

POLICY No. 6-14

CONFIDENTIALITY OF BILLING INFORMATION

PURPOSE OF POLICY:

To provide a policy that respects the privacy and confidentiality of member information and affirm that member information will not be sold or used for purposes of marketing products or services a member has not subscribed to until written permission is obtained. This policy describes the information that Inland Power collects as a routine part of its operations and how it uses, protects and shares confidential member information. The cooperative considers personal information privileged and confidential and will protect it from unlawful disclosure.

POLICY CONTENT:

Categories of Information Collected

Inland Power collects and maintains appropriate information about its members, including:

1. Contact information, including a member's name, address, telephone number, email address, user name and password.
2. Billing information, including social security number, credit information, financial account information and payment history.
3. Electric usage data gathered by Inland Power's metering systems and a member's service history.
4. Capital and patronage account information for member's (including former) and contact information for members (including former) resulting from membership and governance activities.
5. Additional information about a member's property and activities (such as locked gate, dog on premises or lifeline services).

Purposes for Collection: Access and Correction

1. Inland Power collects and 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.
2. Inland Power 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. Inland Power generally permits its members to access and seek correction of records about themselves that are maintained and used by Inland Power to provide service, for billing, and to manage capital accounts.
3. Inland Power may provide usage data to members who have access to electric usage data

through Inland Power's secure website and/or mobile app.

How Inland Power Collects Member Information

Inland Power collects member information through the following methods:

1. When members create an account and interact with Inland Power regarding their account, utility service or participation in Inland Power programs.
2. When members use electricity service and metering systems.
3. When members interact with Inland Power's secure website and/or mobile app.
4. When Inland Power interacts with third parties such as credit agencies.

Use and Retention of Member Information by Inland Power

1. Inland Power uses information about members in defined and responsible ways in order to manage, provide and improve its products, services and operations (i.e. outage information, billing updates or reminders, information regarding system upgrades, etc.).
2. Data about a member's electric usage may be compiled in aggregate form so that an individual member's daily energy usage habits are not revealed, and such data may be used by Inland Power to improve system operations, efficiency and overall member service.
3. Inland Power retains member 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.

Security

1. Inland Power maintains member 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 information.
2. Inland Power requires its employees, affiliates, contractors, other utilities and credit reporting agencies who have access to member information to agree in writing 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 and possible legal action.
3. Member information that members may access through Inland Power's website is protected using cyber security protocols designed to prevent unauthorized third parties from accessing such information.

Disclosure to Third Parties

1. Information Provided to Affiliates or Contractors – Inland Power may disclose information to affiliates or contractors hired by the cooperative to assist in carrying out operations, such as service, maintenance, billing and management functions including legal, audit and collection services.

2. Information Provided to Other Utilities – Inland Power may also provide information to other utilities under shared service agreements or to meet operation requirement. Information will only be disclosed to such persons to the extent necessary to render services. The cooperative may provide credit related information to other utilities upon request. Credit related information includes years of service, history of electricity use, payment history and deposit requirements.
3. Information Provided to Credit Reporting Agencies – Inland Power may disclose to and share information with commercial and consumer credit reporting agencies for credit-related activities (e.g., the reporting of bad debts).
4. Information Provided to Prospective Tenants – Electricity use for a particular service location may be provided to prospective service applicants or their representatives. The name of the member having used the electricity is not to be revealed.
5. Information Provided to Law Enforcement Agencies – Inland Power may provide certain information to law enforcement agencies conducting a criminal investigation. Available information may include the following for a specific location:
 - a. Billing information such as name of member, billing and service address information and phone number.
 - b. Electricity use information.
6. Information Provided to Landlords – Inland Power may provide information to landlords regarding disconnection of electric service or kWh consumption.
7. Information Provided to Others – All other releases of privileged and confidential information will require one of the following:
 - a. A court order, subpoena, or other jurisdictionally proper order requesting such information. Disclosures may also be made when appropriate to protect Inland Power's legal rights or in situation involving an imminent threat to life or property. Inland Power will take reasonable steps to limit the scope and consequences of any of these disclosures.
 - b. A written or verbal request provided by the member authorizing such release of the information. If the member authorization is for the purpose of marketing products or services of another it must be in writing. Inland Power will maintain a record of the same. If the member permission is obtained electronically, Inland Power will retain the following:
 - i. Confirmation of consent
 - ii. Date
 - iii. List of recipients
 - iv. Confirmation that name, address and account number matches Inland Power's records
 - c. An authorization from the CEO or acting manager to release such information.

Investigation Process and Resolution of Complaints:

Any requests for, or disputes relating to, access, correction, or other matters involving release or disclosure of a member's personal information or potential or suspected violation of this policy by the cooperative should be directed to the cooperative as follows:

Inland Power & Light
Attn: General Counsel
10110 W Hallett Rd.
Spokane, WA 99224

The cooperative will investigate the complaint and when the results of the investigation are determined, communicate its findings to the member and attempt to resolve the complaint. The complainant may appeal the findings of the investigation to the cooperative board of trustees for further review and resolution. If the investigation or review of the complaint finds a possible breach of this policy by a third party, the cooperative will work with the member in an effort to resolve the complaint.

RESPONSIBILITY FOR IMPLEMENTATION:

The board of trustees shall ensure that this policy reflects current practices for personal information about members. The CEO is responsible for developing the necessary procedures to implement this policy.

POLICY APPROVAL DATE 10/12/16

POLICY EFFECTIVE DATE 10/12/16



Kristina Bahr, President
Board of Trustees

CONFIDENTIALITY AND EMPLOYEE PRIVACY POLICY STATEMENT

I have read the attached Inland Power confidentiality of billing information policy and I declare to:

(PLEASE MARK ONE)

I agree and will comply with Inland Power's policy on confidentiality of billing information.

OR

I disagree and will not comply with Inland Power's policy on confidentiality of billing information. Non-compliance may be subject to disciplinary action.

Employees: Please report promptly any situation that may arise that would be a breach to Inland Power's privacy and confidentiality policy. Please report these to your supervisor, human resources manager or CEO.

Signature

Date

Print or type name

Reviewed by _____

Date _____