



Privacy Notice – Canada

Your personal information

The protection of your personal information is important to us. We respect your privacy and want you to understand what we do with the information we hold about you.

This privacy notice explains how we (Centrica Connected Home Canada, Inc) collect, share and use your personal information. Our Privacy Notice is designed to comply with the Personal Information Protection and Electronic Documents Act (**PIPEDA**) and corresponding provincial privacy acts.

For the purpose of this Privacy Notice **personal information** means information about an identifiable individual.

Changes to this notice

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information. The Privacy Policy is current as of the date which appears at the bottom of this page.

Personal information we collect

We may collect the following types of personal information from you when you use Hive services or products:

- **Contact details:** information that allows us to contact you directly such as your name, email address, telephone number and addresses associated with your account or order.
- **Hive account details:** when you download and use the Hive app, you will be asked to register with us and create an account. Your account details include your user name, password and your contact details, such as your name, address and email address.
- **Transaction information:** records of the products and services you purchase from us such as Hive Active Thermostat, Hive Active Plugs, Hive Active Lights, sensors, cameras and our service plans.
- **Payment information:** credit/debit card details and bank account details you provide to make payment for the products and services you purchase from us.
- **Delivery information:** information relating to the delivery of our products to you.
- **Installation and service history:** records relating to the installation of our products at your home or property and information relating to the servicing of that product.
- **Device information:** information about the smartphones, mobiles, computers or other electronic devices you connect to our products, website or Hive app, such as details about the type of device (which can include unique device identifying numbers), its operating system, the browser you use and applications on the device that connect to our products and services. It can also include details of your internet service provider, mobile network and your IP address.
- **Responses to surveys, competitions and promotions:** we keep records of any surveys you respond to or your entry into any competition or promotion we run.

- **Records of your discussions with our customer support teams:** when you share comments and opinions with us, ask us questions or make a complaint we will keep a record of this. This includes when you send us emails, phone our customer service team or contact us through social media such as through Twitter or our Facebook page. We may also monitor and record our phone calls with you to make sure we are living up to the standards we want, as well as relevant laws and regulations.
- **How you use Hive products:** we will collect information about how you are using Hive products and services in your home and their performance, what devices are connected to them and how those devices are being used with the Hive products. For example, this includes information that smart devices you connect to your Hive Hub collect about rooms temperatures, temperature settings, heating schedules, lighting use and schedules, when contact sensors show doors or windows are open or closed, when motion sensors detect movement, water flow events and water temperature, when smartplugs are on or off and the collection, storage and processing of video and audio recordings from your monitoring devices.
- **How you use the Hive app and our website:** when you use the Hive app or our website we collect information about the pages you look at and how you use them.
- **Location information:** we will collect information about your exact location when you choose to share that with us and motion information from the motion sensors in your Hive products that detect movement in your home. For example, you may set up your Hive app to send you a reminder to turn off your heating when you are out of the house, to do this you will need to share the location of your mobile device with us.

Even when you don't actively share your location with us, your smartphone or computer's IP address may tell us an approximate location when you connect to our website or products but this will be no more precise than the city, state or country you are using your device in.

You are not required to provide any of the personal information described above to us, however, if you do not do so, you may not be able to use our products and services or the functionality of our products may be reduced.

What we use your personal information for

We will use personal information only for the purposes for which it was collected, including:

Purpose	Personal information used
Provide our services to you and maintain your account	All the personal information we collect
Take payment for our products and services	Transaction and payment information
Deliver products to you	Delivery information
Installation and servicing	Installation and service history How you use Hive products
Answer your queries or complaints	All the personal information we collect
Maintain and improve our products and services	All the personal information we collect
Data analytics and statistical research to help us better understand how our products are used in the home and make suggestions and recommendations to you about the use of our products	How you use Hive products How you use the Hive app and website Device information Transaction information Installation and service history Records of your discussions with our customer support teams
Staff training	All the personal information we collect
Develop new products and services	All the personal information we collect
Determine products and services that may be of interest to you	All personal information we collect (but not your payment information)
Direct marketing	Contact details Products and services that we have determined may be of interest to

	you
Investigating misuse of your account, fraud and debt collection	All the personal information we collect

We may anonymise and aggregate any of the personal information we hold (so that it does not directly identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site, apps and products and developing new products and services.

Sources we collect your personal information from

We will collect personal information from a number of sources. These include the following:

- **Directly from you:** for example, when you create your Hive account with us, connect your smartphone or computer to the Hive hub or other Hive products, purchase products and services from us, complete forms we provide to you, enter our competitions and promotions, contact us by phone, email or communicate with us directly in some other way.
- **Our website, app and Hive products:** provide us with information about how you use them and the devices in your home that you connect to them.
- **Other companies we work with:** provide us with information to help us deliver our products and services to you, and to understand you better. These include:
 - **Companies in the same group of companies as us:** who may provide relevant information about your gas or electricity account when you link them to your account with us.
 - **Installers and service engineers:** who will provide us with information about the installation and maintenance of Hive products in your home.
- **Other companies' apps and products:** provide us with information when you connect them to Hive products and approve their sharing of personal data with us. For example, when you connect to the IFTTT app or Amazon Alexa, we will receive your information about how you use those apps with our Hive products.

Consent

It is important to us that where we collect, use or disclose your personal information we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you accept our products or services, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to your acceptance and use of those products or services, or for other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect the personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Notice or separately), we will endeavour to advise you of that purpose before such use or disclosure.

We may also collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

In some circumstances, a change in or withdrawal of consent may severely limit our ability to provide products or services to, or acquire products or services from, you. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Office.

Children under the age of 18

Our services and products are not intended for children under the age of 18. No one under the age of 18 may provide us any personal information on or through the products and services. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information to us on or through our products and services. If we learn we have received personal information from a child under 18 without verification or parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us through the contact information below.

Who we share your personal information with

We disclose your personal information only for the purposes for which it was collected, except with your consent or as required by law. We share personal information with the following parties:

- **Companies in the same group of companies as us:** for the purpose of providing a service to you and understanding your use of our products and services.
- **Other companies' apps and products:** for the purpose of helping you use apps and products you connect to Hive products.
- **Installers and service engineers:** so that they can book appointments with you and provide installation and product maintenance services.
- **Delivery companies:** to deliver products that you have ordered from us.
- **Other service providers and advisors:** such as companies that support our IT, help us analyse the data we hold, process payments, send communications to our customers, provide us with legal or financial advice and generally help us deliver our services to you. Some of our devices can trigger recordings or actions when certain audio or visual events are detected. If you tell us the software has mis-identified an audio event, we will give a copy of that audio recording, without any accompanying information about you, to our software provider, Audio Analytic, to help improve their detection system. If you choose to take part in product improvement, we will give all audio recordings to Audio Analytic to improve their detection system, again without any accompanying information about you.
- **Market research:** occasionally we may ask our market research partners to contact our customers to help us find out how to improve our products and services
- **Purchasers of our business:** buyers or perspective buyers who we sell or negotiate to sell our business to.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives for the energy industry.
- **Police and law enforcement:** to assist with the investigation and prevention of crime.

We do not disclose personal information to anyone else except as set out above. We may provide third parties with aggregate statistical information and analytics about users of our products and services but we will make sure no one can be identified from this information before we disclose it.

Direct Marketing

We will ensure that we act in compliance with Canada's Anti-Spam Legislation. In order to ensure compliance, commercial electronic messages (including email marketing) will be based on an 'opt-in' approach. We will gain consent for commercial electronic messages purposes prior to sending commercial messages (including emails), unless we have a pre-existing business relationship with you as in these particular cases consent is considered to be implied. Should we require personal information for a new purpose, we will contact you to seek consent for that new use. Individuals that 'opt-out' from receiving emails from our us and/or our partners and associates will be unsubscribed upon request.

You can unsubscribe from receiving future marketing messages (e.g., texts, emails, phone calls) by sending an email to us at help.CAN@hivehome.com or contacting the customer service team by phone or by webchat.

You can also unsubscribe from our marketing emails by clicking on the unsubscribe link in the emails we send to you.

Advertising on other websites and apps

We work with our advertising agencies to show you advertising about our products and services on websites or apps that you visit, at a time and in manner that we feel is relevant to you. To do this, our advertising agencies use anonymised information about the websites, apps, social media content and ads you interact with or view when connected to the Internet, to make sure the advertising you see is more relevant to you.

The techniques our advertising agencies use (to determine what advertising to show you), recognise the device you are using but are not aimed at you as a named individual. Typically, cookies and similar technologies are used to target this type of advertising. You can find out more about cookies and how to manage their use by reading our cookie policy: hivehome.com/cookies.

Service notifications

The Hive app will send service notifications directly to your smartphone or device through the app when we have something important or interesting to make you aware of or you have asked to be notified about certain events relating to your Hive products, e.g. to remind you that your heating is on or when movement is detected in an area of your home.

Depending on the service you choose, you may also receive these notifications by text message or email depending on your preferences.

You can turn off service notifications at any time through the app, your smartphone system settings or your online account.

Cookies

If you use our website or app, we will collect information about how you interact with us online. We use cookies and other similar technologies to help us do this. You can find out more about cookies and how to manage their use by reading our cookie policy: hivehome.com/cookies.

Transferring your personal information internationally

The personal information we collect may be transferred to and stored in countries outside of the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy policy and applicable European data protection laws and is respected and kept secure.

We may transfer your personal information to other entities, such as our vendors, suppliers and agents (**Service Providers**) who assist us in serving you. When your personal information is transferred to a Service Provider, we require them to protect the information in a manner that is consistent with this Privacy Notice. Our Service Providers may be located outside of Canada and may be required to disclose your personal information under the laws of their jurisdiction. You may contact us for information about our policies and practices regarding Service Providers to whom we have transferred your personal information and their locations.

How long do we keep personal information

Personal information will be retained only as long as necessary for the fulfilment of the purposes identified within this Privacy Notice. After you close your account with us we will keep your personal information for a reasonable period to maintain our records and legal obligations to you. We destroy, erase or make anonymous personal information that is no longer required to fulfil the identified purposes.

For audio and video recordings, we will keep your recordings for the period of time set out in your service plan with us. We will delete your recordings promptly after this period ends.

Protecting your personal information

We endeavour to maintain physical, technical and administrative safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copy, use, modification or disclosure.

We secure your personal information from unauthorized access, use or disclosure on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure.

We are open about our privacy and security policy

We are committed to providing you with understandable and easily available information about our policies and practices related to management of your personal information.

Accuracy of personal information

We want to keep your personal information up to date, accurate and relevant for its intended use. We rely on you to let us know if your address, telephone number or other information changes, so that we may provide you with the best possible service.

Your rights in relation to your personal information

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to opt-out of receiving direct marketing messages;
- the right to request the correction of inaccurate personal information we hold about you; and
- the right to request the blocking or deletion of your personal information where the processing does not comply with applicable data protection laws.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the 'Contacting us' section below.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact us at help.CAN@hivehome.com.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.

Handling Complaints

You can direct any questions or concerns about this Privacy Notice to us. We will maintain procedures to receive and investigate complaints and complainants will be advised of the results of any such investigation.

If you are unhappy with the way we are using your personal information you can also complain to the Office of the Privacy Commissioner of Canada or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

Contacting us

In the event of any query or complaint in connection with the information we hold about you, please email us at help.CAN@hivehome.com.

Contacting the Privacy Commissioner of Canada

The Office of the Privacy Commissioner of Canada oversees our personal information handling practices. If your privacy concerns are not addressed to your satisfaction by Hive you may contact the Office of the Privacy Commissioner of Canada for further guidance:

By Phone: 1 800 282 1376 or 819 994 5444
By Fax: 819 994 5424
By TTY: 819 994 6591
Website: privcom.gc.ca

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