



Privacy of Member Information Policy 4.016

At Freeborn Mower Electric Cooperative (FMEC), we value the trust that our members place in us. FMEC has a fiduciary responsibility to our members and vendors. The purpose of our Privacy Policy is to protect the privacy and confidentiality of the members. No action can be taken involving the member, without the prior consent of the member.

1. Recognition of a Member's Expectation of Privacy

FMEC recognizes and respects that our members expect privacy and confidentiality in all dealings with the cooperative and pledge that FMEC will take the steps necessary to protect the privacy of information shared with the company.

2. Collection, Use and Retention of Member Information

Freeborn Mower Electric Cooperative collects, uses, and retains information about individual members when it is necessary and as a part of providing our members reliable services. FMEC will never utilize data obtained from individual members without the permission of the member.

3. Maintenance of Accurate Information

FMEC has established procedures so that our members' financial information is accurate, current and complete in accordance with reasonable commercial standards. FMEC staff also responds to requests to correct inaccurate information in a timely manner.

4. Limiting Employee Access to Information

The management of FMEC limits employee access to information to those with a business reason for knowing such information. FMEC educates its employees on the importance of maintaining member confidentiality and we enforce our privacy policies with appropriate disciplinary procedures.

5. Protection of Information by Means of Security Procedures

Freeborn Mower Electric Cooperative business information is protected by industry standard firewalls, encryption, and password protection. FMEC enforces security procedures to protect confidential information from loss, misuse, or alteration.

6. Restrictions on Use and Sharing of Personal Information

FMEC collects, uses, and retains information about individual members when it is necessary and as a part of providing our products and services. FMEC will never utilize data obtained from individual member without the permission of the member.

FMEC will not reveal specific information about member accounts or other personally identifiable data to unaffiliated third parties for their independent use except as follows:

1. when the information is required to complete a transaction initiated by the member;
2. when the member requests it;
3. when disclosure is required by law (e.g. subpoena, investigation of fraud, etc); or
4. when the member has been informed about the possibility of disclosure for marketing or similar purposes through a prior communication, and the member is given the opportunity to decline or "opt out".

7. Confidential Personal Information

Members may participate in Minnesota's Safe at Home program or other similar federal, state or local regulations governing the confidentiality of a person's name, address or similar information for personal safety reasons. FMEC has implemented necessary practices to identify those accounts subject to such confidentiality programs and prevent disclosure of the information.

No account information, including the member's name, address, other identifying information, or their participation in the Safe at Home or similar programs shall be disclosed to any party without the prior approval of the FMEC President & CEO or Director of Cooperative Relations.

8. Business Relationships with Third Parties and Employment

FMEC agrees that the Cooperative will not share information with third parties that do not adhere to similar privacy principles and practices for keeping such information confidential.

FMEC will not disclose employment application information to third parties, unless a release is signed by the applicant, and after 6 months, will appropriately dispose of employment applications and any other pertinent information regarding the application.

9. Disclosure of Privacy Principles to Members

FMEC posts the privacy policy at the Freeborn Mower Electric Cooperative business location.

REVIEWED: 11-28-17

SIGNED: Roger Weness
Board Chairman