

POLK-BURNETT ELECTRIC COOPERATIVE

Policy No.: **BD-20**

Subject: **Proprietary Information**

Objective: To preserve and protect the Cooperative members' investments and all proprietary information relating to the Cooperative's members, consumers and its operations as a whole.

Policy:

1. It shall at all times be the policy of the Cooperative to comply with the requirements of Wis. Stat. §185.47 providing for the proper keeping of the books and records of the Cooperative, and making such information available to members, in accordance with Wisconsin law.
2. Notwithstanding the Cooperative's general open information policy, the general internal business affairs of the Cooperative and Confidential Information shall not be discussed with non-members, or anyone outside the Cooperative. Confidential Information includes, but is not limited to, personally identifiable member/customer information such as names, addresses, telephone numbers, payment history, or types of Cooperative services purchased; programs, projects or studies used in developing mapping and member location information; computer software in use or network vulnerability studies; pursuing economic development activities; financial information of the Cooperative and its subsidiaries of a competitive or proprietary nature or involving a trade secret, strategic plan or initiative; specific personally identifiable employee information; collective bargaining strategy or information prepared or gathered for collective bargaining purposes; plans or strategy relating to litigation or potential litigation; plans, strategy, data and related information regarding the Cooperative's territorial integrity; the Cooperative's trade secrets; or other competitive information and operational information.
3. The unauthorized disclosure of Confidential Information will be reviewed on a case-by-case basis and judged based upon the effect it will have on competition in the marketplace, marketing and investment advantages for the Cooperative, impact on members, the reasoning for said disclosure, and from the likelihood of the said information falling into the public domain.
4. Directors with access to Confidential Information are responsible for ensuring they act in a manner that prevents its unauthorized disclosure. Failure to keep Confidential Information confidential exposes the Cooperative and the director involved to potentially damaging legal consequences.
5. Web logging ("blogging"), or other computer-based communications, by a director that is harmful to the Cooperative or its subsidiaries' business interests or reputation, whether the blogging was done on Cooperative electronic devices or elsewhere is prohibited.

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6. Directors are to utilize their Cooperative email account for all Cooperative and subsidiary related business. All correspondence using a personal email account is not considered Polk-Burnett business.
7. All Cooperative files will reside on the board Call To Order application for iPads for viewing. No Cooperative or subsidiary data/information may be saved on home/personal devices.
8. Directors shall keep Confidential Information confidential after the expiration of their term as a director of the Cooperative and shall adhere to this policy even after the conclusion of their term.

Process:

Handling of Paper Media

The primary means of handling paper media containing Confidential Information is to take every measure possible to ensure the Confidential Information on the paper media is secure. This includes ensuring that only authorized personnel can see the document and that Confidential Information is secure from viewing and access by unauthorized persons, and that Confidential Information is securely locked from unauthorized parties.

Handling of Electronic Visual Media

The primary means of protecting Confidential Information which is in electronic visual media form (the images of Confidential Information visible to others on a computer monitor, other portable electronic devices, or laptop) is locking the device, or turning it off so that unauthorized persons cannot view it.

Electronic data available to directors must be secured from unauthorized persons.

Handling of Electronic Non-Visual Media (CD/DVD, Disks, Portable Hard Drives, Memory Sticks)

The primary means of securing non-visual electronic media shall be to ensure such Confidential Information is locked in a safe when not in use.

A violation of this policy may constitute cause as referred to in Bylaw Article V, Section 2(c).

When Confidential Information is no longer needed, refer to *BD-32 - Destruction of Proprietary/Sensitive Information* for guidelines.

This policy is the joint responsibility of the Board of Directors and the General Manager.

Edward O. Gullickson, President
May 22, 2023