



**OUTHEAST COLORADO
POWER ASSOCIATION**

MEMBER RELATIONS

BP - 314

Subject: **PRIVACY AND CONFIDENTIALITY**

Original Issue Date: **08-18-10**

Last Revised: **09-15-21**

Last Reviewed: **09-18-13**

Page 1 of 3

I. OBJECTIVE:

To establish fair information principles for Southeast Colorado Power Association (SECPA) in carrying out its responsibility to respect the privacy and confidentiality of member information.

II. POLICY:

A. Notice

1. SECPA discloses to its members its policies and practices for the collection, maintenance, use, and disclosure of identifiable information about its members.
2. SECPA collects and maintains appropriate information about its members as a routine part of its operations.

B. Trust

1. General Practices: SECPA 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: SECPA generally permits its members to access and seek correction of records about themselves that are used by SECPA to provide service, for billing, and to manage capital accounts.

C. Security

1. SECPA maintains member information with technical, administrative, and physical safeguards to protect against loss, unauthorized access, destruction, misuse, modification, and improper disclosure. SECPA provides reasonable and appropriate security to protect against foreseeable hazards.
2. SECPA requires its employees and, when practicable and appropriate, its affiliates and contractors who have access to identifiable member information to comply with this policy. Any employee or contractor who fails to comply with these rules may be subject to disciplinary action up to and including dismissal.

Date Adopted: **09-15-21**

, President



**OUTHEAST COLORADO
POWER ASSOCIATION**

MEMBER RELATIONS

BP - 314

Subject: **PRIVACY AND CONFIDENTIALITY**

Original Issue Date: **08-18-10**

Last Revised: **09-15-21**

Last Reviewed: **09-18-13**

Page **2** of **3**

D. Use and Disclosure

1. SECPA uses and discloses identifiable information about members in defined and responsible ways in order to carry out its operations.
2. Records may be disclosed to affiliates or contractors hired by SECPA 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. Members may access information about their specific account, by making an appointment for no more than four members in each meeting with the Chief Executive Officer (CEO) and viewing the documents in the presence of the CEO or a delegate of the CEO. Information from documents may be hand-copied, but photographic images or copies are not allowed. When SECPA staff assistance is required to interpret the data, the requesting member will be responsible for reimbursing SECPA for the employee(s) time.
5. Records may be disclosed to government regulators and other government agencies when authorized or required by law.
6. Records may be disclosed when required by law. SECPA 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 SECPA's legal rights or during emergencies if physical safety is believed to be at risk, SECPA 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.

Date Adopted: **09-15-21**

, President



**OUTHEAST COLORADO
POWER ASSOCIATION**

MEMBER RELATIONS

BP - 314

Subject: **PRIVACY AND CONFIDENTIALITY**

Original Issue Date: **08-18-10**

Last Revised: **09-15-21**

Last Reviewed: **09-18-13**

Page **3** of **3**

9. In addition, member information may be shared with affiliates and partners of SECPA that offer products and services to members.
10. SECPA does not sell, rent, loan, exchange, or otherwise release mailing lists or telephone lists of members. SECPA does not disclose any information about a member to non-affiliated third parties without the prior written consent of the member.
11. In some instances, lists may be made available for appropriate uses without disclosing the list to a third party. For example, SECPA 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 Board of Directors action, and further uses of any lists so disclosed will be subject to that action, and for no other purpose.
12. Any person or entity receiving any information from SECPA shall be required to verify that the information will not be used for any purpose other than the proper purpose for which it was released, and the information will not be sold, loaned, exchanged, or otherwise released or used.
13. Members may request that their information not be shared with affiliates for the offering of new products and services by informing the cooperative and having those instructions on its member records by notification of SECPA.

III. RESPONSIBILITY

- A. The CEO is responsible for the administration of this policy.

Date Adopted: **09-15-2021**

Randy Phillips, President