

communicating with a party that has a viable interest in the condition.

- ▶ When shared with contract-bound third parties as described in the prior section.
- ▶ When data is aggregated or anonymized in a manner that does not directly identify a customer.

Importantly, Great Plains does not sell PII and, except as provided for above, does not share PII with third parties.

EXISTING AND FORMER CUSTOMERS

Great Plains' privacy policies and practices apply to existing customers and to former customers. Customers may review their own PII on file with the utility by contacting Great Plains at **877-267-4764**. Customers can request the deletion of a Social Security number and/or correction or deletion of any customer PII data improperly collected or retained.

Disputes regarding the deletion of a Social Security number or customer PII data that remain unresolved for more than 45 days from the date of the request for deletion may be brought by the customer or the utility to the Minnesota Public Utilities Commission for a determination. Contact the Commission at **651-296-0406** or **800-657-3782**.

CUSTOMER SERVICE

Monday-Friday 7:30 a.m. - 6:30 p.m.

877-267-4764

 **GREAT PLAINS**
NATURAL GAS CO.
A Division of Montana-Dakota Utilities Co.

In the Community to Serve®



www.gpng.com

YOUR PRIVACY IS IMPORTANT TO US



Great Plains Natural Gas Co. (Great Plains), a division of Montana-Dakota Utilities Co., understands the importance of protecting the privacy of all information provided by customers. Great Plains respects and protects customer privacy and recognizes the importance of customer trust. The purpose of this notice is to disclose the types of Personally Identifiable Information (PII)* collected, security measures that are taken to protect that information and how that information is shared inside and outside of the company.

**PII is defined as data that can be used to distinguish or trace the identity of an individual (e.g., name, Social Security number, biometric record, etc.) alone, or when combined with other personal or identifying information that is linked or linkable to a specific individual.*

 **GREAT PLAINS**
NATURAL GAS CO.
A Division of Montana-Dakota Utilities Co.

In the Community to Serve®

INFORMATION WE MAY COLLECT

In the course of providing natural gas service, Great Plains only collects and maintains the customer PII needed to perform its regulated utility business functions. Great Plains collects and maintains PII in order to provide safe and reliable utility service, provide other services for safety reasons, detect and prevent unauthorized use of utility services and to prevent fraud and to meet legal and regulatory requirements.

Great Plains collects information, including PII, at the time natural gas service is requested, including:

- ▶ Information such as the names of the responsible parties on an account, addresses and Social Security numbers.
- ▶ Great Plains' customers have the right to refuse to provide their Social Security number upon initiating natural gas service and Great Plains will allow the use of an alternative identification process to personally identify a customer, such as a valid U.S. or State Government issued photo identification. A customer's decision not to provide their Social Security number shall not impact the customer's ability to receive service provided that the customer provides alternative identification. Great Plains will also delete an existing customer's Social Security number upon request by the customer and the establishment of an alternative identification process.

In the normal course of providing utility service, Great Plains obtains information including:

- ▶ Business relationships and transactions with Great Plains, its subsidiaries and third parties, including information such as energy service and usage, account balance and payment history. Further, for those customers utilizing Great Plains' online account services website, Great Plains also collects computer IP addresses when customers log on with their username and password. Great Plains tracks such information to assist with troubleshooting and to ensure the integrity of any transaction conducted through the website.
- ▶ Verification of identity, credit, creditworthiness and payment history from consumer reporting agencies.

HOW WE SECURE YOUR INFORMATION

Great Plains restricts access to PII to employees who need to know the information or provide services, service accounts, and to address safety concerns and unsatisfactory conditions with customers' facilities or equipment. Physical, electronic and procedural safeguards are maintained, complying with applicable industry standards and federal regulations, including the Fair and Accurate Credit Transactions Act, to protect PII from unauthorized disclosure.

In the event of an unauthorized use or release of customer PII data, Great Plains will promptly notify affected customers, the Minnesota Public Utilities Commission, the Minnesota Department of Commerce and the Minnesota Attorney General's Office. Such notice shall include the number of customers affected, date of period of breach, type of data inappropriately accessed, whether the source or cause of the breach has been identified and provided to law enforcement, steps taken to prevent similar breaches and steps to redress the breach.

SHARING INFORMATION INSIDE THE COMPANY

Great Plains may disclose information, including PII (as described under the heading "Information We May Collect"), to affiliates and a limited number of contract-bound third-party program contractors and evaluators who are held to strict confidentiality provisions. This helps Great Plains provide customer service, maintain customer accounts, supply crucial information for safety reasons, address unsatisfactory conditions with customers' accounts, facilities or equipment and offer services to customers.

SHARING INFORMATION OUTSIDE THE COMPANY

Great Plains will only share PII outside the company under the following conditions:

- ▶ When the customer has authorized such disclosure in writing.
- ▶ When responding to a subpoena or other legal process.
- ▶ For credit reporting purposes to a credit bureau.
- ▶ When there is an unsafe condition, and