



# HUNTSVILLE UTILITIES POLICY

<b>Revision Approval Date:</b> Gas & Waterworks Board-11/14/2023 Electric Board-11/15/2023	<b>Date Posted:</b> 11/30/2023	<b>Implementation Date:</b> 12/1/2023
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**Policy #:** IT-02

**Policy:** Customer Data Privacy

**Purpose:** To notify customers what information Huntsville Utilities (HU) collects, and how we use, disclose, and protect customer information.

## Overview

HU recognizes the need for appropriate protection and management of personal information shared with us by our customers (“you”). This Privacy Policy (the “Policy”) applies to your use of our websites and other digital resources, including our mobile application and self-service payment kiosks. By using our digital resources, you consent to the collection and use of information by HU as described in this Policy.

This Privacy Policy tells you about:

- Personal information we collect
- How we use your personal information
- Retention of your personal information
- Disclosure of your personal information
- How we protect your personal information
- Children’s Privacy
- Warning about social media

This Privacy Policy applies only to personal information that we collect on the website [www.hsvutil.org](http://www.hsvutil.org) as it may be modified, relocated and/or redirected from time to time (the “Site”). This Privacy Policy does not apply to any other web sites that may be accessible through the Site.

## **Changes to this Policy**

HU reserves the right to change this Policy at any time and for any reason. If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

## Personal Information We Collect

### • **Information That You Voluntarily Provide**

To serve you and effectively process your transactions, HU may request certain information from you, including for example, your name, mailing address, telephone number, email address, PIN number for your HU account, and bank account information. You acknowledge that your submission of any



## Customer Data Privacy

information to HU is voluntary on your part. You may always choose not to provide information. However, your failure to provide certain information may preclude you from completing a purchase or taking advantage of certain of HU' services.

- **Automatic Collection of Information**

HU may use cookies or applets to recognize you when you visit our website, in order to personalize your experience and generally to serve you better. Cookies are identifiers that a website sends to your browser to keep on your computer to facilitate your next visit to our website. These technologies collect certain technical information such as the date and time of your visit, internet protocol (IP) address, browser software and operating system used for your visit, and the content of any sent or received cookies. HU does not use these technologies to associate you with any off-line activity. HU does not use cookies or applets to track your activities once you leave HU' websites. 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. HU reserves the right to use third party analytical tools to monitor use of our website. HU does not currently use cookies for any reasons other than security monitoring logs, and no analytics are currently enabled.

- **Information From Utility Meters**

HU may utilize digitally communicating utility meters. These meters provide automated means of collecting utility consumption information for Electrical, Water, and Gas usage. Data collected from utility meters is used for customer billing and HU' other business purposes, such as load balancing and system analysis and modeling to enhance system efficiency. All metered data is transferred over secure communication channels and access limited to authorized personnel.

### How We Use Your Personal Information

HU stores and uses your personal information to serve you effectively and process your transactions. HU may access, preserve, and use your personal information to the extent HU reasonably believes necessary to comply with any law, regulation, or legal process. HU may also access, preserve, and use your personal information to obtain credit reporting information to establish deposit amounts and delinquent account collection efforts. HU will not use any financial information supplied by you for any purpose unrelated to payment for the services provided or billed by HU. Here are some additional examples of how HU uses your information:

- Communicating with you by email, telephone, or text message
- Sending you marketing and promotional emails advertising our products and services, or on behalf of selected third parties
- Troubleshooting technical problems on the Site
- Responding to questions and feedback
- Addressing service complaints
- Conducting research and analysis
- Improving customer service
- Continuously evaluating and improving the online and mobile user experience
- Preventing, discovering, and investigating violations of this Privacy Policy or any applicable terms of service or terms of use for the Mobile Application, and investigating fraud, chargebacks, or other matters



## Customer Data Privacy

### Retention of Your Personal Information

HU will retain your information for the period necessary to fulfill the purposes outlined above unless a longer retention period is required or allowed by applicable law. Remember that, even after you cancel your HU 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. HU may also retain backup information related to your account on its servers for some time after cancellation for fraud detection or to comply with applicable law or our internal security policies. It is not always possible to completely remove or delete your information due to technical constraints or contractual, financial, or legal requirements.

### Disclosure of Your Personal Information

HU does not sell or lease your personal data to third parties. The following are some of the ways we may disclose your personal information:

- **Third-Party Vendors:** HU uses third-party vendors to support its digital services. These vendors provide services related to, for example, quality control/customer surveys, customer billing and payments, establishing new service, and collections, among others. Before any personal information is disclosed to these vendors, HU uses commercially reasonable means to ensure that: (i) the third-party has robust information practices to protect the personal information, and (ii) use of the information by the third-party is limited, by written agreement, to HU business purposes. These vendors may process information about you in order to perform their contractual functions. HU is not responsible for disclosure of your information due to unauthorized acts of third parties or acts otherwise outside of HU' control.
- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
- **Legal Compliance and Protections:** We may disclose account and other personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of HU, our users, or others. This includes exchanging personal data with other companies and organizations for fraud protection and credit risk reduction.

### How We Protect Your Personal Information

HU uses industry-standard safeguards and protection practices and controls to ensure the integrity of its systems and protect your personal information from loss or misuse. HU takes off-line measures to protect your personal information that HU knows to be financial or business-sensitive information to the same extent HU protects its own information. However, no security system can be guaranteed to be 100% secure. As such, HU cannot guarantee the information you provide will never be accessed or obtained by unauthorized persons.



## Customer Data Privacy

It is Important for you to protect against unauthorized access to your password and to your computer. Be sure to close your browser after you have completed your visit to the HU website.

### **Children's Privacy**

We understand children's privacy is important. HU' websites and other digital resources do not knowingly collect personal information from visitors under age 13 and are in no way directed at children under the age of 13. If you are under the age of 13, then you should not submit any personal information to this site. If a user submits a verifiable report to HU that HU has collected personal information of a child under age 13, HU will delete that information as quickly as reasonably possible.

### **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.

### **Have Questions**

If you have any questions about this Privacy Policy, we'll do our best to answer them promptly. You can contact us at: [https://www.hsvutil.org/about\\_hu/directory.php](https://www.hsvutil.org/about_hu/directory.php)

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