

# Privacy Policy

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Hydro-Québec has developed this Privacy Policy to provide information to visitors to the Electric Circuit's website, our associated sites or our transactional pages (collectively, the "Sites") and to the users of the public charging station network or its mobile application (collectively, the "Services"). We therefore recommend that you carefully read this Privacy Policy.

## Our commitment to your privacy

For more information about our general practices concerning the protection of your privacy, for example, the retention or destruction of your personal information, please see [Our Commitment to Your Privacy](#). In the event of a discrepancy between Our Commitment to Your Privacy and this Privacy Policy, Our Commitment to Your Privacy will take precedence.

Why should I read this policy?

What am I consenting to?

What personal information do we collect?

What other information do we collect?

How do you collect my personal information?

Do you use cookies or other technologies to monitor my activities?

Do you use Google Analytics to collect data on how I use your Sites?

How do you protect my personal information?

Why do you use my personal information?

Why do I receive promotional offers?

Who will we share your personal information with?

How long do we keep your personal information?

What are your rights concerning your personal information?

Who should I contact if I have questions about the Policy?

Changes to the Privacy Policy

## Why should I read this policy?

This Policy explains our practices concerning personal information we collect when you visit our Sites or use our Services. It does not apply to websites operated by third parties, for example, when you

- click on hyperlinks on our Sites

- use Messenger on our Facebook page
- link your Facebook, Apple or other profiles to connect to your user account
- provide personal information to your application store operator when you download our mobile application

We are not responsible for protecting your personal information that you provide to or that is collected by these third parties. It is your responsibility to find out about their practices and read their policies in this regard.

## What am I consenting to?

By using our Sites or Services, you consent to the handling of your personal information in accordance with the practices described in this Privacy Policy and in [Our Commitment to Your Privacy](#).

You also consent to the collection of information that may concern you when your computer, tablet or cell phone interacts with our Sites or you use our Services. If you are a member of another electric vehicle charging network and you use our Services as a member of this other network, you agree to be bound by this Privacy Policy.

You may completely or partially withdraw your consent concerning the handling of your personal information at any time by writing to our [access to information and privacy team](#). As a result, you may cease to benefit from some of the functionalities of our Sites or the advantages provided by our Services.

## What personal information do we collect?

“Personal information” is information that allows you to be identified. You are not required to provide personal information to view the content of our Sites. The following is a list of some of the personal information we may collect about you:

- **information concerning your identity:** such as your first and last names
- **contact information:** such as your telephone number, your home address and email address, your geolocation with your consent
- **financial information about you:** such as your billing information and available balance
- **information concerning use of your Customer Space:** such as your identification code, password, member number, activity when connected, detailed history of your energy consumption and your charging dates
- **information concerning your property:** such as the make and model of your electric vehicle that you may have provided to us
- **information concerning your interactions:** such as personal information you may have provided when interacting with us

## What other information do we collect?

Some information is collected automatically when you use our Sites or Services. When such data may be related to your identity, for example, through use of cookies or other monitoring technologies, we consider it to be personal information and handle it accordingly. The data collected during use of our Sites and Services specifically includes the following:

- the brand and model of your device (computer, tablet or phone)
- your Internet service provider
- your IP address
- geographical location (from your IP address)
- your geolocation, with your consent if applicable
- type of Internet connection
- type and version of your device's operating system
- type and version of your Internet browser
- unique identifier of your device
- MAC address for your device, if applicable
- IDFA (identifier for advertisers) for your iOS device, if applicable
- details concerning issues you may have experienced
- starting point of your visit (e.g., banner, email, social media or third-party website)
- information on how to install and open our mobile application
- frequency and history of use of our Sites
- pages you have viewed
- your activities (e.g., clicking and scrolling)

## How do you collect my personal information?

We collect your personal information when you provide it to us, in particular when you use our online services (for example, if you complete our contact form). We also collect your personal information when you use your Customer Space or our mobile application.

## Do you use cookies or other technologies to monitor my activities?

### Cookies

Our Sites use cookies. Cookies are small text files that your browser installs automatically on your computer or other device. They allow the Sites to recognize you when you visit them. Cookies are

stored on your computer and are automatically retrieved when you visit the Sites in the future. Only the cookie issuer can read the text file.

We use functional cookies to ensure our Sites run smoothly, and in particular for managing your user account or completing forms. We use performance cookies so that our Sites will run more efficiently when you visit them. We also use cookies that allow us to add functionalities to our Sites so that content can be shared on social media such as [Facebook](#). Clicking the share button will install a cookie that connects content viewed on our website to your user account for these media.

The information collected is used to determine the popularity of our pages, analyze traffic on our Sites, and as a guide for developing improvements. These cookies do not contain any personal information.

For more information concerning the cookies we use and how to delete or disable them in your browser, please visit our page [Policy regarding cookies](#).

### **Geolocation**

You are under no obligation to agree to providing your geolocation data. We will ask for your consent before activating technology that allows your location to be determined. We use technologies allowing us to determine your geolocation when you activate the Trip planner function on our mobile app so you can plan your charging activities based on where you are going.

You may refuse to share your location with us at any time by changing the settings of the mobile application. However, you will no longer be able to locate nearby charging stations.

### **Do you use Google Analytics to collect data on how I use your Sites?**

We use analytical tools such as [Crashlytics](#) and [Google Analytics](#) to analyze how you use our Sites and Services. Google stores this information on servers that may be located outside Canada, and in the United States in particular. These tools and technologies collect and analyze certain types of data, including cookies. You can download the [opt-out browser add-on](#) to disable Google Analytics or [consult this guide](#) for Crashlytics settings.

### **How do you protect my personal information?**

Our contact form uses the [reCAPTCHA](#) test to determine whether the information collected on our Sites was entered by a real user or by an automated computer program that completes forms. For more information about how we protect your information, please refer to [Our Commitment to Your Privacy](#).

### **Why do you use my personal information?**

We use the personal information we collect about you mainly for the following reasons:

- to administer our Sites and Services, and make them available to you, specifically to plan, deploy and install new charging stations
- to allow you to purchase charging services online
- to allow you to access the Sites and Services and other charging networks with which we have entered into roaming agreements
- to invoice your charging activities on our network or on networks with which we have entered into roaming agreements
- to detect incidents and prevent threats to our Sites and Services or to cybersecurity
- to improve the quality of our Sites and Services and your customer experience
- to send you technical notifications, updates to the Sites and Services, and security alerts. This information is important for your use of our charging network; as a result, you may not refuse to receive these notifications, alerts and offers while you hold an account with us.
- to verify and authenticate your identity
- to respond to your requests, complaints, comments and questions
- to help you locate a nearby charging station
- to help plan your trips
- to transmit notifications or alerts based on your settings for the mobile application's functionalities
- to recommend promotional offers from our various partners
- to contact you to obtain your comments about your customer experience
- to associate users with our Sites and Services
- to verify compliance of your use of our Sites and Services
- to tell you about our services, events, activities, special offers and other news that involves us, and in particular through our newsletter
- for any other purposes as we may determine from time to time and that are authorized by law

### **Why do I receive promotional offers?**

Our promotional offers program allows you to view offers from our various partners. You can disable the "Show my promotional offers" functionality at any time from your user account.

You are under no obligation to agree to receive promotional offers. We will ask for your consent in advance, in particular to receive our newsletter, which tells you about our services, events, activities, special offers and other news about us, in accordance with applicable laws. If your name is on our distribution list and you wish to be removed from this list, simply follow the unsubscribe link provided in each PUSH notification or SMS you receive.

If you withdraw your consent to receive promotional offers by PUSH notification or SMS, you may still receive online advertising from the FLO charging network, our partners, social media or other websites or applications that you may visit or use. These ads are not presented to you as part of our program. It is therefore your responsibility to unsubscribe from the distribution lists of these third parties by using the links provided in their advertisements and to change your settings in your social media profiles such as Facebook.

## **Who will we share your personal information with?**

As indicated in [Our Commitment to Your Privacy](#), we do not share personal information with third parties without your consent, except under the rare circumstances provided by law.

We retain the services of suppliers to operate our Sites and Services. Our subsidiary AXSO Inc. operates the technological platform for the electric vehicle charging network and our mobile application.

We sometimes share your personal information when our suppliers require it to provide their services:

- Amazon Web Services for cloud-based storage
- [CAA-Québec](#) to operate our customer service
- [Stripe](#) for the online payment system
- Twilio for sending SMS messages
- SendGrid for sending emails
- OneSignal for sending PUSH notifications

If you use your user account to charge your electric vehicle on a charging network with which we have entered into a roaming agreement, or if you are a member of another charging network, we may be required to provide certain personal information to the operator of this other network, such as your member number, information concerning your charging activities or your contact information in order to authorize you to charge your electric vehicle, to provide any necessary support, as well as for billing purposes and to generate statistical reports required under our agreement with this partner.

We may also exchange data collected concerning the use of our Services with our partners, and in particular with charging station owners, charging site hosts and with other companies in order to improve or continue to supply charging services and services concerning programs you are participating in, and in particular to receive promotional offers. This consists of non-identifying charging data and statistical data concerning promotional offers that are displayed, that you view and that you use. We will not share your personal information and your consumption habits with merchants who present promotional offers.

## How long do we keep your personal information?

We keep your personal information for as long as is necessary to carry out our activities and offer you our services, plus an additional period of time provided for in our retention rules, which we have adopted and have been approved by the Bibliothèque et Archives nationales du Québec. This additional time allows us to meet certain legislative and regulatory requirements, or to enter such information into evidence in the event that we are party to legal proceedings. If you have questions concerning the retention period that applies to a specific situation, please contact our access to information and privacy team. Their contact information is provided under the question **Who should I contact if I have questions about the Policy?**

## What are your rights concerning your personal information?

You have the right to access your personal information. Only you can exercise this right, unless you authorize the disclosure of your personal information to a third party.

In addition, if you believe that we hold personal information about you that is inaccurate, incomplete or ambiguous, or if you believe that we have collected, used, communicated or retained this information contrary to the Access Act, you have the right to request that we correct your information or that we stop collecting, using, releasing or keeping the information in ways you consider to be unauthorized by the law.

In the event you no longer wish to use our Services, you may request that your personal information be deleted, in accordance with our retention rules. In addition, if you believe that we have retained personal information about you in a way that is contrary to the Access Act, you have the right to request that we delete this information, in accordance with our retention policies. If you wish to exercise these rights, you may send a request in writing at any time to one of Hydro-Québec's persons in charge of access to documents and protection of personal information by completing the [Access Request Form online](#), by mail or by e-mail. Their contact information is provided below.

The law provides certain restrictions on your exercise of these rights. We will advise you in such situations. If you submit a request to us in this regard, we may require that you identify yourself and provide proof of identification so that we may verify the request.

If you wish to exercise your rights, we recommend that you begin by consulting your [My account](#) space of The Electric Circuit. Much of your information can be found there, and you can update some of it yourself or delete your account. Please do not hesitate to contact [The Electric Circuit's customers services](#) for questions concerning your personal information.

You may send a request for access or a request for correction in writing at any time to one of Hydro-Québec's persons in charge of access to documents and protection of personal information by

completing the [Access Request Form online](#), by mail or by e-mail:. Their contact information is provided below:

Access to Information and Privacy team Hydro-Québec  
Édifice Jean-Lesage  
75, boul. René-Lévesque Ouest, 20e étage  
Montréal (Québec) H2Z 1A4

[Responsable.Acces@hydroquebec.com](mailto:Responsable.Acces@hydroquebec.com)

### **Who should I contact if I have questions about the Policy?**

You can email our Access to Information and Privacy team.

If you contact us by email, you are doing so voluntarily. You must therefore provide your name and email address, and write your message to: [Responsable.Acces@hydroquebec.com](mailto:Responsable.Acces@hydroquebec.com).

No method of Internet transmission or digital storage is completely secure. There is always a risk that the information you send us is lost, intercepted, pirated or destroyed. We encourage you to use extreme caution when deciding what type of personal information you wish to send us by email because we are unable to guarantee its complete security.

### **Changes to the Privacy Policy**

This Policy is governed by the [Act respecting Access to documents held by public bodies and the Protection of Personal Information](#) and we may update or amend it from time to time. If we make major changes to it, we will post a notification on our Sites, on our mobile app and in your Customer Space.

You must therefore consult this Privacy Policy on a regular basis to learn about the updates. Continuing to use our Sites and our Services means that you accept this Privacy Policy and all of its updates, and that you consent to them.