

**APPALACHIAN ELECTRIC COOPERATIVE  
ADMINISTRATIVE AND OPERATIONAL CONTROLS**

**POLICY 3160**

**PRIVACY AND CONFIDENTIALITY**

**I. OBJECTIVE**

The objective of this policy is to establish procedures, rules and standards in collecting, storing, using, disseminating, sharing and securing member-consumer information.

**II. CONTENT**

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

**III. PROVISIONS**

**A. Categories of Information Collected**

Appalachian Electric Cooperative 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. Appalachian Electric Cooperative may also collect information for online access, website and other social media or mobile applications.
2. Billing information including but not limited to: Social Security number, driver license number, credit information, financial account information, and payment history.
3. Electric use data gathered by Appalachian Electric Cooperative's metering systems and a member-consumer's service history, which may include information on a member-consumer's property and appliances and information maintained for meter reading purposes (e.g. warning about a dog in the yard).
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 as required by our bylaws and power contract. (Appalachian Electric Cooperative's Wholesale Power Contract with TVA does not allow distribution of capital credits or patronage capital.)

5. Responses to member-consumer survey(s) conducted by a third party on behalf of or by Appalachian Electric Cooperative to identify needs or improve service.
6. Additional information or digital images of or about a member-consumer or a member-consumer's property, appliances, and activities obtained through services or programs offered by Appalachian Electric Cooperative.

B. Purposes for Collection; Access and Correction

1. Appalachian Electric Cooperative 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. Appalachian Electric Cooperative 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. Appalachian Electric Cooperative generally permits its member-consumers to access and seek correction of records about themselves that are maintained and used by Appalachian Electric Cooperative to provide service, for billing, and to manage their accounts. Any requests for or disputes relating to, access, correction, or other matters should be directed to the Customer Service Department, the Director of Office Services or the Vice President of Administration. Appalachian Electric Cooperative will do its best to resolve any questions or problems that may arise regarding the use of member-consumer information.
3. Appalachian Electric Cooperative may provide use data to member-consumers who have access to electric use data through an interface, such as a website or in-home display. Appalachian Electric Cooperative may wish to describe how such access is provided/what data is made available.

C. How Appalachian Electric Cooperative Collects Member-Consumer Information

Appalachian Electric Cooperative collects member-consumer information through the following methods:

1. When member-consumers create an account and interact with Appalachian Electric Cooperative regarding their account, utility service, or participation in Appalachian Electric Cooperative programs.
2. When member-consumers use electricity service through metering systems.
3. When member-consumers interact with Appalachian Electric Cooperative through its website [www.aecoop.org](http://www.aecoop.org), social media or mobile applications
4. When Appalachian Electric Cooperative interacts with third parties, such as credit agencies.

D. Use and Retention of Member-Consumer Information by Appalachian Electric Cooperative

1. Appalachian Electric Cooperative uses information about member-consumers in defined and responsible ways in order to manage, provide, and improve its products, services, and operations. Examples may include: administering member-consumer accounts; informing member-consumers about their energy use; provide member-consumers with outage information, designing and offering optional retail rates, and communicating with member-consumers about programs or opportunities that may be of interest to them.
2. Data about individual member-consumers' electric use may be compiled in aggregate form to be used by Appalachian Electric Cooperative to improve system operations, engineering studies, efficiency and overall customer service.
3. Appalachian Electric Cooperative retains member-consumer information, including energy use data, in such amounts and for such periods of time as required by law or regulation or as reasonably necessary to provide services in accordance with Administrative and Operational Policy 3140 – Records Management Policy.

E. Security

1. Appalachian Electric Cooperative 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. Appalachian Electric Cooperative utilizes a defense-in-depth strategy providing several layers of physical and electronic security for member-consumer information. Specifically, the

Cooperative employs proximity card based physical access control with archived video backup. Electronic access to member-consumer information is secured by role-based user access accounts using frequently changed passwords. Member-consumers are warned, however, that no system can ever be fully protected against every possible hazard.

2. Appalachian Electric Cooperative requires its employees, affiliates and contractors who have access to member-consumer information to comply with this privacy and confidentiality policy. Affiliates and contractors are required to sign the Appalachian Electric Cooperative's Non-Disclosure Agreement for Confidential Information (Form 598). Prior to beginning employment, new employees who have access to "identifying information" are required to be issued, trained, and acknowledge receipt of the Appalachian Electric Cooperative's Identity Theft Policy 3150, i.e. Red Flag policy. Additionally, annual identity theft prevention training is provided to all applicable employees. Any employee who fails to comply with these rules may be subject to disciplinary action up to and including termination. Any contractor who fails to comply with these rules may be subject to voidance of contract and legal prosecution as allowed by law.
3. Member-consumer information that member-consumers may access through Appalachian Electric Cooperative's website, social media or mobile applications is protected using cyber security protocols designed to prevent unauthorized third parties from accessing such information. Additional information regarding website and social media security can be found in Appendix A – Terms of Use (website), and Appendix B – Social Media Privacy Addendum.
4. Appalachian Electric Cooperative also maintains Administrative and Operational Policy 3150 – Identity Theft Prevention (Red Flag) which specifically addresses internal controls to identify relevant Red Flags and respond to such as they occur.

F. Disclosure to Third Parties

1. Appalachian Electric Cooperative does not share member-consumer information, including, a member-consumer's electric use data and information that can reasonably be used to identify an individual, with a third party, except at the member-consumer's request, with the member-consumer's consent, or as described below. Member-consumers who wish to authorize Appalachian Electric Cooperative to disclose their information to a third party may do so by contacting Appalachian Electric Cooperative and completing Form 599 – Authorization to Release Member-Consumer Information.

- a. Information may be disclosed to affiliates or contractors hired by Appalachian Electric Cooperative 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.
- b. Appalachian Electric Cooperative may disclose to and share information with commercial and consumer credit reporting agencies for credit-related activities (e.g., the reporting of bad debts).
- c. Sufficiently aggregated information may be disclosed to third parties where necessary or beneficial for Appalachian Electric Cooperative's operations (for example, to improve efficiency and overall customer services).
- d. Information may be disclosed when authorized or required by law, including in response to a search warrant, subpoena, or court or law enforcement order. (For example, Appalachian Electric Cooperative 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 Appalachian Electric Cooperative's legal rights or in situations involving an imminent threat to life or property. Appalachian Electric Cooperative will take reasonable steps to limit the scope and consequences of any of these disclosures.
- e. In addition, information may be shared with affiliates and partners of Appalachian Electric Cooperative that offer products and services of interest to member-consumers. Appalachian Electric Cooperative does not sell, rent, loan, exchange, or otherwise release member-consumer information to non-affiliated third parties or partners for their marketing purposes.

G. Disclosure of Membership Lists to Member-Consumers

Membership lists of Appalachian Electric Cooperative will NOT be disclosed to a member-consumer of the cooperative except for proper purposes, such as in connection with Cooperative election activities. Such disclosures will only be made in accordance with a procedure adopted by the Board and further uses of any lists so disclosed will be subject to that procedure.

H. How to Contact Appalachian Electric Cooperative

This policy is maintained and supervised by the Vice President of Administration. Questions about the policy may be directed to that office.

IV. RESPONSIBILITY

- A. The Board of Directors of Appalachian Electric Cooperative shall ensure that this policy reflects current practices for personal information about member-consumers.
- B. The Board of Directors of Appalachian Electric Cooperative has the right to vote to authorize other uses and disclosures of information, subject to applicable laws, rules, and regulations.
- C. The General Manager/Executive Vice President of Appalachian Electric Cooperative shall ensure that this policy is adhered to.

APPROVED: 12/27/12