

BELCO Privacy Notice

BELCO Website: Customer Portal

This privacy notice sets out how we use your personal information within the BELCO customer portal (Customer Portal) on the BELCO website (Website).

Please read this document carefully and contact us if you have any questions. By using our Website you are deemed to have both read the document and to have understood its contents.

The Personal Information Protection Act 2016 (PIPA) provides individuals in Bermuda with a right of informational privacy protection. The PIPA has not yet come into force however this privacy notice has been drafted with BELCO's compliance in mind.

1. Who we are and our contact details

Ascendant Group Limited (AGL) is a limited liability company listed on the Bermuda Stock Exchange (BSX Ticker AGL.BH) and is the holding company for the following companies that hold personal information:

- a. Bermuda Electric Light Company Limited (BELCO); and
- b. AG Holdings Limited, which is the direct or indirect holding company for:
 - i. AIRCARE LTD.
 - ii. IFM Limited
 - iii. iEPC Limited

(together the 'Ascendant Group').

Each of the Ascendant Group companies have their registered offices at:

27 Serpentine Road
Pembroke
HM 07
Bermuda

Any reference to "our", "we" or "us" in this privacy notice means any one of the above listed organisations within the Ascendant Group as relevant to the circumstances and references to "you" or "your" means those persons who provide their personal information to an Ascendant Group company in connection with a Customer Portal account.

As the ultimate holding company for the Ascendant Group, AGL provides, or may provide, certain services to its subsidiaries that include:

- Human Resources
- IT
- Finance
- Legal / Privacy

- Marketing/Communications

The provision of the above services may require the transfer of personal information between the subsidiary and AGL. All members of the Ascendant Group are subject to the provisions of this privacy notice that secures the privacy of Ascendant Group customers.

If you have a question about this privacy notice or about our use of your personal information please contact our Privacy Officer.

Our Privacy Officer is Ms. Lorianne Gilbert whose contact details are:

- Privacy Officer
- 27 Serpentine Road
- Pembroke
- HM 07
- Bermuda
- PO Box HM 3392
- Hamilton
- HM PX
- email: privacy@ascendant.bm

2. What personal information do we use?

Personal information can include things that can allow someone to identify you either directly, e.g. through your name, or indirectly, through your address, phone number, date of birth, bank details, email or IP address etc.

Our Customer Portal uses:

- Your name and address (mailing and service address) and other contact information (e.g., home and work telephone numbers and e-mail addresses)
- Banking and payment information for bill payment, including general financial information (e.g. credit card number, credit and reference information and employment information etc.)
- Information we receive from you through your correspondence or communications with us
- Energy usage and consumption
- Security information (user name/password)
- Account number
- Meter number
- Account activity
- Transaction history
- Service history
- Customer comments

3. The legal basis for our use?

The PIPA (when in force) requires us to identify the legal basis for our use of your personal information.

Our legal basis for use will be:

- your consent; and/or
- performance of a contract; and/or
- that you would not reasonably request us to “not begin or cease” using your personal information.

4. How we use your personal information?

We may use your personal information for the following purposes:

- Deliver the services you requested
- Respond to your inquiries and maintain business relations with you
- Set up an account
- Improve information about our services
- Confirm your identity
- Bill and collect payment
- Establish your credit worthiness
- Register you for pre-authorized payment
- Help prevent or investigate fraud or other breaches of the law
- Request your participation in surveys/questionnaires
- Provide notifications or reports
- Manage outages
- Send you information about our services such as energy conservation and event notices

5. Who has access to your personal information and do we transfer your personal information to organisations in Bermuda / overseas?

- Your personal information is used by the relevant areas:
 - in order to provide your requested services
 - to make such other use that would be in your reasonable expectations

All our staff understand their obligation to maintain customer personal information subject to conditions of confidence. Only relevant staff are permitted access to customer personal information. We disclose only the personal information that is necessary to deliver the services you require to those staff members relevant to the task.

- We transfer your personal information to third parties in Bermuda for the purposes of completing tasks relating to the operation of our Website and/or the delivery of our services (e.g. financial transaction processing).

When we use third party service providers in Bermuda, we disclose only the personal information that is necessary for the discharge of the task to the relevant organisations and individuals.

- We may transfer your personal information to third parties outside Bermuda for the purposes of completing tasks relating to the operation of our Website and/or the delivery of our services.

When we use third party service providers overseas, we disclose only the personal information that is necessary for the discharge of the task to the relevant organisations and individuals.

We will not share your personal information with third parties for marketing purposes.

We will not sell or rent your personal information.

6. How long do we keep your personal information?

We are legally required to hold some types of personal information to fulfil our statutory obligations. We will hold your personal information only for so long as it is necessary for the relevant activity, or for internal audit and quality control purposes.

We review our retention periods for personal information on a regular basis.

7. What are your rights?

We will do all we reasonably can to assist you with any issue arising from our use of your personal information.

When the PIPA comes into force, this section will be amended to detail your full legal rights.

8. How can you exercise your rights?

Please contact our [Privacy Officer](#).

9. Security

We constantly monitor the security of our systems and we review our policies and procedures on a regular basis.

Information transmitted over the internet can never be guaranteed as 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us. Once we receive your personal information, we make all reasonable (and appropriate) efforts to ensure its security on our systems.

10. Cookies

For information relating to the use of cookies when accessing our Website and within the Customer Portal please see the [Website privacy notice](#).

11. Privacy Notice (administrative details)

Privacy notice No. v1.0

Effective Date: January 2019

On occasion we will update this privacy notice. Any amended privacy notice becomes effective once published.