

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 (5) Charging Session Details (duration of charging and plug status), (6) Vehicle Make Model and Year, (7) App Usage (any crashes or analytics and user behavior plus use of features) and (8) Location Data Services (identify user location, find nearby chargers, and have chargers communicate with the App while in the background). 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. However, 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 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. Stripe: For payment processing.
- ii. National Renewable Energy Laboratory: Public data on electric vehicle charging station locations.
- iii. Twilio: Phone messaging service.
- iv. Amazon Web Services: For accurate charging time determination in connection with our hardware products.
- v. Apple and Google Services
- vi. Hubspot: CRM tool

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, like charging or payment notifications. We use your Financial Data to bill you for products and services ordered from the Site or App and for payouts where applicable. We use Charging Session Details for reporting, analytics, and accurate payment processing

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 event, you can still access and use much of the Site; however, 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 EVE 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 event, 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. California Privacy Rights

If you are a California resident, California law requires us to provide you with some additional information regarding how we collect, use and share your "personal information" (as defined in the California Consumer Privacy Act ("CCPA")), other than the personal information we collect in connection with providing financial products and services.

Depending on how you interact with our website, app and services, we may collect the following categories of personal information about you, in addition to the information we collect in connection with providing financial information and services:

- Identifiers, such as your name and contact information, IP address, and mobile device identifiers
- Internet usage information, such as browsing history, access history, and use and interaction with our website.

This information is used and disclosed for the purposes and to the categories of third parties described in the main privacy policy, above.

Your California Privacy Rights

If you are a California resident, you may have certain rights. California law may permit you to request that we:

- Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or distributing your personal information; and the categories of third parties with whom we shared personal information.
- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we may have about you.

We do not sell Personal Information to third parties. We do allow third parties to collect personal information through our service and share personal information with third parties for the business purposes described in this Privacy Policy, including without limitation advertising and marketing on our service and elsewhere based on users' online activities over time and across different sites, services, and devices.

California law permits consumers to request, once per year, that we disclose the identity of any third parties with whom we have shared personal information for the third parties' direct marketing purposes within the previous calendar year, along with the type of personal information disclosed. Please contact privacy@xeal.com for such requests.

Updates to this Policy

As required by federal law, we will notify you of our privacy policy annually. We reserve the right to modify this policy at any time. If we do change it, we will revise the "Effective Date" above and post the new policy. To stay informed of our privacy practices, we recommend you review this Policy on a regular basis as you continue to use our Services.

Contact Us

For questions about our policy, or for additional copies of this notice, please email us at info@xealenergy.com

Reasons we can share your personal information	Does Xeal share?	Can you limit this sharing?
For our everyday business purposes – such as to maintain your account(s) or respond to court orders and legal investigations.	YES	NO
For our marketing purposes — To offer our products and services to you	YES	NO
For joint marketing with other financial companies	NO	We don't share
For our affiliates everyday business purposes — information about your transactions and experiences	YES	NO
For our affiliates to market to you	YES	YES
For nonaffiliates to market to you	NO	We don't share

To limit our sharing	<p>Email us at info@xealenergy.com with the form below.</p> <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing</p>
Questions?	Email us at info@xealenergy.com .

Who we are	
Who is providing this notice?	Eve Energy Ventures, Inc. (also “Xeal”)

What we do	
How does Xeal collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Open an account or give us your income information, <p>We also collect your personal information from others, such as affiliates, or other companies.</p>
How does Xeal protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness • Affiliates from using your information to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under certain state laws.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	<p>Your choices will apply to everyone on your account.</p>

Other important information

State and International Laws

For Vermont Residents: In accordance with Vermont Laws, we will not share information we collect about Vermont residents with companies who are not affiliates, except as permitted by law, such as with your consent or to service your accounts. We will not share information about your creditworthiness with our affiliates without your authorization or consent, but we may share information about our transactions or experiences with you with our affiliates without your consent.

For Nevada Residents: Nevada law requires us to disclose that you may request to be placed on Xeal's internal "do not call" list at any time by calling (312) 600-2883, and that we are providing this notice to you pursuant to state law, and that you may obtain further information by contacting the Nevada Attorney General, 555 E. Washington Ave., Suite 3900, Las Vegas, NV 89101; phone 702-486-3132; email BCPINFO@ag.state.nv.us.

For California Residents: In accordance with California law, we will not share information we collect about you with nonaffiliates, except as allowed by law. For example, we may share information with your consent or to service your accounts. Among our affiliates, we will limit information sharing to the extent required by California law.

10. 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