

## EPCOR PRIVACY POLICY

This EPCOR, Inc. Privacy Policy (“Policy”) describes the practices EPCOR, Inc. (“Company,” “we,” or “us”) observes when collecting, using, and sharing data and other information (“Information”) we collect through our website located at [www.epcor.org](http://www.epcor.org) and any other websites operated by EPCOR (each, a “Site”) and through the services we provide through each Site (each Site and those services, our “Platform”). By accessing or using any part of our Platform, you consent to the collection, use and sharing of your Information by the Company as described in this Policy.

If you have any questions or concerns regarding this Policy or our Information collection or usage practices, please contact us at [memserve@epcor.org](mailto:memserve@epcor.org).

If we need, or are required, to contact you concerning any event that involves this Policy or your Information we may do so using the email address, telephone number, or physical mail address we have on file for you.

### SUMMARY

Although we encourage you to read the entire Policy, the following provides a summary of some of the important aspects of this Policy:

- This Policy is applicable to Information we collect through our Platform.
- We may collect both Non-Personal Information and Personal Information through our Platform.
- We may also collect Sensitive Personal Information through the Platform.
- We will not use or share your Personal Information (including Sensitive Information) except as permitted by this Policy.
- You may be permitted to “opt out” of certain uses of your Personal Information.
- We will take reasonable and appropriate measures to secure your Personal Information, but we make no promise that your Personal Information will remain secure in all circumstances.

### SCOPE OF THIS POLICY

While the Platform enables you to interact and communicate with third parties and to access and use services offered by those third parties, this Policy covers ONLY Information we collect through our Platform. THIS POLICY DOES NOT COVER THE COLLECTION, USE, OR SHARING OF ANY INFORMATION BY THIRD PARTIES WITH WHICH YOU MAY INTERACT OR COMMUNICATE IN CONNECTION WITH YOUR USE OF THE PLATFORM. For information about what policies may apply to the Information you may share with any third party, please contact the third party before sharing your Information.

### INFORMATION WE COLLECT

The Information we collect through the Platform may include both “non-personal” and “personal” Information. We may also obtain “sensitive” personal information about you through the Platform. For purposes of this Policy:

“Non-Personal Information” refers to information that may not by itself be reasonably associated with, linked to, or used to individually identify you or someone else. For example general, non-specific Information regarding your use of the Platform or derived from the Information that you provide to us through the Platform.

“Personal Information” refers to information that may be reasonably associated with, linked to, or used to individually identify you or allow you to be personally identified or contacted. For example, Personal Information may include information such as your name, email address, telephone number, address, or credit card number, either alone or in combination with other information.

“Sensitive Personal Information” refers to Personal Information regarding more sensitive areas such as financial information, such as bank account or credit card numbers, or other sensitive topics.

## SOURCES OF INFORMATION

We may collect Information through the Platform from a variety of sources, for example:

**Directly from You.** We may collect Information (including Information about you) directly from you when you provide Information to us through the Platform. For example, by visiting and using the Site, registering for the Platform, providing Information through the Platform, or otherwise communicating through the Platform. We may use any Information you provide to us through the Platform in accordance with this Policy.

**From Third Parties.** We may also obtain Information about you from third parties who have a right to provide us with that Information. We may use any Information about you we receive from a third party in accordance with the terms we establish with that third party. Only if we combine that Information with Information we collect under this Policy will we be required to use that Information in accordance with this Policy.

**Through the Operation of the Platform.** We may collect Information about you automatically when you interact with the Platform. For example, the Company and our third party advertisers and service providers may use “cookies,” “web beacons,” and other automated tracking technology to monitor and collect Information regarding how you access, use, and interact with the Platform. “Cookies” are commonly used small files that are stored on your computer or mobile device to help identify you as a unique user of the Platform. “Web beacons” (also known as “single-pixel” or “clear” GIFs) include electronic images imbedded in the Platform that allow us to recognize when you visit that area of the Platform.

The Company and our third party advertisers and service providers may use cookies, web beacons, and other tracking technology that expire once you close your browser or log out of the Platform. We may also use technologies that persist and stay on your computer until you delete them. Most browsers will allow you to erase cookies from your computer or mobile device, block acceptance of cookies, or receive a warning before a cookie is stored. You may also be able to refuse certain web beacons by adjusting the settings on your browser or email software. Please refer to your browser or email software instructions or help screen to learn more about these functions.

The computers we use to provide the Platform may also automatically record Information about you. For example, our web servers may record the Information you enter on the Platform, the areas of the Platform you visit, the services you use through the Platform, your IP address, or cookies that are set on your browser. We may use any Information we collect from you automatically through the Platform in accordance with this Policy.

Please note that our third party advertisers and providers also use cookies, web beacons, or other tracking technologies in advertisements and other messages displayed on or communicated through the Platform. We do not have access to information that would confirm all uses of cookies, web beacons, or other tracking technology by our third party advertisers and providers.

## HOW WE USE INFORMATION

**Non-Personal Information.** We may use and share the Non-Personal Information we collect and obtain for any lawful business purpose without any duty or obligation of accounting or otherwise to you, provided that the Information remains Non-Personal Information. This will include, by way of example, sharing that Non-Personal Information with third parties or developing products, services, and other offerings based on the Non-Personal Information and providing those offerings to other users and third parties.

**Personal Information.** We may use the Personal Information we collect about you for a variety of purposes, for example:

- Operating the Platform;
- Providing services to you through the Platform;
- Customizing and improving the Platform and services for you;
- Providing maintenance, support, and customer service for the Platform;
- Providing advertising through the Platform;
- Providing notices and announcements to you relating to the Company, the Platform, or your Information;
- Providing offers for products, services, or other offerings that we feel may be of interest to you;
- Contacting you for direct marketing purposes;
- Processing payments made through the Platform;

- Developing additional products, services and offerings; and
- Research and analysis.

We may combine and enhance the Personal Information we collect and obtain about you with Information we receive from third parties, provided that we use the combined Information in accordance with this Policy.

We may also use the Personal Information we collect and obtain about you to generate Non-Personal Information. When we do so, we will take reasonable measures to ensure that the Non-Personal Information is no longer personally identifiable and may not later be reasonably associated with, linked to, or used to identify you. This will include, by way of example, storing the Non-Personal Information separately from any Personal Information. Once we generate Non-Personal Information from any Personal Information, we will not later attempt to again make that information personally identifiable. However, we may combine and enhance that Non-Personal Information with other Non-Personal Information we receive or obtain from third parties.

You should not provide any personal information to us, whether via the Platform or any Services, unless you agree to the use of that Information in accordance with this Policy.

**Sensitive Personal Information.** The Information we collect and obtain regarding you may include Sensitive Personal Information, such as Sensitive Personal Information you share in communications with us through the Platform. Company will use any Sensitive Personal Information about you that we receive solely in accordance with this Policy to enable the operation of the Platform and the services you ask us to provide to you. Note though that Company is not responsible for monitoring the Sensitive Personal Information you may exchange with others through the Platform or for the use of that Information by other third party with whom you share that Information.

## HOW WE SHARE INFORMATION

We may share Information about you in a variety of ways, for example:

**Affiliates.** We may share Information with companies that we own or control, that are owned or controlled by us, or that are under common ownership or control with us.

**Business Partners.** We may share Information with business partners for which we collect Information through the Platform. We will work with our business partners to provide notice to you concerning the purpose for which any Personal Information is being collected on behalf of any business partner. Unless we otherwise notify you, any information we collect on behalf of a business partner will be in accordance with this Policy.

**Advertisers.** We may share Information with advertisers, for example to target advertising and other content to you and provide pertinent offers that may be of interest to you based on the Information we collect and obtain about you. In addition, third party advertisers may receive Personal Information about you if you click on advertisements displayed through the Platform. Clicking on any advertisement displayed through the Platform will be considered your consent to “opt in” for this transfer.

**Service Providers.** We may share Information with third parties that help us provide the Platform and our services. For example, we may use third parties to: (i) host, maintain, or manage the Platform or our services; (ii) collect or analyze Information; (iii) customize or assist us in managing our databases; or (iv) provide other services relating to the Platform. We require that these third parties agree to use the Information we share with them only to perform their obligations to us and to treat all Personal Information they receive from us in compliance with this Policy.

**Other Entities.** We may share Information with third parties so that they may develop and offer additional products and services to you that we believe will be of interest to you based on the Information we collect and obtain about you.

**Law Enforcement.** We may share Information with law enforcement agencies if we reasonably believe unlawful activities have occurred or the Information may aid in an investigation into unlawful activity. We may also share Information with law enforcement if we determine, in our sole judgment, that you have violated our agreements or policies or that the release of your Information may protect the rights, property, interests, or safety of Company or any third party.

**Legal Processes.** We may share Information as required by, or permitted by, law, whether in response to subpoenas, court orders, other legal processes, or as we believe is necessary to exercise our legal rights, including to defend against legal claims that have been or might be brought against us.

**Business Transactions.** If we transfer ownership or control of any portion of Company or the Platform to a third party, whether or not in the context of an acquisition, merger, or reorganization, we may transfer Information that third party, provided that the use of any of your Personal Information by that third party remains subject to the terms of this Policy.

## CHOICE AND OPT-OUT

We may give you the opportunity to “opt-out” of having your Personal Information used or shared for certain purposes otherwise permitted by this Policy. For example, we may provide you with a choice whether to receive certain messages through/from us, whether through the Platform or through other means.

If you no longer wish to receive certain messages from us or to have your Personal Information shared in the manner otherwise permitted by this Policy, you may seek to opt-out of receiving those messages or having your Personal Information shared in that manner. In some cases, opting out of receiving messages or having your Personal Information shared will not affect your ability to use the Platform or the services we provide through the Platform. However, some messages are necessary to the use and operation of the Platform. Likewise, some sharing of Personal Information is necessary to provide you with the services we offer through the Platform. If you wish to opt-out of receiving these messages or of sharing your Personal Information in this manner, we may be required to limit or cancel your access to the Platform or our services.

All opt-out requests can be made as indicated through the Site or contacting the Company as described above. Note that it may take up to [10] business days to remove contact information from our lists, so messages from us may continue for a time after a removal request is made.

## SECURITY

We are committed to protecting and securing your Personal Information. Despite our commitment, no security system can be 100% effective and we cannot guarantee that your Personal Information (or any other Information) will be secure in all situations. We will nonetheless take all reasonable and appropriate steps to insure the safety and security of your Personal Information. This includes using industry standard security measures to protect the loss, misuse, and unintended alteration of the Personal Information under our control. For example, our policy is that only those individuals who need your Personal Information to perform a specific job for us are granted access to that Personal Information. Likewise, all employees and contractors are kept up-to-date on our security and privacy practices. Finally, the servers that we store personally identifiable information on are kept in a secure environment.

## ADDITIONAL TERMS

**Children.** The Platform and our services are not directed to children under 18 years of age. The Company does not knowingly solicit or collect personal information from children under 18 years of age.

**Do Not Track.** Certain web browsers and other devices you may use to access the Platform may permit you to indicate your preference that you do not wish to be “tracked” online. At this time we do not modify your experience on the Site or the Platform, or the Information we collect from you through the Site or Platform, based on whether such a preference is indicated.

**Review and Update of Information.** While the Company takes reasonable steps to ensure that the Personal Information we collect from you is reliable for its intended use, accurate, complete, and current, we rely on you to update and correct your Personal information. Please contact us as described above to review, update, or change any of the Personal information we have on file for you.

**Notification of Changes.** We may notify you of any changes to this Policy by way of an email, by posting on the Site or through the Platform. Changes to this Policy will be effective 30 days following such notice. Your continued use of the Site or other aspects of the Platform after any change has become effective will constitute your acceptance of that change. Unless we seek and receive consent from you, we will use the Personal Information we collect and obtain about you in accordance with the version of this Policy effective when the Personal Information was last collected.