# **Privacy Policy**

Continental Divide Electric Cooperative Inc. (CDEC) is sensitive to your concerns about the confidentiality and privacy of your personal information. This privacy policy applies to all customer\* information (data about you and your energy usage), whether provided by you, recorded by our meters, or collected by our websites.

\* The term "customer" refers to member electrical account holders and non-members.

# **Our Privacy Principles**

- We will not sell, rent or license your personal information.
- We treat customer information as confidential, consistent with legal and regulatory requirements.
- We will only share your information with your consent or as provided for in this policy.
- We require any person or organization we share data with to protect customer information.
- We do not allow any person or organization acting on our behalf to use customer information for their own marketing purposes.
- We use customer data for customer service, billing, planning, and grid management, as well as
  optional customer programs for demand response and distributed power generation. We also use it
  to communicate with you about your account, your utility service and other programs.
- We track online behavior on our website and through email communications only to improve our programs and services.
- We limit our data gathering to the electricity data recorded by the meter, unless you give us
  permission to gather additional data by signing up for one of our special programs.

Below is a list of Frequently Asked Questions describing how we use and protect the information we collect about our customers.

#### What customer information do we collect?

We collect customer information based on our business relationship with you and your use of our services. Some examples include:

- Information that allows us to establish your account, including your name and service address. We
  will also maintain your user name and password if you establish an online account.
- Billing information related to your financial relationship with us, including your payment data, credit history and social security number.
- Electricity data recorded by our meters.

- Detailed usage data and information if you choose to participate in special programs, such as those related to energy efficiency.
- Information to communicate with you, including your mailing address, telephone number, email address, and your communication preferences. If you have provided us with an email address, we may also automatically acquire information when you reply to or interact with an email we send in order to gauge your engagement with our messages.

#### How is customer information collected?

We collect customer information in a variety of ways, including:

- When we set up or manage your home or business electric account.
- When you choose to participate in a special program, such as those related to energy efficiency and load management.
- When you use electricity, usage data is recorded by our meters.
- When you interact with our marketing and community awareness email campaigns.
- When we interact with contracted third parties, such as credit or collection agencies.
- We may also supplement information we collect from you with information from third parties when doing so will help us serve you or offer services that we believe may interest you. We will apply this policy to any customer information received from any third-party source.

#### How is customer information used?

We use customer information (including electrical usage data) to establish and maintain your account and inform you about your energy usage, as well as to manage, provide, customize and improve our services and business operations. We may use the contact information you provide us to mail, email, call or text you concerning matters closely related to your utility service and, if your preferences allow, marketing and community awareness campaigns.

We use basic information collected by our website and other online resources to learn more about how the resources are used and to improve and administer our site and services. We also use this information to enable us to deliver information tailored to your interests and preferences.

#### Do we share the customer information we collect?

We share your customer information for business purposes only. This can include affiliates and subsidiaries, for purposes of providing electrical and customer service. We also share customer information when contracting with third parties to provide customer billing or other services. We require any affiliate, subsidiary, or contracted third party to have data security measures in place to protect and secure this data.

Disclosure of customer information may be required by the New Mexico Public Regulation Commission (PRC) or other government agencies for regulatory purposes. Disclosure may also be required by legal processes, such as a search warrant, subpoena or court order. We may need to disclose customer information in certain exceptional circumstances, such as to protect against malicious and/or unauthorized access, to protect legal rights, or to address actual or threatened illegal or harmful conduct.

#### How do we ensure customer information is secure?

We apply administrative, physical and technical precautions to safeguard customer information. In accordance with industry standards, we operate with restricted access to data, and we have implemented commercially-appropriate security controls to protect customer information when it is stored or transmitted. While no computer system is completely secure, we believe the measures we have implemented reduce the likelihood of security problems to a level appropriate for the type of data involved.

#### How can you access or update your customer information?

It is important that the information contained in your records is both accurate and current. If your customer information changes, please keep us informed. The easiest way to access, verify or update your customer information is through our <u>SmartHub Self Service site</u>. You can also tell us of any changes through the methods on the "Contact Us" page of our website.

At Continental Divide Electric Cooperative Inc. we believe that informed consumers make better decisions about energy. That's why we think it is important that you have access to your usage data. We provide your electric usage profile on your bill and through our <u>SmartHub Self Service site</u>. The electric usage profile for your meter can help you monitor your electricity use. Additionally, some customers may participate in optional energy programs and pilots, which may offer access to additional usage data.

After closure of your electric account, we will remove information as required by law. We retain information for backup, archival or other technical purposes.

#### How can you manage your email communication preferences?

You can take advantage of our digital services, such as paperless billing, online payments and important alerts, by registering to view your account online through our <u>SmartHub Self Service site</u>. If you prefer to simply receive email communication, you can opt-in for that service through our website by clicking <u>here</u>. Providing us your email address allows you to receive marketing and community awareness communications on topics such as emergency preparedness, clean energy programs, energy efficiency, co-op products and services and co-op news.

When we send marketing emails relating to our programs, products and services, you will be provided the option to update your email preferences or unsubscribe by clicking on the link located at the bottom of our emails. If you have registered to access your utility account online, you can update your email preferences through the <u>SmartHub Self Service site</u>.

# A word about phishing and fraud

We may send you emails about our services. Likewise, we may from time to time call or text the phone number associated with your account. However, we will never email you or call you to ask for your online logon credentials (your user ID and online password).

We will never ask for payment through virtual currency such as cryptocurrency or reloadable prepaid cards. Payments should only be made at the locations listed on your bill or on our website. Some scams use technology to imitate our telephone caller ID or links to our website. When in doubt, open a new browser and enter our website address yourself or call us directly. Both our website and our phone number can be found on your bill.

## A note about "cookies" and internet browsers

A cookie is a small amount of data that often includes an anonymous unique identifier. Cookies are sent from a website to your internet browser and stored on your computer's hard drive. Each website you visit can send its own cookie to your browser, if your browser's preferences allow it. We use a cookie to recognize you as a return visitor to our site for statistical reporting.

We also collect standard information available from your browser, including the type of browser you use (for example, Internet Explorer), the operating system of your computer (such as Windows), and the path you took to reach our website (for example, from a search engine or a link). This information helps us improve the customer experience and ensure that our website accommodates our users' computer configurations and information needs. We also store the IP address assigned by your internet service provider. We keep this for a limited period of time to analyze and troubleshoot network or access issues if they occur.

We do not store cookies or collect browser data containing your personal information.

## A special note about children

This website contains energy-related information and programs that may be of educational interest to children. We do not intend to gather personal information online from or about children. We encourage all children and young teenagers to seek consent from their parents before providing any information about themselves or their households to anyone on the internet.

## Changes to this policy

If we modify our Customer Information Privacy Policy, we will post the revised policy here with an updated revision date. This policy supersedes all prior policies of the same or similar subject.

# If you have a question

We want to assure you that we are committed to protecting your privacy. If you have any questions or comments about this policy, please call CDEC's Member Services Department at (505) 285-6656, Monday through Friday, between 8:30 a.m. and 4:30 p.m., or email us at <u>memberservices@cdec.coop</u>.

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