

# BELCO Privacy Notice

## BELCO Website: General

This privacy notice sets out how we use your personal information when you visit 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 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.

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](mailto: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 social insurance number, or indirectly, through your address, phone number, date of birth, bank details, email or IP address etc.

Our Website uses:

- **Contact information provided through the contact us form**
- **Cookies and Social Media Plug-Ins (see paragraph 10)**

## 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:

- inferred consent through your accessing our Website; 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:

- to enable certain functions of our Website
- to provide analytics
- to store your preferences
- to direct services to you based on your behaviour

- to authenticate users / prevent fraud
- to respond to queries
- to direct information requests relating to jobs or scholarships to AGL

## **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 improve your Website experience

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 may 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.

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

- We may transfer your personal information to third parties outside Bermuda for the purposes of completing tasks relating to 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 to those organisations and individuals relevant to the task.

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 normally 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. Social media, plug-ins, cookies and website analytics**

For a list of the social media plug-ins, cookies and website analytics see paragraph 11.

- **Social Media Plug-Ins**

To enhance your use of our Website, we include a limited number of social media plug-ins that you may use.

These plug-ins allow you to directly post links on the relevant network.

When you open a website on which a social media plug-in is embedded (e.g. our Website), the respective social network provider will use personal information regarding your visit for its own business purposes. This use is not initiated or controlled by us (neither do we have access to it or store it), but is a built-in feature of the respective social media plug-in.

The PIPA (when in force) requires us to identify the legal basis for our use of your personal information. Our legal basis for use (if any) will be (i) inferred consent through your accessing our Website; and (ii) that you would not reasonably request us to “not begin or cease” using your personal information as this use will (a) improve the user experience; and (b) promote our business.

The social media plug-in will connect to a webserver of the social media network outside Bermuda.

For the use of your personal information, you should view the privacy notice/policy of the relevant social media provider.

- **Cookies: General**

Our Website uses cookies.

Cookies are small files that are stored on your computer. They are designed to hold information specific to a particular client and website, and can be accessed either by the web server or the client computer.

Cookies discharge a number of functions such as allowing us to distinguish you from other users of our Website. This helps us optimise your access to and use of our Website and enables the correct functioning of those parts of our Website that you access. You can find out more about our cookies on [www.allaboutcookies.org](http://www.allaboutcookies.org).

The PIPA (when in force) requires us to identify the legal basis for our use of your personal information. Our legal basis for use (if any) will be (i) inferred consent through your accessing our Website; and (ii) that you would not reasonably request us to “not begin or cease” using your Personal Information as this use will (a) improve the user experience; and (b) promote our business.

You may adjust your browser’s settings to deactivate the cookies. If you use that option, (i) necessary cookies: some functions of this Website may not work; and (ii) enhancing cookies: there will be no loss of website functionality.

Some analytic cookies (e.g. Google) provide an opt-out browser add-on and thereby deactivate the use of the cookies and the associated use of personal information.

Cookie personal information is used by our own servers as well as the servers of third parties based outside Bermuda.

You may at any time withdraw your consent to the use of cookies at any time by deactivating the cookies.

- Cookies: Specific

- Necessary

We use necessary cookies that are either set by our own systems or provided by third parties. These cookies are essential to enable you to move around our Website and use its features. Without these cookies, services you have requested (e.g. login) cannot be provided.

We collect necessary cookie personal information, such as your session ID, authentication information, time of login (time stamp), etc. This personal information allows us to relate the visitor's session to server-side information. The cookies act as a reference to the session created. Whenever an activity is performed on our Website, our server recognises your session ID and validates that activity.

Disabling these necessary cookies will hinder our Website’s performance and may make certain of its functions and features unavailable.

- Enhancing

We use enhancing cookies to improve the appearance of our Website or accelerate access.

Disabling these cookies may hinder the performance of our Website and could impact your viewing experience.

- Web Analytic Cookies

Web Analytics: We use the web analytics for statistical analysis and the optimisation of our Website. This helps us to tailor our Website to our users' needs (e.g. placing the most sought-after information where it is most easily found) or assessing its popularity.

For these purposes, we use third party cookies to collect and store usage data (e.g. pages visited, how long you spend viewing, how often you return etc.). This information is attributed to an anonymous identifier so that the analytics reports we receive are non-personalised analyses.

Web analytic are used by our cookie supplier - a third party based outside Bermuda. Analyses of website traffic provided by our cookie suppliers are used by our internal departments, in particular the IT and marketing departments.

Disabling these cookies will not hinder our Website's performance and will not affect your experience of our Website.

For Google analytics cookies, you can opt-out by installing the Google Analytics opt-out browser add-on.

## 11. List of social media plug-ins, cookies and website analytics

- Social media plug-ins

Service: Facebook - [www.facebook.com/belcobermuda](http://www.facebook.com/belcobermuda)

Privacy Details: [www.facebook.com/privacy/explanation](http://www.facebook.com/privacy/explanation)

Details: News and information relating to on BELCO and its services

Service: Twitter - [twitter.com/belcobermuda](https://twitter.com/belcobermuda)

Privacy Details: <https://twitter.com/en/privacy>

Details: News and information relating to on BELCO and its services

Service: YouTube - [www.youtube.com/channel/UCtiRdy6Luql7jA\\_cVHyhLg](https://www.youtube.com/channel/UCtiRdy6Luql7jA_cVHyhLg)

Privacy Details: <https://policies.google.com/privacy?hl=en>

Details: News and information relating to on BELCO and its services

Service: Instagram - [www.instagram.com/belcobermuda/](https://www.instagram.com/belcobermuda/)

Privacy Details: <https://help.instagram.com/519522125107875>

Details: News and information relating to on BELCO and its services

- Necessary Cookies

Name: n/a

Service: Application Session Cookie  
Privacy Details: This privacy notice  
Details: A cookie is used to create a web 'session' so that we can maintain portal login authentication state. The cookie contains a randomly generated unique id value, Example: 16394A9EB74403B670D898B02CBFCCE3

Name: n/a  
Service: Authenticated Login Cookie  
Privacy Details: This privacy notice  
Details: A cookie is created for CMS and Portal integration when a customer logs into the portal so that we can display the login name in the site header. The cookie contains the portal logged in username, Example: joesmith

- Enhancing Cookies

Name: n/a  
Service: Remember Me Login Cookie  
Privacy Details: This privacy notice  
Details: An optional cookie is used to remember the login username if the customer wishes to do so.

Name: n/a  
Service: Zoom Level Cookie  
Privacy Details: This privacy notice  
Details: An optional cookie is used to remember the browser zoom level if a customer changes the site font size. The cookie contains the zoom level to set the browser, Example: 110

- Web Analytic and Retargeting Cookies

Name: Google Analytics  
Service: website statistics  
Privacy Details: <https://policies.google.com/privacy?hl=en>  
Details: Tracks the number of times a visitor has been to our site, when their first visit was, and when their last visit occurred. Google Analytics uses the information to calculate visitor statistics.

Name: Portal Application Analytics  
Service: Web portal usage statistics  
Privacy Details: This privacy notice  
Details: The portal application captures information about every click done on the site from Login to Logout. The following information is captured to a database table:

- Login User ID
- Date and Time of click
- Requested action - login, select account, view usage, etc.
- Request parameters - any information passed into the requested action - account number, encrypted password, user name, etc.
- Customer Account Number
- Customer Meter Number
- Application Session ID
- Browser Type
- Customer IP address

## **12. 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.