

## **Bartlett Electric Cooperative**

### **Policy No. 5-17**

#### **Policy on Privacy and Confidentiality**

##### **I. Objective**

Bartlett Electric Cooperative respects the privacy and confidentiality of member-consumer information. This policy describes the information that Bartlett Electric Cooperative collects from its member-consumers as a routine part of its operations, and how it uses, protects, and shares the information that it collects.

Unless specifically precluded below, BEC will not post or publish imaging or images without the subject's consent. Further, such content will be maintained and protected as confidential material.

##### **II. Policy**

###### **A. Categories of Information Collected**

**Bartlett Electric Cooperative collects and maintains appropriate information about its member-consumers, including:**

1. Contact information, including a member-consumer's name, address, telephone number, user name, password, and e-mail addresses.
2. Billing information, including Social Security number, credit information, financial account information, and payment information and history.
3. Electric usage data gathered by Bartlett Electric Cooperative's metering systems and a member-consumer's service history, to include information on a member-consumer's property and appliances and information maintained for meter reading purposes (e.g., warning about a dog in the yard).
4. Capital and patronage account information for member-consumers and former member-consumers and contact information for former member-consumers resulting from membership and governance activities.
5. Anonymous responses to member-consumer survey(s) conducted by Brazos Electric Cooperative or Bartlett Electric Cooperative to identify needs or improve service.
6. Additional information about a member-consumer or a member-consumer's property, appliances, and activities obtained through services offered by Bartlett Electric Cooperative or its affiliates.

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7. Drone or electronic imaging (video), or electronic images (pictures) of Bartlett Electric's distribution assets on or near member-consumer's premises.
8. Business telephone recordings and tracking of conversations made to, or from, Bartlett Electric (with the exception of credit card information per PCI compliance).

**B. Purposes for Collection; Access and Correction**

1. Bartlett Electric Cooperative collects and 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.
2. Bartlett 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. Bartlett Electric Cooperative generally permits its member-consumers to access and seek correction of records about themselves that are maintained and used by Bartlett Electric Cooperative to provide service, for billing, and to manage capital accounts. Any requests for, or disputes relating to, access, correction, or other matters should be directed to Bartlett Electric Cooperative, 27492 State Highway 95, Bartlett, TX 76511 or by emailing [customerservice@bartlettec.coop](mailto:customerservice@bartlettec.coop); or by phone at 254.527.3551. Bartlett Electric Cooperative will do its best to resolve any questions or problems that may arise regarding the use of member-consumer information.
3. Bartlett Electric Cooperative may provide usage data to member-consumers who have access to electric usage data through an interface, such as a website or in-home display.
4. Due to the very nature of drone imaging and unpredictable/intermittent wind gusts reflections, etc., to protect the privacy and confidentiality of the member-consumer and others in the surrounding areas, imaging will not be redistributed as it pertains to collecting imaging for maintaining or diagnosing the condition of distribution assets located on or near member-consumer premises. Imaging is collected only for work-related purposes.
5. Electronic images may be provided to member-consumers (e.g. condition of BEC equipment on the member-consumer's premises) or non-member consumers (e.g. pole damage cause by auto) to support BEC's position on a claim, maintenance item, or diagnosis of BEC distribution assets. Images are collected only for work-related purposes.
6. Business telephone recordings will generally not be made available to the member-consumer nor non-member consumer; however, the timing and purpose of the calls may be discussed with member-consumers or non-member consumers on the account or invoice. Recordings may be used for training, vendor relations, or to confirm with a member-consumer BEC's request or instruction.

**C. How Bartlett Electric Cooperative Collects Member-Consumer Information**

**Bartlett Electric Cooperative collects member-consumer information through the following methods:**

1. When member-consumers create an account and interact with Bartlett Electric Cooperative regarding their account, utility service, or participation in Bartlett Electric Cooperative programs.
2. When member-consumers use electricity service and metering systems.
3. When member-consumers interact with Bartlett Electric Cooperative through its website at <http://bartlettco.coop/>.
4. When Bartlett Electric Cooperative interacts with third parties, such as credit and collection agencies.
5. When Bartlett Electric contracts for annual or semi-annual Member Survey per Board Policy (5-1 A.1.d).
6. When Bartlett Electric performs drone imaging for the maintenance or diagnosis of distribution assets on or near the member-consumer's premises.
7. When member-consumers, vendors, and non-member-consumers either call, or are called by Bartlett Electric Cooperative, the conversation is recorded – except for credit cards numbers due to PCI compliance. Member-consumer calls are also tracked and noted by BEC in an effort to maximize member support.
8. When Bartlett Electric Cooperative is onsite for maintenance or diagnosis of distribution system and uses electronic images.
9. When member-consumers call BEC or the Interactive Voice Response (IVR).

**D. Use and Retention of Member-Consumer Information by Bartlett Electric Cooperative**

1. Bartlett Electric Cooperative uses information about member-consumers in defined and responsible ways in order to manage, provide, and improve its products, services, operations, and member touchpoints.
2. Data about member-consumers' electric usage may be compiled in aggregate form so that an individual member-consumer's daily energy usage habits are not revealed, and such data may be used by Bartlett Electric Cooperative to improve system operations, efficiency and overall customer service.

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Bartlett Electric Cooperative retains member-consumer information including drone imaging, telephone recordings, contact tracking electronic images, IVR access, and energy usage data, in such amounts and for such periods of time as required by law or regulation or as reasonably necessary to provide services.

**E. Security**

1. Bartlett Electric Cooperative maintains member-consumer information, telephone recordings, electronic images, and drone imaging with reasonable and appropriate technical, administrative, physical and cyber safeguards to protect against loss, unauthorized access, destruction, misuse, modification, and improper disclosure of member-consumer information. Member-consumers are warned, however, that no system can ever be fully protected against every possible hazard.
2. Bartlett Electric Cooperative requires its employees, affiliates and contractors who have access to member-consumer information to comply with this privacy and confidentiality policy. Any employee or contractor who fails to comply with these rules may be subject to disciplinary action up to and including termination.
3. Member-consumer information that member-consumers may access through Bartlett Electric Cooperative's website is protected using cyber security protocols designed to prevent unauthorized third parties from accessing such information.

**F. Disclosure to Third Parties**

1. Bartlett Electric Cooperative does not share member-consumer information with a third party, except at the member-consumer's request, with the member-consumer's consent, or as described below. Member-consumers who wish to authorize Bartlett Electric Cooperative to disclose their information (except imaging and telephone recordings) to a third party may do so by contacting Bartlett Electric Cooperative by mail at 27492 State Highway 95, Bartlett, TX 76511; by email at [customerservice@bartlettcc.coop](mailto:customerservice@bartlettcc.coop); or by phone at 254.527.3551.
2. Information may be disclosed to affiliates or contractors hired by Bartlett Electric Cooperative to assist in carrying out operations, such as service, maintenance, billing, and management functions including legal, audit, and collection services. Information may also be shared with other utilities under shared service agreements or to meet operational requirements. Information will only be disclosed to such persons to the extent necessary to render the services, and only to those who agree to maintain the confidentiality and security of the information.
3. Bartlett Electric Cooperative may disclose to and share information with collection firms and commercial and consumer credit reporting agencies for credit-related activities.
4. Sufficiently aggregated information may be disclosed to third parties where necessary or beneficial for Bartlett Electric Cooperative's.

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5. Information may be disclosed when authorized or required by law, including in response to a search warrant, subpoena, or court or law enforcement order. Disclosures may also be made when appropriate to protect Bartlett Electric Cooperative's legal rights or in situations involving an imminent threat to life or property. Bartlett Electric Cooperative will take reasonable steps to limit the scope and consequences of any of these disclosures.
6. In addition, information may be shared with affiliates and partners of Bartlett Electric Cooperative that offer products and services of interest to member-consumers. Nevertheless, Bartlett Electric Cooperative does not sell, rent, loan, exchange, or otherwise release member-consumer information to non-affiliated third parties or partners for their marketing purposes, without a member-consumer's consent.
7. Bartlett Electric Cooperative may make information regarding third party products and services available to member-consumers through the co-op's website.

**G. Disclosure of Membership Lists to Member-Consumers**

1. Membership lists of Bartlett Electric Cooperative may be disclosed to a member-consumer of the cooperative for proper purposes, such as in connection with Cooperative election activities. Such disclosures will only be made in accordance with a policy adopted by the Board, and further uses of any lists so disclosed will be subject to that policy.

**H. How to Contact Bartlett Electric Cooperative**

1. This policy is maintained and supervised by Bartlett Electric Cooperative, 27492 State Highway 95, Bartlett, TX 76511; or by emailing [customerservice@bartlettcc.coop](mailto:customerservice@bartlettcc.coop); or by phone at 254.527.3551.

**III. Responsibility**

- A. The Board of Bartlett Electric Cooperative shall ensure that this policy reflects current practices for personal information about member-consumers.**
- B. The Board of Bartlett Electric Cooperative has the right to vote to authorize other uses and disclosures of information, subject to applicable laws, rules, and regulations.**
- C. The General Manager/CEO of Bartlett Electric Cooperative shall ensure that this policy is adhered to.**

Approved:   
President

Approved: 12.20.2007

Approved: 02.15.2018

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Annual Review: