

CDE LIGHTBAND

Operating Policy 2-31

Subject: Identity Theft Prevention Program (ITPP)

I. Objective:

- A. To protect the identity/financial data of CDE customers and employees, minimizing the possibility of identity theft of consumer information.
- B. To comply with the requirements of the Fair and Accurate Credit Transactions Act of 2003 and the “Red Flags” rules promulgated by the Federal Trade Commission.
- C. To establish a program to detect, prevent and mitigate identity theft.

II. Policy:

- A. The Executive Vice President will be responsible for ongoing involvement in oversight, development, implementation and administration of the ITPP.
- B. Training for the employees will be provided as necessary.
- C. Oversight of third party providers will assure that they also comply with the program.
- D. As risk factors are discovered, such as identity theft, customer or employee information breach, etc., the policy will be revised to address any future risks.
- E. The discovery of a “Red Flag” may initiate an investigation.
- F. When customer or employee information has been jeopardized, the following procedures apply:
 - a. Notify customer or employee
 - b. Eliminate breach of information
 - c. Notify law enforcement
- G. A customer or employee suspecting his/her personal information has been jeopardized must complete the Identity Theft Affidavit.
- H. The CDE Executive Vice President will provide the oversight and the ITPP Committee will provide the procedures to comply with this policy. In addition, the CDE Executive Vice President will, on an annual basis, report to

the Clarksville Electric Power Board concerning the effectiveness of the program and compliance with the regulatory compliance.

III. RESPONSIBILITY:

The CDE President is responsible for the administration of this policy.