

WEST RIVER ELECTRIC ASSOCIATION, INC.

WALL, SOUTH DAKOTA

POLICY BULLETIN No. 10-31

SUBJECT Privacy Policy

RESPONSIBILITY: CEO/General Manager and Employees

I. POLICY

- A. West River Electric Association, Inc. strongly believes in carrying out its responsibility in protecting the privacy and confidentiality of member and customer information. This notice describes our privacy policy on how we treat information collected from our customers.
- B. We safeguard personal information our customers share with us. This information includes name, address, telephone number, social security number, credit information, and payment and usage history. Usage history may include information on member's property and equipment. Audio recordings and video surveillance may contain additional member information.
- C. West River may provide to members their personal electronic usage data through an interface such as a website. West River retains member 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. Retention of information is per Policy 20-30 "Record Retention".
- D. Data about members electric usage may be compiled in aggregate form so that an individual member's daily energy usage habits are not revealed and such data can be used by the Cooperative to improve system operations through engineering studies, efficiency, and overall customer service.
- E. West River Electric Association, Inc. maintains information about members suitable for its operations and for the benefit of its members. It collects personally identifiable information only by fair and lawful means. It maintains information in an accurate, complete, and timely manner as necessary for the purpose for which the information is to be used. Members may examine service, billing, capital credit, video, audio and other information about themselves and may correct any inaccurate, incomplete, or untimely information.
- F. Member information is maintained with reasonable and appropriate technical, administrative, physical and cyber safeguards to protect against foreseeable hazards such as loss, unauthorized access, destruction, misuse, modification, and improper disclosure. Members are warned, however, that no system can ever be fully protected against every possible hazard. We do not sell, rent, loan, exchange, or release mailing lists or telephone lists of members for marketing purposes outside the Cooperative. Information is not disclosed to non-affiliated third parties without the

prior written consent of the member. The Cooperative may release member information to non-affiliated third parties to be used solely for the Cooperative's marketing or information purposes. The non-affiliated third party will be required to sign a confidentiality agreement that they will not release or use the member's information for any purpose except those authorized by the Cooperative. Records may be disclosed to government or law enforcement agencies or other utilities when authorized or required by law or a court order. The Cooperative may share the names and addresses only of their members to a duly nominated candidate of the Board of Directors per Bylaw Article 2, Section 3 as set out in Board Policy 10-11 "Disclosure of Cooperative Information". The Cooperative may disclose to and share information with commercial and consumer credit reporting agencies for credit related activities such as the reporting of bad debts. Audio and video recordings will not be released to the member for their use. The member may come into the office to hear or view the recordings.

- G. West River Electric Association, Inc. will do its best to resolve any questions or problems that arise regarding the use of member information.