

**Policy Number: C-8**

**Subject: Member Privacy and Confidentiality**

**Review Requirement: 3 years**

**Original Issue Date: January 01, 2003**

**Date of Last Review: April 09, 2026**

**Date of Last Revision: April 09, 2026**

**Previous Revisions: 03/13/2008, 09/12/2013, 07/12/2019, 10/08/2020, 01/12/2023**

---

**I. OBJECTIVE**

To establish standards for Mountain Parks Electric, Inc., (the “Cooperative”) in carrying out its responsibility to respect the privacy and confidentiality of member-consumer information (“Member Records”).

**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, 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 members.
5. The Cooperative surveys 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.

7. This policy 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 Member 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 Member Records regarding such member-consumer that are used by the Cooperative to provide service, for billing, and to manage capital accounts. Any person who wants to identify personal Member Records maintained by the Cooperative, access such Member Records, or correct the Member Records should contact Member Services.

#### 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. The Cooperative makes no representations that its records or computer systems are fully protected against every possible hazard. The Cooperative provides reasonable and appropriate security to protect against foreseeable hazards.

#### 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. Member 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. Member Records may be disclosed to government regulators and other government agencies when authorized or required by law.
5. Member Records may also be compiled in aggregate form and disclosed for the Cooperative's management activities.
6. Member 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 Member 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. Member Records may be shared with other utilities under shared service agreements or to meet operational requirements.
8. Member Records about individual member-consumers may be disclosed at the request of or with the permission of the subject member-consumer.
9. In addition, Member Records may be shared with affiliates and partners of the Cooperative that offer products and services to member-consumers.
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.

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 Chief Executive Officer (“CEO”), Mountain Parks Electric, Inc., P.O. Box 170, Granby, CO 80446, 970-887-3378. 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 CEO will be responsible for the administration and compliance of this policy.

**APPROVED BY THE BOARD OF DIRECTORS ON APRIL 09, 2026**