



North Lauderdale Water Association

9709 Mount Carmel Road (PO Box 143)

Bailey, Mississippi 39320

601-681-6157

customerservice@nlwa.ms

facebook.com/northlauderdalewater

10 April 2025

POLICY: MEMBER AND CUSTOMER PRIVACY

Ref: (a) NLWA Bylaws
(b) NLWA Secure Customer Information (SCI) Incident Response Plan

- 1. Purpose.** This policy governs the handling of member and customer personally-identifiable information (PII) collected during business of the Association.
- 2. Background.** North Lauderdale Water Association is a member-owned cooperative. Our Board of Directors are members, as are many of our employees, and we answer to our fellow members in the conduct of the business of the Association. We value the privacy of our members and customers, and we are committed to protecting all personally-identifiable information (PII). This policy outlines how we collect, safeguard, and use PII.
- 3. Collection.** As a necessary condition of establishing membership and water service, the Association must collect proof of identification of account holders and legal claim to the property to be served. This is because membership conveys partial ownership of the Association, requires easements for emplacing and maintaining water lines and meters, and grants voting privileges in the business of the Association. These collected documents include drivers licenses, deeds, state business filings, and court orders. We also collect PII on water service applications, service agreements, and payment pathways. This PII includes service address, billing address, phone numbers, email addresses, last four digits of Social Security numbers, and bank account or payment card information. All information is provided voluntarily by our members and customers or is collected from government sources accessible to the public.
- 4. Use and Safeguarding.** Member and customer information will never be sold, and will not be shared or disclosed to third parties except as required by law or to fulfill legitimate operational needs of the Association (e.g., a trusted mass alert or bill printing service provider). The Association implement reasonable security measures to protect your data from unauthorized access or misuse and is constantly moving toward best industry practices. The Association has legal obligations to contact its members and customers for such things as boil water notices and all-member meetings. Additionally, the Association strives to alert members and customers to service outages and impending meter lock-offs. Valid phone numbers and email addresses are essential to providing such notifications in the form of voice calls, text messages, and emails. The Association requires each member and customer maintain valid contact information including at least one voice phone number. Apart from this, members and customers may opt to be alerted by voice message, text message, and email to additional phone numbers and email addresses. Outgoing phone calls and emails have correct caller ID and return address information, to help members and customers identify them. Employees are provided Association ID cards to identify themselves to members and customers in the field. The Association will retain PII

only as long as necessary to provide these services or as required by applicable regulations. Email addresses and phone numbers are retained for the duration of membership plus 1 year for operational continuity, then securely deleted unless legally required otherwise.

- 5. Director Responsibilities.** Among other things, reference (a) makes the North Lauderdale Water Association (NLWA) Board of Directors responsible for establishing and publishing policies governing the operation of the Association. The Board establishes and updates this privacy policy as necessary and appropriate. In addition, the Board has created policy for dealing with any security incidents that might threaten the secure handling of PII, as well as any actual disclosures (reference (b)). In addition, the Board is working toward adopting new technology and services that allow members and customers to enter their own PII directly and securely, without having to pass it through employees. This includes complying with Payment Card Industry (PCI) standards for bank and payment processing information.
- 6. Staff Responsibilities.** NLWA President, Office Manager and office employees, Operations Manager, Senior Waterworks Operator, System Surveyor, and Meter Readers all have occasion to handle member and customer PII. These employees are carefully screened before hiring, have access only to the subsets of information needed to perform their job, are trained on respecting and safeguarding member and customer privacy, and are monitored in their use of PII. All PII records are currently being digitized for more secure storage and access control, and paper records beyond the date of our legal retention obligations are being destroyed by commercial shredding service. All Association staff are aware of their responsibility to report any breaches of security or privacy.
- 7. Member and Customer Responsibilities.** As the Association transitions to providing services via the internet and secure web portals, members and customers will be provided individual accounts and log-in credentials. It will be the responsibility of each member and customer to safeguard his or her credentials and to ensure the accuracy of the information they enter via the portal.
- 8. Applicability.** The above policies are binding upon Association directors, employees, members, and customers. Changes and exceptions can only be approved by the Board of Directors.



Todd "Ike" Kiefer
President
for the Board of Directors