



Project Neutral Transitioning neighbourhoods to carbon neutrality One neighbourhood at a time

Project Neutral's Privacy Policy

Date of last revision: September 25, 2014. For a copy of previous versions, please email us at hello@projectneutral.org.

Project Neutral, a project of Tides Canada (“Project Neutral,” “we”, “us” or “our”), has created this privacy policy (the “Privacy Policy”) to demonstrate our commitment to you, our user (“You” or “Your”), regarding Your privacy with respect to information that You submit to Project Neutral by or through the Site or Services (defined below).

Scope of this Privacy Policy

Project Neutral has the goal of helping neighbourhoods and individuals transition to carbon neutrality. We do this by helping individual people and businesses (in each case, individually, a “User,” and collectively, as “Users”) understand and reduce their greenhouse gas emissions.

This Privacy Policy applies to projectneutral.org (“projectneutral.org”), including all portions of projectneutral.org where Users can obtain Services from Project Neutral (the “Site”). Because we gather information from Users of the Site and related services offered through the Site provided by Project Neutral (the “Services”), we have established this Privacy Policy as a means to communicate our information gathering, use and dissemination practices. In order to access and use the Site and/or Services, You must agree to our Terms of Use posted on the applicable Site. Any capitalized terms not defined in this Privacy Policy are defined in the Terms of Use.

If, after reading this Privacy Policy, You have any questions, please contact us at hello@projectneutral.org.

We consider the phrase “Personal Information” to mean any information or combination of information that is used or intended to be used to identify a discrete individual, and any other non-public information that is associated with that information. “Anonymous Information” means information that is not associated with or linked to Your Personal Information, and is not used or intended to be used to personally identify an individual.

BY USING OUR SITE OR SERVICES OR SUBMITTING PERSONAL INFORMATION THROUGH OUR SITE OR SERVICES, YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY AND YOU EXPRESSLY CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY. YOUR PERSONAL INFORMATION MAY BE PROCESSED BY US OR ON OUR BEHALF IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES (INCLUDING THE UNITED STATES) WHERE



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LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY.

Collected Information

Should You choose to provide us with Personal Information, we will treat such information in accordance with this Privacy Policy. The Personal Information we gather from You helps us learn more about, and provide You with, access to the Site or Services. We collect Personal Information that You submit to us voluntarily in the course of correspondence, registration and as otherwise identified below. We primarily collect this information to provide Services to You.

To register for certain Services offered on our Site, You might provide certain Personal Information, including Your name, utility account number and login, and e-mail address. Through Your use of the Services, we may ask for additional information about Your residence, such as the home type, square footage, and number of residents, as well as other factors that could impact Your greenhouse gas emissions, such as transportation, food, water and energy consumption. You are not required to provide this information, but we may not be able to provide certain Services without this information. We may associate this information with Your Personal Information, making it also Personal Information. Additionally, when You send us a communication, or fill out a request form such as a survey, we will collect all information contained therein.

Information from other sources: we may also receive Personal Information about You from: (i) Your utility; (ii) third parties that provide services for us in connection with the Site or Services, and (iii) third parties to whom You have voluntarily provided information. We may add this information to the information we have already collected from You via the Site or Services.

Information collected via technology: as You use the Site or Services, certain information may also be collected and stored on our or our service providers' server logs, including Your Internet protocol address (as defined below), browser type, and operating system. We also use Cookies (as defined below) and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of Your visit and the information for which You searched and viewed.

An "Internet protocol address" or "IP Address" is a number that is automatically assigned to Your computer when You use the Internet. In some cases Your IP Address stays the same from browser session to browser session; but if You use a consumer internet access provider, Your IP Address probably varies from session to session. We, or our service providers, may track Your IP Address when You access the Site or Services.



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“Cookies” are pieces of information that some Web sites transfer to the computer that is browsing that Web site and are used for record-keeping purposes at many Web sites. Use of Cookies makes Web-surfing easier by performing certain functions such as saving passwords, personal preferences regarding the use of the particular Web site and making sure the user does not see the same ad repeatedly. Our site uses Cookies to enhance Your experience by allowing us to track Your click-stream data (the specific pages You visit on the Site), improving performance, and tailoring web content to Your interests. We do not store any Personal Information in the Cookies. Browsers are usually set to accept Cookies. However, if You would prefer not to receive Cookies, You may alter the configuration of Your browser to refuse Cookies. If You choose to have Your browser refuse Cookies, it is possible that some areas of our Site will not function as effectively when You view them.

Disclosure – Relationship with Partners

There may be times when we also offer certain Services in conjunction with Your energy utility or other partners (“Partners”) through co-branded Web sites (which are sometimes subdomains of the Site) (“Co-Branded Sites”). These Co-Branded Sites provide services to You by our Partners and us. Both this Privacy Policy and the Partners’ privacy policies govern information collected on Co-Branded Sites. Please be aware that when we collect information on the Co-Branded Sites, that information will be considered to be collected by both any Partners and us. While this Privacy Policy governs our use and disclosure of that information, You should be aware that our Partners may have different practices, and all such information may be used and disclosed by our Partners in accordance with their own privacy policy. While we do not actively provide Your Personal Information to our Partners, our Partners will have access to any information collected on a Co-Branded Site through its customer service center. As we provide services on our Partners’ behalf, we may in certain situations use Your Personal Information in a manner in which You provided consent to our Partners.

Disclosure – Usage of Third Party Cookies

We may allow third party companies to collect certain Anonymous Information when You visit our Site. These companies typically use a Cookie or a third party web beacon to collect this information. Such Cookies will not be used to associate individual Users of a Site to any Personal Information. For example, one of our service providers tracks emails we send to You via the Services.

Use of Information

In general, we use Personal Information that You submit to us to:

- Register You for and/or provide You access to the Site or Services and administer Your account;



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- Provide You Services, including Services related to Your utility and analytics and information about energy efficiency and Your energy and greenhouse gas emission reduction choices;
- Enable our Partners to provide You Services You have signed up for;
- Tailor the features, performance and support of the Site or Services to You;
- Respond to Your requests, resolve disputes and/or troubleshoot problems;
- Market our products and Services to You that we believe may be of interest to You;
- Make it easier for You to fill out our survey by accessing data from Your utility account directly;
- Improve the quality of the Site and the Services; and
- Communicate with You about the Site and the Services.

You do not have to provide us with Your utility account information to use our Services. If you do choose to provide it to us, for example to make it easier or faster for You to fill out our survey, then You consent to our using Your utility account information to obtain Your utility use data.

We may occasionally contact Users to further discuss their interest in Project Neutral, the Services that we provide and to send information regarding Project Neutral. If You would not like to receive these emails, please see the section below titled “Opt-Out Policy”, but please remember that even if You opt out, we may still send information such as administrative emails that pertain to the Site and Services.

We may create Anonymous Information records from Personal Information by excluding information (such as Your name or email address) that makes the information personally identifiable to You.

Disclosure of Information

It is our general policy to restrict who can access Personal Information. Except as otherwise stated in this Privacy Policy, we do not trade, rent, or share the Personal Information that we collect with third parties, unless You ask or authorize us to do so. If You provide us with Your utility login information, You hereby authorize us to disclose Your Personal Information to Your utility and to access Your utility account to gather Your utility use information for the purposes of filling out Your greenhouse gas survey.

We may provide Your Personal Information to third party service providers who work on behalf of or with us to provide some of the services and features of the Site or Services and to help us communicate with You. Examples of such services may include, but are not limited to, sending emails, analyzing data, providing marketing assistance and conducting surveys. These third parties are required not to disclose Your Personal



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Information and not to use Your Personal Information except based on our instructions and in accordance with this Privacy Policy.

In the event of a change in ownership, or a merger with, acquisition by, or sale of assets to another entity, we reserve the right to transfer all of Your Personal Information to that entity. Project Neutral will notify You (via a posting on this Site or email (at Project Neutral's discretion)) of such a transfer, and You may choose to modify Your Personal Information at that time. This means if You are concerned about Your Personal Information being transferred to a new owner, You can notify us and request that Your account is not transferred to the new owner.

We may share some or all of Your Personal Information with Your utility or other third parties to whom You ask or authorize us to send Your information. This Privacy Policy does not cover the use of Your personally identifiable information by such third parties. Project Neutral does not maintain responsibility for the manner in which third parties use or further disclose Your personally identifiable information collected from You in accordance with this Privacy Policy, after we have disclosed such information to those third parties. You agree and acknowledge that by using the Site and Services, You hereby consent to Project Neutral sharing Your Personal Information under the circumstances described herein. If You do not want Project Neutral to use or disclose Personal Information collected about You in the ways identified in this Privacy Policy, we will not be able to provide, and You may not use the Site or Services, and must notify Project Neutral by emailing hello@projectneutral.org or following any of the other opt-out procedures discussed below in the “Opt-Out Policy” section. Please note that this opt-out will only affect Your receipt of reports and emails, and will not affect our use of previously collected information.

Project Neutral reserves the right to disclose Your Personal Information if required by law or if Project Neutral reasonably believes that such disclosure is necessary to (a) resolve disputes, investigate problems, or enforce our Terms of Use; (b) comply with relevant laws or to respond to requests from law enforcement or other government officials relating to investigations or alleged illegal activity, we can (and You authorize us to) disclose Personal Information without subpoenas or warrants served on us; or (c) protect and defend the rights or property of Project Neutral, You, or third parties.

We reserve the right to disclose Anonymous Information publicly without restriction, including to third party vendors who may help us enhance or provide the Site or Services or to third parties.

Feedback

If You provide feedback to us, we may use and disclose such feedback for any purpose, provided we do not associate such feedback with Your Personal Information. We will



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collect any information contained in such feedback and will treat the Personal Information in it in accordance with this Privacy Policy.

Third Party Sites

The Site may contain links to other Web sites, including those of utilities. Project Neutral is not responsible for the privacy practices or the content of these other Web sites. This Privacy Policy applies solely to information collected by us through the Site or Services and does not apply to these third party Web sites. Users will need to check the privacy policies of these other Web sites to understand their policies. Users who access a linked site may be disclosing their Personal Information.

Blogs & Forums

Our Web site offers publicly accessible blogs or community forums. You should be aware that any information You provide in these areas may be read, collected and used by others who access them.

Regarding Children & Minors

Families are welcome to sign up for the Site, but children and minors under the age of 18 years of age must have the consent of their parent(s) or guardian(s) before providing Personal Information of any kind. We do not collect or maintain Personal Information from people we actually know are under 18 years of age without parental or guardian consent, and no part of the Site or Services is designed to attract people under 18 years of age without parental or guardian consent. If we later obtain actual knowledge that a User is under 18 years of age and does not have parental or guardian consent, we will take steps to remove that User's Personal Information from our databases.

Security

We have put in place reasonable security measures designed to safeguard against the loss, misuse and alteration of Your Personal Information under our control. This includes utilizing Secure Sockets Layer (SSL) software, which encrypts the Personal Information You input.

Despite such efforts, however, please note that no company, including Project Neutral, can fully eliminate risks or guarantee the security of Your Personal Information; unauthorized entry or use, hardware or software failure and other factors that may compromise the security of information about You at any time, and we bear no liability for uses or disclosures of Personal Information or non-personal data arising in connection with the theft thereof. If You have any questions about security on our Web site, You can contact us at hello@projectneutral.org.



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Project Neutral conducts periodic self-assessments to verify that the attestations and assertions it makes about its privacy practices are true and that such privacy practices have been implemented as presented. Project Neutral will take steps to remedy any problems arising out of failure to comply with the Safe Harbor principles.

Opt-Out Policy

Project Neutral offers Users of its Site and Services a means to opt-out of receiving certain service-related communications from us. If, at any time after registering for information or ordering Services, You change Your mind about being contacted by us, You can opt-out of receiving such information by emailing hello@projectneutral.org. In addition, Users can choose to opt out of newsletters, reports and promotional emails via the unsubscribe link included in each email. However, even if You opt-out of receiving such communications, we retain the right to send You service-related communications in our sole discretion.

Removing, Correcting & Updating Your Information

You may remove, correct and update the Personal Information we have collected directly from You by logging onto the Site and accessing Your account or by sending us an email at hello@projectneutral.org.

We may not make all requested changes where such changes are unreasonably burdensome or expensive. We will however, promptly correct any inaccuracies in any Personal Information that we have in our possession once notified of the requested change. We endeavor to process these requested changes as soon as is possible, but it may take up to thirty (30) days to make requested changes.

Certain information is necessary in order for us to provide the Site or Services; therefore, if You delete such necessary information You will not be able to use the Site or Services. If You wish to discontinue the Services, You may contact us at hello@projectneutral.org. After such request, we may continue to use Anonymous Information previously derived from Your Personal Information.

Please note that even after the deletion of Your Personal Information by us, we may be required (by law or otherwise, such as to prevent fraud, resolve disputes, troubleshoot problems, or enforce our Terms of Use) to keep this information and not delete it (or to keep this information for a certain time) in which case we will comply with Your deletion request only after we have fulfilled such requirements. When we delete Personal Information, it will be deleted from the active database, but may remain in our archives.

Notification of Changes



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We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will notify You by email (sent to the e-mail address specified in Your account) or by means of a notice on this Site prior to the change becoming effective. We encourage You to periodically review this page for the latest information on our privacy practices.

Additional Information Questions

Additional information questions regarding this Privacy Policy or the practices of the Site or Services should be directed to Project Neutral by e-mailing such questions to hello@projectneutral.org.

Contact Information

If Users have any questions or suggestions regarding our Privacy Policy, please contact us:

Project Neutral Privacy Officer Email: hello@projectneutral.org
Address: Centre for Social Innovation - Annex, 720 Bathurst Street,
Toronto, ON, M5S 2R4.

If our Privacy Officer does not resolve Your complaint to Your satisfaction, You can seek more information or file Your complaint with the Information and Privacy Commissioner of Ontario (the “Commissioner”). The Commissioner can be reached at 1-800-387-0073 or info@ipc.on.ca.