

SNOHOMISH PUD

PRIVACY POLICY

Effective date: September 20, 2016

Maintaining your privacy and trust are important to us at Snohomish County PUD ("the PUD"). This privacy policy describes how we collect information that directly identifies or is directly associated with an individual ("personal information"), and the ways in which we may use and disclose that information. We will not sell, share, rent, compare or trade personal information about our customers in ways that conflict with this policy. This policy does not apply to personal information we collect in our capacity as an employer; employment information is covered under separate policies.

We are committed to offering you, our valued customer, the best products and services possible to meet your energy and water needs. Sometimes this requires that we share information about you with third parties that partner with the PUD to provide you with products and services. Some examples are: (1) services offered to our customers (i.e., online bill view and payment) and (2) credit and debit card payment transaction services. We require these third party vendors to safeguard information they receive from us.

We do not release personal information to a third party without your consent, except for information that is reasonably necessary to meet the PUD's business needs. These primary purposes include, for example:

- To provide or bill for energy or water
- To inform you about your energy and water usage
- To maintain or operate our safe and reliable electric system or grid operations
- To plan, implement or evaluate energy use programs, such as energy management, demand response or energy efficiency
- To obtain customer satisfaction data
- To comply with a law, regulation, legal process or governmental request, such as a properly supported request from law enforcement, or a governmental agency when necessary and permitted for the performance of official duties, or a court order.

We only share customer information with the public in compliance with local, state and federal laws. As a public entity, we will seek to protect the privacy of our customers' personal information in complying with public records requests.

This policy is posted on the PUD's website. We may change this policy at any time, and will notify customers of changes by indicating on the policy the date of its last update. We may also communicate with you about steps we've taken to enhance the security of your personal information, and may ask for your cooperation in implementing certain safeguards. Please review this policy whenever you visit our website in order to understand how personal information we collect from you will be used.

By using our website, or by opening and holding a PUD account, you consent to the information collection and use practices described in this policy.

What personal information does the PUD collect?

We may collect personal information in various contexts, including on our website, having to do with our business relationship with you and your use of our utility services. Personal information includes information that may be used to identify you personally or to contact you, or information such as electricity usage data that reveals details, patterns or other insights into your personal life or activities.

Personal information includes, but is not limited to, your name, street address, mailing address, telephone numbers, email addresses, birthdate, social security numbers, account numbers (including PUD account, bank accounts and credit card accounts), passwords, account balances and payment history, any information we receive for identification purposes (such as a driver's license, passport, or information collected to establish creditworthiness), income, household information collected when applying for a low-income discount, and meter identifiers and interval/utility usage data that is combined with any of the other information set forth above.

Except as set forth in this Policy, personal information is considered confidential information and will not be disclosed to third parties without your consent.

This section summarizes the personal information that we collect and describes how we collect it.

A. Active collection of information

Account Registration

The PUD requires certain information in order to establish your energy or water account, and to access some features and services through the PUD's website. To establish an account, we will require your address and telephone number, the service address, birthdate, email address, and valid identification information. We also collect and retain on file financial information such as payment data, account balances, credit history, and social security number, which is used solely to validate identity. We may also collect information we receive from a consumer reporting agency, or information we obtain from verifications of employment or income, or other forms or applications that you provide to the PUD or Energy Assistance Agencies, etc.

Account registration also is required to access some features and services on our website. During the registration process, we may ask you for a username, password, and other personal information in order to verify your identity, establish your account, promote security and to provide appropriate access to features. Information you give during online account registration may be linked to your utility account information in our system in

order to provide you with simplified online access to your utility account information or to provide other services related to your utility account.

The PUD may also collect information about your property as part of your participation in one of the PUD's energy efficiency programs, such as the amount of insulation in the premises, type of windows, model of clothes dryer, or similar information. Unless the information we collect is likely to reveal details, patterns or other insights into your personal life or activities, it is not considered personal information.

Identity Verification

As part of its Identity Theft Prevention program that is required by law, the PUD uses Social Security Numbers (SSN) to validate the identity of residential customers who open accounts online, by fax or over the telephone. Customer SSNs are maintained in a secure environment. Customers wishing to use other government-issued identification are welcome to apply for service in person at a local PUD office. To apply in person, please bring two pieces of unexpired, government-issued identification, one of which must contain a photograph. The PUD will accept all forms of identification approved by the U.S. Department of Homeland Security and/or the U.S. Transportation Security Administration.

Usage Information

When you use electricity or water, usage data is collected via our metering systems, and is used for billing purposes. We may also collect usage history information when you choose to take part in one of our energy efficiency or other energy management programs.

Advanced metering infrastructure ("AMI") and other emerging smart grid technologies have the potential to dramatically change the ways in which utilities provide service to their customers in the future. AMI enables the collection and reporting of granular data about customer usage and demand ("Advanced Meter Data"). Together with other distribution automation and improved communications technology, these advances in technology help improve reliable utility service, provide better customer service, streamline utility operations, and help consumers make informed choices that could reduce their consumption.

The granular level of usage information could be used as a source of behavioral information on residential customer households. Third parties will be or are developing innovative consumer products to give customers more insight and control over their energy and water usage. Note that no personal customer information is stored on the meter or is transmitted by the meter.

In the future, we may offer products and services that take advantage of advanced meter data to provide you enhanced capabilities to monitor and control your energy and water usage. Your consent will be required for these services, and we will require you to provide consent if you wish to have a third party vendor use the PUD's advanced meter data to provide such services. While there is little privacy concern over aggregated or de-identified

Advanced Meter Data, privacy concerns do arise if advanced meter data linked to a residential customer could be used without the knowledge of the customer for purposes that are not authorized by that customer.

Online Customer and Energy Service Features

We may offer Customer Service or Energy Services features on our website. If you use these features, we may ask for your address, account number, location during use of some features, and other information, just as we would if we were speaking to you over the phone or in person. We also may offer services such as online rebate applications and payments which utilize some personal information. We collect this personal information in order to customize the information and services that we provide to you within and in connection with these features, to provide the services, to authenticate you as a security measure and to monitor and improve the website and our services.

Surveys, Contests and Promotions

We may offer surveys, contests and other promotions from time to time. Participation is completely voluntary. Information requested may include contact information (such as name and shipping address) and demographic information (such as ZIP code and age level). Contact information will be used to notify the winners and award prizes. Survey information will be used to help us monitor and improve our website and services and to help us develop future service offerings.

Third Party Vendors

On certain co-branded pages on the website, third party vendors may collect contact, demographic, energy and water use and other information from you on our behalf. These third party vendors may use this information to allow you to create Energy Management Plans, sign up for electronic newsletters and use other tools or services. All information collected by these vendors on our behalf is the sole property of the PUD and is governed by this Privacy Policy.

The PUD contracts with some third party vendors to implement some of its energy efficiency and conservation programs. These third party vendors may collect contact, demographic, energy and water use information, or information about your premises. If you participate in these programs, the third party vendor will use the information to provide the services to you.

Like all third parties that provide services on our behalf, we require these businesses to protect personal information that is disclosed to them, to not use or disclose our users' personal information in a manner inconsistent with the purpose for which it was provided, and to not disclose personal information to another party. Some of these specific service areas include, for example: SnoPAY (Kubra), EnergyAdvisor, Electrical Safety World, credit reporting, customer research, meter reading services, conservation program delivery, and tree trimming services. This is not an exclusive list.

B. Passive Collection

Our software automatically collects certain information from your computer when you use our website. This information is not linked to other personal information you provide to us and is not used to identify you personally. The two main ways in which this general information is collected are through "log files" and "cookies."

(i) Log Files

Our website's log files contain our users' Internet service providers, Web browsers, the times of their visits and the pages visited, and the IP addresses of their computers. We use this information to analyze trends, to improve the security and efficiency of our website and online services, and to otherwise administer and improve our website and our services.

(ii) Cookies

A "cookie" is a small file, stored on your hard drive, which contains information about your computer. Cookies cannot execute code or deliver a virus to your computer. We do not link cookies to personal information. We may use cookies to keep users logged in to the website, serve pages to users more quickly on subsequent visits, understand users' interaction with our website, track users' paths for security purposes and customize our users' experiences on our website.

If you wish to block, erase or be warned of cookies, please refer to your browser instructions or help file. You may still use our website if you block cookies, but your use may be limited and your browser may behave strangely. Please also note that some of our business partners may use cookies on our website. We have no access to or control over these cookies.

C. Aggregated Information

"Aggregated" information, as used in this policy, is information that has been combined (i.e., aggregated), or from which personal information has been removed, so that the resulting information does not identify you or allow you to be contacted. An example of aggregated information would be a report stating that fifty percent of Site visitors use computers located in Snohomish County. Or we could summarize total energy use for all homes and businesses in a certain geographic area. We use the information to manage, provide, and improve our services and business operations.

Aggregated information is not "personal information" under this policy. We may use aggregated information for various purposes and may disclose it to third parties without restrictions.

How do we use the information we collect?

We use personal information to authenticate and administer your account and inform you about your utility usage. We also use it to manage and improve our services and business operations. For example, we may use personal information that you provide to us in the following ways:

- To prepare your customer billing statement and in connection with billing and payment on your account;
- To enable you to see your energy usage data via secure access on our website;
- To provide you with other products and services you choose to have the PUD provide;
- To communicate with you about your online account, your energy or water account, the website and our other products and services;
- To respond to your comments or requests;
- To develop and improve the website and our products and services;
- To obtain customer satisfaction data;
- To inform you about PUD service and product offers and promotions that we believe you may find of interest;
- To administer contests or similar promotions in which you have entered your name; and
- For the purpose for which the information was provided.

We will not sell, share, or rent your personal information to others in ways different from what is disclosed in this policy without first obtaining your authorization.

We may disclose personal information to independent contractors, service providers and consultants who provide services to us or help us perform functions necessary to operate our businesses. Any such disclosures are consistent with applicable laws and regulations. For example, we may use credit card processing companies to process payments for goods and services and shipping companies to ship orders. We also may use service providers to deliver the PUD's energy efficiency programs. We contractually require these third parties to protect personal information that we provide to them and to not use or disclose personal information in a manner inconsistent with the purpose for which it was provided to them.

Additionally, as noted above, information collected by third party vendors on behalf of the PUD on its website or on co-branded pages is the sole property of the PUD but may be used by these businesses for the purpose(s) for which it was collected.

In addition, information about users of our website, including personal information, may be disclosed as part of any merger, acquisition, debt financing or sale of company assets, as well as in the event of an insolvency, bankruptcy or receivership in which personal information could be transferred to third parties as one of our business assets.

As a public agency, we also may disclose information we collect about you under other circumstances as permitted by or required by law. This category may include, but is not limited to, law enforcement agencies, regulators and auditors, subpoenas or other court orders, and applies equally to current and former customers.

The Washington Public Records Act, however, exempts from public disclosure a customer's address and contact information, other sensitive information such as social security numbers, birthdates, credit card and bank information, and also exempts energy usage and billing information in increments smaller than a month or a billing cycle.

We reserve the right to share information with third parties if we are required to do so by law; to initiate and render our services; to bill and collect for amounts owed to us; or if in our good faith judgment, such action is reasonably necessary to protect us, our customers or the public from fraudulent, abusive or unlawful use of our website or our services, to comply with the legal process, to respond to any claims, or to protect the rights, property or safety of the PUD, its employees, its customers, or the public.

Opt Out Provisions

We provide registered online users with opportunity to "opt-out" of having their personal information used for purposes not directly related to our services at the point where we ask for the personal information. Users may opt-out of receiving promotional e-mail from the PUD by clicking on the unsubscribe option button at the bottom of the email they received and entering their email address.

Your right to access and disclose your usage information

You have the right to access and correct your personal information at any time by contacting our Customer Service Department.

If you have an advanced meter, the PUD will make reasonable efforts to ensure you have access to any interval meter data after it has been collected and verified, in a readable format that is as detailed as the information we use in providing our services to you. Unless disclosure of the data is permitted or required to be disclosed, we will require you to consent if you wish to have the PUD disclose the advanced meter data to a third party vendor with whom you choose to do business.

Consent is required for information to be disclosed for secondary purposes

Customer information can be used for secondary purposes, such as marketing services or product offerings that the customer does not already subscribe to.

Secondary purposes are considered services and products that are not directly related to the conduct of the PUD's business. For example, a customer might ask the PUD to share his or her data directly with a third party vendor, or a vendor might ask the PUD for customer information for the vendor's own marketing purposes. Please note, however, that when the

PUD contracts with third party vendors to implement energy efficiency programs that result in energy savings for the PUD, we consider these services and products that are directly related to the conduct of the PUD's business.

The PUD will require affirmative customer consent for each instance of the release of such customer information for these secondary purposes. The PUD will require the following elements to document the customer's consent to the release of his or her information:

- The date or date period for which the consent is granted;
- The party or parties to whom the customer has authorized the release of his or her information, including any affiliates or third parties;
- The PUD will validate that the individual providing consent matches the name, service address and account number of the customer of record in the PUD's customer information system, or the customer information will not be released;
- The PUD will keep a record for each instance that the customer has given written or electronic consent, following applicable records retention guidelines.

A form for customer consent to the release of information is attached to this Policy.

How do we protect personal information?

Security Measures

Except as set forth above, personal customer account information is ordinarily shared only with the person or persons listed on the account. An account holder requesting his or her information must show identification if in-person at a PUD office, or when requesting by telephone a customer is required to provide two forms of identification which will be validated against account records. The PUD will supply the information by mail, upon request, by using the documented mailing address. Requests for customer information from third parties will be individually reviewed to determine whether the law authorizes disclosure.

We restrict access to confidential information about you to employees who have a specific need to know. Maintaining confidentiality and customer privacy is a priority for us.

We have implemented appropriate administrative, physical, technical and logical safeguards to protect the confidentiality, integrity and availability of personal information that we collect, and prevent loss, theft, misuse, unauthorized access, disclosure, alteration or destruction.

We take measures to limit access to all categories of personal information – not just "sensitive" information – to authorized employees and contractors. For example, our customer information system has access controls designed to ensure that only those PUD employees who have a business need to work with personal information will have access to it, and they will have only the limited amount of access that they need to perform their jobs.

Social Security numbers are used within a secure environment, and the PUD has in place a federally required identity theft prevention program.

To protect customers' privacy, we encrypt or use an alternate method to protect any data that we forward to third parties. In addition, we provide personal information only to companies that sign written agreements requiring them to protect the confidentiality of your information. We do not sell your personal information nor do we permit other companies to sell, or otherwise use, the information we provide to them.

When we request sensitive information (such as credit card number and/or social security number) on the website, we use Secure Socket Layer (SSL) encryption to protect it from unauthorized access while in transit.

Despite our security safeguards, however, we cannot guarantee that personal information will be protected from interception, misappropriation, misuse or alteration, or that it will not be disclosed or accessed by accidental circumstances or by unauthorized actions. We are required by law to notify you if we become aware of a security breach that has the potential to affect your personal information. (RCW 42.56.590).

Social Networking Services

We have no control over the security of other sites you might visit, interact with or do business with. For example, when you post on a social networking service, the personal information you share is visible to other users and can be read, collected or used by them. You are responsible for personal information you choose to share. Please take care when using these features.

Links

You may find co-branded sites on our website pages (www.snopud.com). Co-branded sites are those where you will see the PUD name and logo as well as the name and logo of the service provider.

In addition, some pages of our website and mobile website offer you the ability to link to and view pages of websites not operated or controlled by the PUD. Often, but not always, you can tell that you have linked to a non-PUD website because a separate browser window will open. If you use such links, you will leave the PUD website. Links by the PUD to such external websites do not imply endorsement by the PUD of that company, its site or its privacy policy, which may differ from PUD's practices.

Beyond the confidentiality and protection requirements that the PUD imposes on third party vendors with whom it does business, the PUD is not responsible for any information you provide to these sites, information gathered at a linked site, or for the content of any such site. The PUD does not monitor or control the content or the privacy policies of the external sites, and are not responsible for the privacy practices or the content of linked external websites. When using a link to a non-PUD website, we recommend that you

investigate the privacy practices and policies of such external site. Any use of external links is at the sole discretion of the user. Once you leave the PUD's website, this policy no longer governs.

Updating your information

We provide access to personal information that we collect and give users the opportunity to update and make corrections to it. If you have registered for an online account, you may access and edit the personal information you provided during registration by accessing your online customer account on the Site. To access or update other personal information you have provided on the website, please contact customerservice@snopud.com or telephone 425-783-1000 (in Washington State) or 1-877-783-1000 (Western Washington & outside Everett).

Internet Fraud: Phishing

Phishing is a scam where Internet fraudsters employ techniques that create a fraudulent website to lure personal and financial information from unsuspecting victims. One way phishers attempt to fool consumers is by sending fraudulent emails designed to look like they are coming from a business or institution, luring consumers to "take action" by clicking on a link that takes victims to a fraudulent website. Thinking that the website is authentic, consumers enter personal information compromising their privacy and security.

While the PUD may request some personal information when conducting surveys, the PUD does not and will not request personal information related to your account via email unless you have initiated the request. If you receive any emails asking you to take an action described above, please contact us at 425-783-1000 or toll-free in Western Washington & outside of the Everett local calling area at 1-877-783-1000 (Monday through Friday, 8 a.m. to 5:30 p.m., excluding holidays). Visit www.antiphishing.org for the latest information about phishing scams.

PUD Personnel & ID

If a person comes to your door claiming to be a PUD employee, don't let him or her inside without first asking for identification. Our employees carry an ID card with their picture on it and will gladly show it to you, and the PUD's meter reading contractors carry similar identification.

If you receive a phone call and aren't sure if it actually came from us, call our Customer Service Department to verify the information you were given. We will be able to tell you whether or not the call was a hoax.

How to make a complaint about disclosure of customer information

The PUD is committed to investigating complaints from customers whose personal information may have been sold or disclosed by the utility for purposes of marketing services or product offerings in violation of RCW 19.29A.100.

A customer who wishes to make such a complaint must provide a request for investigation in writing, signed by the customer or by someone with the legal authority to act on the customer's behalf. Each such request shall include a short and plain statement of the circumstances and the information he or she believes was disclosed. The written request must be delivered to the PUD's Customer Service Department, located at the following address:

In person:

Customer Service Department
Snohomish County PUD
2320 California St.
Everett, WA 98201

Mail-in address:

Customer Service Department
Snohomish County PUD
P.O. Box 1107
Everett, WA 98206-1107

Or the request may be submitted by electronic mail at the following address customerservice@snopud.com.

Upon receipt of a complaint, the Assistant General Manager for Customer and Energy Services or his or her designee shall promptly investigate the complaint and provide a written response to the customer. Absent exceptional circumstances, the response will be provided within 30 days of receipt of the complaint.

The customer may subsequently make a request for a discretionary independent hearing using the PUD's Dispute Resolution Procedure (also known as the Customer Hearings Procedure).

PRIVACY STATEMENT INQUIRIES

If you have any questions about our privacy practices, please call the PUD at 425-783-1000 (toll-free in Western Washington and outside of the Everett local calling area at 1-877-783-1000), Monday through Friday, 8 a.m. to 5:30 p.m., excluding holidays.

TTY (Deaf or Hard of Hearing) contact: 7-1-1 or 1-800-833-6384

CUSTOMER AUTHORIZATION TO RELEASE INFORMATION FOR NON-PUD BUSINESS

This consent form will allow Snohomish PUD to release customer information as indicated below to a third party for non-PUD business purposes. To authorize third party disclosure, the customer must complete this document in its entirety, and the utility must verify that the individual providing consent matches the name, service address and account number of the customer of record in the utility’s customer information system.

CUSTOMER INFORMATION:

Account Number: _____

Name on Account: _____

Name of Representative (if a business): _____

Service Address: _____

Telephone number: _____

Email address (if applicable): _____

AUTHORIZATION:

I authorize the release of my customer information as follows:

Type of information to be released (for example, usage or payment history, payment, contact information):

Period which the information covers: _____

Name of recipient/business: _____

Address: _____

Telephone number or contact information: _____

Manner in which information is to be provided (mail, email, pick-up, etc.):

Date(s) for which this release is in effect: _____

RELEASE:

This consent for information release is at the request of, and on behalf of the customer listed above. Therefore, the Customer agrees to release and hold harmless Snohomish PUD from any liability, claims, demands, causes of action, damages or expenses resulting from: 1) any release of information to the recipient authorized above; (2) the unauthorized use of such information by the recipient; and (3) any actions taken by the recipient with respect to such information.

Account holder signature: _____ Date: _____
(or Authorized representative)

By my signature above, I attest under penalty of perjury that I have the authority from the holder of the account to authorize the release of information set forth above.