

MOUNTAIN PARKS ELECTRIC, INC.

COMMUNICATIONS / COMMUNITY POLICIES AND PROCEDURES

SUBJECT: MEMBER PRIVACY AND CONFIDENTIALITY	POLICY No. C-8
EFFECTIVE DATE: JANUARY 1, 2003	PAGE 1 OF 4
REVISED DATE: 3-13-08, 9-12-13, 7-12-19, 10-08-2020, 1/12/2023	

I. OBJECTIVE

To establish fair information for the Cooperative in carrying out its responsibility to respect the privacy and confidentiality of member-consumer information.

II. POLICY

A. Notice

1. The Cooperative discloses to its member-consumers its policies and practices for the collection, maintenance, use, and disclosure of identifiable information about its member-consumers.
2. The Cooperative collects and maintains appropriate information about its member-consumers as a routine part of its operations.
3. When providing electricity and related services the Cooperative collects information from member-consumers, including name, address, telephone number, email address, credit information, and payment and usage history. Usage history may include information on a member-consumer's property and appliances, health information for lifeline service, service history, and information maintained for site visitation purposes (e.g., warning about a dog in the yard).
4. Membership and governance activities may result in the maintenance of capital and patronage account information for members and former members, and contact information for former members.
5. Occasionally, the Cooperative may survey a sample of its member-consumers to collect information to identify needs or improve services.
6. Other activities by the Cooperative or its affiliates will result in the collection of additional information about a member-consumer's property, appliances, and activities. This information will be collected and maintained only when and to the extent appropriate to provide the services.

SUBJECT: MEMBER PRIVACY AND CONFIDENTIALITY	POLICY No. C-8
EFFECTIVE DATE: JANUARY 1, 2003	PAGE 2 OF 4
REVISED DATE: 3-13-08, 9-12-13, 7-12-19, 10-08-2020, 1/12/2023	

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

B. Trust

1. **General Practices:** The Cooperative 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. The 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.
2. **Access and Correction:** The Cooperative generally permits its member-consumers to access and seek correction of records about themselves that are used by the Cooperative to provide service, for billing, and to manage capital accounts. Any person who wants to identify personal records maintained by the Cooperative, access the records, or correct the records should contact Customer Service.

C. Security

1. The Cooperative maintains member-consumer 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. The Cooperative provides reasonable and appropriate security to protect against foreseeable hazards.

SUBJECT: MEMBER PRIVACY AND CONFIDENTIALITY	POLICY No. C-8
EFFECTIVE DATE: JANUARY 1, 2003	PAGE 3 OF 4
REVISED DATE: 3-13-08, 9-12-13, 7-12-19, 10-08-2020, 1/12/2023	

D. Use and Disclosure

1. The Cooperative uses and discloses identifiable information about member-consumers in defined and responsible ways (in order to carry out its operations). This section describes how identifiable information about member-consumers may be used and disclosed.
2. Records may be disclosed to affiliates or contractors hired by the Cooperative to assist in carrying out operations, such as service, billing, tree removal and management functions including legal, audit, and collection services.
3. Member-consumer 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).
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 Cooperative's management activities.
6. Records may be disclosed when required by law, such as in response to a search warrant, subpoena, or court order. The 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 the Cooperative's legal rights or during emergencies if physical safety is believed to be at risk. These events are unlikely, but they are possible. The Cooperative will take reasonable steps to limit the scope and consequences of any of these disclosures.
7. Records may be shared with other utilities under shared service agreements or to meet operational requirements.
8. Records about a member-consumer may be disclosed at the request of or with the permission of the member-consumer.

9. In addition, member-consumer information may be shared with affiliates and partners of the Cooperative that offer product and services to member-consumers.

SUBJECT: MEMBER PRIVACY AND CONFIDENTIALITY	POLICY NO. C-8
EFFECTIVE DATE: JANUARY 1, 2003	PAGE 4 OF 4
REVISED DATE: 3-13-08, 9-12-13, 7-12-19, 10-08-2020, 1/12/2023	

10. Membership lists of the Cooperative may be disclosed to a member of the Cooperative for a proper purpose, such as in connection with Cooperative election activities. In some instances, lists may be made available for appropriate uses without disclosing the list to a third party. For example, the Cooperative may undertake a mailing on behalf of and at the expense of a third party. Disclosures of membership lists will only be made following a policy adopted by the Board and further uses of any lists so disclosed will be subject to that policy.
11. The Cooperative does not sell, rent, loan, exchange, or otherwise release mailing lists or telephone lists of member-consumers. The Cooperative does not disclose any information about a member-consumer to nonaffiliated third parties without the written consent of the member-consumer.
12. Member-consumers may request that their information not be shared with affiliates for the offering of new products and services.

E. Questions and Disputes

1. This policy is maintained and supervised by the Office of the General Manager, Mountain Parks Electric, Inc., P.O. Box 170, Granby, CO 80446, 970-887-3378 or 1-877-887-3378. Questions about the policy may be directed to that office. Any disputes over access, correction, or other matters may also be directed to that office. The Cooperative will do its best to resolve any questions or problems that arise regarding the use of member-consumer information.

III. RESPONSIBILITY

- A. The Board shall ensure that this policy reflects current practices for personal information about member-consumers.
- B. The General Manager will be responsible for the administration and compliance of this policy.

 , PRESIDENT DATE: 1/12/2023