

Hill County Electric Cooperative  
Policy on Privacy and Confidentiality

Dated: January 1, 2013

I. Objective

Hill County Electric Cooperative respects the privacy and confidentiality of member-consumer information. This policy describes the information that Hill County 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.

II. Policy

A. Categories of Information Collected

Hill County Electric Cooperative collects and maintains appropriate information about its member-consumers, including:

1. Contact information, including a member-consumer's name, address, telephone number, and e-mail address. Hill County Electric Cooperative might also collect a username and password for online account access.
2. Billing information, including Social Security number (or Tax ID number), date of birth, credit information, financial account information, and payment history.
3. Electric usage data gathered by Hill County Electric Cooperative's metering systems and the member-consumer's service history.
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. Responses to member-consumer survey(s) conducted by Hill County 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 electrician services or energy audits offered by Hill County Electric Cooperative.

B. Purposes for Collection; Access and Correction

1. Hill County 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. Hill County 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. Hill County Electric Cooperative generally permits its member-consumers to access and seek correction of records about themselves that are maintained and used by Hill County Electric Cooperative to provide service, for billing, and to manage capital credit accounts. Any requests for, or disputes relating to, access, correction, or other matters should be directed to:

Hill County Electric Cooperative  
Customer Service  
PO Box 2330  
Havre, MT 59501-2330  
or call 406-394-7804

Hill County Electric Cooperative will do its best to resolve any questions or problems that may arise regarding the use of member-consumer information.

3. Hill County Electric Cooperative may provide usage data and billing information to member-consumers who have access to electric usage data through an interface such as a website. This access is provided via a username and password established by the member-consumer.

#### C. How Hill County Electric Cooperative Collects Member-Consumer Information

Hill County Electric Cooperative collects member-consumer information through the following methods:

1. When member-consumers create an account and interact with Hill County Electric Cooperative regarding their account, utility service, or participation in Hill County Electric Cooperative programs.
2. When member-consumers use electricity service and metering systems (including smart meters).
3. When member-consumers interact with Hill County Electric Cooperative through its website at [www.hcelectric.com](http://www.hcelectric.com)
4. When Hill County Electric Cooperative interacts with third parties, such as credit agencies.

#### D. Use and Retention of Member-Consumer Information by Hill County Electric Cooperative

1. Hill County Electric Cooperative uses information about member-consumers in defined and responsible ways in order to manage, provide, and improve its products, services, and operations. Examples of such use include to: administer member-consumer accounts; inform member-consumers about their energy usage; provide member-

consumers with outage information and warning messages; and communicate with member-consumers about programs or opportunities that may be of interest to them.

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 Hill County Electric Cooperative to improve system operations, efficiency, and overall customer service.
3. Hill County Electric Cooperative retains member-consumer information, including 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. Hill County Electric Cooperative maintains member-consumer information 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. Hill County Electric Cooperative requires its employees, affiliates, and contractors who have access to member-consumer information agree in writing to comply with Hill County Electric's privacy and confidentiality policies. Our employees and contractors are educated about customer confidentiality and access is limited to those individuals who have a need to know. 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 Hill Country Electric Cooperative's website is protected using cyber security protocols designed to prevent unauthorized third parties from accessing such information. We use ICSA-certified firewalls with deep packet inspection, industry-leading intrusion/virus prevention, and SSL encryption. These firewalls are monitored 24 hours a day and receive constant updates protecting our infrastructure from zero-day threats.

#### F. Disclosure to Third Parties

1. Hill County Electric Cooperative does not share member-consumer information, including a member-consumer's electric usage data, that can reasonably be used to identify an individual to a third party, except when Hill County Electric Cooperative has received a written request or consent from the member-consumer, or as described below. Member-consumers who wish to authorize Hill County Electric Cooperative to disclose their information to a third party may do so by contacting Hill County Electric Cooperative as described below. Hill County Electric Cooperative shares e-mail addresses of members who participate in the Montana Electric Cooperative Association (MECA) Grassroots Action Team with MECA.

2. Information may be disclosed to affiliates or contractors hired by Hill County Electric Cooperative to assist in carrying out operations, such as service, maintenance, billing, and management functions including legal, audit, and collections 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 (in writing) to maintain the confidentiality and security of the information.
3. Hill County Electric Cooperative may disclose to and share information with commercial and consumer credit report reporting agencies for credit-related activities (e.g., the reporting of bad debts).
4. Sufficiently aggregated information may be disclosed to third parties where necessary or beneficial for Hill County Electric Cooperative's operations (for example, to improve efficiency and overall customer services).
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. For example, Hill County Electric Cooperative may use and disclose records for investigations into employee misconduct or for law enforcement investigations related to its business. Disclosures may also be made when appropriate to protect Hill County Electric Cooperative's legal rights or in situations involving an imminent threat to life or property. Hill County 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 Hill County Electric Cooperative that offer products and services of interest to member-consumers. Member-consumers may request that their information not be shared with affiliates or partners for the offering of new products and services by sending a written request to:

Hill County Electric Cooperative  
Customer Service  
PO Box 2330  
Havre, MT 59501-2330

Nevertheless, Hill County 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 prior written consent.

7. Hill County 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 Hill County 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 endorsed by the Board, and further uses of any lists so disclosed will be subject to that policy. In some instances, membership lists may be made available for appropriate uses without disclosing or sharing the list to a third party.

III. Responsibility

- A. The Hill County Electric Cooperative Board shall ensure that this policy reflects current practices for personal information about member-consumers.
- B. The Board of Hill County 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 of Hill County Electric Cooperative shall ensure that this policy is adhered to. Questions about the policy may be directed to that office at (406)394-7804 or by writing to:

Hill County Electric Cooperative  
General Manager  
PO Box 2330  
Havre, MT 59501-2330