

PRIVACY NOTICE – CALIFORNIA

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS (“Notice”) supplements the information contained in the [Privacy Policy](#) of Energy Systems Group, LLC (“COMPANY,” “we,” “us,” or “our”) a wholly owned subsidiary of CenterPoint Energy Inc., and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). This Notice sets out how we use and protect any Personal Information you may provide to us through your use of our websites or apps (the “Site(s)”), by social media, by phone, in writing or otherwise (collectively, the “Service(s)”).

This Notice explains how COMPANY collects, uses, shares and stores your Personal Information and other data when you use the Services, and how you can exercise certain rights you have in connection with your privacy and Personal Information.

This Policy is effective as of: July 1, 2020.

For ease of reference, you may click on any of the following links to jump to one of the sections addressed below:

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Scope of this Notice

This Notice covers only the Services identified above and is only applicable to consumers who reside in California. This Notice does not apply to visitors, users and others who avail themselves of our Services but do not reside in California, and this Notice does not apply to information which you may send us by other means. We understand that the privacy and security of your Personal Information is important to you. In keeping with this understanding, and with our legal obligations, we utilize appropriate administrative, technical and physical safeguards to protect your Personal Information.

Other COMPANY websites, locations and certain products or services, whether online or offline, may have their own specific privacy policies or notices which apply instead of this Notice, and you should consult those accordingly.

The Sites may contain links to external websites and other online locations, including those embedded in third-party advertisements or sponsor information, that are not controlled by COMPANY. COMPANY is not responsible for the privacy practices and data collection policies for such third-party services. You should consult the privacy policies or notices of those third-party services for details about how they handle your Personal Information.

If you do not want your internet activity or similar information tracked or collected through the use of cookies, you should review your web browser settings. Most web browsers allow a user to restrict these functions; however, you should note that disabling cookies may prevent certain website features from functioning properly. More information on our use of “cookies” can be found in our Privacy Policy.

Our Sites do not support or respond to “do not track” or similar technical requests you may activate through your computer or browser settings.

Information we collect, use and share

Personal information is generally defined as information that, by itself or in combination with other information, identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer, device or household (“Personal Information”). Personal Information can include, but is not limited to, name, address, telephone number, email address, username and password, IP address or other online identifiers, browsing or search history, credit/debit card number or other financial information, professional or employment-related information, office address and other business information, demographic information, consumer preferences, biometric information such as fingerprints, precise location information, or any other type of information that, directly or indirectly, can be linked to or is reasonably capable of being associated with you.

In connection with the Services, during the last 12 months, COMPANY may have collected, used and shared, and continues to collect, use and share, the following categories of Personal Information from you in the following ways:

Categories of Personal Information:

- Identifiers, such as:
 - Name, date of birth, email address, telephone number, Internet Protocol (“IP”) address, first-party cookie identifiers, account information including username and encrypted password, or home, office or service address
- Professional or Employment-Related Information, such as:
 - Job title, profession and employer information, or other professional or business information
- Customer Records Information, such as:
 - Telephone number, employment history, bank account number, credit or debit card number, other financial information, or home, office or service address
- Characteristics of Protected Classifications, such as:
 - Gender or age
- Commercial Information, such as:
 - Information on products, services, equipment or devices you purchase and use, information on your interests, or information relevant to customer surveys and feedback
- Inferences, such as:
 - Hobbies, interests, or preferences drawn from the other categories of Personal Information collected
- Internet Activity or Other Similar Network Activity, such as:
 - Type of internet connection, time of connection, the equipment used to access the website, usage information, browsing history, search history, information from cookies/tracking pixels, or information relating to your interaction with this website or advertisements
- Geolocation Data, such as:
 - The physical location of your device via your IP address

Sources of Personal Information:

We may collect the above-mentioned categories of Personal Information when you:

- Visit or use our Sites, through the use of cookies or other tracking technologies
- Contact COMPANY with questions, comments, or requests for information

- Submit comments, questions or requests for information
- Sign up to receive COMPANY newsletters, e-mail updates or other communications about services which may be of interest to you

How We Use Personal Information:

We use the above-mentioned categories of Personal Information for purposes of:

- Account administration on our Sites
- Providing customer service and responding to your questions and comments
- Administering and processing surveys, quizzes, questionnaires or contests
- Verifying customer information
- Providing you with marketing and promotional communications about offers, products or services that we think may interest you
- Detecting, protecting against, and prosecuting security incidents or illegal activity
- Communicating with you regarding additional uses of your Personal Information beyond the scope of this Notice
- Compiling market insights and understanding your needs to provide you with better Services and products
- Customizing your experience on the Sites by gathering your usage information and preferences
- Improving the content, general administration and customization of our Sites;
- Conducting data analysis for business or commercial development purposes

How We Share Personal Information:

We do not sell your Personal Information, but we may disclose your Personal Information to our affiliated companies, service providers and others for legitimate business purposes as described below. When we disclose Personal Information to a service provider, we contractually obligate the recipient to maintain the confidentiality of any Personal Information and use any Personal Information only as required for performance of the contracted services.

In the preceding 12 months, we have disclosed the following categories of Personal Information for a business purpose: Identifiers, Professional or Employment-Related Information, Customer Records Information, Commercial Information, Characteristics of Protected Classifications, Inferences, Internet Activity and Geolocation Data.

In the preceding 12 months, we have disclosed the following categories of Personal Information for a commercial purpose: None.

Other COMPANY group entities. We may share Identifiers, Professional or Employment-Related Information, Customer Records Information, Characteristics of Protected Classifications, Inferences, Internet Activity and Geolocation Data with other COMPANY group entities in order to benefit from our corporate structure and facilitate more efficient Services.

Payment processing service providers. We may share Identifiers and Professional or Employment-Related Information with payment processing service providers.

Shipping entities and logistics service providers. We may share Identifiers and Professional or Employment-Related Information with shipping and logistics service providers in order to ship you products and other materials.

Survey and market research companies. We may share Identifiers, Professional or Employment-Related Information, Customer Records Information, Commercial Information, Characteristics of Protected Classifications, Inferences, Internet Activity, and Geolocation Data with survey and market research companies in order to obtain market intelligence and develop our products and services.

Customer services agencies. We may share Identifiers, Professional or Employment-Related Information, and Customer Records Information with customer services agencies in order to provide service to you for products or services purchased or to respond to comments or questions you submit to us.

Media, event and marketing agencies or networks. We may share Identifiers, Professional or Employment-Related Information, Customer Records Information, Commercial Information, and Inferences with media, event, promotional and marketing agencies, as well as targeted advertising networks.

Data analytics providers. We may share Identifiers, Customer Records Information, Commercial Information, Inferences, Internet Activity and Geolocation Data with data analytics providers.

We may also use or disclose any of the above categories of Personal Information we collect for one or more of the following reasons:

- In response to a legal requirement, COMPANY may also disclose your Personal Information and other data to relevant third parties if we are required to do so by law or if we reasonably believe that disclosing such information is necessary to: (i) conduct investigations of possible breaches of law; (ii) identify, contact, or bring legal action against someone who may be violating an agreement they have with COMPANY; or (iii) to avoid imminent physical harm to any person or to protect COMPANY's rights, safety, or property. We may also disclose your Personal Information or other data to relevant third parties (e.g., forensics investigators, external legal counsel, law enforcement) to investigate, respond to, and/or to prevent a security/data breach, or to cooperate with government or law enforcement authorities pursuant to other legal matters.
- In the course of corporate transactions, COMPANY may share your Personal Information and other data with a third party (and its attorneys, accountants and other relevant parties) in the event that COMPANY merges with, acquires, is acquired by, or becomes a legal affiliate with, such third party, or should such a transaction be proposed.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections;
- As necessary or appropriate to protect the rights, property or safety of us, our customers or others;
- As otherwise described to you at or before the point when we collect your Personal Information.

Where we ask you for your Personal Information due to statutory or contractual requirements, we will indicate which information is required and which is voluntary. However, if you do not provide us with certain information voluntarily, we may not be able to provide you with the respective products or services, or respond to your requests, for which we need that information.

By providing to COMPANY the Personal Information and other data referenced above, you agree that we may use such Personal Information and other data in accordance with the terms of this Policy. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Except as described above, your Personal Information is not transferred to any person or entity. Where we transfer your Personal Information to third parties (as described above), we always ensure that all required contractual arrangements will be agreed between us and the third parties.

This may include contractually requiring them to only act on our instructions, to implement appropriate measures for the protection of your Personal Information and not to use it for their own purposes.

Children's information

The Services are intended for individuals 18 years of age and older who are located in the United States. The Services are not directed at, marketed to, nor intended for, use by children under 16 years of age. COMPANY neither collects nor sells the Personal Information of minors under 16 years of age. If COMPANY learns that any information was provided through the Services by a person younger than 16 years of age, COMPANY will delete or destroy the information immediately.

Your rights and choices

The California "Shine the Light" law provides California residents with the right to request a list of affiliates and third parties with whom we shared their Personal Information for direct marketing purposes during the previous calendar year. If you have any questions on what we share for direct marketing purposes, please contact us at Privacy@CenterPointEnergy.com.

The CCPA provides California consumers with specific rights regarding their Personal Information. More specifically, you have the following rights regarding COMPANY's collection, use and sharing of your Personal Information:

Right to Access/Know:

As a California resident, you have the right to request that we disclose certain information to you about our collection and use of your Personal Information for the past 12 months. You may submit a verifiable request (see "*Submitting Requests*" below) that the following be disclosed to you:

- The categories and sources of Personal Information we collected about you;
- Whether we sold or disclosed your Personal Information;
- Our business or commercial purpose for collecting, selling, or disclosing your Personal Information;
- The categories of recipients of your Personal Information; and
- The specific pieces of Personal Information we collected about you (also called a data portability request), unless doing so would create an unreasonable security risk or is prohibited by law.

Right to Delete:

As a California resident, you have the right to request that we delete all or some of the Personal Information we collected about you, subject to certain exceptions. You may submit a verifiable request (see "*Submitting Requests*" below) that may result in:

- The permanent and complete erasing of your Personal Information on our existing systems, with the exception of archived or back-up systems;
- De-identifying your Personal Information so that it can no longer identify you; and
- Aggregating your Personal Information with other information so that it can no longer identify you.

Right to Opt-Out:

As a California resident, you have a right to opt-out of the sale of your Personal Information.

Right to Non-Discrimination:

As a California resident, you have a right not to be subject to discriminatory treatment as a result of exercising the rights conferred upon you by California law. In other words, the quality and price of the goods and services we offer will not be modified because you exercised your rights described above.

Submitting Requests

To exercise your access, data portability and deletion rights, as described above, please submit a verifiable request to us by:

- Calling us at 1-800-752-8036; or
- Emailing us at Privacy@CenterPointEnergy.com;

Emailed requests must include the reference "Request for California Privacy Information" on the subject line and in the body of the message and must include the email address or mailing address, as applicable, for us to send our response. We reserve the right not to respond to requests submitted other than to the address specified in this paragraph.

Only you, or an agent registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. Each verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information, or an authorized representative of such person; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Upon receipt of your request, you will receive a confirmation that we received the request. We will then attempt to verify your identity and residency. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. You may be asked to sign a declaration that you are a resident of California. You will be informed of the timeframe for a response to the request and will receive communications if we are unable to verify identity, are complying with the request, or are denying the request.

If you have a password-protected account with us, you may verify your identity by re-authenticating your identity through existing authentication procedures.

For non-account holders, in order to verify your identity, you may be asked to provide information about your: home, office or service address, job title, service history, email address, account

number or telephone number. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. We will need to verify your identity to a "reasonable degree of certainty" for requests to know categories of Personal Information, which may include matching at least two data points that you provide to those that we maintain about you. For requests to access specific pieces of Personal Information, or to delete highly sensitive information, we will need to verify your identity to a "reasonably high degree of certainty", which may include matching at least three data points and requiring a signed declaration under penalty of perjury.

You may grant an authorized agent written permission to submit requests regarding your Personal Information. COMPANY may request proof of your written permission before responding to any requests made by a supposedly authorized agent. COMPANY may deny authorized agent requests if we are unable to verify your identity, or if you cannot provide proof that the agent is registered with the California Secretary of State and that you authorized the agent to act on your behalf. You may designate an agent who is registered with the California Secretary of State by following that agent's specific authorization protocols.

If you choose to request that we delete certain portions of your Personal Information, it may affect your ability to use certain parts of the Services. If the request relates to information that COMPANY needs to make the Services function properly for you, you may no longer be able to use the Services.

COMPANY reserves the right to maintain proper business records as required by law, or for otherwise legitimate business purposes to the extent permitted by law, even if such records contain your Personal Information.

For More Information

In the event that you have any questions about this Notice, or if you have reason to believe that we may have failed to adhere to this Notice, you may contact us at:

Privacy@CenterPointEnergy.com

Changes to our Privacy Notice

COMPANY reserves the right to make changes to this Notice at any time. Since this Notice may change over time as we modify or expand our Services, we suggest that you check back from time to time in order to understand how we treat your information. Our Notice's effective date will always be set forth at the beginning and end of the Notice. Any changes will be immediately incorporated into this Notice, and will be prospective only. We will not make any changes that have retroactive effect unless legally required to do so.

Any change to this Notice is effective immediately. Your continued use of the Services after any changes are made to this Notice constitutes your acceptance of the changes. If any changes are unacceptable to you, you should cease all use of the Services.

This Notice was last updated on July 1, 2020.