



August 19, 2020

Applicability: Board and Management

**BOARD AND MANAGEMENT POLICY NO. 555  
MEMBER INFORMATION AND IDENTITY THEFT**

**I. PURPOSE**

To establish the administrative mechanisms necessary to protect member information, preserve members' right to privacy, and prevent member identity theft.

**II. PROCEDURE**

**A. Requests for a Member's Own Information**

1. A member may request information about his or her current bill by calling the Cooperative office and providing his or her full name, address of record and account or membership number.
2. A member may confirm his or her name, address, and account or membership number by calling or writing to the Cooperative office to register an inquiry. Inquiries for such information will be answered only by mail within ten (10) working days and shall be sent only to the member's address of record.
3. A member may request information about his or her vested capital account by writing to the Cooperative office. The inquiry must include the member's full name and address of record, membership or account number, if any, and the year he or she joined the Cooperative. The Cooperative shall respond in writing only, sent to the member's address of record within thirty (30) days of receipt of the inquiry. No information on capital accounts will be provided over the phone or to anyone other than the member or the authorized representative of his or her estate.

**B. Third Party Requests for Membership Information**

1. It is the policy of the Cooperative not to provide specific information about any member to a third-party, whether or not a member, except as required by law or by the Articles or Bylaws of the Cooperative.
2. Membership lists will not be distributed or sold to any individual or organization for any purpose without the approval of the Board of Directors.
3. Anyone who requests publicly available information about the membership or any member will be referred to the official custodian of the public record.
4. No specific information about any member or the membership will be provided to any company or person for the purposes of direct marketing, sales solicitations, or any other solicitation, or for any other purpose except as required by law.
5. Any party that wishes to communicate with the Cooperative membership for any purpose other than for a "Legitimate Cooperative Purpose," as that term is defined herein, below, shall be advised of the availability of paid advertising space in the Cooperative's newsletter, magazine, or other periodical.



6. A "Legitimate Cooperative Purpose" is defined as appropriate campaign material relating to the election of directors, or any other purpose required by law or the Articles of Bylaws of the Cooperative. The Board of Directors shall be the final arbiter of a challenged determination that a purpose is or is not a "Legitimate Cooperative Purpose."
7. Anyone seeking to communicate directly with all of the members for a Legitimate Cooperative Purpose may either:
  - a. purchase paid advertising space in the Cooperative's newsletter, magazine, or other periodical, or;
  - b. provide mailers to the Cooperative, in a number sufficient to send one to each member's household as follows:
    - i. At least sixty (60) days before the desired mailing date, the party wishing to send a mailing to the members ("Mailer") will, in writing, notify the Cooperative of the proposed mailing and request determination of a Legitimate Cooperative Purpose, which Request shall set forth in detail the reasons therefore. The Notification shall include a description of the mailing including content, size, shape and weight of each piece.
    - ii. Within fifteen (15) days of receiving the Mailer's Notification and Request for Determination, the Cooperative shall advise the Mailer of its determination. If the determination is negative, the Mailer will be notified that his or her proposed mailing has been declined and will be advised of the availability of paid advertising space in the Cooperative's newsletter, magazine, or other periodical. If the determination is affirmative, the Mailer will be so notified, and will be instructed as to the number of mailing pieces to provide and the amount of the Required Deposit (defined below).
    - iii. Mailers shall be directed to provide mailing pieces in a number equal to the number of member households plus five percent (5%) for archival purposes, and to compensate for lost and damaged pieces. Mailing pieces must comply with all United States Postal Service requirements, and shall contain no obscene, vulgar or offensive material. The Cooperative reserves the unilateral right to reject any mailing that contains such material or which otherwise violates community standards. All pieces must be imprinted with the Cooperative's return address.
    - iv. The "Required Deposit" for non-member Mailers shall be in certified funds for an amount equal to the sum of the expected postage plus ten percent, plus a \$250 handling fee. The handling fee shall be waived for members. Within thirty days after the Cooperative has paid the United States Postal Service for the postage, the surplus deposit, minus the handling fee, if any, will be returned to the Mailer.
    - v. At least thirty (30) days before the proposed mailing date, the Mailer shall deliver the mailing pieces and the Required Deposit to the Cooperative office. The Cooperative will make every reasonable effort to affix mailing labels to and deposit the pieces with the United States Postal Service on or prior to the proposed mailing date, but will not warrant or guarantee that date or timely delivery by the United States Postal Service.

C. Employees' Duty of Confidentiality

1. Employees may have access to certain confidential, privileged, or private information about the Cooperative, its members, employees, and associates.
2. Employees have a duty to maintain and guard the confidentiality of this information.

Such information may not be discussed with or disclosed to anyone, including other employees, except where necessary for normal job performance.

3. Employees may not knowingly use, or allow anyone else to use, information for personal profit or benefit.
4. Unauthorized access to any information is strictly forbidden. Employees shall not access files, work areas, or computer storage areas of other employees, except as authorized in order to perform their job.
5. Misuse of employee or Cooperative information may result in disciplinary action up to and including termination.

D. Identity Theft Prevention

1. The Cooperative will take measures to detect, prevent and mitigate identity theft of member information.
2. The Cooperative has the following procedures in place to mitigate the ability to create an electric account under false pretenses.
  - a. Applicants for service must provide current valid identification.
  - b. Applicants must provide proof of residency, property ownership, or lease agreement.
  - c. Account information can only be discussed with account holders and no personal information of any kind is discussed.
  - d. The Cooperative will not retain social security numbers in physical document form. Any reference to social security numbers in electronic documentation will either be omitted or blacked out.
3. The Cooperative has the following procedures in place to mitigate the ability to access account information and billed amounts without proper identification or authorization.
  - a. Social Security numbers will not be used as an accepted form of identification for account information requests over the phone.
  - b. Employees will use account numbers, service address, map number, meter number in order to establish identity of those requesting account information.
  - c. Members that come to the office with in-person requests for account information must show proper identification.
  - d. Information will only be supplied to non-members when appropriate information exists identifying other persons authorized to have access to an account.
- E. The Cooperative shall meet or exceed industry standards in terms of cybersecurity and cyber risk management.
- F. The Cooperative shall provide appropriate and adequate training for employees related to identity theft.

**III. RESPONSIBILITY**

The President & CEO will be responsible for the administration of this policy and shall seek the advice and counsel of the Board of Directors as necessary.

This policy supersedes all previous versions of the policy and all other instructions dated prior to this policy and in conflict with its provisions.

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Jeffrey D. Rathell, Sr., Chairman

### REVISION HISTORY

Revision Number	Effective Date	Description of Changes
1	7/17/95	New document.
2	Various	Reviewed and updated 3/18/04, 1/27/10, 3/26/10, 5/24/16
3	8/19/20	Updated formatting. Incorporated Board Policy 556 and Board Policy 557. Incorporated components of Operational Policy 210-100 (Employees/Customers – Protection of Confidential Information).