Columbus Light and Water Privacy Policy

Columbus Light & Water Department is a municipal public utility company owned by the City of Columbus, Mississippi. Solely for convenience, the term "CLW" will herein be used to refer to Columbus Light & Water Department.

The term "Website" refers to the website https://www.columbus-lw.com/. The term "Web Services" refers to any and all services available through this Website, including, but not limited to, service requests, account access services, paperless bill delivery services, and bill payment services.

CLW understands the importance of privacy and is committed to the highest level of integrity in dealings with customers, employees, and job applicants.

1. Privacy Commitment

CLW may collect various pieces of Personal Information from customers to provide the best utility service possible. This information may include, but is not limited to, your name, physical address, email address, IP address, phone number, fax number, tax identification number, social security number, debit card number and associated billing information, credit card provider, resume, CLW account number, password, picture, or other various information that might assist CLW in identifying its customers.

CLW will retain privacy information for at least the period of time required by law. After a customer cancels service with CLW, the information may be retained for a longer period to assist with fraud detection.

Except as expressly detailed in this Privacy Policy, CLW does not share or sell Personal Information to third party organizations for their commercial or marketing purposes.

As a general matter, CLW may disclose Personal Information:

- When authorized by the customer or when necessary to provide a service the customer has requested.
- To communicate with customers about issues related to their application, account, or request for service.
- When necessary to comply with an order of a government agency or court, when requested by a government regulator, or as otherwise required by law, or requested in writing by law enforcement.
- To investigate and address system problems and to protect the security of CLW.

Additionally, CLW may disclose Personal Information to individual contractors and third-party service providers who assist CLW with providing its customers with services, or with other permitted uses of Personal Information (subject to appropriate confidentiality agreements).

The following sections describe in detail the data that CLW collects and how CLW uses that data.

2. Information CLW Collects Automatically

CLW may collect information about a user's interactions with the CLW Website and other websites related to CLW that a user visits, including IP address and the web pages visited.

CLW may use this information for various purposes, including diagnosing problems, investigating security issues, supporting training efforts, or documenting a user's interaction with the CLW Website or other websites. This information is also used to evaluate our Website's effectiveness and improve user experience.

Privacy Policies for third-party services related to CLW's mobile app are linked below:

- Google Play Services
- Legal Privacy Policy Apple
- CSA App Privacy Policy

3. Information CLW Collects from All Users

CLW may collect the name, address, telephone number, and email address from users of our Website.

For members of the public, CLW may collect this information from surveys, service eligibility determination, inquiries, outage management, and account registration. Other uses of our Website may provide this information in connection with Web Services described below:

- Notifying the user about changes to our Website.
- Alerting the user to outages in CLW's service area.
- Informing the user when new services, options, or features become available.
- Offering users the opportunity to donate to CLW's charitable funds, such as the Share One Fund.

4. Information CLW Collects from Customers

When service is initiated with CLW, regardless of whether it is via our Website, phone, fax, email, or visiting our Customer Service Representatives in person, CLW will collect Personal Information for activities including:

- To identify a customer in connection with establishing an account.
- To establish a deposit amount (if required).
- To provide online bills or usage information.
- To collect amounts due on a customer's account.

- To process, evaluate, and respond to account and service requests, inquiries, and applications a customer makes.
- To maintain a customer's account.
- To close a customer's account.
- To provide, administer, and communicate with customers about products and services.
- To operate, evaluate, and improve our business (including developing new products and services; managing our communications; performing market research; managing our advertising and marketing; analyzing our services and Websites; administering our Websites; and performing accounting, auditing, reconciliation, and collection activities).
- To protect against and prevent fraud, unauthorized activity, claims, and other liabilities.
- To comply with and enforce applicable legal requirements, industry standards, and our policies and terms of use.

CLW may utilize digitally communicating utility meters. These meters provide automated means of collecting utility consumption information for Electrical and Water usage. Data collected from utility meters is used for customer billing and CLW data metrics acquisition. All metered data is transferred over secure communication channels and access is limited to authorized personnel.

Utility usage data is analyzed to help determine the best rate plan or take advantage of programs offered by CLW and the Tennessee Valley Authority (TVA). TVA receives Personal Information and Usage Data monthly. TVA may also use meter data in daily, hourly, or 15-minute intervals to design and promote personalized energy efficiency services.

CLW may engage third parties to assist in providing customers with service. For example, CLW may:

- Send certain Personal Information to a credit-reporting agency to assist in determining deposit amounts.
- Allow an IT service provider to access Personal Information to assist CLW with technology-related customer service issues.
- Provide collection agents with Personal Information in connection with collecting amounts due to an account.

5. Information CLW Collects from Job Applicants

CLW will collect information from job applicants needed to evaluate job applications, such as a resume and information provided in the application.

CLW does not disclose information contained in resumes or job applications to third parties, except as provided below. CLW is committed to limiting internal access to resumes and job applications to individuals involved in the application process.

CLW will use the information provided in applications as necessary to evaluate job applications. In connection with job applications, CLW may provide applicant information to third parties for

the purpose of administering and processing applications, performing background checks, and scheduling drug screenings.

An applicant may choose to provide information on gender, race, or ethnicity on a voluntary basis. CLW does not consider this information, or the choice to decline providing this information, when evaluating qualifications for employment. If such information is provided, CLW may use it to the extent necessary or appropriate for compliance with relevant legal obligations or for internal purposes.

Once a job applicant is employed by CLW, certain Personal Information may be disclosed, including name and picture, in CLW marketing material. CLW employees may opt out of this disclosure by contacting the CLW Human Resources Department.

6. Information CLW Collects from Vendors and Potential Vendors

As a vendor or potential vendor, CLW collects information that CLW needs to process an application to become a vendor. CLW may use this information to conduct background checks and drug screenings. CLW may also use it to evaluate work and proposals to work, process payments, comply with reporting obligations, and for other internal business purposes. In addition to Personal Information, CLW may collect information to comply with CLW's federal reporting requirements and internal policies concerning expenditures with local, small, small-disadvantage, minority, and women-owned businesses.

7. Personal Information Provided in Connection with Web Services and other CLW Services

In connection with usage of the CLW Website and Web Services, users may be asked to create an account and provide a password. The user is responsible for the use, security, and safety of such account and password.

8. Email Addresses, Physical Addresses, and Phone Numbers

Individuals who supply their email address, physical address, or phone number may periodically receive messages from CLW with information on new products and services, outages, upcoming events or news, account-related information, information about job or vendor applications, information on job-related activities if employed by CLW, or opportunities to donate to CLW's charitable funds (such as the Share One Fund).

If an individual does not wish to receive such communications from CLW (except with respect to communications in connection with an individual's CLW account, request for service, job or vendor application, or job-related activities if employed by CLW), contact CLW Customer Service to stop receiving these types of communication. CLW will comply with such requests as required by law or requested in writing by law enforcement.

9. Unsolicited Material Not Confidential

Unless provided by an individual in connection with Web Services or other CLW Service, in connection with a job application, employment with CLW, vendor application, or unless CLW specifically notes otherwise, any Personal Information or any other information or material provided on an unsolicited basis will be deemed NOT to be confidential.

CLW has established social media accounts to keep current customers and members of the public informed. CLW has no control over the public forum that is social media. Any information provided through social media may be read, collected, or used by others. Each social media platform used by CLW has a unique privacy policy that can be accessed on that respective platform. CLW strongly suggests reviewing each privacy policy associated with the social media platforms used by CLW.

10. Submissions to CLW

Any information, suggestion, idea, graphic design, remark, or other submission to CLW shall become the exclusive property of CLW, and shall not be deemed to be confidential, except as provided by this Privacy Policy. CLW shall be entitled to use any such submission and any derivative works created therefrom, and any related concepts, ideas, techniques, or know-how for any lawful purpose without any obligation to any user submitting the same and without any other restriction, permission, or compensation. Each user making any such submission thereby acknowledges the originality of such submission and accepts responsibility for its accuracy, completeness, appropriateness, and legality.

11. Data Security

CLW maintains administrative, technical, and physical safeguards designed to protect the personal information you provide against accidental, unlawful, or unauthorized destruction, loss, alteration, access, or disclosure of use.

The CLW Website uses Secure Sockets Layer (SSL) encryption. SSL encryption preserves and protects the confidentiality of Personal and Financial Information when submitted to CLW.

12. Child Privacy

CLW's Website and Web Services does not knowingly collect Personal Information from visitors under the age of 13. The Website and Web Services are in no way directed or catered to anyone under the age of 13.

13. Links to Other Websites

The Website and Web Services may contain links to other sites for convenience and information. These sites may be operated by companies not affiliated with CLW. Linked sites may have their own privacy policies or notices, which CLW strongly suggest reviewing. CLW is not responsible for the content of any sites that are not affiliated with CLW, any use of those sites, or the privacy practices of those sites.

14. Changes to this Privacy Policy

This privacy notice may be updated periodically and without prior notice to reflect changes in CLW's personal information practices. CLW will include the date on which this privacy policy was last updated.