

NOTIFICATION OF USE OF CUSTOMER INFORMATION

Clarksdale Public Utilities ("CPU") is governed by the Clarksdale Public Utilities Commission ("CPUC"), which is committed to your privacy.

To make sure your personal information is secure, we communicate our privacy and security guidelines to CPU employees and strictly enforce privacy safeguards within our organization.

"Personal information" is any record that identifies an individual person. Examples are social security numbers, address, name, phone numbers, birth dates, and billing, credit, and energy use data specific to you.

To ensure your privacy, CPUC adopted an Information Management and Security Policy. In brief, we do not release to a third party any of your information that is proprietary or private without your written consent. The only exception is for information that's reasonably required to meet CPU's business needs, for example:

- To provide or bill for utility service or services provided by CPU.
- To maintain or operate CPU's utility facilities and properties.
- To plan, implement or evaluate water and/or energy-use programs, such as water use management, energy management, demand response, or energy efficiency.
- To comply with the Mississippi Public Records Act of 1983 as set forth in Miss. Code Ann. §25-61-1 et seq or other law, regulation, legal process or governmental request, such as a request from law enforcement, or a government agency when necessary for the performance of official duties, or a court order.

What personal information we collect

We collect customer information having to do with our business relationship with you and your use of our utility services. Here are some examples:

- Contact information that allows us to communicate with you, including your name, address, telephone number, CPU account number and email address.
- Information about your financial relationship with us, including your payment data credit history, and Social Security number
- Water and electric usage data gathered by our metering systems
- Information about your use of the CPU website, as well as any other media form, media channel, mobile website or mobile application related, linked or otherwise connected thereto (collectively, the "Site").

When we collect personal information

We gather personal information at different times, including:

- When you set up your account and interact with us about it or about your electric service and your participation in our programs.
- When you use electricity, usage data is collected via our metering systems.
- When you choose to engage with us through our Site.

- When we interact with third parties such as credit agencies.

How we use personal information

We use personal information to administer your account and inform you about your water and energy usage. We also use it to manage and improve our services and business operations. Some examples include:

- To prepare your customer billing statement and in connection with billing and payment on your account.
- To communicate with you about -
 - your water and energy use,
 - specific programs or opportunities we offer that may help you to lower your water or energy use, gain other benefits, or provide a convenience, such as pick-a-due-date.
- To provide you services or to complete your transactions or requests.
- To enable you to see your energy usage data via secure access on the Internet at our Site.

How we protect personal information

CPU takes precautions -- including administrative, technical, and physical measures -- to safeguard your personal information against loss, theft, and misuse, unauthorized access, disclosure, alteration, and destruction.

When you post on a social networking service, the personal information you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to share. For example, if you provide your name and email address on a social networking service, that information is public. Please take care when using these features.

How we use customers' non-personal information

CPU also may combine data about your water and electricity use in various formats so that it cannot be identified personally with you. For example, we could summarize total water or energy use for all homes and businesses in a certain geographic area. This kind of aggregated data is not subject to privacy restrictions. We use the information to manage, provide, and improve our services and business operations. Here are some examples:

- To analyze rates and rate structures.
- To project usage demand patterns and water consumption, electric load, plan growth, and identify load centers.
- To improve our water production and energy supply planning and to better design and engineer our water and energy distribution systems.

We collect other non-personal information in a form that does not identify specific individuals and we use, transfer, and disclose it for many purposes. An example of non-personal information that we collect and how we may use is that we may gather information -- such as occupation, language, and zip code -- so that we can better understand customer behavior and improve our products,

services, and advertising. We also may collect information regarding customer activities on our Site. We combine this information and use it to learn what's most useful to our customers and to understand which parts of our Site and services are of most interest.

If we do combine non-personal information with personal information, we protect the combined information as private and personal for as long as it is combined.

Disclosing information to third parties:

At times CPUC may make some personal information available to strategic partners or consultants that work with CPUC to provide services. Personal information will be shared only to provide or improve services; it will not be shared with third parties for their marketing purposes.

Cookies and other Technologies

CPUC's Site, online services, interactive applications, email messages, and advertisements may use "cookies" and other technologies such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our Site people visit most often, and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information.

However, if Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we will protect these identifiers as private and personal. As is true of most sites, we may gather some information automatically and store it in log files. This information includes IP addresses, browser type and language, Internet service provider (ISP), referring and exit pages, operating system, date/time stamp, and "clickstream" statistics. We use this information to understand and analyze trends, to administer the site, to learn about customer behavior on our Site, and to gather aggregate demographic information about those who use our Site. We may use this information in our marketing and advertising services.

In some of our email messages, we use a "click-through URL" linked to content on our Site. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our Site. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, just don't click text or graphic links in the email messages.

Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

Disclosing information to Third Parties

Service providers-CPUC shares personal information with companies that provide services, such as information processing, credit reporting, managing and enhancing customer data, customer service, assessing interest in our services, and conducting customer research or satisfaction surveys. These companies are obligated by contract with CPUC to protect your information.

Others-It may be necessary – by law, legal process, litigation, or requests from public and governmental authorities – for CPUC to disclose your personal information. We may also disclose

information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we see that disclosure is reasonably necessary to enforce our terms and conditions or to protect our operations or users.

Questions

If you have any questions or concerns about CPU's Privacy Policy or data processing, please contact us.

CPU may update its Privacy Policy from time to time. When we change the policy in a material way, we'll post a notice on our Site along with the updated Privacy Policy.

So adopted this the 13th day of August, 2019.