

Eastern Iowa Light & Power Cooperative

BOARD POLICY

SUBJECT: Member Privacy and Confidentiality

OBJECTIVE: To establish fair informational principles in carrying out privacy and confidentiality of member-owner information.

POLICY:

The Board of Directors recognizes the responsibility of Eastern Iowa Light and Power Cooperative (EILP) to respect and protect the private information of EILP member-consumers and by this policy directs the CEO to undertake procedures and precautions to safeguard that information.

EXPECTATIONS:

A. EILP Notice

1. Discloses to its member-consumers its policies and practices for the collection, maintenance, use, and disclosure of identifiable information about its member-consumers.
2. Collects and maintains appropriate information about its member-consumers as a routine part of its operations.
3. When providing electricity and related services EILP collects information from member-owners, including name, address, telephone number, social security number, email address, letter of credit, driver's license, and payment and usage history. Usage history may include information on a member-consumer's property and electrical equipment, service history, and information maintained for property access.
4. Membership and governance activities may result in the maintenance of capital and patronage account information for current and former members-consumers, and contact information for former member-consumers. Shall use proper disposal methods for current and former member-consumers information in compliance with applicable law.
5. May survey a sample of its member-consumers to collect information to identify needs or improve service.
6. Other activities by EILP 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 notice describes generally EILP's privacy and confidentiality policies. The policy is not a formal limitation to use, manage, and disclose its records as determines to be necessary, appropriate, or as required by law. It is subject to change without notice.

B. Trust

1. General Practices: Maintains information about member-consumers for purposes suitable to its operations and management. Information is collected only through lawful and fair means and for appropriate purposes. 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 used to provide service, for billing, and to manage capital accounts. Any person who wants to identify personal records access the records, or correct the records should contact:

Eastern Iowa Light and Power Cooperative
Manager of Member Billing and Records
PO Box 3003
Wilton, Iowa 52778

C. Security

1. Maintains member-owner 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.
2. Requires its employees and, when practicable, its affiliates and contractors who have access to identifiable member-consumer information to sign a statement acknowledging 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. 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 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 creditreporting 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 management activities.
6. Records may be disclosed when required by law, such as in response to a search warrant, subpoena, or court order. May use and disclose records for investigations into employee misconduct or for law enforcement investigations related to our business. Disclosures may also be made when appropriate to protect EILP's legal rights or during emergencies if physical safety is believed to be at risk. These events are unlikely, but they are possible. 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. 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 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 directors and further uses of any lists so disclosed will be subject to that policy.
12. Does not sell, rent, loan, exchange, or otherwise release mailing lists or telephone lists of member-consumers for marketing purposes. Does not disclose any information about a member-consumer to nonaffiliated third parties without the prior, written consent of the member-consumer.
13. Member-consumers may request their information not be shared with affiliates for the offering of new products and services.

To Opt-Out: provide your written request to the Manager of Member Billing and Records at Eastern Iowa Light and Power Cooperative, PO Box 3003, Wilton, Iowa 52778.

14. Member-owner information which is posted or accessible through the EILP website is also subject to terms of the privacy statement contained on the website at www.easterniowa.com.

LIMITATIONS:

Questions and Disputes

This policy is maintained and supervised by the Compliance Office, PO Box 3003, Wilton, Iowa 52778, or email at complianceoffice@easterniowa.com or phone 563-732-7320. 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. EILP will do its best to resolve any questions or problems that arise regarding the use of member-consumer information.

RESPONSIBILITY:

The CEO shall ensure this procedure reflects current practices for personal information about member-consumers and enforcement of this policy.

ADOPTED BY THE BOARD OF DIRECTORS ON APRIL 28, 2022.

REVIEWED BY THE BOARD OF DIRECTORS ON JULY 1, 2022.