## MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION

POLICY NO. 532

SUBJECT: Member-Owner Privacy Effective Date: May 18, 2016

#### I. PURPOSE

At Meade County Rural Electric Cooperative Corporation (Meade County RECC), confidentiality is very important to the organization. Meade County RECC will make every effort to protect and maintain member-owners' account information and will not share specific and/or private information to third parties, without written authorization or unless required to do so by court order, subpoena or other compulsory process, or by operation of law. As Meade County RECC continues to improve and expand services and delivery channels, the cooperative recognizes members-owners needs and desires to preserve privacy and confidentiality. Meade County RECC recognizes the trust member-owners have placed in the cooperative and are committed to safeguarding the privacy of member-owner's information. The following policy confirms the continued dedication and commitment to preserving member-owners confidentiality.

### II. POLICY

## Information Collected

Meade County RECC receives and safeguards information about member-owners through many sources.

- Information received on applications or other forms;
- Information about transactions with Meade County RECC, affiliates or others;
- Information received from consumer-reporting agency; and
- Information received from usage data gathered by metering systems.

### Use of Information

Member-owner account information may be used in the following representative ways:

- To verify the existence of a member-owner's energy service:
- To communicate with a member-owner and handle consumer requests;

- To compile information about how Meade County RECC's website is reached and used:
- To compile research that does not identify the member-owner as an individual, group or entity other than age group and gender;
- To contact member-owners about other products or services offered by alliance partners; and
- To collect debts owed by a member-owner.

Meade County RECC limits the use and collection of nonpublic personal information to that which is necessary to preserve and administer financial services. Meade County RECC does not share this information with outside parties unless:

- Information is provided to help complete a member-owner initiated transaction (such as credit reporting agencies, document processing companies, etc.);
- Member-owner has requested it;
- Disclosure is required by law (e.g., subpoena, investigation of fraudulent activity, etc.); or
- Disclosure is required by banking regulation (e.g., Fair Lending Reporting Act, Home Mortgage Disclosure Act).

When member-owner information is provided to any of the third parties mentioned above, that third party must agree to adhere to privacy principles that provide for keeping such information confidential.

# **Limiting Employee Access to Information**

Meade County RECC limits employee access to member-owner information to those with a business reason for knowing such information. All employees are educated on the importance of confidentiality and member-owner privacy. This policy is maintained and supervised by the Cooperative. Any employee that violates the financial privacy of member-owners will be subject to appropriate disciplinary measures and possible termination.

# Protection on Information via Established Security Procedures

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, Meade County RECC has appropriate physical, electronic, and managerial procedures to safeguard and secure member-owner information.

## **Maintaining Accurate Information**

Procedures have been established so that member-owners' financial information is accurate, current and complete in accordance with reasonable commercial standards. Meade County RECC will respond to requests to correct inaccurate information in a timely manner.

#### III. RESPONSIBILITY FOR ENFORCEMENT

The President/CEO, or duly authorized personnel delegated by the President/CEO, shall be responsible for the communication and enforcement of this policy.

5/18/20/6 Date

Martin W. Littrel, President/CEO