

# United Electric Cooperative Services, Inc. (UCS) Privacy Policy

## Privacy and Confidentiality of Member Personal Information

### A. General

- i. United discloses to its members its policies and practices for the collection, maintenance, use, and disclosure of identifiable personal information about its members.
- ii. United maintains personal information about members for purposes that are suitable to its operations and management. Personal information is collected only through lawful and fair means and for appropriate purposes.
- iii. This policy generally describes United's privacy and confidentiality policies. The policy is not a formal limitation on the ability of United to use, manage, and disclose its records as United determines to be necessary, appropriate, or as required by law. It is subject to change without notice.

### B. Collection of Member Personal Information

- i. Due to the requirements of providing electric service and collecting resulting payments for electric service, United collects and maintains personal information about its members (hereinafter "Member Personal Information") as a routine part of operations. Member Personal Information means information that alone or in conjunction with other information identifies an individual member, including such member's: name, social security number or other government-issued identification number, date of birth, mother's maiden name, email address, account number or credit card number. Member Personal Information does not include publicly available information that is lawfully made available to the general public from the federal government or a state or local government.
- ii. United collects Member Personal Information from its members with their consent.
- iii. Occasionally, United or a contractor hired by United may survey a sample of its members and collect survey information which may include Member Personal Information.
- iv. Membership and governance activities may result in the maintenance of capital and patronage account information for members and former members which may include Member Personal Information for former members.

### C. Use of Member Personal Information

- i. United uses and discloses Member Personal Information in defined and responsible ways in order to carry out its operations.
- ii. Records containing Member Personal Information may be disclosed to affiliates or contractors hired by United to assist in carrying out operations, such as service, billing, and management functions including legal, audit, and collection services.
- iii. Member Personal Information may be disclosed to and shared with commercial and consumer credit reporting agencies for credit-related activities (e.g., the reporting of bad debts).
- iv. Records containing Member Personal Information may be disclosed to government regulators and other government agencies when authorized or required by law.
- v. Records containing Member Personal Information may also be compiled in aggregate form for the United's management activities.

- vi. Records containing Member Personal Information may be disclosed when required by law, such as in response to a search warrant, subpoena, or court order. United may use and disclose such records for investigations into employee misconduct or for law enforcement investigations related to our business. Disclosures may also be made when appropriate to protect United's legal rights or during emergencies if physical safety is believed to be at risk. United will take reasonable steps to limit the scope and consequences of any of these disclosures.
- vii. Records containing Member Personal Information may be shared with other utilities under shared service agreements or to meet operational requirements.
- viii. Records containing Member Personal Information may be disclosed at the request of or with the permission of the member.
- ix. Member Personal Information may be shared with affiliates and partners of United that offer products and services to members.
- x. United does not sell, rent, loan, exchange, or otherwise release mailing lists or telephone lists of members. United does not disclose Member Personal Information to nonaffiliated third parties without the prior, written consent of the member.

#### D. Protection of and Access to Member Personal Information

- i. United maintains Member Personal Information with technical, administrative, and physical safeguards to protect against loss, unauthorized access, destruction, misuse, modification, and improper disclosure. No record or computer system can ever be fully protected against every possible hazard. United provides reasonable and appropriate security to protect against foreseeable hazards.
- ii. United requires its employees and, when practicable and appropriate, its affiliates and contractors who have access to identifiable Member Personal Information to comply with these rules. Any employee or contractor who fails to comply with these rules may be subject to disciplinary action up to and including dismissal.
- iii. United only allows employees and affiliates or contractors access to Member Personal Information data which is needed to perform their specific job function.
- iv. United generally permits its members to access and seek correction of records about themselves that are used by United to provide service, for billing, and to manage capital accounts. Any person who wants to identify personal records maintained by United, access the records, or correct the records should contact United.
- v. In the event that a security breach was to occur where Member Personal Information is compromised or disclosed without the permission of United, United will follow all reasonable and lawful steps to notify the members affected by the breach.

#### E. Disposal of Member Personal Information

- i. In the event Member Personal Information is no longer needed, it will be disposed of properly and lawfully.