

POLICY BULLETIN NO. 89



SUBJECT: PRIVACY AND DISCLOSURE OF CONSUMER INFORMATION

I. OBJECTIVE

To set forth the policy of Grand Valley Rural Power Lines, Inc. ("GVP") for disclosure of information relating to its consumers ("Consumer Information").

II. POLICY

- A. GVP shall have in place a privacy policy explaining to consumers how it collects and uses Consumer Information, which includes names, addresses, telephone numbers, email addresses, account and usage information, payment history, credit, financial information, banking information, and occupation.
- B. GVP may share Consumer Information with trusted third parties approved by GVP and with whom the cooperative has a contractual relationship associated with the provision of service to its consumers.
- C. Unless otherwise provided for in this policy, GVP shall not disclose Consumer Information to any other third party except under the following circumstances:
 - 1. When GVP, in the reasonable exercise of its discretion, determines such disclosure is necessary for the appropriate administration of an account—e.g., an estate's personal representative paying an invoice;
 - 2. GVP receives a consumer's written authorization of disclosure to the third party, in which case the cooperative shall only disclose such Consumer Information as is authorized. If the requested Consumer Information concerns a joint account, any of the joint members may authorize disclosure;
 - 3. GVP is obligated by law to disclose the Consumer Information, such as under a warrant, subpoena, or as otherwise required by applicable law;
 - 4. GVP receives a request for relevant Consumer Information from another utility provider from whom the consumer is applying for services;
 - 5. GVP receives a request for a consumer's estimated average monthly bill or usage if such request is made by a licensed real estate agent or other with similar purchase or sale interest in the consumer's property; or
 - 6. In other compelling circumstances that warrant disclosure of Consumer Information as determined in the reasonable discretion of the Chief Executive Officer.

D. In addition to this policy, GVP will maintain any data privacy policies and procedures the law may require.

III. RESPONSIBILITY

A. The Chief Executive Officer will administer this policy and ensure GVP's compliance.

Date Adopted: March 15, 1995
Date Revised: July 15, 2009
Date Revised: September 21, 2022

APPROVED: Jesse Mease
Board Secretary