

## EDISON ENERGY DATA PRIVACY FRAMEWORKS STATEMENT

### EU-U.S. Data Privacy Framework (for personal information transferred from the EU to the U.S.)

### UK Extension to the EU-U.S. Data Privacy Framework (for personal information transferred from the UK and Gibraltar to the U.S.)

### Swiss-U.S. Data Privacy Framework (for personal information transferred from Switzerland to the U.S.)

Edison Energy, LLC (“**Edison Energy**”, “**we**”, “**us**”, “**our**”) complies with the EU-U.S. Data Privacy Framework (“**EU-U.S. DPF**”), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (“**Swiss-U.S. DPF**”) as set forth by the U.S. Department of Commerce (collectively, the “**Frameworks**”). Edison Energy has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (“**EU-U.S. DPF Principles**”) regarding the processing of personal information received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Edison Energy has certified to the U.S. Department of Commerce that it also adheres to the Swiss-U.S. Data Privacy Framework Principles (“**Swiss-U.S. DPF Principles**”) regarding the processing of personal information received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy statement and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the relevant principles shall govern. To learn more about the Data Privacy Framework program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

**Personal Information We Process.** We collect the categories of personal information described in the “**Categories of Personal Information Acquired About You**” section of our privacy policy, available at <https://uploads.edisonenergy.com/2021/01/12172202/EE-Website-Privacy-Policy-with-GDPR-09082020-1.pdf> (“**Privacy Policy**”). We process this personal information for the purposes stated in the “**How We Use Your Personal Information; Sharing of Personal Information**” section of our Privacy Policy. In particular, Edison Energy may process business contact identifiers and information, including a business contact’s business email address and his/her organization’s physical address, in order to:

- Fulfill or meet the reason for which personal data was provided. For example, if a potential customer shares name and contact information to request a price quote or ask a question about our Products or Services, we will use that personal data to respond to the inquiry. If a customer provides personal data to purchase a Product, we will use that personal data to process payment and facilitate delivery. We will retain and use details of the Products or Services potential customers have previously obtained a price quote or purchased to make suggestions to potential customers for other Products or Services which we believe the customer will also be interested in.
- Provide, support, personalize and develop our Service and Products.
- Create, maintain, customize and secure accounts with us.
- Process customer requests, purchases, transactions and payments and prevent transactional fraud.

- Provide customers with support and to respond to inquiries, including to investigate and address concerns and monitor and improve our responses.
- Personalize a customer’s Service experience and to deliver Content and Product offerings relevant to a potential customer’s interests, including targeted marketing or other commercial messages about our Products and Services that we think a potential customer might like, offers and ads through our Service and via email or text message (with customer consent, where required by law). We may keep a record of the Content that a potential customer has clicked on and use that information to target marketing to the potential customer that is relevant to the potential customer’s interests, which we have identified based on the Content the potential customer has read.
- Help maintain the safety, security and integrity of our Service and Products and other technology assets and business.
- Use for testing, research, analysis, and product development, including to develop and improve our Content and Products.
- Respond to law enforcement requests and as required by applicable law, court order or governmental regulations.

We may share personal information within Edison Energy and with third-party service providers who support Edison Energy or our customers’ business needs. We may also disclose personal information to our service providers and other third parties in the U.S. when required to do so under law or by legal process. Third party service providers are required to keep personal data received from Edison Energy confidential and may not use it for any purpose other than originally intended.

We commit to process the personal information we receive under the Frameworks in accordance with the EU-U.S. DPF Principles or the Swiss-U.S. DPF Principles, as applicable.

**Edison Energy U.S. Entities.** The following Edison Energy entities adhere to the EU-U.S. DPF Principles: Altenex, LLC., Perimeter Energy, LLC.

**Your Choices.** Pursuant to the Frameworks, EU, UK, and Swiss individuals (“**you**” or “**your**”) have the right to obtain confirmation of whether we maintain your personal information in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also request that we correct, amend, or delete the personal information we hold about you. To request access, correction, amendment, or deletion of your personal information that we have transferred to the United States under the Frameworks, please contact us at [DataProtection@EdisonEnergy.com](mailto:DataProtection@EdisonEnergy.com).

You may also opt out of our disclosure of your personal information to a third-party, or use of your personal information for a purpose that is materially different from the purpose(s) for which the personal information was originally collected or subsequently authorized by you. To do so, please contact us at [DataProtection@EdisonEnergy.com](mailto:DataProtection@EdisonEnergy.com)

**Sensitive Personal Information.** For any sensitive personal information we collect about you (i.e., personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the

individual), we will obtain affirmative express consent (i.e., opt in) from you if such data will be (i) disclosed to a third party or (ii) used for a purpose other than those for which it was originally collected or subsequently authorized by you. In addition, we will treat as sensitive any personal information received from a third party where the third party identifies and treats it as sensitive.

**Transfers to Third Parties.** As described in more detail in the “**How We Share Personal Information**” section of our Privacy Policy, we transfer personal information to third parties such as service providers (e.g., to process your transactions), to other customers or third parties using our service (e.g., to assist in carrying out transactions) and to appropriate vendors (e.g., to investigate suspected fraud, verifying identity, potential threats to safety, illegal activities, violations of Terms & Conditions). We contractually require third parties to whom we transfer personal information to provide the same level of protections as those found in this statement.

**Contacting Us, Complaints, and Dispute Resolution.** In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Edison Energy commits to resolve complaints about our collection and use of your personal information that we receive pursuant to the Frameworks. EU, UK and Swiss individuals with inquiries or complaints relating to our handling of personal information received in reliance on the Frameworks should first contact us either by email at [DataProtection@EdisonEnergy.com](mailto:DataProtection@EdisonEnergy.com) or mail at Edison Energy, LLC Attention: Privacy Policy Coordinator 2 Park Plaza, Suite 200, Irvine, California 92614. We will work to resolve your issue as quickly as possible and, in any event, we will respond no later than 45 days of receipt. Edison Energy has in place procedures for training employees in Data Privacy Framework implementation, disciplining them for failure to follow it, and periodically conducting objective reviews of compliance with the above.

Edison Energy further commits to refer unresolved complaints concerning our handling of personal information received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, or the Swiss-U.S. DPF to the EU-U.S. DPF to the BBB Data Privacy Framework Program, operated by the Council of Better Business Bureaus, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers/ProcessForConsumers> for more information or to file a complaint. This service is provided free of charge to you.

**Binding Arbitration.** If your complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See DPF Principles Annex 1 at <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>.

**FTC Enforcement.** The U.S. Federal Trade Commission has jurisdiction over Edison’s compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF.

**Law Enforcement or Public Authority Requests.** In accordance with our legal obligations, we may be obligated to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

**Liability for Onward Transfers.** Edison Energy remains responsible and liable under the EU-U.S. DPF Principles and the Swiss-U.S. DPF Principles for any onward transfers of your personal information to third-parties.