

 Oakdale Electric Cooperative	
Policy Name: Privacy Principles for Member Information	Policy No: 4.02
Reviewed/Revised Date: 06-06-2023	Page 1 of 3

OBJECTIVE:

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

POLICY CONTENT:

A. Notice

1. Oakdale Electric Cooperative discloses to its members its policies and practices for the collection, maintenance, use, and disclosure of identifiable information about its members.
2. Oakdale Electric Cooperative collects and maintains appropriate information about its members as a routine part of its operations.
3. When providing electricity and related services, Oakdale Electric Cooperative collects information from members, including name, address, telephone number, Social Security number, credit information, and payment and usage history. Usage history may include information on a member's property and appliances, health information for lifeline service, service history, and information maintained for onsite 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, Oakdale Electric Cooperative may survey a sample of its members to collect information to identify needs and/or improve service.
6. Other activities by Oakdale Electric Cooperative or its affiliates, including energy efficiency programs, rebates, line clearing, and maintenance will result in the collection of additional information about a member'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 Oakdale Electric Cooperative's privacy and confidentiality policies. The policy is not a formal limitation on the ability of Oakdale Electric Cooperative to use, manage, and disclose its records as Oakdale Electric Cooperative determines to be necessary, appropriate, or as required by law. It is subject to change without notice.

B. Trust

1. General Practices: Oakdale Electric Cooperative maintains information about members for purposes that are suitable to its operations and management. Information is collected only through lawful and fair means and for appropriate purposes. Oakdale Electric Cooperative is

committed to maintaining accurate, complete, timely, relevant, and appropriate information about members as necessary for the purpose for which the information is to be used.

2. Access and Correction: Oakdale Electric Cooperative generally permits its members to access and seek correction of records about themselves that are used by Oakdale Electric Cooperative to provide service, for billing, and to manage capital accounts. Any person who wants to identify personal records maintained by Oakdale Electric Cooperative, access the records, or correct the records should contact the office.

C. Security

1. Oakdale Electric Cooperative maintains member 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. Oakdale Electric Cooperative provides reasonable and appropriate security to protect against foreseeable hazards.

2. Oakdale Electric Cooperative requires its employees and, when practicable, its affiliates and contractors who have access to identifiable member 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. Oakdale Electric Cooperative uses and discloses identifiable information about members in defined and responsible ways in order to carry out its operations. This section describes how identifiable information about members may be used and disclosed.

2. Records may be disclosed to affiliates or contractors hired by Oakdale Electric Cooperative to assist in carrying out operations, such as service, billing, and management functions including legal, audit, and collection services.

3. Member 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 Oakdale Electric Cooperative management activities.

6. Records may be disclosed when required by law, such as in response to a search warrant, subpoena, or court order. Oakdale Electric Cooperative 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 Oakdale Electric Cooperative's legal rights or during emergencies if physical safety is believed to be at risk. These events are unlikely, but they are possible. Oakdale Electric 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 may be disclosed at the request of or with the permission of the

member.

9. 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 with the approval of the General Manager/CEO or the Board of Directors, and further uses of any lists so disclosed will be subject to this disclosure.

10. Oakdale Electric Cooperative does not sell, rent, loan, exchange, or otherwise release mailing lists or telephone lists of members for marketing purposes. Oakdale Electric Cooperative does not disclose any information about a member to nonaffiliated third parties without the prior, written consent of the member.

E. Questions and Disputes

1. This policy is maintained and supervised by Oakdale Electric Cooperative, 489 N. Oakwood St., Tomah, WI 54660. 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. Oakdale Electric Cooperative will do its best to resolve any questions or problems that arise regarding the use of member information.

A. The board shall ensure that this policy reflects current practices for personal information about members.

B. The General Manager/CEO shall ensure that this policy is adhered to.

Original Effective Date: 6/24/2020	Reviewed Date (no revisions): 06-06-2023	Revised Date(s):
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