

ICF Utilities Privacy Statement

Mass Save, its wholly owned affiliates and subsidiaries (collectively, Mass Save) understands that privacy is important to you, and we respect your privacy concerns. ICF is a Mass Save authorized contractor assisting the operation of select services for Mass Save.

This Privacy Statement ("Privacy Statement") applies to the webpages, applications, features, widgets, online services, social media, email, and related content (collectively, the "Site(s)") that display or link to it operated by ICF International, Inc. and its affiliates, subsidiaries, trusted business partners, agents, subcontractors, or third-party vendors (collectively, "ICF" or which may be referred to as "we", "us", and "our") in support of and under the direction of Mass Save, as well as any information ICF collects offline in connection with our services or programs in support of and as directed by Mass Save. This Privacy Statement only applies to sites that display or link to this Privacy Statement.

ICF is a privacy-conscious organization and your trust is paramount to us. This Privacy Statement discloses our information treatment practices, from what type of information we gather and track about Site users to how we collect, use, process, share, or transfer such information. This Privacy Statement also describes the choices available to you regarding the use of, your access to, and how to update and correct your information.

By using this Site, you consent to the information practices described in this Privacy Statement and to our Terms of Use. Unless otherwise expressly stated and to the extent permissible by law, if you reside outside the United States and continue to use the Sites, you understand and agree that your information may be processed in the United States where laws regarding the processing of information may be less stringent than the laws in your country.

If you have questions regarding this Privacy Statement or you want to let us know about the Site or marketing permissions, please [Contact Us](#).

How We Collect Your Personal Information

At the direction of Mass Save, we collect information about you from a variety of sources through automatic means and from information voluntarily provided by you that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, you, a household, or device ("Personal Information"). We only will process that data if we consider it fair and lawful to do so and at the direction of Mass Save. Personal information does not include publicly available information from government records, deidentified data, or aggregate consumer information.

Personal Information voluntarily provided by you:

- Information that you provide by filling in forms on the Site. This includes information provided at the time of registering to use the Site, subscribing to our service, posting material, submitting an incentive or program participation application, registering for an event, signing up for a mailing list, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with the Site.

- Records and copies of your correspondence with us, including email addresses.
- Your responses to surveys that we might ask you to complete for research purposes.
- Information shared by you through following a link from an ICF email address to a feature on one of the Sites.
- Details of transactions you carry out through the Site and of the fulfillment of your orders or requests for service. You may be required to provide financial information before requesting service through the Site.

If we collect Personal Information from you at any other time on the Sites, we will either link to this Privacy Statement, link to our other applicable privacy statements, or state that Personal Information is being collected at that time and it is always a voluntary submission. Due to the open nature of the Internet, ICF requests that you do not send us unsolicited proprietary or other confidential information through the Sites.

Information we collect automatically:

We also may collect information through the use of various technologies to enhance your experience on the Site. For example, when you visit the Sites, we may automatically log certain information that your browser sends us, such as your IP address, browser type and language, access time, and referring website addresses (“Automated Non-Identifiable Data”). We may collect information about the pages you view within the Sites and other actions you take while visiting us. We may use such technologies to determine whether you've opened an e-mail or clicked on a link contained in an e-mail.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

These may include:

- 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 and remove existing cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of the Site. By using the Sites, you agree that we can place cookies and other similar technologies on your device as soon as you visit the Sites or click a link in a targeted email we have sent you. Note that current “Do Not Track” initiatives are not recognized by the Sites. Please, however, follow the steps under the below Your Rights section if you would like to decline cookies. If you have any queries about these cookies or would like more information about them, please [Contact Us](#).
- Web Beacons. Pages of the Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

- **Flash Cookies.** Certain features of the Site 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.

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

The Personal Information We Collect

The types of Personal Information we collect and have collected at the direction of Mass Save within the last twelve months:

Category	Example	Collected	Disclosed
Identifiers	Real name, alias, email address, account name, online identifier, and IP address	Yes	Yes, to affiliates, service providers, and other vendors
Personal information categories listed in Cal. Civ. Code 1798.80(e)	A name, signature, address, or telephone number.	Yes	No
Protected classification characteristics under California or federal law	Age, race, ethnicity, national origin, citizenship, religion, marital status, medical condition, disability status, sex, sexual orientation, veteran or military status, and genetic information.	Yes	No
Commercial information	Products or services purchased, obtained, or considered from ICF.	Yes	Yes, to affiliates, service providers, and other vendors
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information	No	No
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes	Yes, to affiliates, service providers, and other vendors

Geolocation data	Physical location or movements.	Yes	Yes, to affiliates, service providers, and other vendors
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	No	No
Sensitive personal information	Communications the consumer has with a third party, Biometric data processed to identify an individual, sexual orientation or sex life, financial account details in a combination that gives access to an account, genetic data, government-issued numbers, health data, philosophical or religious beliefs, precise geolocation, racial or ethnic origin, and union membership	No	No
Professional or employment-related information	Current or past job history or performance evaluations.	No	No
Non-public education information (FERPA)	Grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No	No
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, predispositions, behavior, attitudes, abilities, and aptitudes.	Yes	Yes, to affiliates, service providers, and other vendors

How We Use Your Personal Information

ICF and its trusted business partners, agents, subcontractors, or third-party vendors only use Personal Information for purposes consistent with this Privacy Statement and as directed by Mass Save. This may include to:

- Fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote, ask a question about our products or services, register for services, or submit an application we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will

use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns;

- provide, support, personalize, and develop the Site, products, and services.
- create, maintain, customize, and secure your account with us;
- process your requests, purchases, transactions, and payments and prevent transactional fraud;
- provide you with support and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses;
- provide Site functionality, including customizing your view of the Site in a registration-based area or to tailor the information you receive from us;
- help maintain the safety, security, and integrity of the Site, products and services, databases and other technology assets, and business;
- test, research, analyze, and develop products, including to develop and improve the Site, products, and services;
- respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our users is among the assets transferred;
- communicate with you, including via research surveys;
- facilitate your participation in your requested private or public forum, send you direct mail, email, or telephone contact from us. Please be aware that when you voluntarily make your Personal Information available for viewing by third parties online, such as on a blog or public message board, your information can be viewed, collected, and used by individuals and companies outside of ICF. ICF is not responsible for any unauthorized third-party use of such information that is provided in a public forum;
- facilitate you conducting business with us if you are a supplier or a business partner;
- protect the rights or property of ICF, our business partners, suppliers, clients, or others when we have reasonable grounds to believe that such rights or property have been or could be affected;
- disclose your Personal Information as required by law and when we believe that disclosure is necessary to protect our rights, or the rights of others, or to comply with a judicial proceeding, court order, or legal process served on the Sites;
- market to you. The information you provide to us, as well as the information we have collected about you indirectly, may be used by us for marketing purposes; and
- implement or utilize various tools, including:

- Rebate Applicant Portal: We may use a rebate application portal to process rebates. If you visit and submit an application through the Site, we request that you provide us with personal information. We may provide your application information to a utility partner to validate and process payments;
- Home Auditing Tools: We may use a home auditing tool that allows a 3rd Party to collect personal information and data on your home or business in order to provide energy savings improvements;
- Scheduling Tools: We may use tools to schedule appointments or site visits that require personal information;
- QA/QC Inspection tools: We may use Inspection tools that collect personal information, as well as information regarding your energy savings improvements; and
- Procurement Portal: We use this procurement portal to capture qualifications and proposals. If you visit and submit qualifications or a proposal through the Site, we request that you provide personal information, e.g., name, email address, and company information.

How We Share Your Information

We may share your Personal Information by disclosing it to a third party for a business purpose and under the direction of Mass Save. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract, including the selling of your Personal Information. In the preceding twelve (12) months, we have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below. We do not sell personal information.

All third-party vendors are required to implement security measures and are subject to contractual prohibitions on selling or sharing any Personal Information. When Personal Information is transmitted to other websites, it is protected through the use of encryption.

To see how we will share or disclose your information, please refer to the above table.

Please note that we also share Personal Information with government entities, including law enforcement, only in the following circumstances: (1) when required to do so as a matter of law; (2) to assist in the investigation of a potential crime impacting ICF, its employees, its customers, or the communities we serve; or (3) when required in response to legal process (e.g., subpoena, warrant).

Linking to Non-ICF Websites and Third-Party Applications

To allow you to interact with other websites on which you may have accounts (such as Facebook and other social media sites) or join communities on such sites, we may provide links or embed third-party applications that allow you to log in, post content, or join communities from the Sites. We provide links to other websites for your convenience and informational purposes only. ICF is not responsible for the content, accuracy of, or cookies set by any third-party linked site that is not operated by or on behalf of ICF or for any other links contained in such third-party sites. The inclusion of any link to a website not owned by ICF is not an endorsement by ICF of the site or its contents or accuracy and does not suggest that the opinions expressed on a third-party site are representative of the views or opinions of ICF. You may wish to review the privacy statements in use on third-party sites before interacting with such third-party websites.

ICF assumes no responsibility for any links to the Sites from another party's website. You may post a link to any portion of the Site without prior written permission. However, any such links must not use framing techniques or in any way represent the Site or its content as being connected with another organization. In addition, you may not use any meta tags or hidden text in your website that incorporate the ICF name or the names of any ICF affiliate, subsidiary, business, program, or service.

Personal Information Accuracy, Privacy, and Security

We intend to maintain Personal Information in an accurate, complete, current, and secure manner. In the event of changes in your Personal Information, you may inform us to make sure that our information is up-to-date.

We implement commercially reasonable physical, administrative and technical safeguards to help us protect the confidentiality, security, and integrity of your Personal Information and prevent the unauthorized loss, misuse, access, interception, disclosure, and alteration.

Unfortunately, no data transmission over the Internet is 100% secure. While we strive to protect your Personal Information, we cannot ensure or warranty the security of any such Personal Information or fully ensure that your private communications and other Personal Information will not be inadvertently disclosed to third parties by ICF or its business partners, agents, subcontractors, or other third-party vendors.

Residents of certain states may have additional personal information rights and choices. Please see the additional information below for additional information or instructions on how you may exercise your rights.

Changes to this Policy

At our own discretion, we may occasionally amend or supplement this Privacy Statement. The "Effective Date" reference at the top of this page indicates when we last revised this Privacy Statement, and any changes to this Privacy Statement will become effective when we post the revised Privacy Statement on the Sites. Your continued use of the Sites or engagement in the Interactions after we implement such changes also will constitute your affirmative consent to the revised Privacy Statement.

Retention

Under the direction of Mass Save and limited to those purposes as a Service Provider or Processor, we will retain and use your each category of Personal Information identified in the above table according to applicable law and only as long as necessary to fulfill your requests or inquiries, provide services, comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

Children's Online Privacy Protection

ICF is committed to protecting children's privacy online. The Sites are not intentionally designed for or directed at children under the age of 13. In accordance with the Children's Online Privacy Protection Act of 1998 (COPPA), ICF will not intentionally collect, maintain, or distribute information about anyone under 13 years of age. If we become aware that we have inadvertently received Personal Information from a user under the age of 13, we will delete these data from our records.

Your Rights

U.S. Domestic and International Residents

General. You may, at any time, exercise your right to decline to supply certain information while using the Sites. Please bear in mind that you, however, may not be able to access certain content or participate in some features on the Sites. If you tell us that you do not want us to use your information to make further contact with you beyond fulfilling your request, we will respect your wishes. You may be entitled to know whether we hold Personal Information about you and, if we do, to have access to that Personal Information and require it to be corrected if it is inaccurate. We generally do not make decisions by purely automatic means, but if we do, you may have the right to object. If we are going to use your Personal Information in a manner different from that stated at the time of collection, we will notify you, and you will have a choice as to whether or not we can use your Personal Information in such a way.

Marketing. You may, at any time, exercise your right to prevent us from sharing marketing materials with you by checking certain boxes on our forms, utilizing the unsubscribe or opt-out mechanisms in the emails we send you, indicating so when we call you, or sending an email to sightline@icf.com or visiting [Do not sell or share my personal information | Limit the use of my sensitive personal information | ICF](#). In such cases, we will retain minimum Personal Information to note that you opted out in order to avoid contacting you again.

If you have subscribed to one or more of our newsletters or receive information from ICF via email or postal mail and would like to modify or cancel these messages, please follow the instructions included in the message, and send an email to sightline@icf.com. For best results, please forward a copy of the mailing you received from ICF.

Your State Privacy Rights. State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about your state's privacy rights, please read the applicable section below.

Privacy Questions and Access

You can exercise any of your rights by Contacting Us or submitting any requests regarding exercising your rights in writing to:

ATTN: Data Protection Team

ICF

1902 Reston Metro Plaza,

Reston, VA 20190 USA

E-mail: dataprotection@icf.com

Please note that you may be required to prove your identity before we can fulfill your request.

Additional Information for Residents of Certain States

Residents of some states have certain choices ("State Consumer Rights") regarding ICF's use and disclosure of your personal information. Depending on your state of residence, these State Consumer Rights may include:

- Access: You have the right to request, twice in a 12-month period, that we disclose to you the personal information related to you we have collected during the past 12 months. This may include:
 - The categories and specific pieces of personal information we have collected about you
 - The categories of sources from which we collected the personal information
 - The business or commercial purpose for which we collected or sold the personal information
 - The categories of third parties with whom we shared the personal information
 - The categories of personal information about you that we sold or disclosed for a business purpose, and the categories of third parties to whom we sold or disclosed that information for a business purpose
- Rectification: You have the right to have your Personal Information corrected or amended by a business or other organization if it is inaccurate.
- Portability: You have the right to receive your Personal Information in an easily understandable format, and to the extent technically feasible, in a structured, commonly used, machine-readable format.
- Deletion: You have the right to request that we delete certain personal information we have collected from you. Exceptions apply.
- Restrict the Sharing and Use of Sensitive Information: Subject to limitations, you have the right to limit the sharing of certain information deemed "sensitive." An example of sensitive information is your Social Security Number, bank account number, racial origin, or religious beliefs.
- Restrict the sharing of Personal Information: Subject to limitations, you have the right to limit how we share your Personal Information.
- Opt-Out of Sale: You have the right to opt-out of the sale of your personal information.
- Opt-Out of Targeted Advertising: You have the right to opt-out of the processing of personal data for targeted advertising purposes.
- Opt-Out of Profiling: You have the right to opt out of profiling based on personal data.
- Shine the Light Request: You also may have the right to request that we provide you with (a) a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (b) the identity of those third parties.
- Non-discrimination: You have the right to not be discriminated against for exercising your privacy rights
- Automated Decision-Making:

These rights are dependent upon your state of residence and may be subject to certain limitations or exceptions. Please see the following list of states to determine what State Consumer Rights apply to you:

- California – Access, Rectification, Deletion, Restriction of Sensitive Information, Portability, Opt-out of Sales, Automated Decision-Making.
- Delaware – Access, Rectification.
- Nevada – Opt-out of Sales
- Virginia – Access, Rectification, Deletion, Restriction, Portability, Opt-out of Sales, Opt-out of targeted advertising, Opt-Out of Profiling, Non-discrimination, Automated Decision-Making.

Exercising Your State Consumer Rights Request

Pursuant to Cal. Civ. Code § 1798.140(v) and Va. Code § 59.1-575 ICF is either a “Service Provider or a “Processor” for the purposes of managing this Site and cannot respond directly to your request exercise your State Consumer Rights. However, should you desire to exercise these rights and Mass Save qualifies as a regulated entity under the applicable law, you may be able to submit a request with Mass Save. As a Service Provider, ICF will provide Mass Save whatever assistance is reasonably required to facilitate your request and will forward any consumer requests to Mass Save. Please see Mass Save’s [privacy policy](#) for more information on how they respond to you Consumer Right’s Requests.

To contact us regarding a State Consumer Rights request please reference the below contact methods. So that we may promptly notify Mass Save please include information regarding your state residency and the service or product related to your request:

ATTN: Data Protection Team

ICF

1902 Reston Metro Plaza,

Reston, VA 20190 USA

E-mail: dataprotection@icf.com

Please note that you may be required to prove your identity before we can fulfill your request.

Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. To designate an authorized agent or to make a request on behalf of your child please use one of the above contact methods.

Mass Save cannot respond to your request or provide you with personal information if it cannot verify your identity or authority to make the request and confirm the personal information relates to you. You do not need to create an account with us or Mass Save to submit a request. Mass Save will only use personal information provided in the request to verify the requestor’s identity or authority to make it. Once Mass Save receives State Consumer Rights request and confirms your information, it will respond within 45 days. In some circumstances, an additional 45 days may be required. When this is the case Mass Save will inform you that additional time is required within the first 45 days of your initial request.

Response Timing and Format

Should Mass Save be subject to the applicable state privacy law, it will confirm receipt of your request and subsequently respond within the time frame allotted under the applicable state law.

Any disclosures Mass Save provides will only cover the 12-month period preceding our receipt of your request. The response Mass Save provides will also explain the reasons it cannot comply with a request, if applicable. For data portability requests, Mass Save will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Mass Save does not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If Mass Save determines that the request warrants a fee, it will tell you why it made that decision and provide you with a cost estimate before completing your request.

Should Mass Save deny your request to exercise your State Consumer Right, Mass Save will inform you of the reason why they could not complete your request and how you may appeal the decision.

Personal Information Sales Opt-Out and Opt-In Rights

ICF does not sell your Personal Information.

However, should you still desire to indicate that you wish to exercise your right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link: [Do not sell my personal information | Limit the use of my sensitive personal information | ICF](#)

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by following the above link.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination

We will not discriminate against you for exercising any of your State Consumer Rights.

Unless permitted by the applicable state law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA and other state laws that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.