

Northwest Natural Water Company, LLC- Privacy Policy

The privacy of your personal information is respected by NW Natural.

This Privacy Policy describes the privacy practices for the collection of personal information by, Northwest Natural Water Company, LLC and its subsidiaries, which include the companies listed directly below (“NW Natural”, “we”, “our”, or “us”), and applies solely to the personal information that we collect and use relating to consumers and users (“Customer” or “you”).

**Avion Water
Blue Topaz Utilities
Cascadia Water
Falls Water Company
Foothills Utilities
Gem State Water
NW Natural Water Services
Rose Valley Water
Salmon Valley Water Company
Suncadia Water and Wastewater
Sunriver Water and Environmental**

By using the websites and providing us with personal information, you agree to the practices described in this Privacy Policy and to the updates to this Policy posted here from time to time. To make sure you stay informed of all changes, you should check this Policy periodically. Updates will be referenced by the “Last Updated” date shown at the end of this Policy.

NW Natural wants you to be comfortable knowing that personal information you provide when using our websites will be protected. The online interactive portion of this site is secured by technology designed to safeguard your personal information and in compliance with laws and regulations regarding your personal information.

You can protect yourself further by logging off of the interactive portion of our websites when you have finished using it. If you choose to link to any of the other websites NW Natural has provided for your convenience, NW Natural’s privacy and security protections do not apply. We encourage you to check the privacy and security provisions of those websites before you use them.

1. Information We Collect

We collect up to three types of information when you interact with our websites:

- **Automatically Collected Information**—Our websites use cookies, which are small files kept on your computer which help us provide you with a more consistent experience as you browse the site. These files are very small, and do not contain any personal information about you. You can remove cookies through your browser’s “Options” or “Preferences” screen; however, removing cookies may reduce performance or prevent use of some features on the websites. We also collect visitor information through our websites’ log files. These files contain information such as IP address, date and number of visits, web browser used, and pages visited. We do not use this information to identify you personally.
- **Customer Information**—We encourage customers to sign up for and manage their utility accounts through our websites. When signing up for a new utility account, we collect personal information including name, address, telephone number, social security number, driver license number, and employment information. When registering for an online account we use the personal information you have already provided, and also collect your email address. For more information about signing up for online account management, please go to the online account registration page. By providing us with this information to manage your account online, you agree to the uses and disclosures described in this Policy. If you do not consent to these uses

and disclosures, you may not use NW Natural's online account management tools. If you have already provided us with this information, and do not consent to these uses and disclosures, you may delete your online profile through the Account Settings section of the websites or contact us at by contacting us as set forth in Section 7 of this Privacy Policy to request deletion of your online account. All information submitted by customers related to their NW Natural utility accounts is governed by our Customer Information Policy as described below. It is our general policy not to disclose Customer Information to third parties except as described in Section 5 of this Privacy Policy without first obtaining permission. If you choose to pay your bill using online services, you will be redirected to the website of our third-party payment processor, and your personal information will be governed by the privacy policies of that third party.

- Offers, Programs, and Promotions—Our websites also feature information on offers, programs, and promotions that do not directly relate to managing your utility account. Website visitors can provide us with information so that they can participate in or receive more information about an offer, program or promotion. Your participation in such programs is strictly voluntary. If you do choose to participate, your personal information may be provided to third parties so they can fulfill your requests. We will not provide your personal information to such third parties without your written or electronic consent.

2. Security

Our websites use a variety of technologies for security, including firewalls, digital certificates, authentication capabilities, intrusion detection systems, and Transport Layer Security (TLS) for encryption.

3. Customer Information Policy

For the purpose of this Policy, Customer Information is any information received from the customer, or purchased or compiled by NW Natural in the normal course of providing utility services, including but not limited to name, address, account number, type or classification of service, current or historic utility service usage, expected patterns of use, types of facilities used in providing service, individual contract terms and conditions, price or current charges, billing records, or installed appliances or equipment.

Definitions:

- Private consumer information - A type of Customer Information where data attributes are such that either individually or in combination, the information presented can be attributed to a specific customer. Examples of data attributes that specifically identify a customer are their name and address.
- Aggregated and/or Encrypted information - A type of Customer Information where data attributes cannot be attributed to a specific customer. Utility service usage evaluations for a class of customers (for example, all residential customers) are an example of Aggregated Information. De-identified Customer information that is provided to a third party to allow targeting of promotions to individual customers is an example of Encrypted information.
- Direct Marketing - An activity by a third party to inform individual customers about a product or service, or to incentivize a change in utility usage.

NW Natural maintains Customer Information on the customer's behalf, for the purpose of providing utility services. As such, NW Natural will provide a customer with their Customer Information upon explicit request from the customer. The customer's positive identity must be verified to NW Natural's satisfaction prior to its release.

NW Natural will not disclose Customer Information to a third party unless the disclosure is in accordance with an exception outlined below and is not otherwise prohibited by law.

Except as set forth in Section 4 and Section 5 of this Privacy Policy, we will not share your private consumer information, such as name, address, telephone number, e-mail address, and other identifying information, without your permission, unless we are required to divulge this information (1) to comply with law or legal process; (2) to protect and defend NW Natural's rights or property; (3) to protect against misuse or unauthorized use of the websites; (4) to protect the safety or property of our customers or the public; or (5) as set out in the Sharing Personal Information section below.

4. Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our websites and present their contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our customers, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As otherwise set forth in this Policy or according to our mandated responsibilities as a regulated utility (see Sharing Personal Information section below).
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

5. Sharing Personal Information

We may disclose your personal consumer information to a third party for a business purpose. For example, we may disclose private consumer information to a contractor or service provider to perform work on our behalf. When we disclose personal consumer information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal consumer information confidential and not use it for any purpose except performing the contract.

Exceptions

- **Legal Requirement**—NW Natural will disclose Customer Information to the extent disclosure is legally required. This includes but is not limited to responding to requests by law enforcement officers, subpoenas, and requests during regulatory proceedings, and circumstances where a law, regulation, or tariff requires disclosure. In such cases, Customer Information may be aggregated, de-identified, and/or subject to protective order, as appropriate to the disclosure.
- **Low Income Service**—NW Natural may disclose Customer Information to agencies providing low-income assistance services on behalf of NW Natural. Customer participation in these programs is considered consent to share private consumer information, and will supersede a customer's opt-out at the time the request is made to participate in such a program.
- **Establishing Credit for Utility Service**—NW Natural may disclose Customer Information to other utilities, such as when such request is made in accordance with OAR 860-021-0200.
- **Third Party Contractors**—NW Natural may disclose Customer Information to third party contractors performing work on behalf of NW Natural provided that the work does not include direct marketing of non-utility products and services that NW Natural is not currently offering. Third party contractors must execute a NW Natural-approved agreement containing appropriate confidentiality obligations, prior to obtaining access to Customer Information.
- **Aggregated Information**—NW Natural may disclose Aggregated Information, for limited purposes, to the following agencies and organizations: 1) Federal or State agencies, and municipalities; 2) Industry organizations; and 3) building and site owners when there are five or more accounts related to the building or site.
- **Ad Hoc Provision**—Customer Information may be disclosed in limited situations if NW Natural's Corporate Secretary and General Counsel both determine that sharing of Customer Information is in the best interest of NW Natural and its customers. In such cases, transfer would be subject to NW Natural's internal transfer policies, and must be for a substantial public policy reason, such as promoting energy efficiency or equitable access. The party receiving Customer Information must execute a NW Natural-

approved agreement containing appropriate confidentiality obligations, prior to obtaining access to Customer Information.

6. Changes to Our Privacy Notice

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will notify you through a notice on our website homepage.

7. Contact Information

If you have any questions or comments about this Privacy Policy, please do not hesitate to contact us at:

NW Natural Water Company, LLC

Phone: 800-422-4012

Website: nwnatural.com

Email: info@nwnatural.com

Postal Address: NW Natural Water Company

Attn: Customer Service

250 SW Taylor Street

Portland, OR 97204