



**Subject:** Notice of Accessing, Collecting, Storing, Using and Disclosing Energy Usage Information (Privacy Notice)

**Policy:** Consistent with all legal and regulatory requirements, PCE treats all customer information as confidential and employs a combination of technology and standard practices to ensure that customer information is safeguarded from unauthorized access or exposure. This notice, as well as PCE's companion Customer Confidentiality Policy and Advance Metering Infrastructure (AMI) Data Privacy and Security Policy, apply to PCE, its employees, agents, contractors, and affiliates.

To standardize some of the rules regarding customer privacy, the California Public Utilities Commission (Commission) has issued "Rules Regarding Privacy and Security Protections for Energy Usage Data." These rules prohibit PCE and other load-serving entities from releasing information that can reasonably be used to identify an individual customer (or a customer's family, household, or residence) to a third party without the customer's written consent, except as is necessary for PCE to:

- Provide or bill for electrical power services;
- Provide services required by state or federal law or as specifically authorized by an order of the Commission;
- Plan, implement or evaluate energy management, demand response or energy efficiency programs under contract with PCE or under contract with the Commission;
- Provide personal information pursuant to a lawful warrant or court or law enforcement order, after prior notice to you unless such notice is prohibited by law; or
- Provide personal information to emergency responders in situations involving an imminent threat to life or property.

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## Privacy Policy and Website Security FAQs

### 1. What kind of information does PCE collect?

We collect customer information, such as your electric usage, name, address, and account information, based on your use of electric services and your decision to participate in programs we offer, such as those related to energy efficiency.

### 2. How is the information collected?

PG&E provides customer information to PCE. When you use electricity service, usage data is collected via PG&E's metering systems (including the SmartMeter system).

In order to provide greater security for you on PCE's website, you may be asked to submit personal information such as your PCE account number, PG&E account number, name, address, phone number, and email address. You may also be asked to submit additional personal information or financial information in order to use certain services. Our goal is to protect all information you provide us on the website, as set forth in this Privacy Notice. To that end, the Secure Socket Layer (SSL) certificate installed via SimpleSSL is a Lets Encrypt SSL certificate, using Sha 256 and RSA Encryption so that traffic is encrypted at 256 bit when using HTTPS.

You are responsible for your use of PCE's website. Accordingly, please use your own good judgment when choosing to share your user name or password with anyone who could use it to access your personal information without your permission. We encourage you to protect the confidentiality of your user name and password and other personally identifiable information that you access on PCE's website.

### 3. How is the information used?

We use customer information to administer your account and inform you about your energy usage, as well as to manage, provide, and improve our services and business operations, including data management and customer service.

We use this information to generate the PCE charges on your customer billing statement and to communicate with you about specific programs or opportunities offered by PCE that may help you to lower your energy usage or realize other benefits. We may also aggregate data about your electric usage with other users in various formats so that the data becomes anonymous and cannot be identified directly with you.

For instance, aggregated data could be a summary of total energy usage for all homes and businesses in a certain geographic area or climate. Aggregated data is not subject to privacy restrictions, and we use it to manage, provide, and improve our services and business operations.

We ask you to provide personal information when you access customer services offered on our website, and that information enables us to provide you with better service. We may use this information to contact you to respond to an inquiry that you send to PCE or to keep you informed about PCE and its services. If you choose email as an approved method for communicating with us, then we will generally use your email to communicate with you.

To provide you the services offered on our website, or to complete transactions requested by you on the website, we may transfer you to outside services provided by third-party operators. In certain instances, the third-party content may be shown in such a way that it appears that you are still on PCE's website. In such cases, we will have agreements with those third parties where they agree to maintain the confidentiality of your personal information and to use it only to help us serve you.

Other than for the exceptions noted in the above section, it is PCE's policy to not release personal information about you to any other person or business entity without your prior written consent. We may obtain your consent electronically. When we have obtained your consent to disclose data for certain purposes, you may revoke your consent (via the same means through which you provided it).

Your visits to PCE's website. We collect information about our website, such as the number of visitors to the website and the number of users who click on certain links or use certain services. For some applications, such as rate analysis, we may link usage information with the customer visiting the website. We use industry standard software to create summary statistics of the usage data we collect, which we may then use to highlight what our visitors find interesting, improve the website design and usability, identify system performance issues, or for other internal purposes.

Our use of your IP address. An Internet Protocol (IP) address is a number automatically assigned to your computer every time you browse the Internet. When you visit the website, our servers log your current IP address. We may use your IP address to help diagnose problems with our servers and to administer the website. Your IP address is not tied to your personal information, and we do not use it to identify you when logging IP address data except to provide content to you.

Our use of cookies. When you visit the website, our server may create cookies, which are small files placed on your computer, making it easier for you to use the website by verifying when you travel from page to page. The data we collect on website usage from cookies is not tied to your personal information, and we use it only in a collective form. We do not sell or transfer the data we obtain from cookies for any purpose other than to evaluate website usage or provide utility services to you, or to contact you to offer programs and/or services that you may be interested in.

Installed plug-ins: PCE has installed WP DoNotTrack. This stops plugins and themes from adding third-party tracking code and cookies, thereby protecting visitors' privacy and security and offering performance gains (by limiting requests executed in the browser to render your pages). Additionally, the Third Party Eraser Tool removes all the occurrences of third-party embed inside posts, pages, and

widgets. These programs stop images or javascript from being loaded if these are added using document.write, and set a2a\_config.no\_3p to true for add-to-any NOT to execute the third-party tracking.

Links. While browsing the website, you may encounter and choose to access other third-party operated websites or online services through hypertext links. These third-party websites may send their own cookies to you, log your IP address, and otherwise collect data or personal information about you and your online activities. PCE does not control and is not responsible for what third parties do in connection with their websites or online services, or for how they handle your personal information. Please use caution and consult the privacy policies posted on each third-party website for further information.

Security. Once you login to PCE's online services, any account information you enter (or that is displayed on our website in your browser window) is secured using SSL, an industry standard security technology. By using SSL, we attempt to protect the confidentiality of your personal and financial information. Your browser must be capable of supporting SSL. Please check with your browser manufacturer for details.

#### **4. Does PCE disclose my information to third parties?**

PCE may share customer data with contractors and vendors for purposes of providing you services and operating our programs. In these cases, we require that the contractors or vendors agree to use customer data only for program operational purposes and to protect it under the same confidentiality and privacy standards that we apply to our own employees and operations. PCE does not release personal customer information for any other reason without your prior written consent, except as described below. PCE does not sell or provide personal customer information to third parties for their commercial benefit. PCE may release personal information without your prior written consent as follows:

- To law enforcement officers, pursuant to legal process (such as a warrant or subpoena approved by a judge);
- To contractors providing utility-related services on behalf of PCE—but only to the extent necessary to render the service and subject to confidentiality and security obligations;
- To the California Public Utilities Commission (or other governmental agencies with jurisdiction over PCE) when they require such information;
- To others as required by court order or by applicable laws, rules, or regulations governing PCE;
- To credit reporting agencies and collection agencies if your account is assigned for collection; and

- To emergency responders in situations of imminent threat to life or property.

**5. How long does PCE keep customer information?**

PCE maintains customer-specific energy usage and billing information only as long as reasonably necessary, typically not more than five years unless otherwise necessitated by law or regulation. As a general policy, we collect and retain personal information in minimal quantities and for limited periods of time such that are reasonably necessary to provide electric services to you.

**6. How will I know about changes to this Privacy Policy, and how can I obtain prior versions?**

We will notify you annually with an on-bill message to guide you to the most updated version of this Privacy Policy, which is also available on our website. Between these notification periods, we will also notify you of any changes to this Privacy Policy through communications on our website, [www.peninsulacleanenergy.com](http://www.peninsulacleanenergy.com), including how to obtain prior versions of this Privacy Policy upon request.

**7. Whom should I contact if I have privacy questions or concerns?**

If you have privacy-related questions or concerns, or would like to view your disclosed information, please contact PCE's Director of Customer Care:

[info@peninsulacleanenergy.com](mailto:info@peninsulacleanenergy.com)  
(650) 260-0005

Peninsula Clean Energy  
2075 Woodside Road  
Redwood City, CA 94061

**8. What measures does PCE take to protect children's privacy online?**

We have areas of our website intended for the use of children containing information about energy and safety. We also provide free classroom materials for teachers on energy awareness and safety. We do not monitor the age of users of the website. However, if you are under the age of 18, you should not submit personal information on the website or any websites without the consent of your parent or guardian.