

**MID-SOUTH SYNERGY
2019 PRIVACY POLICY NOTICE**



2019 Privacy Policy Notice

A. Categories of Information Collected: Mid-South Synergy collects and maintains appropriate information about its member-consumers, including:

1. Contact information, including a member-consumer's name, address, telephone number, and e-mail address. Mid-South Synergy might also collect a user name and password for online access.
2. Billing information, including Social Security number, credit information, financial account information, and payment history.
3. Electric usage data gathered by Mid-South Synergy's metering systems and a member-consumer's service history which may include information on a member-consumer's property and appliances and information maintained for meter reading purposes (e.g., warning about a dog in the yard).
4. Capital and patronage account information for member-consumers and former member-consumers and contact information for former member-consumers resulting from membership and governance activities.
5. Responses to member-consumer survey(s) conducted by Mid-South Synergy to identify needs or improve service.
6. Additional information about a member-consumer or a member-consumer's property, appliances, and activities obtained through services offered by Mid-South Synergy or its affiliates, such as security, home improvement, and lifeline services.

B. Purposes for Collection; Access and Correction

1. Mid-South Synergy collects and maintains information about member-consumers for purposes that are suitable to its operations and management. Information is collected only through lawful and fair means and for appropriate purposes.
2. Mid-South Synergy is committed to maintaining accurate, complete, timely, relevant, and appropriate information about member-consumers as necessary for the purpose for which the information is to be used. Mid-South Synergy generally permits its member-consumers to access and seek correction of records about themselves that are maintained and used by Mid-South Synergy to provide service, for billing, and to manage capital accounts. Any request for, or disputes relating to, access, correction, or other matters should be directed to:

Mid-South Synergy
Member Services
P. O. Box 970
7550 Highway 6
Navasota, Texas 77868
936-825-5100
Email: memberservices@midsouthsynergy.com

Mid-South Synergy will do its best to resolve any questions or problems that may arise regarding the use of member-consumer information.

3. Mid-South Synergy provides usage data to member-consumers who have access to electric usage data through an interface, such as a website or in-home display.

C. Mid-South Synergy Collection of Member-Consumer Information: Mid-South Synergy collects member-consumer information through the following methods:

1. When member-consumers create an account and interact with Mid-South Synergy regarding their account, utility service, or participation in Mid-South Synergy programs.
2. When member-consumers use electricity service and metering systems including smart meters.
3. When member-consumers interact with Mid-South Synergy through its website www.midsouthsynergy.com.
4. When Mid-South Synergy interacts with third parties, such as credit agencies.

D. Use and Retention of Member-Consumer Information by Mid-South Synergy

1. Mid-South Synergy uses information about member-consumers in defined and responsible ways in order to manage, provide, and improve its products, services, and operations, for example: administer member-consumer accounts; inform member-consumers about their energy usage; provide member-consumers with outage information, peak alerts, and warning messages; and communicate with member-consumers about programs or opportunities that may be of interest to them.
2. Data about member-consumers' electric usage may be compiled in aggregate form so that an individual member-consumer's daily energy usage habits are not revealed, and such data may be used by Mid-South Synergy to improve system operations, efficiency and overall customer service.
3. Mid-South Synergy retains member-consumer information, including energy usage data, in such amounts and for such periods of time as required by law or regulation or as reasonably necessary to provide services, as more fully set forth in the Mid-South Synergy Retention Policy.

E. Security

1. Mid-South Synergy maintains member-consumer information with reasonable and appropriate technical, administrative, physical and cyber safeguards to protect against loss, unauthorized access, destruction, misuse, modification, and improper disclosure of member-consumer information, including encryption and restricted access. Member-consumers are warned, however, that no system can ever be fully protected against every possible hazard.
2. Mid-South Synergy requires its employees, affiliates and contractors who have access to member-consumer information to agree in writing to comply with this privacy and confidentiality policy. Any employee or contractor who fails to comply with these rules may be subject to disciplinary action up to and including termination.
3. Member-consumer information that member-consumers may access through Mid-South Synergy's website is protected using cyber security protocols designed to prevent unauthorized third parties from accessing such information.

F. Disclosure to Third Parties

1. Mid-South Synergy does not share member-consumer information, which information may include a member-consumer's electric usage data and/or information that can reasonably be used to identify an individual, with a third party, except at the member-consumer's prior written request, with the member-consumer's prior written consent, or as described below. Member-consumers who wish to authorize Mid-South Synergy to disclose their information to a third party may do so by contacting Mid-South Synergy as described below.

2. Information may be disclosed to affiliates or contractors hired by Mid-South Synergy to assist in carrying out operations, such as service, maintenance, billing, and management functions including legal, audit, and collection services. Information may also be shared with other utilities under shared service agreements or to meet operational requirements. Information will only be disclosed to such persons to the extent necessary to render the services, and only to those who agree in writing to maintain the confidentiality and security of the information.
3. Mid-South Synergy may disclose to and share information with commercial and consumer credit reporting agencies for credit-related activities (e.g., the reporting of bad debts).
4. Sufficiently aggregated information may be disclosed to third parties where necessary or beneficial for Mid-South Synergy's operations; for example, to improve efficiency and overall customer services.
5. Information may be disclosed when authorized or required by law, including in response to a search warrant, subpoena, or court or law enforcement order. For example, Mid-South Synergy may use and disclose records for investigations into employee misconduct or for law enforcement investigations related to its business. Disclosures may also be made when appropriate to protect Mid-South Synergy's legal rights or in situations involving an imminent threat to life or property. Mid-South Synergy will take reasonable steps to limit the scope and consequences of any of these disclosures.
6. For home security customers, if any, Mid-South Synergy may share information with law enforcement authorities, as may be authorized in security service agreements.
7. In addition, information may be shared with affiliates and partners of Mid-South Synergy that offer products and services of interest to member-consumers. Member-consumers may request that their information not be shared with affiliates or partners for the offering of new products and services by sending a written request to Mid-South Synergy, P. O. Box 970, Navasota, Texas 77868. Nevertheless, Mid-South Synergy does not sell, rent, loan, exchange, or otherwise release member-consumer information to non-affiliated third parties or partners for their marketing purposes, without a member-consumer's prior written consent.
8. Mid-South Synergy may make information regarding third party products and services available to member-consumers through Mid-South Synergy's website.

G. Disclosure of Membership Lists to Member-Consumers

1. Membership lists of Mid-South Synergy may be disclosed to a member-consumer of the Cooperative or proper purposes, such as in connection with Cooperative election activities. Such disclosures will only be made in accordance with a policy adopted by the Board, and further uses of any lists so disclosed will be subject to that policy.
2. In some instances, membership lists may be made available for appropriate uses without disclosing or sharing the list to a third party. For example, Mid-South Synergy may undertake a mailing on behalf of and at the expense of a third party.

H. How to Contact Mid-South Synergy

1. This policy is maintained and supervised by Mid-South Synergy's Member Services Department.
2. Questions about the Privacy Policy may be directed to that department as follows:

Mid-South Synergy OR memberservices@midsouthsynergy.com
Member Services Department
P. O. Box 970
7625 Highway 6
Navasota, Texas 77868
936-825-5100