

NOBLE REMC ALBION, INDIANA

Policy Bulletin No. 4.05

SUBJECT:

Privacy and Confidentiality of Member Information

I. OBJECTIVE

To establish fair information principles for the Noble REMC in carrying out its responsibility to respect the privacy and confidentiality of member information.

II. POLICY

A. Notice

1. The Noble REMC discloses to its members its policies and practices for the collection, maintenance, use, and disclosure of identifiable, private and confidential information about its members.
2. The Noble REMC collects and maintains appropriate and necessary information about its members as a routine part of its operations.
3. When providing electricity and related services, the Noble REMC collects information from members, including name, address, telephone number, Social Security number, credit information, bank account information, payment and usage history. Usage history may include information on a member's property and appliances, health information for lifeline service, service history, and information maintained for meter maintenance purposes.
4. Through processes of the Noble REMC, membership and governance activities may result in the maintenance of the member's capital credit account information. This includes current and former members.
5. At certain times the Noble REMC may survey a sample of its members for collecting information to identify needs or improve service.
6. Other activities of the Noble REMC or its affiliates, (which may include security and home improvement services), will result in the collection of additional information about a member's property, appliances, and activities.

This information will be collected and maintained only when and to the extent appropriate to provide such services.

7. This notice describes generally the Noble REMC's privacy and confidentiality policies. The policy is not a formal limitation on the ability of the Noble REMC to use, manage, and disclose its records as the Noble REMC determines to be necessary, appropriate, or as required by law and it is subject to change without notice.

B. Trust

1. **General Practices:** The Noble REMC maintains information about members for purposes that are suitable to its operations and management. Information is collected only through lawful means and for appropriate purposes. The Noble REMC is committed to maintaining accurate, complete, timely, relevant, and appropriate information about members as necessary for the purpose for which the information is to be used.
2. **Access and Correction:** The Noble REMC generally permits its members to access and seek correction of records about themselves that are used by the Noble REMC to provide service, for billing, and to manage capital credits. Any person who wants to identify personal records maintained by the Noble REMC, access the records, or correct the records should contact: Noble REMC, 300 Weber Road, Albion, IN 46701

C. Security

1. The Noble REMC maintains member 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. However, the Noble REMC provides reasonable and appropriate security to protect against foreseeable hazards.
2. The Noble REMC requires its employees, agents and, when practicable, its affiliates and contractors who have access to identifiable member information to sign a statement acknowledging that they have read this privacy and confidentiality policy and agree to comply with it. Any agent, employee or contractor who fails to comply with these rules may be subject to disciplinary action up to and including dismissal.

D. Use and Disclosure

1. The Noble REMC uses and discloses identifiable information about members in defined and responsible ways (in order to carry out its operations). This section describes how identifiable information about members may be used and disclosed.

2. Records may be disclosed to agents, affiliates or contractors hired by the Noble REMC to assist in carrying out operations, such as service, billing, and management functions including legal, audit, and collection services.
3. Member information may be disclosed to and shared with commercial and consumer credit reporting agencies for credit-related activities.
4. Records may be disclosed to government regulators and other government agencies when authorized or required by law.
5. Records may also be compiled in aggregate form for the Noble REMC management activities.
6. Records may be disclosed when required by law, such as in response to a search warrant, subpoena, or court order. The Noble 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 to protect the Noble REMC's legal rights or during emergencies when there exists a reasonable belief that physical safety is at risk. These events are unlikely, but they are possible. The Noble REMC will take reasonable steps to limit the scope and consequences of any of these disclosures.
7. Records may be shared with other utilities pursuant to shared service agreements or to meet operational requirements, in which case the Noble REMC will make reasonable efforts to ensure that such utilities follow a policy to protect the confidentiality of that information.
8. Records about a member may be disclosed at the request of or with the permission of the member.
9. In
addition, member information may be shared with affiliates and partners of the Noble REMC that offer products and services to members.
10. A list of the members of the Noble REMC may be disclosed to a member of the corporation for a proper purpose, such as in connection with corporation election activities.
11. The Noble REMC does not sell, rent, loan, exchange, or otherwise release mailing lists or telephone lists of members for any marketing purposes. The Noble REMC does not disclose any information about a member to nonaffiliated third parties without the prior written consent of the member.
12. The members of the Noble REMC have the right to vote to authorize other uses and disclosures of information.

E. Questions and Disputes

1. This policy is maintained and supervised by the CEO of the Noble REMC. Questions about the policy, any disputes over access, correction, or other matters may also be directed to the CEO. The Noble REMC will do its best to resolve any questions or problems that arise regarding the use of member information.

III. RESPONSIBILITY

- A. Board of Directors shall be responsible for any change or revision of this policy.
- B. The CEO shall be responsible for the administration of this policy and for making recommendations or required changes.

Date Adopted 6/20/2000

Revised: 8/19/10, 10/18/2018