

JOE WHEELER ELECTRIC MEMBERSHIP CORPORATION
OPERATIONAL POLICY

Policy No. 236

ADOPTED: JANUARY 24, 2008

Subject: Confidentiality Policy

I. Objective.

- A. To set forth the guidelines for handling confidential customer information.

II. Policy

- A. The Cooperative requires certain confidential information regarding its customers in order to provide ongoing utility service. This can include addresses, telephone numbers, social security numbers, driver's license numbers, and other sensitive information. The Cooperative does not view individual customer records as public writings that are subject to Section 36-12-40 of the Code of Alabama.
- B. Employees may not disclose customer's personal or financial information to any company, agency or other individuals without prior written consent from the customer. Employees may disclose information to the individual/individuals listed on the membership. Employees should verify the validity of the customer before sharing any account information. Validation can be a social security number, driver's license number or other identification listed on the account.
- C. The Cooperative may provide confidential customer records to members of law enforcement, the judicial system or governing agencies having valid need to know for such information. Proper identification is required before release of such information. Other than exceptions stated above, all other requests require approval of the Director of Customer Service or the General Manager.
- D. The approved release of confidential customer information must be accurate in all respects and provide all customers equal protection under this policy statement. Under no circumstance can an employee receive financial gain by disbursing customer information. To do so is a violation of this policy and subjects employee to disciplinary action up to and including dismissal.

III. Responsibility

- A. The Board of Trustees is responsible for a periodic review of this policy and shall approve all changes to the policy.
- B. The General Manager is responsible for the implementation of the policy.