

**Welcome to the Heritage Power, LLC website located at [www.heritagepower.com](http://www.heritagepower.com) (“Site”), provided by Heritage Power, LLC, located at 3900 North 10th Street, Suite 910 and/or its affiliates or subsidiaries (collectively, “Heritage Power”).**

## **Introduction and Commitment**

Heritage Power is a privacy conscious organization. Protecting the security and privacy of personal data is important to Heritage Power. Therefore, the following Privacy Policy explains how Heritage Power protects information gathered from users of the Site and only addresses information collected directly through or from the Site. It does not address or govern any information gathering, use, or dissemination practices related to information collected from the user (sometimes referred to as a “visitor,” “you” or “your”) other than directly through or from the Site, such as from telephone, facsimile, postal mail, personal delivery, or other or additional offline means or media.

## **Subject Matter of Data Protection**

Subject matter of data protection is personal data, which is any information concerning the personal or material circumstances of an identified or identifiable natural person (“data subject”). Examples of personal data are Name, Address, Telephone Number, meter numbers for any electricity or other energy related service or IP-Address and data related with these, like timestamps and other logging data.

## **Personal Data from Site Visitors**

Heritage Power will not collect any personal data about you, unless you voluntarily choose to provide Heritage Power with it, respectively, provide your consent, or unless otherwise permitted by applicable laws and regulations for the protection of your personal data.

Except as specifically set forth herein, Heritage Power may collect or track:

- The home server domain names
- Date and time of your visit to each individual page
- Type of computer, the originating IP address (IPv4: Class A to C segments only)
- Files downloaded
- Search engine used
- Operating system
- Type of web browser of visitors to the Site

When you do provide us with personal data, we typically use it to respond to your inquiry, process your order or provide you access to specific information or offers (such personal data may comprise e-mail addresses of visitors that communicate with Heritage Power via e-mail; information knowingly provided by the visitor in online forms, registration or membership forms, surveys, e-mail, and other online avenues, including, without limitation, demographic and personal profile data); aggregate and user-specific information regarding which pages a user accesses; and for users who opt-in to the Geolocation service (described in greater detail in Section 8 below), the location of visitors to the Site).

When you access the Site, Heritage Power may place internet “cookies” on your hard drive. Internet cookies are, in general, small amounts of data that contain a unique identifier that many websites frequently send to your web browser to be stored on your computer’s hard drive in order to save data about you, such as your name, password, user-name, screen preferences, and the pages of a website you have viewed. When you revisit the Site, Heritage Power may recognize you by your Internet cookies and customize your experience accordingly. You may decline Internet cookies by using the appropriate feature of your Web browser software, if available.

When a visitor performs a search within the Site, Heritage Power may record information identifying the visitor or linking the visitor to the search performed and recording information related to the search request.

The collection, processing, use, and disclosure of information contemplated in this Privacy Policy may involve a transfer of the information to jurisdictions located outside your country of residence that may not have equivalent laws and rules regarding personally identifiable information.

### **Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymization, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the website provider Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website. Furthermore you can prevent Google’s collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. Please note that on this website, Google Analytics code is supplemented by “gat.\_anonymizeIp();” to ensure an anonymized collection of IP addresses (so called IP-masking).“

### **Purpose of Use and Purpose Limitation**

Personal data submitted via this Site is used only for the purposes disclosed to you. Examples of such purposes include first and foremost registration for specific areas of the Site (e.g. inquiries to receive specific product or company information) or one of our events, job applications or newsletter registration.

Heritage Power may also use personal data for record keeping, editorial and feedback purposes, marketing and promotional purposes, statistical analysis of users' behavior, product development, content improvement, or to customize the content and layout of the Site. Aggregate data on visitors' home servers may be used for internal purposes, and individually identifying information, such as names, postal and e-mail addresses, phone numbers, and other personal information which visitors voluntarily provide to Heritage Power may be added to Heritage Power's databases.

Heritage Power will request explicit consent from you if it intends to use your personal data for any other purpose.

Heritage Power also may use Site visitor data to contact the Site visitors regarding registration and account status and changes to the Privacy Policy and any other policies or agreements relevant to Site visitors.

### **Disclosure of Personal Data to Third Parties**

Except as provided herein, individually identifying personal data provided through the Site will not be sold or otherwise disclosed to third parties not affiliated with Heritage Power. Identifiable and non-identifiable visitor information and data may be disclosed or distributed to another party with which Heritage Power enters or reasonably may enter into a corporate transaction, such as, for example, a merger, consolidation, acquisition, or asset purchase, or to a third party pursuant to a subpoena, court order, or other form of legal process, in response to a request by or on behalf of any local, state, federal, or other government agency, department, or body, whether or not pursuant to a subpoena, court order, or other form of legal process, or if determined by Heritage Power in its sole judgment that such disclosure or distribution is appropriate to protect the life, health, or property of Heritage Power or any other person or entity.

### **Reporting, Correction and Deletion of Personal Data**

At any time, the user has the right to request a report about a specified data category, which Heritage Power may have collected about the user. This report will be provided free of charge. The user has the right to correct data which is incorrect. The user has the right to request deletion of personal data relating to the user. Blocking such data is considered equivalent if deletion is technically unreasonable. After the recorded data has served its purpose, the data will be deleted unless you have agreed to further use of the data by Heritage Power (opt-in). If you have subscribed to our newsletter, we may use your e-mail address for advertising until you unsubscribe.

### **Links to Other Sites**

The Site may also contain links to third party websites. If you access a third party website from a link on this Site, any information you disclose on that website is not subject to this Privacy Policy. It is possible that these links may be used by third parties or others to collect personal or other information about you. Heritage Power is not responsible for the privacy practices of such websites, advertisers, or third parties or the content of such websites and it is your sole obligation to review and understand the privacy practices and policies of these other websites. Heritage Power does not control these third parties' use of

cookies, collection of information, or how they manage such information. It is solely your obligation to review and understand the privacy practices and policies of these other websites, advertisers and any third parties.

### **Security Measures**

Heritage Power has implemented physical, electronic and procedural security features that are designed to prevent the unauthorized release of or access to personal data. Despite Heritage Power's efforts to protect your personal data, there is always a risk that an unauthorized third party may circumvent such procedures or that transmissions of your information over the Internet may be intercepted. The confidentiality of any communication or material transmitted to or from Heritage Power via this Site or via e-mail cannot be and is not guaranteed. Accordingly, Heritage Power is not responsible for the security of information transmitted via the internet.

### **Comments, Notices and User Content**

Any materials or comments posted to any of our web pages are public. As such, Heritage Power assumes no liability for the accuracy of such information, no duty to update or correct such information, and no liability for such communications arising under the laws of copyright, libel, privacy, obscenity, or otherwise.

Any comment system on the Site may utilize an opt-in Geolocation service in accordance with a prevailing community standard such as HTML 5. Such Geolocation opt-in ability is managed by the user's browser settings. If a user chooses to opt-in to the Geolocation service, the user's comments may be associated with the user's location, both internally within Heritage Power and publicly on the Site.

### **Opt-Out Right**

Except as necessary for Heritage Power to provide the services, information, or products requested by a registered user, the registered user may opt out of having his or her personally identifiable information, which has been voluntarily provided to Heritage Power through an account registration, or electronic news or information subscription, prospectively retained by Heritage Power, used by Heritage Power for secondary purposes, or disclosed by Heritage Power to third parties by updating your profile preferences on the Site. (This does not apply to collection of the type of web browser of the visitor to the Site or to non-identifiable visitor information provided or collected.)

### **Privacy of Children**

The Site is not intended for children. Heritage Power will not knowingly collect personal information online from visitors under 18 without insisting that they seek prior parental consent if required by applicable law. All users must be at least 18 years of age in order to use the Site. Heritage Power urges all parents and persons supervising children to supervise their children's use of the Internet in a safe and responsible way. Children should not transmit personal data to Heritage Power's website.

### **Right to Change Privacy Policy**

Heritage Power may change this Privacy Policy from time to time. Heritage Power encourages you to periodically review this Policy to be informed of how Heritage Power is protecting your personal data.

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