

EDISON ENERGY, LLC
PRIVACY POLICY

Effective Date: January 1, 2020 (last updated September 8, 2020)¹

1. Introduction.

This Privacy Policy (“Privacy Policy”) explains how Edison Energy, LLC processes Personal Information. This Privacy Policy does not apply to websites, applications, destinations or other offerings that Edison Energy, LLC does not own or control, even if they are linked to the Service. All capitalized terms used in this Privacy Policy that are not otherwise defined have the meanings set forth in the Glossary included at Section 12 below.

You can access this Privacy Policy any time in the footer of the Service's home page, via the menu button icon or on the Service description screen, or as otherwise indicated depending on the Service you are using. By registering for any aspect of the Service, or otherwise accessing, visiting or using the Service, you consent and agree to be bound by the terms of this Privacy Policy. If you do not agree with the terms and conditions of this Privacy Policy, you should not access, visit and/or use the Service, or request or receive a Product. We advise that you print or retain a digital copy of this Privacy Policy for future reference.

2. Categories of Personal Information Acquired About You.

Depending on the circumstances and which Service you use, we collect, obtain or otherwise acquire the following types of Personal Information about you, and we make and retain inferences drawn from such information:

A. **Identifiers**, such as your real name, signature, alias, postal address, zip code, email address, telephone number, unique personal identifier, online identifier, Internet Protocol address, User ID, Device ID or other similar identifiers.

B. **Internet or other electronic network activity information**, such as browsing history, search history, information regarding your interaction with an internet website, application or advertisement.

C. **Geolocation (latitudinal and longitudinal) data**, such as the precise physical location of your Device.

¹ We keep our Privacy Policy under regular review to make sure it is up to date and accurate. In September 2020, we updated certain sections to comply with the General Data Protection Regulations (“GDPR”).

Nothing in this Privacy Policy addresses, or should be read to limit or restrict, how we collect, use or process anonymous, de-identified, or aggregate information.

3. How We Acquire Personal Information.

A. Personal Information You Provide. We often receive Personal Information because you provide it to us. For instance, when you complete register and/or set up an account/profile or attend an event or webinar, you may be provided, or required to choose, a password and/or User ID, and you may provide your name, telephone number(s), email and/or street address. In addition, we may acquire your Personal Information when you contact us by telephone, postal mail, social media interaction or messaging (e.g., email, SMS, MMS or similar technologies).

B. Personal Information Automatically Collected. The Service also automatically collects certain information, some of which may be deemed Personal Information. The information collected may include, without limitation, information about your Device, such as the make, model, settings, specifications (e.g., browser type, operating system, device identifier) and geographic location of you and/or your Device, as well as date/time stamp, IP address, webpages visited and actions taken on webpages, time of visits, Content viewed, ads viewed, the site(s), application(s), destination(s) and/or service(s) you arrived from, and other clickstream data. See our Cookie Notice, via the menu button icon or on the Service description screen, for more information on cookies and other technologies used to automatically collect information on or through the Service.

C. Personal Information Acquired Elsewhere. We may also acquire your Personal Information offline, from third parties, or otherwise outside of the Service. For example, we may purchase or otherwise acquire Personal Information from third party consumer data suppliers/resellers, data enrichment providers and aggregators, business contact databases, government entities, and our affiliates.

D. Social Network Integration. If you choose to access, visit and/or use any third party social networking service(s) that may be integrated with the Service, we may receive Personal Information that has been made available to those services, including Personal Information about your contacts on those services. Some social networking services also will facilitate your registration for our Service or enhance or personalize your experience on our Service. You should make sure you are comfortable with your Personal Information the third party social networking services may make available to us by visiting those services' privacy policies and/or modifying your privacy settings directly with those services. We treat Personal Information that we receive through third-party social networking services in the same ways as all of your Personal Information we receive through our Service (as described in Section 4 below).

E. Be Careful Publicly Posting Personal Information. Please be aware that Content and Personal Information that you disclose in publicly accessible portions of the Service may be available to other users, and may also be made available outside the Service by third parties, so you should be mindful of all Personal Information, especially sensitive Personal Information, that you may wish to post.

4. How We Use Your Personal Information; Sharing of Personal Information.

We use your Personal Information for one or more of the following business purposes:

A. To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our Products or Services, we will use that Personal Information to respond to your inquiry. If you provide your Personal Information to purchase a Product, we will use that Personal Information to process your payment and facilitate delivery. We will retain and use details of the Products or Services you have previously obtained a price quote or purchased to make suggestions to you for other Products or Services which we believe you will also be interested in.

B. To provide, support, personalize and develop our Service and Products.

C. To create, maintain, customize and secure your account with us.

D. To process your requests, purchases, transactions and payments and prevent transactional fraud.

E. To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.

F. To personalize your Service experience and to deliver Content and Product offerings relevant to your interests, including targeted marketing or other commercial messages about our Products and Services that we think you might like, offers and ads through our Service and via email or text message (with your consent, where required by law). We will keep a record of the Content that you have clicked on and use that information to target marketing to you that is relevant to your interests, which we have identified based on the Content you have read.

G. To help maintain the safety, security and integrity of our Service and Products and other technology assets and business.

H. For testing, research, analysis, and product development, including to develop and improve our Content and Products.

I. To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.

J. As described to you when collecting your personal information or as otherwise set forth in the CCPA (as defined in Section 11 below).

K. 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 about our website users 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. How We Share Personal Information.

We may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We may share your Personal information with the following categories of third parties:

A. Service Providers;

B. Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with Products we provide to you; and

C. Data aggregators.

6. Opt-Out of Marketing; How to Update Your Personal Information.

A. How to Opt-Out of Sharing for Marketing. California residents, please see Section 10 below. For all others, if you do not wish to have Personal Information, such as your name, email address, postal address or phone number shared with third parties for their marketing purposes, contact our Privacy Policy Coordinator by email at DataProtection@edisonenergy.com or as described at the end of this Privacy Policy. But note that, in order for us to properly administer the Service, we must continue to share your Personal Information with Service Providers as described in Section 5 above (if you object to such sharing, you should not use the Service).

B. How to Opt-Out of Marketing Messages from Us. If you do not wish to receive future marketing or other commercial messages from us, simply follow the unsubscribe instructions contained within the message you receive. But note that you may continue to receive certain communications from us that are necessary for the Service, such as renewal notifications, invoices, technical notices, updates, security alerts, and support and administrative service bulletins.

C. How to Update Your Personal Information. If you have registered or created an account on any part of the Service, please use the mechanism or contact information on the Service that allows you to change or update your member preferences, if available, to keep all such Personal Information accurate and up-to-date. If no such mechanism or contact information is available on the Service, contact our Privacy Policy Coordinator with your changes by email to DataProtection@edisonenergy.com, or as described at the end of this Privacy Policy.

7. Transfer of Your Personal Information Among Jurisdictions.

We are, and the Service is, based in the United States. Your Personal Information may be processed, transferred to, and maintained on, servers and databases located within the United States and elsewhere where the privacy laws may not be as protective as your jurisdiction. We reserve the right to transfer your Personal Information to and from any state, province, country or other governmental jurisdiction. Your consent to this Privacy Policy followed by your submission or our collection of such Personal Information represents your agreement to any such transfer.

8. Information Security and Notification.

A. Security Measures; Storage of Personal Information. We take reasonable security measures to protect against unauthorized access to, or unauthorized alteration, disclosure or destruction of, Personal Information. We are committed to taking commercially reasonable technical, physical and organizational measures to protect Personal Information against unauthorized access, unlawful processing, accidental loss or damage and unauthorized destruction. We implement access control measures for our internal systems that hold Personal Information. Authorized users are given access to such systems through the use of secure log-in credentials. Access to Personal Information is provided to our staff for the sole purpose of performing their job duties. We sensitize our employees on proper use and handling of Personal Information. We also require our service providers to maintain compliant security measures. We implement security measures to determine the identity of registered users, so that appropriate rights and restrictions can be enforced for these users. In case of a registered user, we use both user ID's and passwords for authentication. You are responsible for maintaining the security of your log-in credentials.

B. No Liability for Breach. Because no data transmission is completely secure, and no system of physical or electronic security is impenetrable, we cannot guarantee the

security of your Personal Information or the security of servers, networks or databases, and by using the Service you agree to assume all risk in connection with your Personal Information. We are not responsible for any loss of such Personal Information or the consequences thereof.

C. Breach Notification. In the event that we believe the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you. If notification is appropriate, we may notify you by e-mail, push notification, or otherwise.

9. Important Information for Customers in the European Economic Area.

We also comply with GDPR-specific requirements regarding privacy and the protection of Personal Information, including those requirements relating to cross-border data transfers, data retention, data protection impact assessments, additional rights, legal grounds for processing, profiling and automated decision making, complaints with supervisory authorities and Data Protection Officer contact details.

9.1 Will Personal Information be Transferred Abroad?

We are headquartered in the United States of America but we have personnel located in other countries. Our personnel working on fulfilling the data processing purposes for you have global or multi-country roles. They can then be located anywhere in the world where we operate, including outside the European Economic Area (EU), in countries which do not have equivalent standards for the protection of Personal Information as the country where you are located. We also transfer data to Service Providers located outside of the EU, including in the United States of America. In all cases, we will ensure that they comply with applicable legal requirements, for example by executing standard contractual clauses regarding protecting Personal Information.

9.2 How long will Personal Information be Retained?

We will retain Personal Information for as long as the information is needed for the purposes set forth in this Privacy Policy and for any additional period that is required or permitted by law. In general data retention periods are determined taking into consideration: (i) the duration of our relationship (e.g., contract performance duration, account deactivation, your legitimate need to be recognized when contacted by us), (ii) legal requirements for keeping data, and (iii) applicable statute of limitations.

For marketing purposes, unless otherwise contractually bound, we keep relevant customer data for at least three years after the end of our relationship or since the last interaction with us.

9.3 What are Your Rights Regarding Personal Information?

In addition to the other rights described in this Privacy Policy, in the EU, you have certain

rights under applicable data protection laws, including the GDPR. Under the GDPR, these rights include:

A. The Right to Access – you have the right to obtain a copy of your Personal Information;

B. The Right to Request Certification – you have the right to ask us to rectify Personal Information you think is inaccurate; you also have the right to ask us to complete information you think is incomplete;

C. The Right to Request Erasure - you have the right to ask us to erase your Personal Information in certain circumstances;

D. The Right to Restrict the Processing of your Personal Information - you have the right to object to the processing of your Personal Information in certain circumstances; to make such a request, please contact our Data Protection Officer at DataProtection@edisonenergy.com;

E. The Right to Object to Processing - you have the right to object to our processing of your Personal Information under certain conditions to make such an objection, please contact our Data Protection Officer at DataProtection@edisonenergy.com; and

F. The Right to Data Portability - you have the right to ask that we transfer the Personal Information you gave us to another organization, or to you, in certain circumstances. The right only applies if we are processing Personal Information based on your consent or under, or in talks about entering into a contract and the processing is automated.

We will consider and act upon any request in accordance with the GDPR and other applicable data protection laws. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If we are relying on your consent to process your Personal Information, you have the right to withdraw your consent at any time. Please note, however, that this will not affect the lawfulness of the processing before its withdrawal.

9.4 What Statutory or Contractual Grounds are we Relying on to Use Personal Information?

The use of Personal Information is necessary, with respect to the purposes mentioned in Section 4 above, to:

A. Perform the contract entered into between us and you in the context of the use of our Products, Services or digital content. The performance of the contract includes knowing who you are, and your specialty and interacting with you for its performance. It also includes addressing your requests for information, support, your job applications, managing

your accounts and your enrollment into our programs and ensuring compliance with terms and conditions and with this Privacy Policy.

B. Comply with legal obligations to which we are subject. For instance, mandatory tax and accounting obligations or addressing filing obligations and requests by competent regulatory bodies and authorities.

C. With respect to:

- Surveys, some are carried out in our legitimate interest because they are to measure your satisfaction with services you requested from us. For other surveys we will request your consent. You will always be free not to respond.
- Providing you with marketing communications and interest-based advertising, these activities carried out by us and by our subsidiaries are in our legitimate interests. We will always provide you a possibility to opt out and where required by applicable law we will seek your prior consent.
- Using location data transmitted by your mobile device, we will seek your prior consent, where required by applicable law.

We also process your Personal Information for the purposes of our legitimate interests provided that such processing shall not outweigh your rights and freedoms, in particular to: (i) protect you, us or others from threats (such as security threats or fraud), (ii) comply with the laws that are applicable to us around the world, (iii) improve our Products, Services and digital content, (iv) perform profiling to provide targeted content and interest-based advertising, (v) share information between our affiliates, subsidiaries and Service Providers as described in Section 5 above, (vi) understand and improve our online activities, our business, our customer basis and relationships, (vii) enable or administer our business, such as for quality control and consolidated reporting; and (viii) manage corporate transactions.

9.5 Do We Use Profiling and Make Automated-Decisions?

We use profiling to provide you with online content which we believe corresponds to your interests. We combine registration information, such as work specialty and information about online activity to know you better, and provide you with online content corresponding to your profile. We retain and evaluate information on your visits to our Service and how you move around different sections of our website for analytics purposes to understand how people use our Services so that we can make it more intuitive,

We will not make automated-decisions about you that significantly affect you, unless (i) the decision is necessary as part of a contract, (ii) we have your explicit consent, or (iii) we are required by law to use the technology. In these cases, we will provide you with timely notice.

9.6 How Can You Ask Questions or File a Complaint with a Supervisory Authority?

Questions or comments about this Privacy Policy can be addressed to our Privacy Policy Coordinator (who also serves as our Data Protection Officer) as set forth in Section 11 below.

If you believe that we have processed your Personal Information in violation of applicable law or of this Privacy Policy, you may file a complaint with the Data Protection Officer. You may also contact a supervisory authority. Our supervisory authority is the Federal Trade Commission in the United States; you may also contact the supervisory authority in your country. If you are resident in the EU and you believe we are unlawfully processing your Personal Information, you also have the right to complain to your local data protection supervisory authority. To find their contact details, please visit:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

10. Notice to California Customers - Your Privacy Rights.

The California Consumer Privacy Act, California Civil Code §1798.100 et. seq. (“CCPA”), grants residents of California certain rights with respect to their Personal Information and requires us to provide such individuals with certain information, as described in our Privacy Notice for California Residents which may be accessed by visiting:

https://uploads.edisonenergy.com/2020/01/07000544/EE_CCPA-Privacy-Notice-forCalifornia-Residents_2020.pdf.

11. Privacy Policy Coordinator/Data Protection Officer.

If you have any concerns or questions about any aspect of this Privacy Policy, please feel free to contact our Privacy Policy Coordinator (who also serves as our Data Protection Officer) by email at: DataProtection@edisonenergy.com or as follows:

Edison Energy, LLC
Attention: Privacy Policy Coordinator
3501 Jamboree Road, Suite 270
Newport Beach, California 92660

Make sure to include enough information for us to help you, including for example your name, contact information and the specific website, mobile site, application and/or other Service you're contacting us about. It is our policy to notify the Edison International Chief Ethics and Compliance Officer (as of September 2020, Michael Montoya; email: mike.montoya@edisonintl.com) when we receive any concerns or questions about any aspect of this Privacy Policy.

Note: Only inquiries about this Privacy Policy or your Personal Information should be sent to the Privacy Policy Coordinator. No other communications will be accepted or responded to. For communications on other matters, please contact us through the means described on the Service, if available (e.g., in the "Contact Us" section).

12. Glossary.

As used in this Privacy Policy, the following terms have the following meanings:

“Content” means all text, articles, photographs, images, graphics, illustrations, creative, copy, artwork, video, audio, music, podcasts, ringtones, games, trademarks, trade names, service mark, and other brand identifiers, designs, plans, software, source and object code, algorithms, data, statistics, analysis, formulas, indexes, registries, repositories and all other content, information, and materials available on or through the Service, whether posted, uploaded, transmitted, sent or otherwise made available by us, our licensors, vendors and/or Service Providers, or by you, and/or other users or third parties, including any such Content uploaded manually or bookmarked by you and/or other users.

“Device” means any computer, tablet, mobile phone, television, or any other device capable of accessing the Service.

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, Device or household, as further described in Section 2(A) of this Privacy Policy. Anonymous, de-identified, or aggregate information is not Personal Information as used herein.

“Product” means any product and/or service, including without limitation Content, that may be featured, mentioned, reviewed, described, distributed or otherwise available on or through the Service, either by us or third parties.

“Service” means each website, mobile site, application, email/text/SMS campaign, event, and/or other activity, offering, or publication (regardless of how distributed, transmitted, published, or broadcast) provided by us that links to, or references, this document, including without limitation all Content, features and functionality thereof, such as widgets, plug-ins, and embeddable players.

“Service Provider” has the same meaning as set forth in the CCPA, which in general means a for-profit legal entity to whom we disclose Personal Information for processing on our behalf for a “business purpose” (as defined in the CCPA) pursuant to a written contract.

“Third Party Business” means any third party unaffiliated with us to whom we disclose Personal Information for their own purposes, including without limitation our advertising, marketing and sponsorship clients, list buyers, data coops, consumer data suppliers/resellers, data enrichment providers and aggregators, and other entities in the online behavioral advertising ecosystem.

“We”, “Us” “Our” and “Edison Energy”, whether capitalized or not, means Edison Energy, LLC, a Delaware limited liability company, its parent, subsidiaries and/or affiliates, and each of their respective officers, directors, members, employees, independent and sub-contractors, agents, representatives, successors and assigns.

“You” or “Your”, whether capitalized or not, means all those who access, visit and/or use the Service, whether acting as an individual or on behalf of an entity, including you and all persons, entities, or digital engines of any kind that harvest, crawl, index, scrape, spider or mine digital content by an automated or manual process or otherwise. “You” and “Your” also includes your administrators, executors, successors and assigns.