

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 as provided by law.
2. Notwithstanding the cooperative's general open information policy, the general internal business affairs of the Cooperative should not be discussed with non-members or anyone outside the organization. Information considered to be confidential 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; testing computer software enhancements; 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; or other competitive information and operational information.
3. Sharing of information with other entities will be viewed on a case-by-case basis and judged on the effect it will have on competition in the marketplace, marketing and investment advantages for the Cooperative, and precluding the information from falling into the public domain.
4. Directors with access to confidential information are responsible for its security. Polk-Burnett and its subsidiaries consider the protection of confidential business information and trade secrets, as well as personal information, vital to the interests and success of the Cooperative. Failure to keep such materials confidential exposes Polk-Burnett 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 computers or elsewhere is prohibited.
6. Directors are to utilize their Polk-Burnett email account for all cooperative and subsidiary 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. Due to E-Discovery rules; no cooperative or subsidiary data/information will be saved on home computers.

Process:

**Handling of Paper Media**

The primary means of handling paper media containing confidential information is ensuring to take every measure possible to ensure the 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 by unauthorized persons, and that confidential information is securely locked from unauthorized parties.

**Handling of Electronic Visual Media**

The primary means of protecting electronic visual media (the images of confidential information visible to others on a computer monitor, other portable 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 and disposed of properly when it is no longer needed.

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

The primary means of securing non-visual electronic media is to ensure 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)(3).

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.

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Edward O. Gullickson, President  
May 21, 2018