



PRIVACY NOTICE

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INTRODUCTION

Cirro Energy ("Company" "We" "Us" "Our") respects your privacy and is committed to protecting your personal information.

We know that you care how information about you is collected, used, and shared. We appreciate that you trust us with your information. This Privacy Notice ("Notice") outlines the information we may collect about you or that you may provide to us and discloses our practices for collecting, using, retaining, and sharing your information. In addition, this Notice describes choices you may have to control your information and your privacy preferences. We will not use or share information except as specified in this Notice or as permitted by law.

We note that Cirro Energy operates in multiple states, and each state may have different laws governing how we may collect, use, and share your information. This Notice describes our practices, and it contains links to additional information about certain states in which we operate, which may not apply to you.

APPLICATION OF PRIVACY NOTICE

This Notice applies to the use of our products, services, websites, devices, and online portals or mobile applications offered by Cirro Energy and our affiliates, and the information collected by us, or our service providers as described below.

This Notice applies to information collected:

- On our websites ("Website").
- When you enroll for service with us, or purchase or use our products and services.

- Through our mobile and desktop applications that you may download from this Website or other sources (our “apps”), which provide dedicated non-browser-based interaction between you and the Website.
- When you interact with our advertising and applications on thirdparty websites and services if those applications or advertising include links to this Notice.
- When we interact with you via phone calls, text messaging, chats, emails, webforms, or social media.

Please read this Notice carefully to understand our practices regarding your information and how we treat it. This Notice may change from time to time (see Notice Changes). Your continued use of this Website or our products and services after we make changes is understood as your acknowledgment of those changes, so please check the Notice periodically for updates.

Additional privacy disclosures may be provided that are specific to a product or service. In the event of any conflict between this Notice and any product- or servicespecific privacy disclosures, the more specific disclosures will control with respect to that product or service.

In this Notice, “Personal Information” means information that directly identifies an individual (such as a name) or that is associated with an identified individual (such as a home or work address linked with a name), or information that can be used to identify a specific individual, without too much effort (such as a mobile phone number or home address).

If there are sections of this Notice where we refer to “personal information,” as the term may be defined differently under a specific applicable law or regulation, we will let you know.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect Personal Information about you in connection with our products and services, to provide our products and services to you, verify information you provide to us, and help us improve our products and services and provide you with the best possible experience. When using our website or our products and services, you may be prompted to create an account that will store your name, mailing address, service address, email address, telephone number, credit card or other payment account information.

By providing us Personal Information, you agree that you are authorized to provide that information and accept this Notice and any supplementary privacy Notice that may be

relevant to you. If you do not agree with our practices, please do not register, subscribe, create an account, or otherwise interact with our products and services, Website, or mobiledevice applications.

Information We Collect.

We may collect several types of information about you including, for example:

- Personal Information such as your name and contact information or other identifying information, like your postal address, email address, telephone number, Social Security number, driver's license number, credit and financial information, account numbers, billing and credit or payment history, demographic information, geolocation data, and/or distribution utility account numbers or meter identification numbers.
- Information that is about you but does not identify you [such as your energy usage data, aggregated information, demographic information] (which is referred to as "NonIdentifying Information").
- Information about your internet connection including your IP address, the equipment you use to access our website or other services, and usage details (which is referred to as "Usage Information").
- For job applicants, we may also collect your education details, reference information, and employment history.

How We Collect Information.

We may collect your information in one or more of the following ways:

- Directly from you through your interactions with us or our service providers via phone calls, text messaging, chats, emails, webforms, or social media and use of our products and services;
- When you subscribe to our marketing materials, enroll for service with us, or use our products or services;
- Automatically as you navigate through our Website (See Information We Collect Through Automatic Data Collection Technologies below);
- From third parties or publicly available sources (e.g., from social media services, forums, commercially available services); and

- When you apply for a job with us.

The information we collect from you on or through our website or apps may include:

- Information that you provide by filling in forms including online registration forms, subscribing or enrolling for our service, posting material or photographs, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our website or provide online feedback on your experiences with our products/services.
- Records and copies of your correspondence (including email addresses) if you contact us.
- Your responses to satisfaction surveys that we might ask you to complete for research and information purposes.
- Details of transactions you conduct through our website or apps, and of the fulfillment of your orders. You may be required to provide photographs and financial information before placing an order, making a purchase, or enrolling for service through our website.
- Referral contact information for friends or relatives from you to forward promotional opportunities or other information on our website. This personal referral information you provide to facilitate this communication is used on a onetime basis and is not further retained by Cirro Energy, except in circumstances where we obtain consent from the people you have referred to receive communications from us or when they subscribe for our products or services.

Information We Collect Through Automatic Data Collection Technologies

Like many websites and online services, we use “cookies” and other tracking technologies such as web beacons and pixel tags (collectively “Automatic Data Collection Tools”) to personalize your use of our website and to provide you with a better and faster user experience. We allow our service providers to utilize Automatic Data Collection Tools for analytic and marketing purposes. Some of the Automatic Data Collection Tools we use are associated with your customer account and others are not. We may use “session cookies” (cookies that last until you close your browser) or “persistent cookies” (cookies that last until you or your browser delete them).

We also automatically collect Usage Information and other technical information about how you use and navigate our Website, apps, or other online services, such as your IP address, the equipment you use to access online services (such as a browser or mobile

device), time of your use, what features are used, how long you spend on our online services and other “*clickstream*” information.

If you are concerned about the use of Automatic Data Collection Tools, you may be able to direct your browser to reject cookies or to notify you and seek approval whenever a cookie is being sent. You may also delete a cookie manually through your browser or other programs. If you are using a mobile or wireless device to access our website, your mobile or wireless carrier may use cookies or unique identifier headers to transmit certain information about you to third parties. Contact your mobile or wireless carrier to change or optout of such setting if possible. Note that some parts of our website may not function properly or may not be available to you if you refuse to accept a cookie or choose to disable the acceptance of cookies.

Online behavioral advertising is automated, customized advertising that you see when using online services, like ads in mobile Apps or on websites. Those ads are served to you based on inferences about your interests. Those interests are determined from data collected about you, whether by us or other parties. In addition, some content, or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services and they may use this information to provide you with interestbased (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used, and we do not control third parties' collection or use of your information to serve interestbased advertising. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. If you do not wish to participate in interestbased advertising via thirdparty advertising networks or to optout of the use of certain tracking technologies, [click here](#) and follow the simple optout process.

Certain browsers may offer you the option of providing notice to websites that you do not wish for your online activities to be tracked for preferencebased advertising purposes (referred to as “Do Not Track Signals” or “DNT Notice”). Unfortunately, given the lack of standardization among browsers and interestbased advertising technology, DNT Notices may not effectively accomplish this goal. For this and a variety of other reasons, with respect to our website, we do not take any particular action based on browserbased DNT Notices.

HOW WE USE YOUR INFORMATION

We may use your information to provide you products and services and to manage and support our business functions, as follows:

- To fulfill your requests for products or services and to service your account. This may include enrolling you as a customer, providing access to and managing your account, determining your eligibility to receive certain services including obtaining credit approval and verifying your identity, providing customer service, and enhancing your customer experience, and billing and collections.
- To communicate with you or your authorized representative, including responding to your requests and questions, notifying you about changes that may affect your products and services, and sharing essential information or alerts.
- For operational purposes (including but not limited to product and service development and delivery; managing our communications; marketing and advertising, including providing personalized ads and web content and conducting market research, and determining the effectiveness of our sales, marketing and advertising efforts; analyzing and enhancing our products, services, Website and apps (including use of machine learning); ensuring the security of our networks and information systems; providing technical support; performing accounting, auditing, invoicing, reconciliation and collection activities; payment processing; data processing and management; improving and maintaining the quality of our customer service; and evaluating or conducting a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of our assets);
- To personalize our service offerings and Website and inform you of our products and services, in some cases, other than those that you have specifically requested, including targeted offers and ads through our Website, thirdparty sites, and via email or text message (with your consent or as permitted by law);
- To comply with legal or regulatory requirements or with legal process including subpoenas, court orders or search warrants, and as otherwise authorized or required by law;
- To monitor and record any communications we have with you, including phone conversations (in compliance with applicable laws), chat sessions, and emails to ensure we are providing you with quality service and meeting our regulatory and legal responsibilities;
- To investigate or prevent illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person or violations of the terms and conditions of using our website or our products and services;

- To enable your participation in programs, promotions, sweepstakes, contests, games, events, blogs, and chats if you choose to participate;
- In connection with a job application or inquiry for employment consideration; and
- Data analytics.

We may collect, use, or share your information for other reasons, which will be described to you upon the collection of the information.

DISCLOSURE AND SHARING OF YOUR INFORMATION

We do not sell or rent your information, but we may share or disclose your information with our affiliates, service providers, or other third parties that work with us as described below. For any purpose not specified in this Notice, we will provide specific notice or ask for your consent before we share your Personal Information.

SHARING INFORMATION WITH OUR AFFILIATES

Cirro Energy may share your information with our affiliates for purposes described in this Notice, including marketing products or services that may be of interest to you. When required by law or regulation, we will provide you with specific notice or ask for your consent before we share your information with our affiliates.

You can learn more about our affiliates by going to www.nrg.com. For information collected under this Notice, we require our affiliates to use, share and protect the information consistent with this Notice including honoring your communications preferences for marketing of their products and services, whether you have consented to receive advertising communications and other offers from us, and any exercise of your privacy rights under applicable law.

For more information about the controls you have and to optout of sharing your information, see Your Choices and Privacy Controls.

SHARING INFORMATION WITH THIRD PARTIES

We may share your information with our contractors and vendors that support products or services provided to you or that perform services for us, including marketing on our behalf. Those vendors are prohibited from using your information for any purpose other than to perform those services and improving those services provided, including with use

of machine learning, and we contractually require them to protect the confidentiality and security of any data they receive from us consistent with this Notice and as applicable, the following contractors and vendors' privacy policies and notices:

[Products & Privacy Policy | GBG](#)

[Privacy Notice - AU10TIX](#)

<https://risk.lexisnexis.com/group/processingnotices>.

You authorize your wireless carrier to use or disclose information about your account and your wireless device, if available, to us or our service provider for the duration of your business relationship, solely to help them identify you or your wireless device and to prevent fraud. See our Privacy Notice for how we treat your data.

With your consent, we may share your information with third parties, other than our affiliates, to market their products or services to you. For more information about the controls you have and to opt out of sharing your information, see Your Choices and Privacy Controls.

We may also share your information with other companies and entities, such as government agencies, credit bureaus and collection agencies, where permitted or required by law. This may include:

- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Cirro Energy's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which your information held by Cirro Energy about our Website users and customers is among the assets transferred;
- Complying with court orders, subpoenas, lawful discovery requests and as otherwise authorized or required by law or regulation. Like all companies, we are required by law to provide information to government and law enforcement agencies, as well as parties to civil lawsuits;
- Detecting and preventing fraud or other illegal or unauthorized activities;
- Providing or obtaining payment for your service;
- Performing required market transactions or facilitating the provision of electric delivery service;
- Ensuring proper operation and security of technology;

- Notifying, responding, or providing information (including location information) to a responsible governmental entity in emergency circumstances or in situations involving immediate danger of death or serious physical injury; and/or
- Enforcing our legal rights, protecting our property, or defending against legal claims.

We may also use and disclose deidentified or aggregated information about our customers and Website users, as information that does not (and cannot be used to) identify any individual, without restriction, for any lawful purpose.

YOUR CHOICES AND PRIVACY CONTROLS

You can manage your privacy choices about how we contact you and how we use or share your information by sending us an email at privacy@cirroenergy.com. You also have choices about how certain third parties and advertisers use your information, including how we use and share your information for advertising, marketing, and analytics. When making changes, please allow sufficient time for your preferences to be processed.

Communication Preferences

You may update your preferences to receive marketing offers and other information from us, however, even if you optout we may continue to contact you with service and accountrelated information or other nonmarketing communications.

- Email: You can optout of marketing emails by following the unsubscribe links or instructions included in marketing email.
- Text messages: You can optout of receiving text messages from us at any time by texting "STOP " to any message.
- Mobile applications: you may optout of receiving notifications through our mobile applications by either selecting the option to "not allow" on the notification prompt or disabling them through the Settings function on your mobile device.
- Telemarketing: Ask to be removed from our consumer telemarketing lists by contacting us at 18006924776, or by sending an email to privacy@cirroenergy.com. You also can ask the Cirro Energy representative to remove you from our telemarketing lists when you receive a marketing or promotional call from us. In addition, the National Do Not Call Registry gives you a choice about whether to receive telemarketing calls at home. For more information, go to donotcall.gov. Some states in the United States may also maintain their own Do Not Call Registry.

Putting your number on these registries may limit telemarketing calls that you receive.

- For the state of Texas, the Public Utility Commission of Texas (“PUC”) has established two donotcall lists. You can indicate to the PUC that you do not wish to receive telephone solicitations from providers of electric service regarding your choice of service provider by placing your name, address, and telephone number on the electric donotcall list. You can indicate that you prefer not to receive any telephone solicitations by placing your name, address, and telephone number on the statewide donotcall list. For more information or to register your name, address, and telephone number on the donotcall lists you may use one of three different methods.

Online – texasnocall.com

By phone – call tollfree [888-309-0600](tel:888-309-0600)

By mail – write to Texas No Call, 100 Summer Street Suite 800, Boston, MA 02110, or find a printable registration form at texasnocall.com

Sharing Your Information for Marketing or Advertising

If you do not want us to share your Personal Information with third parties or our affiliates for promotional purposes, you can optout by sending us an email to privacy@cirroenergy.com stating your request.

Accessing and Correcting Your Information

You can review and change your Personal Information by emailing us at privacy@cirroenergy.com and/or by visiting your online customer account.

Subject to applicable law, you may have rights to request access to, correct, or delete your Personal Information, or to object to certain processing of your Personal Information. If you have such rights under applicable law, you may send us requests to exercise those rights by email at privacy@cirroenergy.com or you may submit a request online [here](#).

Please understand that we may not be able to delete your Personal Information except by also deleting your account, which may require cancellation of products or services that we provide to you. In addition, we may not accommodate a request to change Personal Information if we believe that doing so would violate any law, legal requirement, or rights of another person, or cause the information to be incorrect.

When making a lawful access, correction, deletion, or other request, we may require additional information from you or take other steps to verify your identity and your right to access the Personal Information we hold about you. This is done to protect your privacy and maintain security. We may charge you a reasonable fee in instances that require a disproportionate effort, but we will advise you of any fee in advance. We may decline to process requests that are frivolous or unreasonably repetitive or burdensome, risk the privacy or impact the rights of others, or are extremely impractical.

HOW WE PROTECT YOUR INFORMATION

Data Security

Protecting your information is a top priority, and we have implemented physical, administrative, and technical safeguards and security measures we consider reasonable and appropriate to protect against the loss, misuse, and alteration of Personal Information under our control. However, the internet and electronic communications always involve risks to Personal Information. Safeguards cannot prevent all loss, misuse, or alteration of Personal Information, and we cannot guarantee the security of information we hold. In the event your information is compromised, we will notify you in the most expedient time reasonable under the circumstances and where required under law. We also review our security procedures periodically to consider appropriate innovative technology and updated methods to safeguard your information and our systems.

Data Storage, Retention and Disposal

The information we collect may be processed and stored in the United States or in other countries where we or our affiliates or service providers process our data. We take steps to ensure that data is processed according to this Notice and to ensure adequate protections of Personal Information in accordance with applicable law.

We will retain, use, and store your Personal Information as necessary to provide products and services to you; to comply with our business requirements and objectives, and legal and regulatory obligations; to mitigate and resolve disputes; and to enforce our agreements. We do not commit to any obligation to retain your data for any length of time and anticipate retaining your Personal Information for as long as it is required by law or regulation or is useful, as permitted under applicable law. If these purposes no longer apply, we will destroy, deidentify, or anonymize the information in accordance with our internal policies and applicable law.

OTHER PRIVACY INFORMATION

Phishing Emails

We will only use your Personal Information to contact and interact with you as described in this Notice.

We will not send you an email asking you to reply by providing personal or account information or threaten to disconnect your services unless you provide us with any information about you. If you receive such an email, it may be an attempted identity theft scheme that is commonly called “phishing,” where hackers steal your passwords or infect your computer with malicious software. If you are concerned about clicking links provided within an email sent by us, do not click the link. Instead, you should manually input our website address in your preferred web browser. Doing so will ensure that you do not open a thirdparty website disguised to look like our website.

For more information about “phishing,” and steps you can take to protect your Personal Information, please visit the Federal Trade Commission’s website at www.ftc.gov.

Children Under the Age of Thirteen

Our website is not intended for children under 13 years of age. We do not knowingly collect Personal Information from children under thirteen. If you are under thirteen, do not use or provide any information on this Website or on or through any of its features. If we learn we have collected or received Personal Information from a child under thirteen without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under thirteen, please contact us at:

NRG Tower, 1301 McKinney Street
Houston, TX 77010
privacy@cirroenergy.com

INFORMATION FOR NEVADA RESIDENTS

We comply with the requirements of the Nevada Privacy law, which provides residents with choices regarding how we share information. Nevada residents who wish to exercise their sale optout rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated email address: privacy@cirroenergy.com. However, please know we do not currently sell data triggering the statutory optout requirements.

INFORMATION FOR CALIFORNIA RESIDENTS

California residents may review our supplemental privacy Notice to understand their California privacy rights, available [here](#).

COMPLAINTS AND CONTACT INFORMATION

Cirro Energy is committed to working with consumers to obtain a fair and rapid resolution of any complaints or disputes about privacy. Please send us your questions or comments regarding our privacy practices either by sending an email to privacy@cirroenergy.com or by writing a letter to:

Cirro Energy Privacy Compliance Coordinator
P.O. Box 2229
Houston, TX 77252-2229

We will be happy to respond to your questions and comments.

LINKS TO OTHER SITES

Our website and mobile applications may contain links to other sites. Cirro Energy is not responsible for the privacy practices or the content of such websites. We recommend you carefully read the privacy policies of each site you visit.

NOTICE CHANGES

We reserve the right to update this Notice from time to time without prior notice. If we modify this Notice, we will update the “Last modified” date at the top of this Notice. We may take other steps to notify you of any updates, including if other steps are required by applicable law.

In the future if we wish to use your information for new unanticipated uses not previously disclosed in our Notice, we will provide a more direct way of notifying you of changes to this Notice and obtain your consent as required by law.