

Policy Number B-119

Subject: Privacy and Confidentiality of Member Information

Objective

Harrison REMC respects the privacy and confidentiality of member-consumer information. This policy describes the information that Harrison REMC collects from its member-consumers as a routine part of its operations, and how it uses, protects, and shares the information that it collects.

Policy

A. Categories of Information Collected

Harrison REMC collects and maintains appropriate information about its member-consumers, including:

1. Contact information, including a member-consumer's name, address, telephone number, and e-mail address, user name, and password for online access.
2. Billing information, including Social Security number, credit information, financial account information, and payment history.
3. Electric usage data gathered by Harrison REMC's metering systems and a member-consumer's service history.
4. Capital and patronage account information for member-consumers and former member-consumers and contact information for former member-consumers resulting from membership and governance activities.
5. Responses to member-consumer survey(s) conducted by "Harrison REMC to identify needs or improve service.
6. Additional information about a member-consumer or a member-consumer's property, appliances, and activities obtained through services offered by Harrison REMC or its affiliates.

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B. Purposes for Collection; Access and Correction

1. Harrison REMC collects and maintains information about member-consumers for purposes that are suitable to its operations and management. Information is collected only through lawful and fair means and for appropriate purposes.
2. Harrison REMC is committed to maintaining accurate, complete, timely, relevant, and appropriate information about member-consumers as necessary for the purpose for which the information is to be used. Harrison REMC generally permits its member-consumers to access and seek correction of records about themselves that are maintained and used by Harrison REMC to provide service, for billing, and to manage capital accounts. Any requests for, or disputes relating to, access, correction, or other matters should be directed to the REMC office.
3. Harrison REMC may provide usage data to member-consumers who have access to electric usage data through an interface, such as a website or in-home display.

C. How Harrison REMC Collects Member-Consumer Information

Harrison REMC collects member-consumer information through the following methods:

1. When member-consumers create an account and interact with Harrison REMC regarding their account, utility service, or participation in Harrison REMC programs.
2. When member-consumers use electricity service and metering systems.
3. When member-consumers interact with Harrison REMC through its website.
4. When Harrison REMC interacts with third parties, such as credit agencies.

D. Use and Retention of Member-Consumer Information by Harrison REMC

1. Harrison REMC uses information about member-consumers in defined and responsible ways in order to manage, provide, and improve its products, services, and operations. Examples are: administer member-consumer accounts; inform member-consumers about their energy usage; provide member-consumers with outage information, peak alerts, and warning messages; and communicate with member-consumers about programs or opportunities that may be of interest to them.

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- 2 Data about member-consumers' electric usage may be compiled in aggregate form so that an individual member-consumer's daily energy usage habits are not revealed, and such data may be used by Harrison REMC to improve system operations, efficiency and overall customer service.
- 3 Harrison REMC retains member-consumer information, including energy usage data, in such amounts and for such periods of time as required by law or regulation or as reasonably necessary to provide services.

E. Security

1. Harrison REMC maintains member-consumer information with reasonable and appropriate technical, administrative, physical and cyber safeguards to protect against loss, unauthorized access, destruction, misuse, modification, and improper disclosure of member-consumer information. Member-consumers are warned, however, that no system can ever be fully protected against every possible hazard.
2. Harrison REMC requires its employees, affiliates and contractors who have access to member-consumer information to comply with this privacy and confidentiality policy. Any employee or contractor who fails to comply with these rules may be subject to disciplinary action up to and including termination.
3. Member-consumer information that member-consumers may access through Harrison REMC's website is protected using cyber security protocols designed to prevent unauthorized third parties from accessing such information.

F. Disclosure to Third Parties

1. Harrison REMC does not share member-consumer information. Harrison REMC's definition of "member-consumer information" here to include, e.g., a member-consumer's electric usage data and information that can reasonably be used to identify an individual with a third party, except at the member-consumer's prior written request, with the member-consumer's prior written consent, or as described below. Member-consumers who wish to authorize Harrison REMC to disclose their information to a third party may do so by contacting the Harrison REMC office.

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2. Information may be disclosed to affiliates or contractors hired by Harrison REMC to assist in carrying out operations, such as service, maintenance, billing, and management functions including legal, audit, and collection services. Information may also be shared with other utilities under shared service agreements or to meet operational requirements. Information will only be disclosed to such persons to the extent necessary to render the services, and only to those who agree in writing to maintain the confidentiality and security of the information.
3. Harrison REMC may disclose to and share information with commercial and consumer credit reporting agencies for credit-related activities.
4. Sufficiently aggregated information may be disclosed to third parties where necessary or beneficial for Harrison REMC operations to improve efficiency and overall customer services.
5. Information may be disclosed when authorized or required by law, including in response to a search warrant, subpoena, or court or law enforcement order. Harrison REMC may use and disclose records for investigations into employee misconduct or for law enforcement investigations related to its business. Disclosures may also be made when appropriate to protect Harrison REMC's legal rights or in situations involving an imminent threat to life or property. Harrison REMC will take reasonable steps to limit the scope and consequences of any of these disclosures.
6. In addition, information may be shared with affiliates and partners of Harrison REMC that offer products and services of interest to member-consumers. Member-consumers may request that their information not be shared with affiliates or partners for the offering of new products and services by calling the REMC office. Nevertheless, Harrison REMC does not sell, rent, loan, exchange, or otherwise release member-consumer information to non-affiliated third parties or partners for their marketing purposes.
7. Harrison REMC may make information regarding third party products and services available to member-consumers through the co-op's website.

G. Disclosure of Membership Lists to Member-Consumers

1. Membership lists of Harrison REMC may be disclosed to a member-consumer of the cooperative for governance and operational purposes, such as in connection with Cooperative election activities. In some instances, membership lists may be made available for appropriate uses without

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disclosing or sharing the list to a third party. For example, Harrison REMC may undertake a mailing on behalf of and at the expense of a third party.

Responsibility

- A. The Board of Harrison REMC shall ensure that this policy reflects current practices for personal information about member-consumers.
- B. The Board of Harrison REMC have the right to vote to authorize other uses and disclosures of information, subject to applicable laws, rules, and regulations.
- C. The CEO/Manager of Harrison REMC shall ensure that this policy is adhered to.

Last Date Reviewed: September 24, 2013

Date Adopted: October 23, 2012

Attest: _____
James Smith, Secretary