

Privacy Policy

Effective Date: September 23, 2019

EVE Energy Ventures, Inc. (“us,” “we,” or “XEAL”) is committed to respecting the privacy rights of visitors and users of this www.Xealenergy.com and the Xeal app (collectively, “Site”). We created this Privacy Policy (this “Policy”) to explain what information we collect from you, how we secure that information, and under what conditions we share your information with others. This Policy is only applicable to the Site, and not to any other website you may be able to access from this Site.

1. NOTICE CONCERNING CHILDREN.

Any website “directed at children under 13” must undertake certain compliance steps pursuant to the Children’s Online Privacy Protection Act and “COPPA Rule.” This Site is directed at adults, not children. Please contact us immediately if you have knowledge of a child under 13 using the Site.

2. INTENDED AUDIENCE.

The Site is controlled and operated by XEAL from its location in the State of California. XEAL currently provides services to customers located solely in North America. The Site and service are directed at an audience in North America only. We do not envision offering products or Services to citizens or visitors of the Member States of the European Union. We also do not monitor their behavior as contemplated in the General Data Protection Regulation and guidance provided by the European Data Protection Board. We make no representation that any of the materials or the services to which you have been given access are available or appropriate for use in other locations. Your use of or access to the Site should not be construed as XEAL purposefully availing itself of the benefits or privilege of doing business in any jurisdiction other than North America.

3. PERSONAL INFORMATION COLLECTED.

A. Information Collection: In order for you to access the Site and to schedule charging sessions and to receive notifications via the Site, we require you to provide us with certain information that personally identifies you (“Personal Information”). Personal Information includes the following categories of information: (1) Contact Data (such as your name, e-mail address, telephone number), (2) Financial Data (such as your PayPal account and credit card number), and (3) Energy Consumption Data (such as the amount of electricity (expressed in kilowatt-hours or kWh) you use when charging your electric vehicle) (4) Utility Data via UtilityAPI authorized by yourself or sent via a third party to us. If you communicate with us by e-mail or otherwise complete online forms or surveys, any information provided in such communication may be collected as Personal Information.

B. Modification or Removal Process: If you wish to remove or modify personally identifiable information, please contact us using the Contact function on the Site. While we will remove your information from publicly viewable areas of the Site, we will maintain your information in our internal records for administrative purposes such as bookkeeping.

C. Privacy Policy Updates: If we modify or update this privacy policy, we will notify you by posting a notice on the Site and by sending you an electronic message indicating as much if we have an email address for you. You may reject the update by discontinuing your use of the Site.

D. Do Not Track Signals: California law requires that we disclose whether we acknowledge "do not track" signals issued by browsers or privacy software. We do not respond to such signals at this time.

E. Third Party Cumulative Tracking: Whether you realize it or not, a new trend on the Internet is for companies to track you across multiple sites in an effort to build behavioral profiles for marketing purposes. We use certain software from companies of this type as part of the Site and want to make sure you understand as much. For example, we use certain software that incorporates Google Analytics, a program known to track users across the web. You can visit this link <http://www.networkadvertising.org/choices/#completed> to view companies tracking you and opt-out from such tracking, including tracking by Google. You can also visit the privacy policies of third party sites and services we use to gain an understanding of their privacy practices by visiting the following links:

- Google Analytics (<https://policies.google.com/privacy>)

F. California Minor Eraser Right: This Site is restricted to users 18 or older. Nonetheless, you may contact us if you are a minor to request the removal of content you've posted to the Site. Please note the removal of the content from this Site does not ensure complete or comprehensive removal of the content from appearing elsewhere on the Internet.

4. COOKIES AND TRAFFIC DATA COLLECTED.

The technologies we use for this automatic data collection may include:

A. Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. HowXealr, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our website.

B. Flash Cookies. Certain features of our website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from,

and on the Site. Flash cookies are not managed by the same browser settings as are used for browser cookies.

C. Web Beacons. Pages of our the website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related website statistics.

D. Third-Party Use of Cookies and Other Tracking Technologies. We use third party services for particular business goals such as statistics programs to record how many hits our website receives, which pages visitors use, and other data we can use to improve your user experience on the website as well as our business and marketing efforts. Third party programs we use include:

- i. Braintree: For payment processing.
- ii. National Renewable Energy Laboratory: Public data on electric vehicle charging station locations.
- iii. Clickatell: Phone messaging service.
- iv. Amazon Web Services: For accurate charging time determination in connection with our hardware products.

5. USE OF INFORMATION COLLECTED

A. Our Use Of Information: We use Contact Data to send you information about our company or our products or to contact you when necessary. We use your Financial Data to bill you for products ordered from the Site.

B. Sharing Personal Information: We share certain categories of information we collect from you in the ways described in this Privacy Policy. We share Contact Data, Financial Data, and Energy Consumption Data with our business partners who assist us by performing core services (such as hosting, billing, fulfillment, data storage and security, and scheduling and managing electric vehicle charging sessions) related to our operation of the Site. Those business partners have all agreed they will only use your Contact Data and other Personal Information to carry out their specific business obligations to us. In addition, we share your Contact Data (such as your telephone number) with other users of the Site so they can send you text messages or call you on the telephone relating to your use of the Site (such as to inquire as to the availability of a charging station that your vehicle is occupying or for other electric vehicle charging scheduling purposes). We share your Energy Consumption Data with the site host of the charging station where you charge your electric vehicle through the Site (such as the building owner or property manager) for purposes of verification of your eligibility to use the charging stations and for other purposes. In addition, we share your Energy Consumption Data with third parties in an aggregated and de-identified state. If you do not want us to share your Contact Data or Energy Consumption Data with any third parties, please contact us, but please understand that such a request will likely limit your ability to take advantage of all of the features and products we offer on the Site.

C. User Choice For Collection, Use, and Sharing Of Personal Information. You may choose not to provide us with any Personal Information. In such an Xealnt, you can still access and use much of the Site; howXealr, you will not be able to access and use those portions of the Site that require your Personal Information. If you do not wish to receive information and promotional material from us, you may select the appropriate "opt-out" option when you receive a communication from us. You may not opt-out of administrative communications.

D. Sale of Information: Should we decide to sell all or part of XEAL Energy Ventures, Inc. or the Site at some point in the future, your Personal Information will be included as an asset in the transfer of the business to the new owner.

6. OUR FRIENDS IN NEVADA.

We do not sell your personal information as defined under Nevada law should we collect any Personal Information from you. Please contact us if you have any questions or comments in this regard.

7. SECURITY INFORMATION

A. Confidentiality and Security of Personal Information: Except as otherwise provided in this Privacy Policy, we will keep your Personal Information private and will not share it with third parties, unless such disclosure is necessary to: (a) comply with a court order or other legal process; (b) protect our rights or property; or (c) enforce the legal documents applicable to the Site. Your Personal Information is stored on secure servers that are not accessible by unaffiliated third parties.

B. Lost or Stolen Information: You must promptly notify us if your payment information, username, or password is lost, stolen, or used without permission. In such an Xealnt, we will remove that payment information, username, or password from your account and update our records accordingly.

8. AREAS BEYOND OUR CONTROL

A. Public Information: We also make comment areas available to you in certain areas of the Site. Please understand that any information disclosed in these areas becomes public information. We have no control over its use, and you should exercise caution when deciding to disclose your Personal Information.

B. Third Party Websites: The Site contains links to other websites. We have no control over the terms and privacy policies of said sites. Please make sure to view the policies of those sites before proceeding.

9. CONTACT INFORMATION

If you have any questions about this Policy or our practices related to this Site, please contact us using the Contact function on the Site or email us at info@xealenergy.com