

## **Efficiency Enterprises, Inc. Website Privacy Policy**

### **Last Updated: December 31, 2023**

This Privacy Policy explains how Efficiency Enterprises, Inc. (“Efficiency Enterprises” or “we”) collects, uses, and discloses information about you when you access or use our websites (collectively, the “Site”), engage with us on social media, or otherwise communicate or interact with us.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our website homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Site or otherwise interact with us to stay informed about our information practices and the choices available to you.

### **COLLECTION OF INFORMATION**

We may collect a variety of information from or about you in the course of your interactions with (collectively, “Personal Information”).

#### **Information You Provide to Us**

We collect information that you provide to us, including information that you provide when you create an account on the Site, participate in any interactive features of the Site (like send a message through the Site), fill out a form, apply for a job, communicate with us via third party social media sites, request customer support, or otherwise communicate with us.

#### **Other Information We Collect When You Use the Site**

When you access or use the Site or transact with us, we automatically collect information about you, including:

- **Log Information:** We collect information related to your access to and use of the Site, including the type of browser you use, app version, access times, pages viewed, your IP address, and the page you visited before navigating to the Site.
- **Device Information:** We collect information about the computer or mobile device you use to access the Site, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Location Information:** We may derive the approximate location of your device from your IP address. In accordance with your device permissions, we may also collect information about the precise location of your device. You have the ability to stop the collection of precise location information at any time (see Your Choices below for details).
- **Information Collected by Cookies and Similar Tracking Technologies:** We (and our service providers) use different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve the Site and your experience, see which areas and features of the Site are popular, and count visits. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that may be used in the Site or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness. For more information about cookies and how to disable them, see Your Choices below.

#### **Information We Collect from Other Sources**

We may also obtain information about you from other sources. For example, we may collect information about you from third parties, including but not limited to mailing list providers, and publicly available sources.

### **Information We Derive**

We may derive information or draw inferences from you based on the information we or our partners collect. For example, we may make inferences about your location based on your IP address.

### **USE OF INFORMATION**

We use the information we collect to:

- Provide, maintain and improve the Site and other products we may from time-to-time offer;
- Send you technical notices, updates, security alerts, and support and administrative messages and to respond to your comments, questions, and customer service requests;
- Communicate with you about products, services, and events offered by Efficiency Enterprises and others, and provide news and information we think will be of interest to you (see Your Choices below for information about how to opt out of these communications at any time);
- Monitor and analyze trends, usage, and activities in connection with the Site;
- Personalize your online experience and the advertisements you see when you use the Site or third-party platforms based on your preferences, interests, and browsing and purchasing behavior, and audit your interactions with our online ads, including by counting ad impressions and verifying positioning and quality of ad impressions;
- Facilitate contests, sweepstakes, and promotions and process and deliver entries and rewards;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and protect the rights and property of Efficiency Enterprises and others;
- Comply with laws, regulations, and legal processes;
- Debug to identify and repair errors that impair existing intended functionality; and
- In connection with research and development activities.

### **SHARING OF INFORMATION**

We may share your Personal Information with the following categories of recipients as follows:

- With vendors, service providers, and consultants as needed to provide our services and operate our business;
- With public authorities and other parties in response to a lawful request in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- With our partners for advertising, marketing, and analytics purposes;
- If we believe your actions are inconsistent with our user agreements or policies, if we believe you have violated the law, or to protect the rights, property, and safety of Efficiency Enterprises or others;

- With other parties in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among Efficiency Enterprises and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- With any other party with your consent or at your direction.

Aggregated and anonymized information that is incapable of identifying an individual is not considered Personal Information under this Privacy Policy. We may disclose aggregated and anonymized information, including certain Usage Information, without restriction.

### **ADVERTISING AND ANALYTICS SERVICES PROVIDED BY OTHERS**

We may allow others, including, but not limited to, Google Analytics, to provide analytics services and serve advertisements on our behalf across the web and in mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Site and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by Efficiency Enterprises and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Site and other websites, and better understand your online activity. To learn more about how Google uses your Personal Information, please visit: <https://policies.google.com/technologies/partner-sites> For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices) .

### **YOUR STATE PRIVACY RIGHTS**

#### **Privacy Rights of Maryland Residents**

Under the Maryland Personal Information Protection of 2008 (“MPIPA”) and its respective amendments and implementing regulations, residents are afforded certain privacy rights. If you are a Maryland resident, subject to certain limitations, you have the following rights concerning your personal information we received from you in the event of a data breach.

In the event of a security breach involving your personal information, we are committed to complying with the Maryland Personal Information Protection Act’s requirements for notifying affected consumers. Notice to the consumer will include:

- A description of the compromised information.
- Contact information for Efficiency Enterprises, including a toll-free number if applicable.
- Toll-free numbers and addresses for each of the three major credit reporting agencies: Equifax, Experian, and TransUnion.
- Toll-free numbers, addresses, and websites for the Federal Trade Commission (FTC) and the Maryland Office of the Attorney General (OAG).
- A statement informing the individual that they can obtain information from these sources about steps to avoid identity theft.

Before sending notifications to consumers, PIPA mandates that a business must notify the Maryland Office of the Attorney General (OAG). We will provide the OAG with a brief description of the nature of the security breach, the number of Maryland residents being notified (a sample copy of the notice being sent to consumers will be attached), details about the compromised information, and any measures the business is taking to restore system integrity. The notification will be sent to the OAG using one of the following methods:

By U.S. Mail:

Office of the Attorney General  
Attn: Security Breach Notification  
200 St. Paul Place  
Baltimore, MD 21202

By Fax:

Office of the Attorney General  
Attn: Security Breach Notification  
(410) 576-6566

By Email:

[ldtheft@oag.state.md.us](mailto:ldtheft@oag.state.md.us)

## Privacy Rights of California Residents

Under the California Consumer Privacy Act of 2018 and California Consumer Rights Act (together, the “CCPA/CPRA”), and their respective amendments and implementing regulations, California residents are afforded certain privacy rights. If you are a California resident, subject to certain limitations, you have the following rights concerning your Personal Information:

- **Right to Know.** You have the right to access the specific pieces of Personal Information collected about you, the sources from which such information was obtained, the categories of information that have been sold or disclosed for a business purpose, and the commercial purpose for which the information was collected or sold, provided to you in a reasonably portable format if you have a password-protected account.
- **Right to Deletion.** You have the right to request that we delete any of the Personal Information we have collected or maintain about you.
- **Right to Rectification and Correction.** You have the right to rectify and correct inaccuracies in your Personal Information.
- **Right to Opt-out of Sales of Personal Information.** You have a right to opt-out of the sale of your Personal Information, including cross-context behavioral advertising, and to opt-in again at your election.
- **Right to Limit Use and Disclosure of Sensitive Personal Information.** You have a right to opt-out of secondary uses and disclosures of your Sensitive Personal Information.
- **Right to Opt-out of Automated Decision-making.** You have the right to opt-out to certain types of automated decision-making, subject to certain exceptions.
- **Right to Non-Discrimination.** You have a right to not be discriminated against in the event you exercise your other rights listed above. If you exercise these rights, Efficiency Enterprises will not deny you goods or services, charge you a higher rate, or provide you with lower quality products.

Exercising Your Rights Under the CCPA/CPRA. You, or an authorized agent, may exercise your rights by submitting a request to our Legal Team at [info@effenter.com](mailto:info@effenter.com). CCPA/CPRA allows for one disclosure request per 12-month period at no cost to you. For subsequent requests, we may charge a fee if we determine that the request is excessive, repetitive, or manifestly unfounded, but will not do so without providing you with a cost estimate before processing your request.

We respond to and process requests promptly and within the timeframes required by the CCPA/CPRA. Please note that all requests are subject to proper prior verification before processing, as required by the CCPA/CPRA.

If you are the authorized agent of an individual making a request, you may have to take additional steps to verify your identity and demonstrate that you can exercise the individual’s rights on their behalf.

Sale of California Resident Personal Information. Efficiency Enterprises may “sell” your Personal Information as disclosed in this Policy and may have sold your Personal Information in the preceding 12-months. To opt-out of the sale of your Personal Information, please visit: [www.aboutads.info/choices](http://www.aboutads.info/choices) or <http://www.youonlinechoices.eu/>. Please note that your opt-out choices will apply on this web browser and remain until you remove the opt-out cookie, e.g., by clearing cookies in your web browser settings.

If you are a California resident and have an established business relationship with us, you can request a notice disclosing the categories of personal information we have shared with third parties, for the third parties’ direct marketing purposes, during the preceding calendar year. To request a notice, please submit your request to Efficiency Enterprises Systems, Inc., Attn: Shine the Light Inquiry at [info@effenter.com](mailto:info@effenter.com) allow 30 days for a response.

### **Privacy Rights of Utah Residents**

Under the Utah Consumer Privacy Act (“UCPA”), effective December 31, 2023, Utah residents are afforded certain privacy rights. If you are a Utah resident, subject to certain limitations, you have the following rights concerning your Personal Information:

- Right to Know. You have a right to know or confirm the processing of your Personal Information.
- Right to Access and Portability. You have a right to access Personal Information maintained about you and to obtain a copy of personal data in a portable and readily usable format.
- Right to Deletion. You have the right to request that we delete any of the Personal Information we have collected or maintain about you.
- Right to Opt-out of targeted advertising and sales of personal information. You have a right to opt-out of targeting advertising and the sale of your Personal Information.
- Right to Non-Discrimination. You have a right to not be discriminated against in the event you exercise your other rights listed above. If you exercise these rights, Efficiency Enterprises will not deny you goods or services, charge you a higher rate, or provide you with lower quality products.

Exercising Your Rights Under the UCPA. You, or an authorized agent, may exercise your rights by submitting a request to our Legal Team at [info@effenter.com](mailto:info@effenter.com) to and process requests promptly and within the timeframes required by the UCPA. Please note that all requests are subject to proper prior verification before processing.

### **Privacy Rights of Colorado Residents**

Under the Colorado Privacy Act, effective July 1, 2023, Colorado residents are afforded certain privacy rights. If you are a Colorado resident, subject to certain limitations, you have the following rights concerning your Personal Information.

If you are a Colorado resident, you have certain rights related to your personal information. If you or an authorized agent wish to exercise these rights, you can submit an access, correction, deletion, or do not sell my personal information requests to [info@effenter.com](mailto:info@effenter.com).

You will be required to submit information about yourself that Efficiency Enterprises will use to determine if we have information about you. If we are able to locate information about you, then we will fulfill your access, correction and/or deletion request. If you are an authorized agent, then you will be required to submit your contact information and complete a certification form as well as provide information about the website user for whom you are making a request. You may appeal our decision with respect to a request you have submitted by emailing us at [info@effenter.com](mailto:info@effenter.com)

Efficiency Enterprises may use your personal information for targeted advertising and "sells" (as defined by state law) personal information. Efficiency Enterprises does not use your personal information for profiling for purposes to which the right to opt out of profiling applies.

### **Purposes for Using Categories of Personal Data**

- Identifiers (e.g., name, mailing address, email address, phone number, credit/debit card number).
- Product and Service fulfillment; marketing; improve products, services, and operations; prevention of fraud and other harm; legal compliance.
- Characteristics of protected classifications (e.g., age, sex, race).
- Communications and marketing; improve products, services, and operations; prevention of fraud and other harm; legal compliance.
- Commercial information (e.g., products or services purchased, purchase history).
- Internet or other electronic network activity (e.g., browse or search history)
- Product and service fulfillment; communications and marketing; improve products, services, and operations; prevention of fraud and other harm; legal compliance.
- Geolocation data (e.g., latitude or longitude)
- Audio, electronic, visual, or similar information (e.g., recording of Guest service calls)
- Inferences drawn from any of the above (e.g., preferences or characteristics)

Categories of personal data sold to third parties: internet or other electronic network activity; identifiers; commercial information.

Categories of third parties to whom personal data sold: advertising networks; merchant partners; social networks.

Categories of personal data shared with third parties: identifiers; commercial information; internet or other electronic network activity; characteristics of protected classifications; geolocation data; audio, electronic, visual, or similar information; inferences.

Categories of third parties to whom personal data shared: advertising networks; internet service providers; data analytics providers; operating systems and platforms; legal, risk, and security.

### **Privacy Rights of Virginia Residents**

Under the Virginia Consumer Data Protection Act, effective January 1, 2023, Virginia residents are afforded certain privacy rights. If you are a Virginia resident, subject to certain limitations, you have the following rights concerning your Personal Information:

- **Opt Out of targeted advertising:** You have the right to opt out of targeted advertising. See our [targeted advertising Opt Out](#) page for more information on how to exercise this right.
- **Appeal a Refusal to Take Action:** Virginia law requires that we establish a process for a consumer to appeal our refusal to take action on certain requests. You may access that process on our [Appeals information](#) page. If you are not satisfied with the outcome of that process, you may [contact the Virginia Attorney General](#) to submit a complaint.
- **Other Options not Relevant.** We do sell personal information as "sale" is defined under Virginia law. We do not knowingly process "sensitive data" concerning Virginia residents, as defined under Virginia law, unless required as a matter of law.

### **Privacy Rights of Connecticut Residents**

Under the Connecticut Data Privacy Act, effective July 1, 2023, Connecticut residents are afforded certain privacy rights. If you are a Connecticut resident, subject to certain limitations, you have the following rights concerning your Personal Information:

- **Opt Out of Targeted Advertising:** You have the right to opt out of targeted advertising. You, or an authorized agent, may exercise your rights by submitting a request to our Legal Team at [info@effenter.com](mailto:info@effenter.com).
- **Appeal a Refusal to Take Action:** Connecticut law requires that we establish a process for a consumer to appeal our refusal to take action on certain requests. You may obtain a copy of our appeal process by submitting a request to our Legal Team at [info@effenter.com](mailto:info@effenter.com). If you are not satisfied with the outcome of that process, you may contact the Connecticut Attorney General to submit a complaint.

### **Verification of Requests**

To help protect your privacy and maintain security, Efficiency Enterprises will attempt to verify your identity before granting you access to your personal information or complying with your request. If you have an account with Efficiency Enterprises, we may verify your identity by requiring you to sign in to your account. If you request access to or deletion of your personal information and do not sign in to an account with us, we require you to provide the following information: name, email address, phone number, and postal address. In addition, if you do not have an account and you ask us to provide you with specific pieces of personal information, we reserve the option to require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If you designate an authorized agent to make a request on your behalf for which verification is required, we may (1) require you to provide the authorized agent written permission to do so, and (2) require you to verify your own identity directly with us (as described above).