions or concerns about our privacy practices, your personal information or the administration of the FIPPA, you may contact us at:

Independent Electricity System Operator
Attention: Privacy Officer
120 Adelaide Street West, Suite 1600
Toronto, ON M5H 1T1
Phone: 416-969-6277
Fax: 416- 969-6383
E-mail: privacy@ieso.ca