

OPERATIONAL POLICY BULLETIN NO. 105

ELECTRONIC COMMUNICATIONS SYSTEMS POLICY

I. OBJECTIVE

To establish a policy for proper use and protection of the electronic communications systems of Grand Valley Rural Power Lines, Inc. (the "Cooperative").

II. SCOPE

This policy concerns the proper use and protection of the Cooperative's electronic communications systems, which include telephones, voice mailboxes, wireless services, cellular phones, fax machines, e-mail, iPads, tablets, internet connections, desktop and laptop computers, network computer hardware, and computer software (the "Electronic Communications Systems").

This policy applies to all Cooperative employees as well as contractors, consultants and others who have authorized access to the Electronic Communications Systems (hereafter referred to as "Users").

III. CONTENT

A. Cooperative Property.

The Cooperative has established and installed Electronic Communications Systems to enhance communications and facilitate performance. The Electronic Communications Systems and all communications sent, received, or stored on the Electronic Communications Systems are the property of the Cooperative. The Users do not own or have ownership rights to the Electronic Communications Systems or to the communications sent, received, or stored on the Electronic Communications Systems.

B. No Privacy or Confidentiality.

A User's use of the Electronic Communications Systems and the communications sent, received, or stored on the Electronic Communications Systems are neither private nor confidential. Further, a User's use of the Electronic Communications Systems constitutes an acknowledgement by the User that the User's use of the Electronic Communications Systems and the communications sent, received, or stored on the Electronic Communications Systems are neither private nor confidential.

C. Right to Monitor.

The Cooperative may, but is not obligated to, periodically audit or monitor the Electronic Communications Systems and the communications sent, received, or stored on the Electronic Communications Systems to ensure

compliance with this policy and to perform operational, maintenance, security and investigative activities, including random or automated unannounced reviews. Such auditing and monitoring may be conducted with or without advance notice to a User. All use of the Electronic Communications Systems should be done with the understanding that communications may be listened to, read or accessed by the Cooperative. Users should also be aware that deleted e-mail messages and other material deleted from the Electronic Communications Systems may be recovered and may be retrieved and reviewed by the Cooperative. All User communications on the Electronic Communications Systems must be done in compliance with all federal, state and local laws, as well as the Cooperative's policies.

D. Authorized Use.

The Electronic Communications Systems are provided to users for Cooperative business purposes. Limited and occasional incidental personal use is permissible so long as it:

1. Does not obstruct any work activity or duty of a User;
2. Is not used for any illegal or unlawful purpose or activity or for any other unauthorized use;
3. Does not divulge confidential Cooperative information to unauthorized parties;
4. Does not violate any Cooperative policies or procedures, including equal opportunity and sexual harassment policies;
5. Is not used for fundraising except for activities explicitly sponsored by the Cooperative or allowed by law;
6. Is not used for a personal business endeavor;
7. Does not result in more than *de minimis* added costs to the Cooperative or interfere with the efficient operation of the Electronic Communications Systems.

E. Unauthorized Use.

Unauthorized, inappropriate use or misuse of the Electronic Communications Systems includes, but is not limited to:

1. Accessing web sites or phone numbers or transmitting statements that include: sexually explicit or obscene images or messages;
2. Racial, sexual, profane, or derogatory communications or harassment;
3. Accessing, voluntarily receiving or communicating materials related to gambling or any other illegal activity;
4. Storing or printing any of the above on the Electronic Communications Systems, property or equipment;
5. Installing or downloading unregistered or licensed software or software which has not been approved and installed by the Cooperative's Information Technology Manager or CEO, (including games, tax programs, etc);

6. Installing or downloading the Cooperative's licensed or registered software programs on personal equipment or to unauthorized users;
7. Selling, transmitting, copying or otherwise using the Cooperative's materials or information without authorization;
8. Unauthorized access or causing damage to the Electronic Communications Systems or enabling others to do so (such as "hacking");
9. Excessive use of the Electronic Communications Systems during work hours for non-Cooperative related purposes, *i.e.* internet surfing, playing games, etc. (such uses, in moderation, during lunch or break periods, are permitted);
10. Providing a User's password to another without I.T. Manager or CEO's approval (or leaving password available for others to find/see); or leaving User's RSA token in/on/around his/her desk when not present.
11. Deviating from the business network access policies or procedures;
12. Utilizing the Electronic Communications Systems for personal business enterprises;
13. Making any communication that disparages the Cooperative, its officers, agents, directors, or employees or which is illegal, unethical or in violation of the Cooperative's policies or procedures;
14. Placing the Cooperative's material (including software, internal memos or other information) on any publicly accessible internet site, unless the CEO or his/her designee or appointed representative has approved the posting of these materials;
15. Modifying computer hardware configurations to add or remove components;
16. Connecting anything (*i.e.* portable hard drives, CD's, thumb drives, personal electronic devices, etc) to the Cooperative's computers, printers or network connections or other Electronic Communications Systems without the Manager of Information Technology's authorization.

F. Reporting Security Problems.

All Users must report any unauthorized use of the Electronic Communications Systems, security breach of the Electronic Communications Systems, the loss of sensitive information or the disclosure of such information to unauthorized persons to the Manager of Information Technology or his/her designees or to the User's supervisor or project manager. Additionally, any theft, unauthorized use, other access, or possibility of unauthorized access to the Cooperative's network must be reported to the Manager of Information Technology immediately. These reporting obligations include, without limitation, reporting loss, misuse or theft of passwords, a computer virus infection, or unusual system behavior such as missing files, frequent system crashes, and misrouted messages, or loss of a laptop, iPad or smartphone by theft or otherwise.

G. Electronic Mail.

Electronic mail (e-mail) is a corporate record. The Cooperative e-mail is not encrypted. Messages intended to be confidential, for limited distribution or containing sensitive information should be clearly marked as such and should not be forwarded or copied without the consent of the sender. E-mails from attorneys should never be forwarded or copied without the attorney's consent. All e-mails (both received and sent) will automatically be deleted after 2 years unless they have been archived by the user personally. When using e-mail for non-Cooperative purposes, precaution should be taken to avoid any representation that the communication is made by or on behalf of the Cooperative.

H. Internet Discussions.

Users may only participate in business-related bulletin board discussions, chat sessions, and similar offerings on the internet. When doing so, users must state that the opinions expressed there are their own, unless otherwise authorized. Information shall not be disclosed which is confidential or proprietary, is critical of the Cooperative, or may adversely affect the Cooperative's reputation or finances in any way.

I. Laptop, Smart Phone and iPad use.

No User, on a Cooperative issued laptop, Smart Phone or iPad, shall access any wireless networks, with the exception of the following:

- GVP network,
- GVP issued Jetpack
- Home wireless ONLY if secured with a strong password.

Users shall not leave laptops, Phones or iPads unattended and unsecured. If a Cooperative device must be left unattended, it shall be locked in the User's vehicle or in the User's home. Users shall not allow any unauthorized use of the laptops, iPads or smartphones by anyone other than authorized Cooperative personnel (i.e. family members, friends, or other persons, etc.) for any reason. All Users who are assigned a laptop, iPad or smartphone (by serial number and Cooperative ID tag) are responsible for ensuring no access to data on the device or to the Cooperative's network. Any theft, unauthorized use, other access, or possibility of unauthorized access to the Cooperative's network must be reported to the Manager of Information Technology immediately.

J. Software Management.

If any employee wishes to add any apps or other software to a company issued device, he/she may do so as long as it meets the guidelines in this policy. The Cooperative's Information Technology Department reserves the right to remove any of this software deemed inappropriate or in violation of the Cyber Security Policy Guidelines. The Information Technology Department will budget software purchases at the request of each department. Said software must meet Information Technology Department software licensing standards.

K. Telecommunication Equipment (IP phones).

Only the Information Technology Department will distribute, install, maintain, and support the telecommunications equipment which must be operated in compliance with FCC regulations and the Cooperative's policies.

L. Discipline.

A User's use of Electronic Communications Systems in violation of this policy will subject that person to disciplinary action up to and including termination of employment, termination of the contract between the User and the Cooperative, and/or civil or criminal action. Further, a User's use of Electronic Communications Systems in violation of this policy may result in suspension or loss of his/her/its Electronic Communications System access.

M. Consent.

A User's use of the Electronic Communications Systems constitutes the User's consent to this policy.

IV. RESPONSIBILITY

The CEO shall be responsible for the overall administration of this policy. The CEO shall also be responsible for making delegations of authority to staff members for the implementation of the specific provisions as well as the intent of this policy.

Issued by:

Date Adopted: May 16, 2007

Date Revised: March 17, 2010

Date Revised: May 8, 2019

Thomas M. Walch
CEO