

## **Pro Energy Privacy Policy**

We respect your privacy and expectation of security regarding your financial information and are committed to protecting it through compliance with this Privacy Policy. This Privacy Policy describes the type of information we collect from you when you visit the Pro Energy website as either the consumer applicant for solar, the consumer user of payment services, the consumer user of Pro Energy's lead generation website, or as a contractor working with Pro Energy to provide solar financing or payment services or as an investor, potential investor, or other Services user. This Privacy Policy is designed to inform you of the types of information we collect, how we use that information, and the circumstances under which we may share it with others.

Pro Energy provides all consumers who complete credit application and seek to enter into a loan facilitated through Pro Energy with an initial privacy notice. Pursuant to the Gramm-Leach-Bliley Act, Pro Energy is required to provide a privacy notice to every consumer using Pro Energy's Services, informing the consumer why we collect information, what specific information we collect, how we collect information, what information we share and whether a consumer can limit us from sharing information.

If you do not agree with our policies and practices, please do not use the Services. This Privacy Policy may change from time to time; the date the Privacy Policy was last revised is identified at the top of the page. Your continued use of the Services after we change the Privacy Policy means you accept those changes, so please check back periodically for updates.

### **We respect your privacy**

Pro Energy respects your privacy and is committed to treating your information responsibly. We believe many consumers appreciate receiving offers of products and Services that may be useful to them. At the same time, we understand the need to safeguard sensitive information that you have provided to us. We treat our consumers' and contractors' information as described in this required notice.

***PROPRIETARY & CONFIDENTIAL***

MAY NOT BE SHARED EXTERNALLY WITHOUT PRIOR CONSENT

### **Information Collection**

From Consumers

Pro Energy collects information about you that we reasonably believe will be necessary or useful in processing or administering the products and Services you have requested.

We collect consumer information from the following sources: (1) information we receive from you on applications or other forms, such as your name, address, social security number, date of birth, assets, income, and payment information, (2) information about your transactions with our lending partners, channel partners or others, such as your invoice amount, account balance, and payment history, (3) information we receive from third parties, including consumer reporting agencies, such as your creditworthiness and credit history, and (4) your IP address, computer or device information and usage information when you visit our website or complete our loan documents.

#### From Contractors

Pro Energy collects information about you that we reasonably believe will be necessary or useful in processing or administering the products and Services which you, as a contractor, are involved in providing to consumers.

We collect contractor information that includes the following: (1) contractor legal entity name and information, including individual personnel contact information; (2) information about transactions originated through an individual contractor; (3) information we receive from third parties, such as from commercial credit reporting agencies, regarding contractor creditworthiness and credit history; (4) your IP address, computer or device information and usage information when you visit our website, and (5) other information you may provide or which we collect about your business when you register as a contractor with us.

#### From Services Users

Pro Energy collects information about you that we reasonably believe will be necessary or useful in improving the user experience when using our Services.

We collect Services user information that includes the following: (1) information automatically collected when you visit or interact with the Services, through technology such as cookies (described below), clear GIFs, pixel tags, log files, and other technologies including analytics and tracking tools from third-party service providers, which often includes computer or device information, IP address, and usage information as well as (2) information that you provide to us, which may include when you use our Services, register or create an online account with us, request information from us, sign up for our e-mail list, enter into promotions, fill out a survey, request customer support, or otherwise communicate or contact us, such as your name, address, e-mail address, telephone number, referrals, and information about your solar activities, such as home ownership, home statistics, home energy usage or utility provider, or demographic information.

## **Cookies**

Our online Services use features of your Internet browser called “cookies” and “flash objects.” Cookies and flash objects are files that are placed in your computer’s browser memory or placed on your hard drive. We may use these features on our websites (collectively, “Sites”) or online banking service to verify your identity, remember personal settings including your preferences, to offer you additional options or enhance your online experience, and to improve our products and Services. We also use them for tracking of online applications and programs. Our server recognizes and records the IP address and/or domain name from which our website visitors accessed the Internet and the names of the pages visited while at our Sites. It does not, however, collect and store your email address or other nonpublic personal information. Finally, we also may use cookies to track the effectiveness of advertisements for Pro Energy products and Services, referred to as banner ads, that we may place on our Sites. Cookies used for tracking advertising effectiveness do not collect nonpublic personal or confidential information.

## **INFORMATION SHARING FOR BUSINESS PURPOSES**

Pro Energy does not share your information with any affiliated or nonaffiliated third parties except when (a) it is required to complete your transaction, (b) you authorize us to do so, or (c) as permitted by law.

### **For Consumers**

Examples of when Pro Energy may share your information to complete a transaction you requested would be to (a) verify your title to the relevant property, (b) submit your information to the lender on your loan, or (c) process a payment on your behalf to your contractor. Other examples of how we use your information would be to report your account information to the consumer reporting agencies and to protect your account against, identifying, and preventing fraud and other crime, claims and other liabilities. Pro Energy does not sell your personal information. We may disclose your personal information to third-party companies for those third parties to market their products and services to you only if you consent to such sharing.

### **For Contractors**

We may share information about your business to complete a payment transaction on your behalf. We may also share information with third parties who either we or you conduct business with such as referral partners, for internal business analysis or other business purposes.

For Services Users

We may share information about you and your usage of the Services to personalize your experience with the Services, target our communications regarding products, services, or other offers, and for internal business analysis or other business purposes.

### **INFORMATION SHARING WITH THIRD PARTY MARKETING SERVICE PROVIDERS AND JOINT MARKETERS**

Pro Energy may disclose the information we collect, as described above, to companies that perform marketing services on our behalf. The third-party service providers who receive this information are required to use the information we share with them only to provide services to us, or as otherwise permitted by law.

### **REVOCACTION OF CONSENT**

If you would like to revoke your consent for Pro Energy and its business partners to call you to offer you products and services to serve your financial needs, please use the Contact link at the footer of our website.

### **MAINTENANCE OF ACCURATE INFORMATION**

We have established procedures designed to ensure that your information is as accurate and complete as possible. If you believe that our records contain inaccurate or incomplete information about you, please notify us by please using the Contact link at the footer of our website.

### **CONFIDENTIALITY AND SECURITY**

We restrict access to your loan application, payment information, or business information to those teammates who have a business reason for knowing such information. We educate our teammates about the importance of confidentiality and privacy of consumer information.

We maintain physical, electronic and procedural safeguards that comply with federal standards to protect your information from unauthorized access. We do not allow our teammates, independent contractors or third-party service providers to use this information or to share it for any purpose other than to provide services on our behalf or as required by law or regulation. For example, Pro Energy may provide documentation about your transaction in response to a court order or subpoena. If you discontinue the use of our Services, we will retain historical information about your transactions, including personal information, as per our record retention requirements.

## **IN SUMMARY**

We appreciate your interest and want you to understand our commitment to maintaining the privacy of your information, as expressed in this Privacy Policy. We reserve the right to amend this Privacy Policy at any time. If you have questions about this Privacy Policy, please use the Contact link at the footer of our website.

## **FOR CALIFORNIA CONSUMERS**

If you are a California consumer, the information below also applies to you. Certain terms used in this section have the meaning given to them in California Civil Code § 1798.100 et seq. and in the California Consumer Privacy Act Regulations § 999.300 et seq.

### **Collection and Disclosure**

Pro Energy collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Personal Information”).

Specifically, we directly and/or through our website, loan portal, or other online systems (“Systems”) have collected the following categories of Personal Information from consumers during the last twelve (12) months:

- Personal unique identifiers (SSN, name, drivers license, passport number)
- Personal information, including contact details, financial information
- Protected classification characteristics under California or federal law, such as sex or marital status
- Biometric information; Geo-location information, Sensory information
- Internet or online information, information regarding interactions with our websites, applications, or advertisements
- Purchase or other commercial information
- Employment or education-related information
- Inferences from drawn from personal information collected

Personal Information does not include:

- Publicly available information from government records.
- De-identified, anonymized or aggregated consumer information.
- Information excluded from the CCPA’s scope (e.g., information covered by the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994).

Pro Energy obtains the Personal Information from the following categories of sources:

- Directly from you. For example, from your communications to us and through the information you provide to request our financial products.
- Indirectly from you. For example, when you navigate through the Systems and such information is collected automatically. Information collected automatically may include usage details, IP addresses and information collected through cookies and other tracking technologies.
- From third-party sources. For example, consumer reporting agencies to process and approve your loan application, to verify identity, and to offer you financial products and services of interest to you.

### Purposes for Collection and 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 you provided the information.
- To provide, support, personalize, and develop our Systems and related services.
- To create, maintain, customize, and secure your account information and to support everyday operations including risk, legal, and compliance requirements.
- To respond to your customer support requests and/or consumer complaints.
- To personalize your experience using our Systems and related services to deliver content and offerings of interest to you.
- To help maintain the safety, security, and integrity of our Systems, services, databases, related technology assets, and our overall business.
- To prevent transactional fraud.
- For testing, research, analysis, and product development, including to develop and improve our business, our Systems and related services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a transaction involving some or all of Pro Energy's business or assets in which such information is among the assets to be included.
- As described to you when collecting your personal information.

### Sharing Personal Information

We share your personal information with the following categories of third parties:

- Parties involved in the loan application, underwriting, and financing process.
- Parties who service your account.
- Parties specifically authorized by you.
- Parties that perform services on Pro Energy's behalf.
- Pro Energy's financing partners, investors, related agents and advisors.
- In any manner required by law.

## California Consumer Privacy Rights

You may have the right to request, twice in any 12-month period, any of the following information about the personal information we have collected about you during the previous 12 months:

- the categories and specific pieces of personal information we have collected about you;
- the categories of sources from which we collected the personal information;
- the business or commercial purpose for which we collected the personal information;
- the categories of third parties with whom we shared the personal information; and
- the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.

In addition, you have the right to request that we delete the personal information we have collected from you. Pro Energy does not sell your personal information. If you choose to exercise these rights, we will not deny, charge different prices for, or in any way provide a different level or quality of goods or services to you.

To submit a request, please use the Contact link at the footer of our website. To help protect your privacy and maintain security, we take steps to verify your identity before granting you access to your personal information or complying with your request. You may also submit a request through an authorized agent, meaning a person or business registered to conduct business with the California Secretary of State who you have authorized to act on your behalf. If you submit a request through an authorized agent, Pro Energy will require the authorized agent to submit a power of attorney or signed permission from you to make the request. We may also call you to verify your identity and may deny a request from an authorized agent that does not submit proof of authorization to act on your behalf. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.