

CLARKE ELECTRIC COOPERATIVE, INC.

Policy Number 306

Subject: Privacy and Confidentiality

I. OBJECTIVE

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

II. POLICY

A. Notice

1. Clarke Electric Cooperative, Inc. discloses to its member-consumers its policies and practices for the collection, maintenance, use, and disclosure of identifiable information about its member-consumers.
2. Clarke Electric Cooperative, Inc. collects and maintains appropriate information about its member-consumers as a routine part of its operations.
3. When providing electricity and related services Clarke Electric Cooperative, Inc. collects information from member-consumers, including name, address, telephone number, Social Security number, 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 meter reading 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, Clarke Electric Cooperative, Inc. may survey a sample of its member-consumers to collect information to identify needs or improve service.
6. Other activities by Clarke Electric Cooperative, Inc. or its affiliates (including security and home improvement services,) 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 notice describes generally Clarke Electric Cooperative's privacy and confidentiality policies. The policy is not a formal limitation on the ability of Clarke Electric Cooperative, Inc. to use, manage, and disclose its records as Clarke Electric Cooperative determines to be necessary, appropriate, or as required by law. It is subject to change without notice.

B. Trust

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

C. Security

1. Clarke Electric 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. Clarke Electric provides reasonable and appropriate security to protect against foreseeable hazards.
2. Clarke Electric Cooperative, Inc requires its employees and, when practicable, its affiliates and contractors who have access to identifiable member-consumer information to sign a statement acknowledging that they have read this privacy and confidentiality policy and agreeing to comply with it. Any employee or contractor who fails to comply with these rules may be subject to disciplinary action up to and including dismissal.

D. Use and Disclosure

1. Clarke Electric Cooperative, Inc. 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 Clarke Electric to assist in carrying out operations, such as service, billing, 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 Clarke Electric management activities.
6. Records may be disclosed when required by law, such as in response to a search warrant, subpoena, or court order. Clarke Electric may use and disclose records for investigations into employee misconduct or for law enforcement investigation related to our business. Disclosures may also be made when appropriate to protect Clarke Electric's legal rights or during emergencies if physical safety is believed to be at risk. These events are unlikely, but they are possible. Clarke Electric 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. For home security customers, information may be shared with law enforcement authorities as authorized in service agreements.
9. Records about a member-consumer may be disclosed at the request of or with the permission of the member-consumer.
10. In addition, member-consumer information may be shared with affiliates and partners of Clarke Electric that offer products and services to member-consumers.
11. 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 (or the membership), and further uses of any lists so disclosed will be subject to that policy.
12. Clarke Electric does not sell, rent, loan, exchange, or otherwise release mailing lists or telephone lists of member-consumers (for marketing purposes). Clarke Electric does not disclose any information about a member-consumer to nonaffiliated third parties without the (prior, written) consent of the member-consumer.
13. The members of the Cooperative have the right to vote to authorize other uses and disclosures of information.
14. 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 Clarke Electric Cooperative, Osceola, Iowa. 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. Clarke Electric will do its best to resolve any questions or problems that arise regarding the use of member-consumer information.

III. ADMINISTRATION

- A. General Manager
- B. The Board of Directors

Effective Date: 4/19/01 **Revision Date:** _____

President Wayne Hornocker_____