

## OUR PRIVACY SUMMARY

*At Rolling Energy Resources, we are connecting electric vehicle owners to the electric utilities or retail energy providers that provide their fuel. Everyone is in this together – utilities need to ensure that their substations and transformers can meet the new demands from vehicle charging, vehicle owners should have insight into their charging costs, and both should be empowered with tools to control their costs and to share the grid together. Everything that our company does is in service to those goals, which ultimately serve to keep rates lower and enable better decision-making for vehicle owners and utilities.*

*To that end, we will use your data to research charging patterns and plan for infrastructure to support customer charging, but we will never sell your data for direct marketing. If you are enrolled in a utility or retail energy provider research, rewards, or load shifting program, we will only maintain data that identifies you until you are no longer a customer of the utility or retail energy provider or you request to be unenrolled from the platform. We will use your data after that to get better at what we do – identifying needs for utilities and retail energy providers and bridging the knowledge gap – but we will anonymize it such that it contains no information that could reasonably be linked back to you personally.*

*How will we do that? We will scrub any unique vehicle or user information and permanently decrease the resolution of any location information to the neighborhood level of a 1000-foot radius. Specific details about our privacy practices are outlined in the Privacy Policy below. In the*

*case of inconsistencies between this summary and the Privacy Policy, the Privacy Policy will always govern and take precedence.*

## **PRIVACY POLICY**

Rolling Energy Resources Inc. (“**RER**,” “**us**,” “**we**,” or “**our**”) has prepared this Privacy Policy (“**Privacy Policy**”) to describe to you, or if you represent an entity or other organization, that entity or organization (in either case, “**you**,” or “**your**”) our online and offline practices regarding the personal information that RER collects, uses, and shares on behalf of end users (“**Users**”) of our online platform (the “**Platform**”) accessed through the website located at <https://rollingenergyresources.com/> and any other websites operated by RER (each, a “**Site**”) or using mobile applications provided by and on behalf of RER (each, an “**Application**,” and each Site and Application treated as a part of the “**Platform**” for purposes of this Privacy Policy) and of our service offered through the Platform (the “**Services**”).

In some cases, we may act as an agent of the electric utility or retail energy provider with which you have a customer relationship (the “**Energy Provider**”). In such a situation, the Energy Provider has engaged RER to provide Services. This Privacy Policy does not apply to the non-personal information described below that is collected by, used by, disclosed by, or disclosed to your Energy Provider. This Privacy Policy only applies to RER’s collection, use,

and disclosure of personal information. For more information about your Energy Provider’s privacy practices please contact your Energy Provider directly.

RER reserves the right, at any time, to modify this Privacy Policy. If we make revisions that change the way we collect, use, or share personal information, we will post those changes in this Privacy Policy. You should review this Privacy Policy periodically so that you keep up to date on our most current policies and practices. We will note the effective date of the latest version of our Privacy Policy at the end of this Privacy Policy. Your continued use of the Platform following posting of changes constitutes your acceptance of such changes.

## 1. COLLECTION OF PERSONAL INFORMATION

**1.1. Personal Information.** The following are categories (with non-exhaustive examples) of personal information we may collect about you and for each category the purpose for which it may be used:

<b>Categories</b>	<b>Examples</b>
A. Individual Identifiers and Demographic Information	A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name.
B. Geolocation Data	Precise physical location while charging.
C. Internet or Network Activity	Browsing history, search history, information on an individual’s interaction with a website, application, or advertisement.

D. Energy Usage Information	Energy usage information from your vehicle.
E. Inferences Drawn from Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.

Personal information does not include:

- Publicly Available Data – Publicly available information from government records.
- Deidentified or Aggregate Information – **“Deidentified Information”** means information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular individual, and for which RER has implemented technical safeguards and business processes that prohibit reidentification of the individual. **“Aggregate Information”** means information that relates to a group or category of individuals, from which individual identities have been removed, that is not linked or reasonably linkable to any individual or household, including via a device.
- Excluded Information – Certain laws require separate privacy notices or are exempt from general personal information privacy policy disclosure requirements. Such laws include health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) or clinical trial data; the Gramm-Leach-Bliley Act (GLBA); Fair Credit Reporting Act (FCRA); and the Driver's Privacy Protection Act of 1994.

**1.2. Sources of Personal Information.** We obtain the categories of personal information listed above on or through our Platform from the following categories of sources:

- Personal Information You Provide. RER collects personal information when you voluntarily submit it to us. For example, we may collect or receive personal information from you when you create an account; edit registration information; sign up to receive promotional communications; use or access a Service or content available through the Platform; participate in one of our promotional sweepstakes, contests, or surveys; post a review; submit a request to our customer service team; interact with our social media pages; or otherwise interact with us or other Users through the Platform.
- Automatically Collected Personal Information. In addition to personal information that we may receive directly from you, RER indirectly collects other information from you automatically through the Platform. For example, we receive personal information from Users when a User visits and navigates our Platform on any device; installs and uses the Application; enables location-based features on the Application. We may also collect personal information about Users over time and across different websites, apps, and devices when a User accesses the Platform. Third parties also collect personal information this way on our Platform. RER collects some personal information automatically using cookies or other online tracking technologies.
- Personal Information from Your Vehicle: We may receive and store information directly from your vehicle, including vehicle make and model, battery charge,

location, and odometer readings. For example, we may calculate your cost per mile driven by collecting charge times, battery percent, and odometer readings.

- Personal Information Obtained from Third Parties. In addition to the personal information that we collect from you directly and automatically, RER may receive personal information about you from other third party sources. For example, we receive personal information from your Energy Provider, our business partners, social media sites, or companies that provide personal information to supplement what we already know about Users. We may merge or combine such personal information with the personal information we collect from you directly or automatically.

## **2. USE OF PERSONAL INFORMATION**

RER's primary purpose in collecting personal information is to provide the Services that you request on the Platform. RER may also use personal information for various purposes, including without limitation to:

- To Provide Our Services. We use your vehicle's charging data to provide monthly reports to help you understand your charging patterns, and to understand infrastructure needs to support charging. If you opt-in to a time of use assistance program or demand response program with your utility or retail energy provider, we

may use your vehicles charging data to delay charging. We use your vehicles miles calculate how many miles you need per day, as well as fuel costs per mile.

- To Improve Our Services and Platform. We use personal information to understand and analyze the usage trends and preferences of our Users to make our Platform, Services, and Content better, diagnose technical issues, prevent fraud, and develop new features and functionality.
- To Understand Your Interests. We use your personal information to personalize your experience on the Platform and to deliver information about our Services relevant to your interests.
- To Respond to Your Requests or Questions. We use personal information to provide you with support and to respond to your requests for customer support, including to investigate and address your concerns and monitor and improve our responses. This may also include responding to your feedback.
- To Determine Your Eligibility and Set Up Your Account. We use your personal information to verify your identity or determine your eligibility for some of our Services, and promotions. For example, this may include verifying your age, and utility or retail energy provider. If you set up an account on the Platform, we will use the registration

information you provide in relation to that account creation to create, maintain, customize, and secure your account.

- To Market Products or Services offered by your Energy Provider. We provide you with information about products, services, and promotions offered by your Energy Provider. For example, we may use cookies or other online tracking technologies to provide customized advertisements, content, and information about your Energy Provider; monitor and analyze the effectiveness of marketing activities; and track your entries, submissions, and status in any promotions. These might be third party offers from your Energy Provider we think you might find interesting. These communications may come in the form of interest-based advertising using information gathered across multiple websites, devices, or other platforms.
- To Secure the Platform. We use personal information to maintain the safety, security, and integrity of our Platform and Services, databases and other technology assets, business, and other Users.
- To Communicate with You. We may communicate with you about your account or our relationship. We may also contact you about this Privacy Policy or the Terms of Service.
- As Required by Law. We use personal information to respond to requests from law enforcement and as required by applicable law, court order, or government investigation.



We may create non-personal Deidentified Information or Aggregate Information from the information we collect, as permitted by law. We may use that data for our own purposes or disclose it in a non-personally identifiable manner to:

- Organizations and government entities that conduct research into energy usage or smart-grid technologies; or
- Other Users of the Services for purposes of comparing energy usage to the broader community.

### **3. SHARING OF PERSONAL INFORMATION**

In addition to the specific situations discussed elsewhere in this Privacy Policy, RER may share your personal information in the following circumstances:

**3.1. Energy Providers.** We disclose personal information to your Utility Provider or Retail Energy Provider for their own purposes and subject to their privacy policy and practices.

**3.2. Related Companies and M&A Transactions.** We may share your personal information with companies that are affiliated with us (that is, that control, are controlled by, or are under common control with us). In addition, if we sell all or part of its business or make a sale or transfer of assets or is otherwise involved in a merger or

business transfer, we may transfer your personal information to a third party as part of that transaction, including at the negotiation stage.

**3.3. Consent.** We may ask if you would like us to share your personal information with other unaffiliated third parties who are not described elsewhere in this Privacy Policy, and we may do so with your consent.

**3.4. Legal Compliance.** We may disclose personal information in response to subpoenas, warrants, or court orders, in connection with any legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our rights; to defend against a legal claim; to investigate, prevent, or take action regarding possible illegal activities or fraud; to protect the safety and security of other Users; or to prevent a violation of our Terms of Service.

**3.5. Service Providers.** We may share your personal information with third parties who perform services on our behalf that are necessary for the orderly operation of the Platform. Among other things service providers may help us perform website hosting, app design, maintenance services, database management, web analytics, app analytics, billing, payment processing, marketing, or any other use set out in this Privacy Policy. Access to your personal information by these service providers is limited to the information reasonably necessary for the service provider to perform its limited function. We require our service providers to keep the personal information that they are provided with confidential and to comply with all applicable laws.

**3.8. Social Networking.** The Platform may offer you the ability to share your personal information through a social networking website (e.g., Facebook, Twitter), using such site's integrated tools (e.g., Facebook "Like" button, or Twitter "Tweet" button). The use of such integrated tools enables you to share personal information about yourself with other individuals or the public, depending on the settings that you have established with such social networking site. For more information about the purpose and scope of data collection and use in connection with such social networking site or a site's integrated tools, please visit the privacy policies of the entities that provide these social networking sites.

**3.9. Public Forum and Messaging.** The Platform may provide you with the opportunity to post comments, messages, or reviews in a public forum. If you decide to submit personal information at these locations, that information will be available to other Users of the Platform.

**3.10. Referrals.** Users may recommend other Users to join the Platform by providing their contact information or selecting friends from a social networking site. Users may also provide information about other Users of the Platform such as reviews of the

Services or products that he or she received, booking or scheduling information, or reference information.

#### **4. SECURITY OF PERSONAL INFORMATION**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from the risks presented by unauthorized access or acquisition, including encrypting your passwords, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any unauthorized access or acquisition of your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

#### **5. YOUR CHOICES**

You can make the following choices regarding your personal information:

**5.1. Access to Your Personal Information.** You may request access to your personal information by contacting us as described below. We will grant you reasonable access to the data that we have about you as required by law.

**5.2. Changes to Your Personal Information.** We rely on you to update and correct the personal information contained in your Account. Note that we may keep historical

information in our backup files as permitted by law. If our Platform does not permit you to update or correct certain personal information, please contact us as described below.

**5.3. Deletion of Your Personal Information.** Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. You may, however, request that we delete your personal information by contacting us as described below. We will grant a request to delete information as required by law, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes. Except as provided above, we will delete, aggregate, or de-identify all of your personal information as described in this subsection within the timeframes required by law.

## **6. OPTING OUT**

You can make the following choices to opt out of certain activities regarding your personal information:

**6.1. Promotional E-mails.** You may choose to provide us with your e-mail address for the purpose of allowing us to send newsletters, surveys, offers, and other promotional

materials related to our Platform. You can stop receiving promotional e-mails by clicking the “unsubscribe” links in the e-mails or by contacting us as described below. If you decide not to receive promotional e-mails, we may still send you service-related communications, such as those about your Account, to fulfill orders for products and service you have requested, or deliver notifications directly to you through the Platform.

**6.2. Behavioral-Based Advertising.** We participate in behavioral-based advertising. This means that a third party may use technology (e.g., a cookie) to collect information about your use of our Platform so that we can provide advertising about products and services from your Energy Provider tailored to your interest. That advertising may appear either on our Platform, or on other websites. If you wish to limit third parties’ collection of information about your use of our Platform, you can opt-out of such at the [Digital Advertising Alliance](#) in the US, the [Digital Advertising Alliance of Canada](#) in Canada, or the [European Digital Advertising Alliance](#) in Europe. PLEASE NOTE THAT OPTING-OUT OF BEHAVIORAL ADVERTISING DOES NOT MEAN THAT YOU WILL NOT RECEIVE ADVERTISING WHILE USING THE PLATFORM. IT WILL, HOWEVER, EXCLUDE YOU FROM INTEREST-BASED ADVERTISING CONDUCTED THROUGH PARTICIPATING NETWORKS, AS PROVIDED BY THEIR POLICIES AND CHOICE MECHANISMS.

**6.3. Do-Not-Track.** Some web browsers and devices permit you to broadcast a preference that you not be “tracked” online. At this time, we do not modify your experience based upon whether such a signal is broadcast.

## 7. RESIDENTS OF CALIFORNIA

The following applies to residents of California.

**7.1. Notice to California Residents.** RER must disclose whether the following categories of personal information are disclosed for a “business purpose” or “valuable consideration” as those terms are defined under California law. Note that while a category below may be marked, that does not necessarily mean that we have personal information in that category about you. In the preceding twelve months, we have disclosed the following categories of Personal Information in the manner described.

<b>Category</b>	<b>Personal Information is Disclosed for a Business Purpose</b>	<b>Personal Information is Disclosed for Valuable Consideration</b>
Individual Identifiers and Demographic Information	Yes	No

Geolocation Data	Yes	No
Internet or Network Activity	Yes	No
Energy Usage Information	Yes	No
Inferences Drawn from Personal Information	Yes	No

**7.2. Notice of Disclosure for Direct Marketing.** Under California Civil Code sections 1798.83-1798.84, California residents who have an established business relationship with RER are entitled to ask us for a notice describing what categories of personal information we share with third parties for their direct marketing purposes. This notice will identify the categories of information shared with and will include a list of the third parties with which it is shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit your request to the address listed in the section titled “CONTACTING US” below.

## **8. EXERCISING YOUR PRIVACY RIGHTS**

When exercising the rights or options described in this Privacy Policy, the following guidelines apply:



**8.1. No Fee Usually Required.** You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee or decline to comply with your request if your request is clearly unfounded, repetitive, or excessive.

**8.2. What We May Need from You.** When exercising your rights or otherwise assisting you, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure we do not disclose personal information to any person who is not entitled to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**8.3. Time to Respond.** We try to respond to all legitimate requests within 30 days of your request. Occasionally it may take us longer than 30 days to respond, for instance if your request is particularly complex or you have made a number of requests. In this case, we will notify you of the delay, and may continue to update you regarding the progress of our response.

**8.4. No Discrimination.** You will not be subject to discrimination as a result of exercising the rights described herein. In some cases, when you exercise one of your rights, we will be unable to comply with the request due to legal obligations or otherwise, or we will be unable to provide you certain Services. These responses are

not discrimination and our reasons for declining your request or ceasing Services will be provided at that time.

**8.5. Authorized Agent.** You may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's identification information, and the authorized agent's identification information.

## **9. CONTACTING US**

If you have any questions or concerns about our Privacy Policy or any other privacy or security issue, please contact us at:

Rolling Energy Resources Inc.  
Attn: Rolling Energy Privacy Agent  
2500 30th Street, Suite 207  
Boulder, CO 80301  
[privacy@rollingenergyresources.com](mailto:privacy@rollingenergyresources.com)

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