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Approver	Corporate Ethics Management Committee (CEMC)

Defined Terms	
Customer Information Privacy Policy	Policy Name
Privacy Officer	Policy Owner

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1.0 Purpose

Puget Sound Energy Inc.’s, (“PSE” or the “Company”) policy is to protect the confidentiality of customer information and to comply with all laws governing the privacy and security of such information. This Customer Information Privacy Policy ("Policy") sets forth the principles that guide the Company's treatment of customer information and shall be incorporated into the Company’s Corporate Policy Manual.

1.1 PSE’s Commitment

PSE takes its responsibility to maintain the confidentiality and security of its customers’ information seriously. The Company’s commitment to protect customer information is reflected in these principles, which shall inform management’s practices and procedures when dealing with such information:

- **Choice.** PSE will not disclose customer information to third parties for the purposes of marketing services or product offerings to a customer who does not already subscribe to that service or product without the Company’s customer’s prior written permission to do so.
- **Notice.** PSE will inform customers about Company privacy practices by posting a privacy policy on the Puget Sound Energy Web site and through other appropriate means.
- **Confidentiality.** PSE will maintain the confidentiality of customer information, and use it only for the Company’s primary purpose. Access to customer information shall be limited to authorized employees, agents and contractors with a business-related need for such access.
- **Security.** PSE will use appropriate security practices and procedures to protect customer information from unauthorized access, use and disclosure while in transit and storage within the Company.
- **Compliance with Laws, Rules and Regulations.** PSE will comply with all local, state and federal laws, rules and regulations applicable to the processing and storage of customer information.

2.0 Scope and Responsibility

Who	Does What
All PSE Employees/Contractors/Service Providers	<ul style="list-style-type: none"> • Support PSE’s commitment to protect customer information and respect customer’s rights with respect to their information • Follow this Policy and associated standards and procedures related to privacy and data security • Promptly report any security incidents involving customer information to the appropriate party • Complete appropriate privacy-related training
Management	<ul style="list-style-type: none"> • Ensure individuals that they oversee comply with this Policy • Take action or escalate to Compliance any privacy-related incidents or inquiries
Compliance Department	<ul style="list-style-type: none"> • Provide guidance to the Company on incidents or inquiries related to the use of customer information • Ensure timely responses and resolution to a customer’s request regarding their customer information

3.0 Policy

This Policy applies to all Customer Information that is processed by the Company by virtue of the customer-utility relationship.

3.1 Access to, and Use of, Customer Information

The Company may collect and retain customer information with customer consent or as reasonably necessary for the Company to perform duties directly related to our primary purpose.

Company employees may only access or use customer information if authorized to do so and if such access or use is needed for a legitimate business-related function. The Company has in place and shall maintain system access controls for authorizing such access.

In addition to system privileges for access, authorization for specific employees and organizational units within the Company to access customer information may be determined by Company management from time to time and will be reviewed and modified as appropriate. Employees shall acknowledge their understanding of Company policies and procedures in regard to system access. Employees with questions regarding whether certain uses of customer information are authorized should seek guidance from management.

Access by non-employees to the Company's systems must be approved by a department manager and reviewed for conformance with IT Security Policies.

3.2 Disclosure of Customer Information

The Company will disclose customer information to affiliates, subsidiaries, parent organizations, or third parties only to the extent necessary for the Company to perform duties related to the Company's primary purpose. The Company will obtain customer's written consent for any other purpose.

When marketing services or product offerings to a customer who does not already subscribe to that service or product, the Company will not disclose customer information to the Company's affiliates, subsidiaries or other third parties without prior written permission from the customer. Each employee is responsible for ensuring that appropriate internal approvals are obtained and that the customer has given prior written permission for the disclosure.

The Company may collect and release aggregate data to the extent reasonably necessary to perform duties directly related to the Company's primary purpose. The Company may also share aggregate data on energy usage to the extent necessary to comply with legal requirements, or to facilitate voluntary efforts, to promote energy efficiency, conservation or generating resource management.

3.3 Security of Customer Information

Each employee is responsible for maintaining the security of customer information in the Company's control. The Company uses appropriate physical, technical and logical safeguards to protect the security of customer information in its control. The Company's safeguards for customer information are consistent with information security safeguards required under applicable laws, rules and regulations. As contracts are entered into or renewed, the Company will require any third party to which it provides access to customer information to have policies, procedures and technological safeguards in place to protect customer information that are no less stringent than the Company's own standards.

3.4 Customer's Rights and Control Over Their Personal Information

The Company will make reasonable efforts to respond to requests from customers for their own account and usage information. The Company will provide customers the opportunity to dispute the accuracy and completeness of the customer account and usage information the Company collected. The Company will take reasonable steps to destroy or arrange for destruction of customer information in accordance with the utility's data retention policies. Furthermore, the Company will ensure customers have the ability to revoke any previously granted consent.

3.5 Response to Breach of Security of Customer Information

The Company will provide notice of a security breach involving the disclosure of customer information to the Washington Utilities and Transportation Commission and affected customers consistent with timing, content, format and distribution requirements imposed by applicable laws and regulations.

3.6 Designation of Customer Information Compliance Official

The Company will designate an employee to ensure compliance with this Policy by all employees (the "Privacy Officer"). The Privacy Officer will review Company-wide compliance with the requirements of this Policy and other applicable policies, make recommendations to the Company's Board of Directors, and will have such other authority and responsibilities as determined by the Board of Directors.

3.7 Training

The Company shall have a training program to ensure that all new and existing employees understand their obligations under this Policy and applicable law. Training shall be conducted periodically and new and existing customer service center employees shall receive more frequent and specific training to understand and implement this Policy.

3.8 Accountability

Employees who violate this Policy or related Company policies are subject to the full range of disciplinary actions applicable to violation of Company policies and standards, up to and including termination of employment.

3.9 Review and Modification of this Policy

This Policy will be reviewed periodically by the Company's Board of Directors, the Privacy Officer, or other Company officials designated by the Board of Directors. The Board of Directors may update or modify this Policy as circumstances warrant. If material changes to this Policy are adopted, the Company will provide its employees with notice of the changes.

4.0 Definitions

4.1 Customer Information

Information that identifies, relates to, describes or is reasonably capable of being associated, directly or indirectly, with a particular customer or household.

4.2 Primary Purpose

A business' need to provide regulated utility services as required by state or federal law, or as specifically authorized in the utility's effective tariff, or by the Commission.

4.3 Account and Usage Information

Customer information contained in the records the Company keeps for each customer to provide and bill for utility services.

4.4 Aggregate Data

Collection of customer data by the Company from which identifiable customer information has been removed or modified so that the information cannot be attributed to any individual customer.

5.0 Related Documents and References

- CP 09 – Information Security and Acceptable Use Policy
- CP 06 – Employee Privacy
- Privacy Policy Statement
- UTC Docket U-061239 Settlement Agreement
- UTC Docket U-180525 AMI rulemaking
- WAC 480-90-153
- WAC 480-100-153
- [WAC 480-90-023](#)
- [WAC 480-100-023](#)

6.0 Review and Revision History

Date	Version	Summary of Change	Preparer
2013	1.0	Initial Release (approved by Board of Directors per Docket U061239)	Unknown
TBD	2.0	<ul style="list-style-type: none"> • Update based on changes to WAC 480-90-153 and 480-100-153 (AMI rulemaking) • Align to Corporate Policy template 	Genea Koski