Privacy Policy

ATCO Ltd., Canadian Utilities Limited and their affiliates and subsidiaries (collectively, "**ATCO**", "**we**", "**our**" or "**us**") value and respect your privacy. We have prepared this Privacy Policy to describe the manner in which we collect, use, disclose and otherwise process personal information in connection with the provision of our services and products, when you visit ATCO and its affiliate or subsidiary websites (the "**Websites**"), download and use one of our mobile applications (the "**Apps**"), or otherwise interact with us.

While this policy applies generally to ATCO's operations, where an ATCO product or business-specific notice exists, that notice will govern to the extent of any inconsistency. This policy does not apply to LUMA Energy, LLC, which maintains its own LUMA Privacy Policy. This privacy policy does not apply to ATCO personnel, contractors, or job candidates. For information about how ATCO collects, uses, discloses, or otherwise processes information about our personnel, contractors, or job candidates, please see ATCO's Personnel Privacy Policy. Please note that not all products or services described in this policy are offered in all regions.

For individuals in Australia, Chile, the European Economic Area, United Kingdom, Mexico or the United States: please refer to the appropriate Regional Disclosures for additional details that may be relevant to you.

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About ATCO

ATCO provides diverse products and services across the housing, real estate, energy, water, transportation, food and agriculture sectors, to its business and consumer customers.

Which ATCO entity controls or processes your personal information, and what personal information ATCO may collect, use, disclose, or otherwise process about you, depends on the specific ATCO business that you, or your organization, interacts with. If you have questions about which ATCO entity is responsible for the processing of your personal information, please contact privacy@atco.com.

Collection and Use of Personal Information

Means of Collection

We collect personal information that you provide directly to us (through our Websites, Apps, by telephone, email, text message, or through other communication channels) as well as information your devices provide to us automatically.

In limited circumstances, we may collect personal information where it is publicly available, and where ATCO's collection and use of such personal information is required or permitted by applicable law (for example, where landowner information is available in a government maintained registry, and the collection of such information relates to an ATCO project).

Finally, we may also collect and process personal information provided to us by our business customers. Where we do so, we collect and use this personal information for the purpose of fulfilling our contractual obligations to our business customers and providing our services to them.

How we collect and use personal information

We may collect and use personal information about you in connection with the following activities:

- Offering our Websites
- Registering for an account
- Providing energy services (electricity and natural gas)
- Providing home services (home and appliance repair, maintenance and installation)
- Providing operational support to our business customers
- Managing landowner relations
- Dining or attending events at Blue Flame Kitchen
- Purchasing or borrowing products or services
- Recordings through fleet vehicle cameras
- Sending marketing emails such as newsletters, offers and promotions
- Utilizing our Apps
- Hosting events
- Offering scholarships, awards, or community funds
- Obtaining feedback and reviews of our products and services
- Conducting surveys or research

- Offering contests, promotions or sweepstakes
- Providing advertising and marketing
- Sending text notifications
- Responding to a comment, question or complaint

Visiting our Websites: You do not have to register to visit or use our Websites. However, we may collect certain personal information when you visit our Websites. Please see the "*Information About Our Websites"* section below for detailed information regarding the personal information we collect when you visit and use our Websites, and the choices you have with regards to that collection.

Registering for an Account: When you create an account to obtain ATCO's products or services, we collect account registration information, including your account type (home or business), full name, email address, phone number, and mailing address, and a password that you select. If you are creating an account on behalf of a business, we may also collect information about the business and your related business title, business address, business number, and business phone number. We use this information to administer your account and create a user login to enable us to provide our services. If you become aware of any unauthorized access to or use of your account, you are required to notify us immediately. Once your account is activated, we may collect certain limited information to create your profile.

Retail Energy Services: ATCO Energy offers retail energy services, including electricity, natural gas and renewable energy, directly to residential and business customers in some jurisdictions. If you sign up to receive these energy services, we may collect information including your name, current and historical residential or business addresses, billing address, mailing address, email address, date of birth, business number, phone number, credit or debit card payment or bank account information for pre-authorized debit payments, and for customers who request an exemption from GST/HST in Canada, proof of Indian-status registration with Indigenous Services Canada, to assess your eligibility and creditworthiness for such energy services, to provide you with electricity, natural gas, energy conservation and use-tracking services, and to bill and collect payment for our products and services.

Home Services: ATCO offers home and appliance purchase, repair, maintenance and installation services to residential and business customers in some jurisdictions. If you request these home appliance purchase, repair, maintenance and installation services, ATCO may collect information including your name, residential address, service address, billing address, email address, phone number, the nature of your request, any additional details that you provide, and for customers who request an exemption from GST/HST in Canada, proof of Indian-status registration with Indigenous Services Canda, for the purpose of contacting you to schedule and complete your purchase, repair, maintenance or installation service, or to refer you to a third-party home service professional to complete the purchase, repair, maintenance or installation service. Where ATCO or one of its service providers handles the purchase, repair, maintenance or installation service directly, we may collect warranty related information, and debit or credit card payment information to bill and collect payment.

Providing Operational Support to Business Customers: ATCO provides its business customers with operational, transportation, and logistics support, including by supplying energy, water, wastewater, housing, real estate, lodging, workcamp and hotel management, food services, modular housing and structures, and

related industrial or commercial products and services. To provide these services, ATCO may collect and use business contact information, including your name, business title, business address, business number, business phone number, business email address, and debit or credit card payment details, or other payment information. In the course of providing these operational support services to our business customers, ATCO may also collect and process other personal information – for example, where ATCO serves as the distributor or utility to a retailer providing you with energy, it may process information from your gas or energy retailer to address a service outage affecting your household or business, including your name, address, and the nature of the service disruption. We rely on our customers to comply with applicable privacy laws when collecting, using, disclosing and otherwise processing personal information to us so that we can provide them with these services. If you have any questions regarding the personal information we process on behalf of our customers, we encourage you to first contact our customers directly and/or review their applicable privacy policy.

Managing Landowner Relations: We collect certain personal information from landowners to manage our relationship regarding ATCO projects, including for ongoing communication and compensation purposes. If you are a landowner in contact with ATCO, the entity you are interacting with may collect certain personal information to manage our relationship, including your name, date of birth, telephone numbers, email addresses, physical addresses, and other contact information, name of your organization, land information (including address and/or legal land description, and any restrictive covenants, easements, or other limitations on the use of the land), tax identification information (including tax identification numbers, or national identification numbers) and bank deposit information.

Blue Flame Kitchen: When you dine at, order from or participate in events or classes with us at Blue Flame Kitchen, we may collect information including your name, phone number, email address, event details, order information, dietary restrictions and allergies, and debit or credit card details, or other payment information. We use this information to process your events and orders, to communicate with you about them, and for safety purposes. If you register your child for a summer camp at Blue Flame Kitchen, we may also collect information about your child including their name, date of birth, dietary restrictions, and medical information (including allergies). We use this information to provide summer camp activities and for safety purposes.

Purchasing Products or Services: When you pay for an ATCO product our service, our authorized third-party payment processor processes your personal information including your first and last name, email address, phone number, address, and payment information (including billing address, credit or debit card number, expiration date and CVV code) when you purchase products and services offered by us. If you pay using a debit or credit card, ATCO only stores the last four digits of your credit card number, the card type, the expiration number, your postal or zip code, and the country.

Fleet Vehicle Cameras: ATCO uses outward-facing cameras installed in its fleet vehicles to record video of the external environment. These recordings may incidentally capture images of individuals, license plates, and other vehicles in public or private spaces. We use this information to improve driver safety, investigate incidents, protect and manage ATCO assets, and support our operational and risk management practices. No audio is collected as part of this process.

Marketing Communications: You consent to us sending you updates, newsletters, offers, promotions or other marketing communications using your email address. You can unsubscribe from an ATCO entity's communications at any time by clicking the "unsubscribe" link included at the bottom of each email. Alternatively, you can opt out of receiving marketing communications from an ATCO entity by using the contact information provided in the "*Contact Us*" section below. Please note that you may continue to receive transactional or account-related communications from us for administrative purposes.

Using the Apps: You do not have to download our Apps to access our services. However, we may collect certain personal information about you if you do download one of our Apps. Please see the "*Information About Our Apps"* section below for detailed information regarding the personal information we collect when you use one of our Apps, and the choices you have with regards to that collection.

Attend an Event: If you register for or attend one of our events, webinars or educational programs, we may collect information such as your first and last name, company name, work email address, phone number and address, so that we can communicate with you about the event, webinar or program and contact you about future events, webinars or programs.

CCTV/Video Monitoring: Our offices and worksites are protected by CCTV video monitoring, and you may be recorded when you visit. We use CCTV to help provide a safe and secure environment for our visitors.

Scholarships, Awards and Community Funds: We collect personal information from individuals who apply for scholarships sponsored by ATCO. Applicants may provide certain personal information including their name, age, physical address, resume, references, status card (if applicable), academic history, educational background, and community, volunteer and work experience in order to apply for a scholarship, award or community fund. We use this information to evaluate applicants and select scholarship, award and community fund recipients.

Provide Feedback and Reviews: We may collect and use feedback and/or reviews about our product and services to better understand our customers, to respond to customer complaints, and to enhance our products and services. With your consent, we may publish your feedback and/or reviews on our Websites or in other promotional materials.

Participate in our Surveys and Research: From time to time, we may offer you the opportunity to participate in one of our surveys or other research projects. We will collect certain personal information about you if you choose to participate in a survey or research project. The information we collect will depend on the particular survey or research project and we will provide you with specific details regarding our information practices for that survey or research project prior to collecting any information from you. We use this information to help us understand our users' needs, improve our Services, enhance our Websites, for auditing and data analytics, and otherwise understand and address concerns.

Participate in our Contests, Promotions, and Sweepstakes: When you enter a contest or participate in a promotion or sweepstake, we may collect your name, address, email address, phone number, and any additional information or content required for the contest or promotion, including to deliver a prize to you. We use this information to facilitate your participation in the contest, promotion or sweepstake. As part of a

contest, promotion or sweepstake, we may obtain your consent to share or otherwise publish the content you submit.

Providing Advertising and Marketing: We may also use information we collect in the course of our interactions with you (as described in this section) for purposes of advertising our services and products, including via interest-based advertising (as described in more detail in the "Interest-Based Advertising" section below).

Text Notifications: If you provide your consent to receive text notifications, we may send text notifications to your mobile device using the phone number you provide, to deliver you with App updates and other relevant information. If you wish to stop receiving text notifications from us, you can opt out at any time by texting "STOP" in response to or otherwise following the instructions in the text message you receive from us, or by turning off text notifications within the Apps. No mobile information will be sold or shared with third parties/affiliates for marketing/promotional purposes. No SMS mobile data will be sold or shared with third parties/affiliates for marketing/promotional purposes.

Referral Programs: If you refer someone as an existing ATCO customer, we may ask for your name, email address, and statement account number. When you use a referral link from one of our existing customers, you may be asked for information including your name and email address. We may also collect certain website visitor information about you, described in more detail under the "*Information About Our Websites"* section below. We use this information, together with billing information, to confirm that the referral and any associated benefit is valid.

Contact Us: When you contact us with a comment, question or complaint about ATCO, you may be asked for information that identifies you, such as your name, email address, phone number and address, along with additional information we need to help us promptly answer your question or respond to your comment or complaint. We may monitor and record our telephone conversations with you for documentation, training, and quality assurance purposes. We may retain this information to assist you in the future and to improve our customer service and service offerings. ATCO also offers an Integrity Line and Reporting Platform, to allow individuals to report concerns without disclosing directly identifiable information.

Sharing of Personal Information

ATCO may share personal information in the ways discussed below:

- **Service Providers:** Your personal information will be transferred or otherwise made available to certain third parties (including affiliates) that provide services on our behalf, subject to applicable legal requirements. In some circumstances, we may use service providers or third parties to provide services such as IT support, hosting the Websites, storing data, providing marketing assistance, conducting analytics, processing credit or debit card payments, handling customer deliveries, completing installations and providing customer service support. Our service providers are only provided with the information they need to perform their designated functions and are not authorized to use or disclose personal information for their own marketing or other purposes. We and our service providers may access, store and otherwise process personal information outside of the jurisdiction in

which you reside (including outside of Australia, Canada, Chile, the European Union, Mexico, and the United States), to other or foreign jurisdictions, where we or our service providers are located. It is not practicable for us to specify in advance the location of every service provider or affiliate with whom we deal, however, personal information may be stored and processed in locations including Canada, the United States, Australia, the European Union, Kosovo, Mexico, and Chile.

- **Legal and Compliance:** We and our Canadian, US and other foreign service providers may provide your personal information in response to a search warrant, regulatory process or other legally valid inquiry or order, or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise may be required or permitted by applicable Canadian, US or other law or legal process, which may include lawful access by US or foreign courts, law enforcement or other government authorities. Your personal information may also be disclosed where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.

- **ATCO Alberta Utilities**: Certain ATCO entities, including ATCO Electric Ltd. and ATCO Gas and ATCO Pipelines, the operating divisions of ATCO Gas and Pipelines Ltd. (collectively, the "**ATCO Alberta Utilities**"), may, subject to applicable legal requirements, share personal information about you between the ATCO Alberta Utilities to coordinate responses to customer inquiries, manage billing, address operational matters, and coordinate service responses.

- **Sale of Business**: We may transfer any personal information we have about you as an asset in connection with a proposed or completed merger, acquisition or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of ATCO or as part of a corporate reorganization or other change in corporate control.

- **Third-party Partners.** We may disclose personal information to third-party partners, including ad networks and other advertising companies (see "Interest-based Advertising" section below for more detail), analytics providers, and other partners who may use your personal information for their own purposes (including for marketing purposes), subject to applicable legal requirements.

- **With your consent.** We may also disclose information about you to third parties when you give us consent to do so.

Information about our Websites

- **Visiting Our Websites:** In general, when you visit our Websites, we collect certain information about you. This information is collected automatically via "cookies" or similar web tracking technologies (see below for more information), and the information we may collect includes the IP (Internet protocol) addresses of all visitors to our Websites and other information such as page requests, browser type, operating system and average time spent on our Websites. We use this information to provide services and functionality through our websites, to provide advertising that may be relevant to you, to help us understand our Websites' activity, and to monitor and improve our Websites.

- **Cookies:** Our Websites use a technology called "cookies". A cookie is a tiny element of data that our Websites send to a user's browser, which may then be stored on the user's hard drive so that we can recognize the user's computer or device when they return. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Websites, you may not be able to take advantage of all of the Websites' features.
- **Analytics:** We may use a third-party such as Google Analytics to help us gather and analyze information about the areas visited on the Websites (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the Websites. These third parties may use cookies and other tracking technologies to help us understand user numbers, date, time, and duration of visit, and the path taken through our Websites. For more information about Google Analytics or to prevent the storage and processing of this data (including your IP address) by Google, you can download and install the browser plug-in available at the following link: https://tools.google.com/dlpage/gaoptout?hl=en. You can also obtain additional information on Google Analytics' data privacy and security at the following links:
    - https://policies.google.com/technologies/partner-sites; and
    - https://support.google.com/analytics/topic/2919631.
- **Third-Party Links:** Our Websites or Apps may contain links to other websites and applications that ATCO does not own or operate. We provide links to third-party websites and applications as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites or websites. The linked websites and applications have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites and applications, and therefore we have no responsibility or liability for the manner in which the organizations that operate such websites and applications may collect, use or disclose, secure and otherwise treat personal information. We encourage you to read the privacy policy of every website you visit.

Information about our Apps

When you install or use our Apps, we may collect and use the following additional information:

- **App Usage Information and Analytics:** As with many applications, certain limited data is required for the Apps to function on your device. When you access and use the Apps, we may automatically collect certain details of your access to and use of the Apps, including information about the type of device hardware and operating system, unique device identifier, IP address, and language settings of your device. We also collect information about the date and time the Apps access our servers. We use this information to help us understand the activity on our Apps, to monitor and improve our Apps, and to tailor your in-App experience. In addition, we may use third party service providers to collect analytical information about your use of the Apps, such as the App features used and time spent on the Apps, to help us tailor your in-app experience, improve our products and the quality of our Apps, and to manage and analyze data in order to better understand our users.

- **Geolocation Data:** If you have consented by enabling location access, we may receive and store your precise location information, including when our Apps are running in the foreground (our Apps are open and on screen) or background (our Apps are open, not on screen) of your device. You may use our services without enabling the collection of precise location information from your device; however, this may impact your experience including the accuracy of certain features and functionality. If you have not allowed us to receive your precise location, we can only determine your approximate location. You can opt-out at any time by turning off your location services for the Apps either within the Apps or in the settings of your mobile device.
- **Push Notifications:** If you provide your consent to receive push notifications, we may send push notifications to your mobile device to provide you with App updates and other relevant information. If you wish to stop receiving push notifications from us, you can turn off push notifications for the Apps either within the Apps or in the settings of your mobile device.

Interest-based Advertising

We work with third parties such as ad networks and other advertising companies that use their own tracking technologies (including cookies and pixel tags) on our Websites in order to provide you with tailored advertisements across the Internet. These companies may collect information about your activity on our Websites and third-party websites (such as web pages you visit and your interaction with our advertising and other communications) and use this information to make predictions about your preferences, develop personalized content and deliver ads that are more relevant to you on third-party websites. This information may also be used to evaluate the effectiveness of our online advertising campaigns.

Opting-out of Interest-Based Advertising: For more information about interest-based advertising and to understand your options, including how you can opt-out of receiving behavioural ads from third-party advertising companies participating in the Digital Advertising Alliance of Canada, please visit the Digital Advertising Alliance of Canada website at http://youradchoices.ca/choices.

- Please note that even if you opt-out of interest-based advertising by a third-party, these tracking technologies may still collect data for other purposes including analytics and you will still see ads from us, but the ads will not be targeted based on behavioural information about you and may therefore be less relevant to you and your interests.

- To successfully opt out, you must have cookies enabled in your web browser (see your browser's instructions for information on cookies and how to enable them). Your opt-out only applies to the web browser you use so you must opt-out of each web browser on each computer you use. Once you opt out, if you delete your browser's saved cookies, you will need to opt-out again.

Safeguards and Retention

We have implemented administrative, technical and physical measures in an effort to safeguard the personal information in our custody and control against theft, loss and unauthorized access, use, modification and

disclosure. We have measures in place that are designed to restrict access to personal information on a need-to-know basis to employees and authorized service providers who require access to fulfil their job requirements. That said, we advise that no method of electronic transmission or storage is 100% secure and cannot guarantee absolute data security.

We have record retention processes designed to retain personal information for no longer than necessary for the purposes of providing services to our customers, for the purposes set out herein, or as otherwise required to meet legal or business requirements.

Your Choices

Marketing Communications

As indicated above, if you receive our email marketing communications from ATCO, you can unsubscribe any time by clicking the "unsubscribe" link included at the bottom of the email. Alternatively, you can opt out of receiving our marketing communications by contacting us at the contact information under the "*Contact Us*" section below.

Exercising Your Privacy Rights

Subject to applicable law and depending on the jurisdiction in which you are based, you may have the right to access, update, rectify and correct inaccuracies in, and withdraw consent to the processing of, your personal information in our custody or control. You may make such a request or withdraw consent by emailing or writing to us using the contact information set out below. We may request certain personal information for the purpose of verifying your identity when you seek access to your personal information.

To opt out of interest-based advertising, see the "Interest-Based Advertising" section above.

For individuals in the European Economic Area, United Kingdom, or the United States: please refer to the appropriate Regional Disclosures below for more information about the privacy rights that may be relevant to you.

Updates to this Privacy Policy

We may update this Privacy Policy periodically to reflect changes to our privacy practices. We encourage you to periodically review this page to ensure you are familiar with those changes. We will indicate at the top of this Privacy Policy when it was most recently updated.

Contact Us

If you have any questions, comments or complaints about this Privacy Policy or the manner in which we or our service providers (including our service providers outside Canada) treat your personal information, please contact us at: **privacy@atco.com**.

Addendum: Regional Disclosures

Depending on where you live, you may have specific privacy rights that apply to you. The following privacy representations and disclosures are intended to supplement the following main privacy policy and provide additional information is about those rights and other information relevant to data subjects located in the following jurisdictions:

- For data subjects located in Australia, please refer to the “Additional Disclosures for Australia” section below.
- For data subjects located in Chile, please refer to the “Additional Disclosures for Chile” section below.
- For data subjects located in the European Economic Area (EEA) or the United Kingdom (UK), please refer to the “Additional Disclosures for the EEA & UK” section below.
- For data subjects located in Mexico, please refer to the “Additional Disclosures for Mexico” section below.
- For residents of the United States (U.S.), please refer to the “Additional Disclosures for the U.S.” section below.

Additional Disclosures for Australia

If you are in Australia, the following additional information is relevant to how we handle your Personal Information.

Australian ATCO entities

The following ATCO entities operate in Australia:

- ATCO Australia Pty Ltd ACN 091 033 546
- ATCO Gas Australia Networks Pty Ltd ACN 659 123 636
- ATCO Power Australia (Karratha) Pty Ltd ACN 132 830 043
- ATCO Australia Services Pty Ltd ACN 067 295 238
- ATCO Gas Australia Pty Ltd ACN 089 531 975
- ATCO Structures & Logistics Pty Ltd ACN 083 902 309
- Osborne Cogeneration Pty Ltd ACN 072 027 331

As mentioned above, personal information is also disclosed to ATCO Ltd., Canadian Utilities Limited and their affiliates and subsidiaries (collectively, "**ATCO**", "**we**", "**our**" or "**us**") in accordance with this Privacy Policy.

"Personal information" has the meaning given in the *Privacy Act 1988* (Cth), and includes information or an opinion about an identified individual, or an individual who is reasonably identifiable:

(a) whether the information or opinion is true or not; and
(b) whether the information or opinion recorded in a material form or not.

"Sensitive information" has the meaning given in the *Privacy Act 1988* (Cth), and includes:

(a) information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices or criminal record that is also personal information;
(b) health information about an individual or genetic information about an individual that is not otherwise health information; and
(c) biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

Employee records

In accordance with the *Privacy Act 1988* (Cth), this Privacy Policy does not apply to our acts and practices directly related to a current or former employment relationship between us and an employee, and an employee record held by us relating to the employee.

Storage and security of personal information

ATCO stores personal information electronically and in hard copy depending on how the data was collected.

We take reasonable steps to protect personal information that we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. This includes technical and organisational measures, including physical, technical (e.g., firewalls, SSL encryption) and procedural methods and controls.

Direct marketing

We do not collect or use 'sensitive information' for marketing purposes.

We may use and disclose your personal information (other than sensitive information) to provide you with information on offers, products and services offered by us and you expressly consent to us doing so.

If at any time you no longer wish to receive any direct marketing from us or do not want your information disclosed for direct marketing, please contact us. Even if you have requested not to receive further direct marketing communications, we may nevertheless continue to provide you with information about changes to our terms and conditions for the supply of goods or services and other factual information as permitted under the *Privacy Act 1988* (Cth) and *Spam Act 2003* (Cth).

Artificial intelligence

We may use artificial intelligence (AI) technologies to enhance our services, our operations, and improve your experience with us. AI may be used in different ways including, but not limited to, analysing data, automating processes, and assisting with document review. When processing your personal information, we ensure that all AI applications comply with relevant data protection laws and regulations.

Right to access and correct your personal information

You have the right to request access to your personal information held by us. After we receive your request, we will respond within a reasonable period and provide you with access, except in the limited circumstances where we are permitted by law to refuse to provide you with such access. If we refuse access, we will provide you with a written notice explaining our reasons for doing so and any available complaints mechanisms.

It is important that information we hold about you is accurate, up-to-date and complete, and we may ask you to tell us of any changes to your personal information. You also have the right to correct your personal information, and we will take reasonable steps to correct your personal information.

To exercise your access and correction rights, you can contact us via the details below. We may require you to verify your identity. We will not charge you for requesting access or correction of your personal information, but we may require you to meet our reasonable costs in actually providing you with access.

Complaints handling

Individuals located in Australia can raise a concern or complaint about our handling of your personal information under the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles (**APPs**). Our contact details are specified above.

In the event that a complaint cannot be resolved by ATCO, you may also address your query or complaint to the Office of the Australian Information Commissioner:

- by phone: 1300 363 992
- using the online Enquiry Form; or
- in writing: GPO Box 5218, Sydney, NSW 2001.

Additional Disclosures for the EEA & UK

The disclosures in this section are intended to supplement the main privacy policy, and they provide additional information for data subjects in the EEA and UK about certain privacy rights and requirements specified under applicable laws in these jurisdictions. (Descriptions in this section do not apply to individuals in other jurisdictions.)

ATCO Ltd., Canadian Utilities Limited and their affiliates and subsidiaries (collectively, "**ATCO**", "**we**", "**our**" or "**us**") are considered the "data controller" of the personal data we handle under our privacy policy. We collect and process personal data about you only where we have a legal basis to do so under applicable privacy laws in the EEA and UK. To the extent those laws apply, our legal bases are as follows:

- Contractual commitments: we may use, share, or disclose personal data to honor our contractual commitments to you. For example, we will process your personal data to provide you with services you request, and to honor our commitments in any agreements that we have with you.
- With your consent: where required by law, and in some other cases, we use, share, or disclose personal data on the basis of your consent. If we ask for your consent to process your personal data, you may withdraw your consent at any time by using the details listed in the "Contact Us" section above. (Please note that if you withdraw your consent, this will not affect the processing activities that took place prior your withdrawal of consent.)
- Legitimate interests: in many cases, we use, share, or disclose personal data on the basis that it furthers our legitimate business interests in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals, such as customer service, certain advertising and promotional activities, analyzing and improving our business and services, providing security for such services, preventing fraud, and managing legal issues.
- Legal compliance: we need to use and disclose personal data to comply with our legal obligations, for example to carry out fraud prevention checks or comply with other legal or regulatory requirements, where this is required by law.

The following chart identifies the applicable legal basis for each processing purpose relevant to individuals in the EEA and UK:

Purpose	**Legal Basis**
• Providing our Websites • Verifying account credentials • Providing operational support to business customers • Managing landowner relations • Sending marketing communications • Hosting events • Offering scholarships or awards • Obtaining feedback and reviews of products and services • Conducting surveys or research • Offering contests, promotions, or sweepstakes	Legitimate interests (Article 6(1)(f) *General Data Protection Regulatiwon* (GDPR))

• Providing advertising and marketing • Responding to a comment, question, or complaint • Detecting and preventing fraud, illegal activity, or violations of policies • Operating, maintaining, and improving services • Evaluating the success of advertising campaigns • Protecting our rights, privacy, safety, or property, and/or that of our affiliated companies, you, or other parties, including to enforce our policies and any other agreements • Aggregate or de-identify data	
• Providing our Websites • Verifying account credentials • Providing operational support to business customers • Managing landowner relations • Processing payments to fulfill purchases for products or services • Responding to a comment, question, or complaint • Detecting and preventing fraud, illegal activity, or violations of policies • Protecting our rights, privacy, safety, or property, and/or that of our affiliated companies, you, or other parties, including to enforce our policies and any other agreements	Contractual necessity (Article 6(1)(b) GDPR)
• Sending marketing communications (where you have provided consent to receive such marketing) • Publishing feedback or reviews for use in promotional materials (where you are asked for and provide consent) • Publishing content you submit in connection with contests, promotions, or sweepstakes (where you are asked for and provide consent)	Consent (where legally required) (Article 6(1)(a) GDPR)
• Verifying account credentials, as necessary to log you into services and help protect the security of your account • Managing landowner relations (e.g., maintaining tax documentation) • Detecting and preventing fraud, illegal activity, or violations of policies • Comply with legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our affiliated companies, you, or other parties, including to enforce this privacy policy and any other agreements or policies	Compliance with a legal obligation (Article 6(1)(c) GDPR)

Where applicable under local law and subject to applicable exceptions, you have the following rights regarding your personal data:

- To request access to and/or a copy of certain data we hold about you (including in a portable and/or machine-readable format);
- To object to how we handle and/or process your personal data;
- To update or correct your personal data;

- To request that we delete certain personal data we hold about you;
- To restrict how we process certain personal data about you;
- To request that we transfer your information to a third-party provider of services;
- To withdraw your consent at any time (where you have provided consent for the processing of your personal data); and
- To lodge a complaint with the relevant supervisory authority.

If you have a complaint or concern about your personal data, we encourage you to contact us first using the details listed in the Contact Us section above, and we will do our best to resolve your concern.

International Transfers

We and our service providers may access, store and otherwise process personal data outside of the jurisdiction in which you reside (including outside of the EEA or UK), to other or foreign jurisdictions, where we or our service providers are located. These jurisdictions may have data protection laws that differ from the laws of your country, and data may be accessible to law enforcement and national security authorities under certain circumstances. For data subjects in the EEA and the UK, where your information is stored and processed in a country that is not regarded under local law as ensuring an adequate level of protection for personal data, we have put in place appropriate safeguards to protect personal data in accordance with applicable legal requirements. To request information about the safeguards in place, please contact us using the details listed in the “Contact Us” section above.

Additional Disclosures for Chile

This Chile Addendum supplements the ATCO Privacy Policy and applies to personal information processing activities subject to Chilean Law No. 19,628 on the Protection of Personal Data (the "**DPL**"), as amended by Law No. 21,719. It applies to processing carried out by ATCO Ltd., Canadian Utilities and their affiliates and subsidiaries (collectively, "**ATCO**", "**we**", "**our**" or "**us**") in all circumstances in which Chilean law governs the processing of personal information.

This Addendum must be read in conjunction with the global Privacy Policy available here and will prevail over the global Privacy Policy to the extent of any conflict in relation to processing activities subject to Chilean law.

Data Controller Identification

In accordance with the applicable law, this section identifies the ATCO entity or entities acting as data controller(s) for processing activities subject to Chilean law, as well as the corresponding legal representative and, where applicable, the appointed Privacy Officer:

- **Data Controller(s):** ATCO Sabinco S.A. Corporate ID (RUT): 76.175.835-7
- **Legal representative in Chile:** José Ignacio Menchaca Zarega
- **Privacy Officer:** Cristóbal Andrés Infante Steinfort

Collection and Use of Personal Information

Means of Collection

For further detail regarding the sources from which ATCO collects personal information (including information provided directly by individuals, collected automatically from devices and interactions with ATCO websites, received from business customers and partners, or obtained from publicly accessible sources where permitted by law), please refer to the "*Collection and Use of Personal Information*" section of the ATCO Privacy Policy, in particular the subsection "*Means of Collection*".

Categories of personal information, data subject categories, purposes, and legal bases

ATCO processes personal information in Chile in connection with its operations and services. The following matrix provides a summary of the categories of personal information, the relevant data subject groups, the main purposes of processing, and the applicable legal bases under Chilean law. Where we rely on legitimate interests, these are identified.

For further detail regarding the specific data elements processed and the full set of purposes associated with each ATCO activity, and for information on our website practices in Chile (including IP address collection, cookies, analytics tools, and third-party links), please refer to the "*Collection and Use of Personal Information*" section of the ATCO Privacy Policy—particularly the subsection "*How we collect and use personal information*"—and the "*Information about our Websites*" section.

Purpose	Data categories	Data subject categories	Legal basis
Account registration and customer servicing (energy/home services where applicable)	Identification and contact data; service address; billing and payment data; usage data; account credentials	Consumers in Chile who interact with ATCO services	Contract performance or pre-contractual measures; legal obligation (sectoral/consumer law); legitimate interests (service continuity, network and information security)
B2B operational support	Business contact information (name, role/title, business email/phone, business address), limited incident/service data	Representatives of ATCO business customers, suppliers and partners	Legitimate interests (B2B relationship management and service delivery); contract performance
Landowner relations for projects	Identification and contact data; land information (address/legal description/easements); tax identification; banking details for compensation	Landowners in Chile interacting with ATCO projects	Contract performance; legal obligation; legitimate interests (project management and stakeholder engagement)
Marketing communications	Identification and contact data; preferences	Consumers and B2B contacts in Chile who have opted in or are otherwise permitted by law	Consent (where required); legitimate interests (own direct marketing consistent with reasonable expectations), subject to opt-out and applicable local rules
Websites and analytics	Online identifiers (e.g., IP address, device info), usage logs, cookie/SDK data; approximate location; preferences	Website visitors in Chile	Legitimate interests (site operation, analytics, security); consent where required for non-essential cookies/SDKs
Events, surveys, contests, scholarships	Identification and contact data; participation data; content submitted	Participants/applicants in Chile	Consent; contract performance; legitimate interests (program administration)
Customer support and complaints handling	Identification and contact data; interaction records; call recordings (where applicable)	Consumers and B2B contacts in Chile	Legitimate interests (service quality and complaint handling); legal obligation

Legitimate interests and balancing test

When we rely on legitimate interests as a legal basis, we do so for purposes such as ensuring and improving service quality and safety; preventing fraud and abuse; protecting network and information security; maintaining business continuity; and managing B2B relationships. In non-intrusive contexts consistent with reasonable expectations, we may also conduct our own direct marketing (e.g., B2B communications or postal mail), always with clear opt-out mechanisms. In all cases, we conduct a balancing assessment to ensure our interests do not override individuals' rights and freedoms, apply data minimization and proportionate security measures, and respect the right to object.

Sharing of Personal Information

ATCO may, in certain cases, share personal information with other ATCO entities or with third parties when necessary for the purposes described in this Addendum and the Privacy Policy. The categories of such recipients are those set out in the "*Sharing of Personal Information*" section of the ATCO Privacy Policy, which identifies, among others: (i) service providers acting on ATCO's behalf; (ii) ATCO affiliates; (iii) legal, regulatory, and compliance-related disclosures; and (iv) transfers in connection with corporate transactions.

Security Policies and Measures

ATCO applies administrative, technical, and physical measures appropriate to the nature, scope, context and purposes of processing, and to the risks for data subjects, to preserve confidentiality, integrity, availability and resilience. These measures include, as appropriate, access controls, encryption at rest and in transit, network segmentation, logging and monitoring, vulnerability and penetration testing, supplier due diligence and contractual safeguards, and regular evaluation of security controls.

Data Subject Rights in Chile

Under Chilean law, data subjects have the following rights: access, rectification, deletion, objection, blocking, and portability. You also have the right to withdraw any consent you may have given.

Requests may be submitted by contacting us at the contact information provided in the "*Contact Us*" section below. ATCO will verify the requester's identity and respond within the statutory timeframes established by law. Where ATCO denies a request, we will explain the grounds for such denial. When a request for rectification, deletion, or objection is submitted, the requester may also seek temporary blocking of processing as provided by law.

If ATCO rejects a request or fails to respond within the applicable time, data subjects may file a complaint with the Chilean Personal Data Protection Agency in accordance with the procedure established by law.

International Data Transfers

Personal information may be transferred to recipients in countries outside Chile, including countries deemed adequate by the Chilean Data Protection Agency, or, where no adequacy decision exists, with appropriate safeguards such as contractual clauses, binding corporate rules, or other recognized mechanisms to protect

personal information and data subject rights. ATCO may also rely on other permitted transfer grounds for specific cases as allowed by Chilean law.

Retention Periods

ATCO retains personal information only for as long as necessary to fulfill the purposes described above, to comply with legal or regulatory obligations, to establish, exercise or defend legal claims, or for business continuity requirements. The following retention criteria apply in Chile:

- Customer accounts and service records: retained for the duration of the relationship and for five (5) years thereafter, subject to legal limitation periods.
- Billing and payment records: retained for six (6) years to meet tax and accounting obligations.
- Complaints and customer support records: retained for five (5) years from closure of the case.
- Marketing contact data: retained until consent is withdrawn or an objection is exercised, or after a period of inactivity of twenty-four (24) months, whichever occurs first.
- Website and logs/analytics: retained for thirteen (13) months unless a longer period is necessary for security or fraud-prevention purposes permitted by law.
- Other operational records (e.g., event participation, scholarship or contest applications): retained based on necessity and proportionality, and for no longer than required to administer the program or comply with applicable legal obligations.

Where no legal period applies, ATCO applies proportional retention criteria aligned with necessity and minimization; upon expiry, ATCO deletes or anonymizes the data.

Automated Decisions and Profiling

ATCO does not make decisions that are solely automated and that produce legal effects or similarly significantly affect data subjects in Chile. ATCO may, however, use automated tools, analytics, or profiling to support certain processes (e.g., customer eligibility assessments, fraud-prevention systems, or marketing segmentation). Such tools do not replace human review for final decisions. If ATCO implements automated decision-making that requires disclosure under applicable law, ATCO will provide meaningful information about the logic involved and the potential consequences for data subjects.

Updates to this Addendum

ATCO may update this Addendum to reflect changes in practices or applicable law. Material changes will be communicated as required by law.

Contact Us

If you have any questions, requests, comments or complaints about this Chile Addendum, the Privacy Policy or the manner in which we or our service providers (including our service providers outside Chile) treat your personal information, please contact us at: privacy@atco.com.

Additional Disclosures for Mexico

This Addendum complements and must be read together with the ATCO Privacy Policy. It outlines how the following entities (collectively, "**ATCO MX**") collect, use, disclose and otherwise process personal data in connection with the provision of our services and products, when you visit ATCO MX Websites, or otherwise interact with it:

- ATCO Structures:
  - ATCO Espaciomovil, S.A.P.I. de C.V., located at Prol. 5 de Mayo 47, Int. 1, San Juan de Ocotán, CP 45019, Zapopan, Jalisco.
- ATCO EnPower:
  - ATCO Servicios y Energía, S.A. de C.V., located at Torre Esmeralda I, Blvd. Manuel Avila Camacho 40, Piso 15 Col, Lomas de Chapultepec, 11000 Ciudad de México, CDMX;
  - ATCO Energía, S.A. de C.V., located at Torre Esmeralda I, Blvd. Manuel Avila Camacho 40, Piso 15 Col, Lomas de Chapultepec, 11000 Ciudad de México, CDMX;
  - AB Development Consulting, S.A. de C.V., located at Torre Esmeralda I, Blvd. Manuel Avila Camacho 40, Piso 15 Col, Lomas de Chapultepec, 11000 Ciudad de México, CDMX;
  - Impulsora de Proyectos Hidroeléctricos, S.A.P.I. De C.V., located at Torre Esmeralda I, Blvd. Manuel Avila Camacho 40, Piso 15 Col, Lomas de Chapultepec, 11000 Ciudad de México, CDMX;
  - Electricidad del Golfo, S. De R.L de C.V., located at Km 10 de la carretera Zongolica a Macuilca, Zongolica, Veracruz; and
  - ATCO-Ranman Energía SLP, S.A.P.I de C.V., located at Avenida Real #491, Lote 6; Parque Logístico "WTC Industrial", Eje 140, km. 4; Col. Zona Industrial rural, C.P. 78395, Delegación La Pila, San Luis Potosí; San Luis Potosí.
- ATCO Gas:
  - ATCO Pipelines, S.A. de C.V., located at Torre Esmeralda I, Blvd. Manuel Avila Camacho 40, Piso 15, Col, Lomas de Chapultepec, 11000, Ciudad de México, CDMX.

How We Collect and Use Personal Information

In connection with the "*How We Collect and Use Personal Information*." section of the ATCO Privacy Policy, only the following purposes, and their corresponding descriptions, apply to your processing:

Necessary purposes for our legal relationship, for which we require your consent:

- Offering our Websites.
- Registering for an account.
- Providing energy services (electrical and natural gas).
- Providing operational support to our business customers.
- Managing landowner relations.
- Purchasing products or services.
- Hosting events.
- Offering scholarships or awards.
- Responding to a comment, question or complaint.

Non-necessary for our legal relationship, for which we require your consent:

- Sending marketing emails such as newsletters, offers and promotions.
- Providing advertising and marketing.
- Obtaining feedback and reviews of our products and services.
- Conducting surveys or research.
- Offering contests, promotions or sweepstakes.

You will have five business days following the date the ATCO Privacy Policy and this Addendum are made available to you to refuse the processing of your personal data for purposes that are non-necessary for our legal relationship, by sending a request by email to the privacy email address indicated in the "*Contact Us*" section of the ATCO Privacy Policy.

We may process your personal data for other purposes without your consent when: (i) a legal provision expressly authorizes it; (ii) the personal data comes from publicly available sources; (iii) the personal data has been previously dissociated or anonymized; (iv) the processing is necessary to exercise rights or fulfill obligations arising from a legal relationship with ATCO MX; (v) there is an emergency situation that may endanger an individual's life, integrity, or property; (vi) the processing is essential for healthcare management when you are unable to give consent, provided it is carried out by someone under a professional secrecy obligation; and (vii) there is a judicial order or lawful mandate from a competent authority instructing the processing.

Sharing of Personal Information

In connection with the "*Sharing of Personal Information*" section of the ATCO Privacy Policy, ATCO MX will only transfer your personal data to other data controllers with your consent, or as otherwise required or permitted by the Federal Law on the Protection of Personal Data Held by Private Parties ("**MDP Law**").

Information About our Apps

This section *"Information about our Apps"* of the ATCO Privacy Policy does not apply to your processing.

Opting-Out of Interest-Based Advertising

This section *"Opting-out of Interest-Based Advertising*" of the ATCO Privacy Policy does not apply to your processing.

Exercising Your Privacy Rights

- You are entitled to exercise your rights of access, rectification, cancellation, and opposition to the processing of your personal data at any time.
- You may limit the use or disclosure of your personal data to prevent its use for purposes that are non-necessary to maintain our legal relationship, at any time.
- You may revoke your consent for the processing of your personal data at any time.

To exercise any of these rights you or your legal representative may submit a request by email to the privacy email address indicated in the "*Contact Us*" section of the ATCO Privacy Policy.

Consent

By purchasing our products or services, visiting our Website, or otherwise interacting with us as described herein, you provide your express consent for ATCO MX to process and transfer your general and financial personal data in accordance with the ATCO Privacy Policy and this Addendum.

Additional Disclosures for the U.S.

The disclosures in this section provide additional information for residents of the United States ("**U.S.**"), including in California, Colorado, Oregon, and other states with consumer privacy laws. These disclosures are intended to supplement the main privacy policy to address state-specific transparency requirements and rights you may have under applicable state laws, depending on where you live. (Descriptions in this section do not apply to residents of other jurisdictions.)

Information We Collect & How We Use and Disclose It

Throughout our privacy policy above, we discuss in detail the specific pieces of personal information and sensitive personal information we collect, the sources of that information, and how we may use and disclose it. In the preceding twelve (12) months, as described in the in the "Collection and Use of Personal Information" section above, we disclosed the following categories of personal information to the following categories of recipients, as set forth in the chart below.

Please note that laws in California and other states treat certain disclosures of personal information to third parties as "sales" of information, even where no money changes hands. This may include personal information shared with third parties for purposes of targeted advertising. If you would like to opt out of "sales" or targeted advertising, please refer to the *Rights You May Have* section below. In the preceding 12 months, we disclosed personal information for business purposes and "sold" personal information to the following categories of recipients:

Category of Personal Information	**Recipients of Disclosures for a Business Purpose**	**Recipients of "Sales"**
Identifiers (e.g., name, email address, mailing address, billing address, property address, account number, phone number, IP address)	Service providers	Advertising providers
Demographic information (e.g., date of birth, zip code)	Service providers	Advertising providers
Financial information (e.g., payment information and related details, billing address, bank deposit information)	Service providers (e.g., payment processors)	n/a
Commercial information (e.g., purchases, transaction history, event attendance, proof of residence or ownership, land title information, billing and energy usage data, land information)	Service providers	n/a
Employment information (e.g., employer, resumes submitted in connection with scholarship applications, employee ID numbers, employer information submitted in connection with business accounts, work history, community / volunteer / work experience)	Service providers	n/a
Student information (e.g., academic records, academic status, educational background, references, and other	Service providers	n/a

information submitted in connection with scholarship applications)		
Geolocation data (e.g., general location data, precise geolocation data)	n/a	Advertising providers
Audio information (e.g., voice recordings of customer support calls)	Service providers (e.g., customer support providers)	n/a
Device, internet, or other electronic network activity information (e.g., information about usage of Websites or Apps, information about interactions with advertisements, device and connection information, browser information, referring / exit URLs, IP addresses and other device identifiers)	Service providers (e.g., IT support, website hosting, analytics providers, data storage providers)	Advertising providers
Content and communications you submit (e.g., inquiries, complaints, feedback, survey submissions, applications for scholarships, contest or sweepstakes entries)	Service providers (e.g., customer support providers)	n/a
Inferences drawn from other personal information (e.g., preferences or interests)	Service providers (e.g., analytics providers, data storage providers)	Advertising providers
Sensitive personal information (e.g., precise geolocation, account log-in credentials, government ID numbers such as social security numbers and tax ID numbers)	n/a	n/a

We may also disclose any or all of the categories of personal information identified above in the event of a sale or transfer of all or part of our business, in response to legal process, or in the interests of protecting rights or safety, as described in more detail in the “Sharing of Personal Information” section above. We do not knowingly “sell” or “share” the personal information of U.S. residents under 16 years of age.

We process the categories of personal information identified above for the purposes as described in more detail in the “Collection and Use of Personal Information” section above. We do not use or disclose your sensitive personal information for purposes other than permitted under applicable law.

Retention of Personal Information

We have record retention processes designed to retain personal information for no longer than necessary for the purposes of providing the services to our customers, for the purposes set out herein, or as otherwise required to meet legal or business requirements (including to resolve disputes, raise or defend legal complaints, or enforce our agreements).

Rights You May Have

Where applicable under state law and subject to applicable exceptions, depending on where you live, you may have the following rights:

- To request information about our processing of your personal information;

- To request access to and/or a copy of certain information we hold about you (including in a portable and/or machine-readable format);
- To update or correct your personal information;
- To request that we delete certain personal information we hold about you, subject to certain exceptions;
- To opt out of targeted advertising or the sale of personal information to third parties;
- The right not to be discriminated against for exercising your rights; and
- The right to appeal our decision to deny your request, if applicable.

To exercise the rights you may have under applicable law (with the exception of the opt-out right; see below), you may email us at privacy@atco.com or contact us using the form at www.atco.com/PrivacyRequest. To protect your privacy and security, we take reasonable steps to verify your identity and requests and may require you to log into your account or provide other personal information as may be necessary. If we are unable to verify your identity, we may be unable to respond to your requests.

You may also be able to designate an authorized agent to make requests on your behalf. Authorized agents may submit requests using the methods described above. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such requests or a legally valid power of attorney. We may also follow up with you directly to verify your identity before processing the authorized agent's request, consistent with applicable law.

Where applicable under local law, if your request is denied in whole or part, we will provide information about how to submit an appeal in our response denying the request.