SHELBY ENERGY COOPERATIVE, INC. Shelbyville, Kentucky

POLICY NO. 501

MEMBER INFORMATION PRIVACY

I. OBJECTIVE

Shelby Energy Cooperative, Inc. ("Shelby Energy") respects the privacy and confidentiality of member information and is committed to operational practices that protects member information. This policy describes the information that Shelby Energy collects from its members as a routine part of its operations, and how it uses, protects, and shares the information that it collects.

II. **DEFINITIONS**

- 1. <u>Member.</u> Person, firm, corporation, limited liability company, body politic, or other entity receiving service from Shelby Energy
- 2. Operational information. Information pertaining to one or more members that does not identify an individual member but includes detailed data about system operations, utility services or programs provided to one or more members.
- 3. <u>Personally identifiable information (PII).</u> An individual member's information that consists of names, address, date of birth, social security numbers and other information that specifically identifies the member to which it applies.
- 4. <u>Anonymous information.</u> Member information that may be disclosed to parties other than the member in a manner that will protect the identity of the member.
- 5. <u>Aggregate information.</u> Information regarding more than one member combined in such a manner that it does not identify an individual member.
- 6. <u>Associated third-party</u>. Third-party contractors, vendors, energy efficiency program partners, governmental entities, or non-profit utilities, or other entities with whom it is necessary to share member information for Shelby Energy to provide energy services and energy efficiency programs. For direct

- payments or rebates made to the member by an associated third-party, a controlled set of the member's PII is provided to the vendor.
- 7. <u>Unassociated third-party.</u> Any person or entity not directly involved with Shelby Energy's routine operations.
- 8. <u>Privacy.</u> The expectation by a member that the member's information will not be disclosed to an unassociated third-party without the member's consent. In contrast, member information will be shared with associated third-parties from time to time on an as-needed basis.

III. CONTENT

A. Accountability

Shelby Energy assumes the following:

- 1. It is accountable for the member's PII within Shelby Energy's possession.
- 2. It is responsible for personal information in Shelby Energy's control that has been transferred to an associated third-party for processing. Shelby Energy will use contractual or other means to provide a comparable level of protection. Shelby Energy cannot be responsible for PII provided by the member to an unassociated third-party.
- 3. It will not sell or distribute the PII of its members.
- 4. It will limit collection of information to that which is reasonable and necessary to provide electric service, participation in an energy efficiency program, use of a specific tariff or other program.
- 5. It will adopt procedures to protect personal information, receive and respond to complaints and inquiries and train employees regarding these policies and procedures.

B. Member Information Collected

PII and Operational information obtained by Shelby Energy regarding a member and persons associated with the member's account include, but aren't limited, to the following:

- 1. The name and address and other contact information, such as telephone numbers and e-mail addresses:
- 2. Facts regarding consumption of energy, both historic and current;

- 3. Data concerning a member's transactions with Shelby Energy, such as account numbers, account balances and payment history;
- 4. Credit and reference information, such as date of birth, social security number, employment information, driver's license, previous addresses, and general financial data;
- 5. Medical information to be used in case of emergency power outages; and
- 6. Financial institution information for pre-authorized payments.

C. <u>Purposes of Member Information Collected</u>

Shelby Energy obtains personal and/or operational member information for the following purposes:

- 1. Conduct the business of Shelby Energy;
- 2. Determine the current status of a member's energy service;
- 3. Assess credit risk, including obtaining credit reports;
- 4. Communicate with the member and address any service issues or needs;
- 5. Bill accounts, maintain payment records, and give notice on current balance;
- 6. Assemble statistics about how Shelby Energy's website is accessed and used;
- 7. Compile Aggregate information that does not identify the member as an individual;
- 8. Contact members about outages and services offered by Shelby Energy and third-party energy-efficiency programs partners;
- 9. Provide Aggregate information to Community Action Council ("CAC") agencies, upon request;
- 10. Respond to federal, state, local regulatory agencies; and
- 11. Collect debts owed by a member

D. <u>Member Access to Information</u>

Members shall have access to their individual information, including but not limited to, historical data regarding electric usage, respective billing units and the current applicable tariff by the following methods:

- 1. The internet member portal may be accessed by all Shelby Energy members by using a personal User ID and Password through Shelby Energy's website at: www.shelbyenergy.com. If a personal security code has not been established, the member may contact Shelby Energy by telephone and assistance will be provided on how to set up the code.
- 2. Members may contact Shelby Energy and the requested information will be mailed directly to the member or may be picked up by the member, with proper identification, at one of Shelby Energy's offices during regular business hours.

E. <u>Disclosure of Member List</u>

An appropriate member list may be disclosed to a member of Shelby Energy for proper purposes, such as in connection with election activities.

F. Security

- 1. Shelby Energy maintains member 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.
- 2. A summary of this Member Information Privacy Policy will be posted on the Shelby Energy website.

G. How to Contact Shelby Energy

This policy is maintained by Shelby Energy at the headquarters office located below. Questions regarding the policy may be directed to this office.

Shelby Energy Cooperative Attn: Member Privacy 620 Old Finchville Road Shelbyville, KY 40065

E-mail at: **shelbyenergy@shelbyenergy.com** Telephone: 502-633-4420 or 1-800-292-6585

IV. RESPONSIBILITY

A. The President and CEO is responsible for the administration of this policy.

Adopted: 07/13/16

Revised: