



HUNTSVILLE UTILITIES POLICY

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Policy #: IT-02

Policy: Customer Data Privacy Policy

Purpose: To notify customers of essential security controls surrounding personally identifiable data shared with Huntsville Utilities (HU).

Objective: HU respects your right to privacy. We recognize the need for appropriate protection and management of personally identifiable information shared with us (for example, your name and contact information).

INFORMATION WE COLLECT

In order to serve you and effectively process your transactions, HU collects information from you. Some of this information may be personally identifiable information. For example, we collect information that you provide when you pay a bill, create an account, or call us with a question, such as your name, your address, your telephone number, your email, PIN number and your financial payment information. HU may also collect information related to your use of our website, such as your IP address and your browser or device characteristics. This information is used to enhance the online experience of our customers.

We may use cookies or applets to recognize you when you visit our sites, to personalize your experience and generally to serve you better. Cookies are identifiers which a website sends to your browser to keep on your computer to facilitate your next visit to our site. These technologies do not use or collect personally identifiable information, such as names or address, and do not link online actions to an identifiable person. We do not use cookies or applets to track your activities once you leave our web site. You may delete these files from your computer at any time. You can also set your browser to notify you when you are sent a cookie, so that you can choose to decline or accept it. We reserve the right to use third party analytical tools to monitor use of our website.

HU may utilize digital, communicating utility meters. These meters provide automated means of collecting utility consumption information. Data collected is used for customer billing and HU' sole business purposes. All metered data is transferred over secure communication channels and access is limited to authorized personnel.

HOW WE USE THE INFORMATION

HU only collects the information it needs to serve you effectively and to process your transaction. HU may retain the content of any customer service web form or email that HU receives, the email address from which it is sent, and HU' response, if any. HU will not use any financial information



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supplied by its customers for any other purpose beyond the services provided.

Generally, HU will not disclose your personal information provided in your account registration to third parties. However, HU may access, preserve and disclose your registration and any other information you provide if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary in HU' opinion to: (a) comply with the law, our regulators or legal process, including, but not limited to, civil and criminal subpoenas, court orders or other compulsory disclosures; (b) respond to claims of a violation of the rights of third parties, whether or not the third party uses the website; (c) respond to customer service disputes or inquiries; (d) enable HU' employees or representatives to provide service to you or otherwise perform their duties; (e) comply with interchange functions; (f) obtain and provide credit reporting information; or (g) protect the rights, property, or personal safety of HU, its users or the public. If HU contracts with third party service providers to perform functions on our behalf such as delivering packages, sending mail and e-mail, or processing credit card payments, then these providers will only have that access to your personal information needed to perform their functions. HU does not sell your personal information to third parties for telemarketing, e-mail or direct mail solicitation of third party products or services.

INFORMATION SECURITY

- A. **By HU.** Your personal information is stored on our servers in the United States. HU takes what it believes to be reasonable precautions to protect its users' information, including off-line measures to protect your information that is known to HU to be financial and business sensitive information to the same extent that we take measures to protect our own such information. Unfortunately, no security system can be guaranteed to be 100% secure. Accordingly, we cannot guarantee the security of your information and cannot assume liability for improper access to it.
- B. **By You.** Do not divulge your user ID or password to anyone. HU will never ask you for your user ID or password in an unsolicited telephone call or in an unsolicited e-mail. Remember to sign out of your account (if you have one) and close your browser window when you have finished with the Website. This may help to protect against access by others to your personal and business information if you share a computer or are using a computer in a public place. If you do share your password or your personal information with others, then remember that you are responsible for all actions taken in the name of your account. If you lose control of your password, then you may lose substantial control over your personal information and may be subject to legally binding actions taken on your behalf. If your password is compromised, then you should immediately notify HU and change your password.

WARNING ABOUT "PHISHING"

HU may periodically send you email to provide energy saving ideas and other useful information, updates regarding our services, customer satisfactory surveys, and special offers. We may also call the phone number associated with your account. However, we will not request any of the



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following information via an unsolicited email:

Your user ID;
Your password;
Your social security number; or
Your bank information

In addition, we never will send you an unsolicited email containing a link to the login page for our Website.

WARNING ABOUT SOCIAL MEDIA

In order to provide current and potential customers with additional options for contacting HU' Customer Service department, HU has established social media accounts. These are public forums. Thus, you should be aware that any personal information you provide through these forums can be read, collected, or used by others and that such disclosures are subject solely to the privacy policies and protections of those forums. HU has no control over those forums and, consequently, is not responsible for any personal information that you may choose to disclose through them.

LINKED SITES

From time to time, this website may link you to other sites ("Linked Sites") that are not owned by us. HU DOES NOT CONTROL AND IS NOT RESPONSIBLE FOR WHAT THIRD PARTIES DO IN CONNECTION WITH THEIR WEBSITES, OR HOW THEY HANDLE YOUR PERSONAL INFORMATION. PLEASE EXERCISE CAUTION AND CONSULT THE PRIVACY POLICIES POSTED ON EACH THIRD PARTY WEBSITE FOR FURTHER INFORMATION.

CHILD PRIVACY

We understand children's privacy is important. Our website is not directed to children under the age of 13. If you are under the age of 13, then you should not submit personal information on the website without the consent of your parent or guardian.

DATA RETENTION

HU will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

Remember that even after you cancel your account, copies of some information from your account may remain viewable in some circumstances where, for example, you have shared information with social media or other services. Because of the nature of caching technology, your account may not be instantly inaccessible to others. We may also retain backup information related to your account on our servers for some time after cancelation for fraud detection or to comply with applicable law or our internal security policies. It is not always possible to completely remove or delete all of your information due to technical constraints, contractual, financial, or legal requirements.



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VOLUNTARY SUBMISSION

You acknowledge that your submission of any information, data or statements to HU is voluntary on your part. You may always choose not to provide information, even though it may be needed to complete a purchase or to take advantage of some features of the website. By using this website, including the online payment service, you acknowledge that HU is not responsible for any errors in the information you provide or for disclosure of your information to others due to errors in transmission, unauthorized acts of third parties, or other events outside of our control.

CONSENT AND UPDATES TO POLICY

By using our website and other digital resources, you consent to the collection and use of information by HU. We reserve the right to change this Privacy Policy and any applicable website terms of use at any time and for any reason. If our Privacy Policy changes, we will update this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. HU will not provide you with a notice of any change in this Privacy Policy other than posting the amended Privacy Policy on our website. It is your responsibility to monitor and review any changes to this Privacy Policy. Each version of this Privacy Policy will be identified at the top of the page by its effective date, and we will also keep prior versions of this Privacy Policy in an archive.

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