# UTILITIES DISTRICT OF WESTERN INDIANA RURAL ELECTRIC MEMBERSHIP CORPORATION

## I. <u>POLICY SUMMARY</u>

Protection of each member-owner's personal information is important to the Utilities District of Western Indiana REMC. It is the intent of this policy to establish and disclose UDWI's practices regarding the collection, use, retention, protection, and distribution of that personal information. This privacy policy shall be reviewed intermittently to affirm compliance with UDWI's business practices, policies, as well as applicable state and federal laws.

## II. <u>COLLECTING PERSONAL INFORMATION</u>

The type and amount of personal information UDWI collects depends upon the scope of service provided. Personal information collected may include, but is not limited to:

- Information provided by the member on their application for membership, such as address, social security number, date of birth, and contact information.
- Information provided by the member, or gathered in relationship to UDWI's business practices or based upon transactions with UDWI, such as credit card information, bank account numbers, routing and/or transit numbers, and credit history.

A member's name or the fact that the member receives services from UDWI shall not be considered personal information.

# III. USING PERSONAL INFORMATION

The Cooperative uses personal information primarily for the purpose of providing electrical service, related UDWI services, and maintaining the member's account. Cooperative employees shall be advised of the sensitive nature of collected data and shall not disclose or use members' personal information for any purposes other than conducting the business of UDWI, except (1) where required by law, (2) in order to establish, exercise or defend the Cooperative's legal rights, (3) where required by the Articles of Incorporation or Bylaws of UDWI, or (4) a member's own personal information if requested by the member during regular business hours, but only upon the member's ability to establish his or her identity pursuant to UDWI's Identity Theft and Red Flag Prevention Policy.

## IV. MAINTAINING AND PROTECTING PERSONAL INFORMATION

UDWI shall take reasonable technical and organizational precautions to ensure against the loss, misuse, or alteration of personal information. Such precautions include:

- Secure Servers
- Password Protected Computer Stations
- Encryption Technology

- Restricted Access to Facilities and/or Storage Units
- Establishment of Board Policy No. 105, Identity Theft Red Flag Prevention Policy, established for the prevention and mitigation of identity theft.

Such precautions do not provide a guarantee that personal information cannot be accessed, altered, or deleted due to physical, electronic, or procedural failures but are intended to be UDWI's reasonable precautions to protect the personal information of its members.

### V. DISTRIBUTING PERSONAL INFORMATION

Personal information will not be rented or sold by UDWI. Personal information shall not be shared with third parties or subcontractors, with the exception of those elements necessary to conducting the business of UDWI and/or as requested or authorized by the member.

### VI. POLICY REVISION AND RESPONSIBILITY

It shall be the responsibility of each UDWI employee to comply with this policy. It shall be the responsibility of the Chief Executive Officer to maintain and enforce this policy. It shall be the responsibility of the Board of Directors to periodically review this policy and authorize modifications deemed necessary to protecting the private information of member-owners.