

**NOTICE & AWARENESS** - Requirements related to communicating applicable policies, and related choices, to customers.

## 1. Principle of Data Management

- *Collection*
  - Companies should notify customers of the types of information that are being collected.
  - Companies should notify customers, at a high level and easy to understand language, how their data is being collected.
- *Use*
  - Companies should inform customers why the information is being collected (e.g. billing, rate structures, federal/state programs, customer communications, and for other purposes outside the normal course of business).
  - Companies should provide an overview of what the data will not be used for (if applicable).
  - Companies should explain how individual level data will be used, including when it is used.
  - Companies should explain that data they collect may be used in conjunction with or merged with other data.
- *Security*
  - Companies should inform customer of high-level methods for securing data throughout the lifecycle of the data and that their data is secured in accordance with any requirements of applicable regulatory authorities.
- *Sharing*
  - Companies should generally notify customers of all parties with whom data is being shared with (service providers, contractors, etc.).
  - Companies should inform customers of the company's duty to respond to certain legal and regulatory requests.
  - Companies should inform customers of the purpose of sharing the data.
- *Retention & Disposal*
  - Customers should be informed that CEUD will be retained and disposed of consistent with applicable local, state, and federal record retention rules and regulations, as well as company policies.
  - Companies should include a statement regarding the conversion of some data from hard copy to soft/electronic copy.

## 2. Principle of Notification

- Companies should provide notice to customers in generally acceptable formats (i.e. paper and/or electronic) as appropriate and as may be required by applicable regulatory authorities.

- Companies should provide to customers, at minimum, notice at the initiation of service and annually thereafter.
- Companies should make customer notices available online and by customer request.
- Companies should provide materials in various formats that are easily understandable by the demographics they serve.
- Customers should be provided with an updated notification when there is a substantial change in procedure or ownership that would have impact on customer data.
- Notice should include, at minimum:
  - An effective date
  - A point of company contact
  - If notifying of a change in policy, a summary of the changes, or a means by which prior versions can be obtained
  - Protections against unauthorized access
- Notice should be reviewed at least annually and to meet current regulatory/legal requirements.

### **3. Principle of Customer Rights**

- *Rights of Awareness*
  - Customer should be given notice that they have the right to ask the company what data is collected, what it is used for, and who has access to it.
  - Customer should be given notice that their information may be shared to fulfill a Primary Purpose.
  - Customer should be notified of their right to consent to the sharing of their data for secondary purposes as outlined in the Principles of Choice & Consent.
- *Rights of Access*
  - The notice should inform the customer of their rights to access, review, and dispute the applicable data.
- *Rights of Dispute Resolution*
  - Customer should be notified of their ability to dispute errors and potentially correct those errors in their applicable data.
  - Customer should be notified of the company's dispute process, including possible recourses for disputing a company's decision.

### **4. Principle of Data Classification**

- *Energy Usage Data*
  - Notice should identify source of information (i.e., meters, credit reports, etc.).
- *Personally Identifiable Information* –

- Notice should identify source of information (i.e., online, consumer hotline, mail, consumer credit report, etc.).
- *Shared Data*
  - Notice should state the conditions under which data may be shared.
  - Notice should explain how company may obtain and/or share information from other sources, as well (i.e., credit reporting agency or government entity, contracted agents).
  - Customers should be told what sharing they can opt in to accept and how to do it.
- *Aggregated Data*
  - Inform customers that Aggregated Data may be used and shared to fulfill certain business purposes.

## **5. Principle of Customer Awareness**

- *Data Collection*
  - Companies should be able to educate customers about any questions they have regarding the reasons for data collection.
- *Privacy Rights*
  - Company should inform the customer, broadly, of their privacy rights.
  - Company should inform the customer of ways to access privacy policies, rules, and/or notices.
- *Customer Responsibility*
  - Customer should be educated on what their responsibilities as a customer entails (e.g., providing accurate data, notifying company of changes to data, etc.).