BLUE RIDGE ELECTRIC MEMBERSHIP CORPORATION

Policy Statement Number: **6-18B**

SUBJECT: **Privacy Policy**

I. OBJECTIVE

 To protect member and customer personal identifiable information of Blue Ridge Electric and its subsidiaries through established policy and procedures.

II. POLICY CONTENT

The Board of Directors of Blue Ridge Electric Membership Corporation has adopted a Member Privacy Policy for the members of Blue Ridge Electric and is included in Attachment 1 to this policy.

The Board of Directors of Blue Ridge Electric which oversees Blue Ridge Energies, LLC has adopted a Customer Privacy Policy for the customers of Blue Ridge Energies, LLC and is included in Attachment 2 to this policy.

The Board of Directors of Blue Ridge Electric which oversees RidgeLink, LLC has adopted a Customer Privacy Policy for the customers of RidgeLink, LLC and is included in Attachment 3 to this policy.

The Board of Directors of Blue Ridge Electric Membership Corporation which oversees a company website has adopted a Website Privacy Policy and is included in Attachment 4 to this policy.

Blue Ridge Electric and its subsidiaries will provide privacy policy information to members and customers upon the establishment of new accounts and on an annual basis. Blue Ridge Electric and its subsidiaries has trained its employees on the implementation of these policies and will provide refresher training as needed, but in any case at least every two years.

III. RESPONSIBILITY

1. Board of Directors: The Board of Directors shall be responsible for reviewing this policy on an annual basis and the Board president will be responsible to call to the attention of the full Board any non-adherence to this policy.
2. Chief Executive Officer: The Chief Executive Officer shall be responsible for the implementation and administration of this policy and development of appropriate control reports to assess results.
3. All members of management are responsible for the application and enforcement of this policy in a consistent manner.

**APPLICATION OF POLICY**

Blue Ridge Electric Membership Corporation reserves the right, in its sole discretion, to interpret, deviate from, amend, modify, reduce or eliminate all or any aspect of this policy at any time.

This policy will be modified as necessary, to comply with applicable federal, state and/or local laws.

Date Adopted: September 26, 2013

Date Revised: 01/20, 9/21

Policy Statement Number: **6-18B**

SUBJECT: **Member Privacy Policy**

**Attachment 1**

**MEMBER PRIVACY POLICY**

Blue Ridge Electric Membership Corporation (The Cooperative) must retain certain personal and financial information in order to conduct our business. We will not share your information except as needed in order to provide you with services you request, and we have adopted physical and electronic safeguards to protect your information. The Cooperative will not sell your personal information.

**Collecting Information**

The Cooperative collects and maintains information used to provide you with requested services. When you open a new account or apply for additional services, we may collect information orally, in writing, or electronically. This could include such items as your name, address, or Social Security number, as well as nonpublic information such as your credit history report, phone numbers, and email addresses.

**Disclosing Information**

Your personal information is shared to the extent necessary to provide you with requested services and/or to meet business needs as detailed in our service rules and regulations. Employees of The Cooperative have access to your information in order to complete your transactions, maintain your accounts, and provide services you request. Occasionally, we may be required by law to provide nonpublic information for governmental or judicial purposes. Even if you become an inactive member, we will continue to protect your privacy and personal information.

**Contact**

If at any time you have questions or concerns regarding this policy, please contact us at 1-800-451-5474 or email us at myBRE@BlueRidgeEnergy.com.

Policy Statement Number: **6-18B**

SUBJECT: **Member Privacy Policy**

**Attachment 2**

**CUSTOMER PRIVACY POLICY**

Blue Ridge Energies, LLC (The Company) must retain certain personal and financial information in order to conduct our business. We have policies and procedures in place to ensure this information is kept secure and confidential, and we have adopted physical and electronic safeguards to protect your data. We will not share your information except as needed in order to provide you with services you request. The Company will not sell your personal information.

**Collecting Information**

The Company collects and maintains information used to provide you with requested services. When you open a new account or apply for additional services, we may collect information orally, in writing, or electronically. This could include such items as your name, address, or Social Security number, as well as nonpublic information such as your credit history report, phone numbers, and email addresses.

**Disclosing Information**

Your personal information is shared to the extent necessary to provide you with requested services and/or to meet business needs as detailed in our service rules and regulations. Employees of The Company have access to your information in order to complete your transactions, maintain your accounts, and provide services you request. Occasionally, we may be required by law to provide nonpublic information for governmental or judicial purposes. Even if you become an inactive customer, we will continue to protect your privacy and personal information.

**Contact**

If at any time you have questions or concerns regarding this policy, please contact us at 1-800-726-0405 or email us at myBRE@BlueRidgeEnergy.com.

Policy Statement Number: **6-18B**

SUBJECT: **Member Privacy Policy**

**Attachment 3**

**CUSTOMER PRIVACY POLICY**

RidgeLink, LLC (The Company) must retain certain personal and financial information in order to conduct our business. We have policies and procedures in place to ensure this information is kept secure and confidential, and we have adopted physical and electronic safeguards to protect your data. We will not share your information except as needed in order to provide you with services you request. The Company will not sell your personal information.

**Collecting Information**

The Company collects and maintains information used to provide you with requested services. When you open a new account or apply for additional services, we may collect information orally, in writing, or electronically. This could include such items as your name, address, or Social Security number, as well as nonpublic information such as your credit history report, phone numbers, and email addresses.

**Disclosing Information**

Your personal information is shared to the extent necessary to provide you with requested services and/or to meet business needs as detailed in our service rules and regulations. Employees of The Company have access to your information in order to complete your transactions, maintain your accounts, and provide services you request. Occasionally, we may be required by law to provide nonpublic information for governmental or judicial purposes. Even if you become an inactive customer, we will continue to protect your privacy and personal information.

**Contact**

If at any time you have questions or concerns regarding this policy, please contact us at 1-800-451-5474 or email us at myBRE@BlueRidgeEnergy.com.

Policy Statement Number: **6-18B**

SUBJECT: **Privacy Policy**

**Attachment 4**

**WEBSITE PRIVACY POLICY**

This Privacy Policy describes how your personal information is collected, used, and shared when you visit https://www.blueridgeenergy.com/ (the “Site”).

**Personal Information We Collect**

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information.”

We collect Device Information using the following technologies:

* “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit http://www.allaboutcookies.org.
* “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
* “Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site.

Additionally when you fill out forms on the Site, we collect certain information from you. This may include (but is not limited to) email addresses, physical addresses, names, phone numbers, and account numbers. We refer to this as "Personally Identifiable Information".

When we talk about “Personal Information” in this Privacy Policy, we are talking both about Device Information and Personally Identifiable Information.

**How do we use your Personal Information?**

We use the Personally Identifiable Information you voluntarily provide to fulfill your request, help you quickly find and/or receive information from us, alert you to updated information and services, provide more complete service, improve the content of our website for your reference, answer your questions, and communicate with you.

We use the Device Information that we collect to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

**Sharing your Personal Information**

Blue Ridge Energy does not sell the Personal Information you provide for financial gain nor does Blue Ridge Energy share such information with third parties for the purpose of sending you advertisements for products or services unaffiliated with Blue Ridge Energy or with its affiliates or business partners. Blue Ridge Energy may, however, share your Personal Information for legitimate business purposes, including without limitation the following:

* Transferring such information to Blue Ridge Energy’s affiliates and subsidiaries, unless such transfer is prohibited by law.
* Transferring such information as part of a merger, consolidation, acquisition, divestiture or other corporate restructuring.
* Making such information available to third parties who are providing the product, service or information that you have requested (but never your password).
* Making such information available to third parties who are providing services to Blue Ridge Energy or its subsidiaries or affiliates. For example, we use Google Analytics to help us understand how our customers use the Site. You can read more about how Google uses your Personal Information here: https://www.google.com/intl/en/policies/privacy/. You can also opt-out of Google Analytics here: https://tools.google.com/dlpage/gaoptout.
* Residents of California: Please see NextRoll’s Information for California Residents regarding the California Consumer Privacy Act of 2018, at <https://www.nextroll.com/privacy#service-13>.

By providing Personally Identifiable Information, you expressly consent to these privacy practices. Also, Blue Ridge Energy reserves the right to share any aggregated information (i.e., non-personally identifiable information) with any third parties for any reason, unless prohibited by law.

Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

**Security Policy**

Blue Ridge Energy uses the highest available industry-standard practices to protect your Personal Information from loss, misuse, alteration and destruction. Our Secure Sockets Layer (SSL) software is the industry standard and among the best software available today for secure transactions. It encrypts all of your personal information so that it cannot be read over the Internet. However, no security system is completely fail-safe, and Blue Ridge Energy cannot guarantee the information you provide will never be obtained by unauthorized persons. In some areas of our website, we require a user ID and password for you to access certain information. Blue Ridge Energy will not disclose such password to third parties; however, you are responsible for maintaining the privacy and security of your password.

**Do Not Track**

Please note that we do not alter our Site’s data collection and use practices when we see a Do Not Track signal from your browser.

**Data Retention**

We will maintain your Personal Information for our records unless and until you ask us to delete this information.

**Changes**

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

**Contact Us**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us using the information below:

Blue Ridge Energy
PO Box 112
Lenoir, NC 28645-0112