



VERMONT ELECTRIC COOPERATIVE, INC. MEMBER INFORMATION PRIVACY POLICY

A. Policy

Vermont Electric Cooperative believes that members own their personal information which includes any information that is personal to the members, such as members' telephone numbers, account information, payment history ("Personal Information"). VEC also believes that members' interval electric usage ("Usage Information") is private and should be protected. Accordingly, VEC treats such Personal and Usage Information as confidential. This privacy policy explains how VEC uses member information, when such information will be shared with third parties, and what safeguards VEC takes to protect member information. VEC will not release a member's Personal or Usage Information except as explained in this policy.

B. How information is used

Personal Information

1. VEC uses Personal Information to administer member accounts, to provide and improve member services, and to manage business operations. Some examples include:
 - To generate members' billing statements and to post payments to members' accounts.
 - To provide members with outage information.
 - To provide members with peak alerts and important warning messages.

Some of these services are provided by third-party vendors, such as a billing services provider, subject to the legal obligation to treat information confidentially and to not disclose it to unauthorized persons. Bill payments are processed securely through companies which comply with Federal "Red Flag" requirements on to ensure that Personal Information is never disclosed inadvertently. VEC's Red Flag Policy is available on the VEC website or by member request by mail or telephone.

2. VEC's bylaws require that member's names and addresses be open to members. In connection with elections, VEC provides lists (names and addresses only) of the members in a district or zone to candidates running for a Director position – but only for use in connection with the election. VEC may use members' email addresses to send statements by candidates for director positions to members within their zone or district

as part of annual director elections. VEC will not disclose the email addresses but will send one statement per election on each candidate's behalf.

3. VEC may also use members' email addresses to communicate with members directly, for example to provide peak alerts, information about annual meetings and other information.
4. VEC may release information to third parties if required by law, by VEC's bylaws, or if necessary to allow a third party to collect delinquent amounts owed by the member.

Member Usage Information

1. VEC uses Member Usage Information to assist members in analyzing and managing their electric usage. Some examples include:
 - To enable members to see their energy usage data on a next-day basis via secure access on the Internet.
 - To analyze energy usage to help members select the best rate plan or take advantage of programs offered by VEC and the Vermont Efficiency Utility (Efficiency Vermont or EVT).
 - To provide energy saving tips and energy management tips tailored to the member's needs and circumstances.
2. VEC may also provide data about electric usage and patterns in various formats to Efficiency Vermont or other third party service providers for various purposes all directed at improving system efficiency and customer service. These third party providers will be subject to the legal obligation to treat information confidentially and to not disclose it to unauthorized persons. Examples of such use include:
 - To analyze rates and rate structures.
 - To project usage demand patterns and plot growth off different substations or other areas.
 - To improve our energy planning in order to better design and engineer our electric distribution systems.
3. Efficiency Vermont currently receives Member Usage Information on a monthly basis. EVT may also use smart meter data in daily, hourly or 15-minute intervals to design and promote personalized energy efficiency services. Any member may choose to opt out of personalized energy efficiency services by contacting EVT

at info@efficiencyvermont.com or 888-921-5990. Members who opt out of such services may still receive services from EVT, but those services will not be customized based on the member's smart-meter interval data. Members who have opted out of these personalized smart-meter-enabled services can choose to opt in again at any time. EVT's complete privacy statement can be viewed at their website, www.efficiencyvermont.com/About-Us/Privacy-Policy.

C. Data Security

VEC has implemented extensive measures and protocols to ensure the integrity of its systems and to secure and protect member information and communications. VEC safeguards information on secure systems with restricted access. VEC also uses advanced security controls to protect the information when it is stored or transmitted. Information and data that members may access through VEC on the Internet are protected using the cyber security protocols that prevent third parties from accessing personal data contained in the VEC business systems.

D. Website Information

The following discloses information gathering and dissemination practices for the VEC website.

- Members' Internet Protocol (IP) addresses are used to help VEC identify website usage patterns.
- The site does not use cookies for tracking purposes. Cookies are used only to help the member navigate the site. Members have the option to disable and clear cookies through their browser.
- Any information collected from the website is never sold, rented, loaned, or the like, to any third party for any reason.