



Privacy Policy

Last Updated: February 4, 2020

Ageto, LLC, a Colorado limited liability company (“Ageto,” “we,” “us” or “our”) respects your privacy and is committed to protecting it through our compliance with this privacy policy (“Privacy Policy”).

Capitalized terms not defined in this Privacy Policy have the meaning set forth in the Terms and Conditions or any additional Ageto policies, addendums, and agreements made available to you.

This privacy policy does not cover information that you submit on other websites, even if we communicate with you on those sites.

We at Ageto constantly aim to provide the best user experience possible to our Users. We value the long-term relationship that allows us to provide a personalized, valuable experience that delivers information, resources and services that are helpful to you. This Privacy Policy discusses, among other things, how information and data obtained during your visit or use of the Ageto Platform and Services may be collected and used. By using the Ageto Platform or Services, you agree to be bound by the terms of this Privacy Policy.

If you do not agree or consent to any of the terms of this Policy, your only recourse is to discontinue accessing or otherwise using the website or any materials obtained from it.

BY CLICKING ACCEPTANCE OR USING THE AGETO PLATFORM OR SERVICES, YOU AGREE TO THIS PRIVACY POLICY.

1. Personal Data and Aggregate Information

“Personal Data” refers to information that tells us specifically who you are, such as your name, phone number, email, approximate geographic location of your computer or device, or postal address, possibly information relating to certain support or customer service issues, and information about the products you purchase, when those pieces of data are stored with your name.

While some experiences will not prompt a collection of Personal Data, you generally need to provide us with Personal Data to use most of the features of the Ageto Platform and Services, including to allow us to provide you with certain personalized or enhanced Services. How we collect and store information depends on the Services in which you elect to participate.

From time to time, we may collect general, non-personal, statistical information about the use of the Ageto Platform or Services. This information represents a generic overview of our Users’ collective viewing habits and allows us and other third parties to modify information, promotions, offers, and/or discounts on Services based on User traffic and behavior. We collect this information using technologies such as “cookies”, which are discussed in greater detail below. We collect this information to determine, for example, which areas of the Ageto Platform are most popular and to enhance the Ageto

Platform. We may also group this information into aggregate data to describe the use of the Ageto Platform to our existing or potential business partners or other third parties, or in response to a government request. From time to time, we may use this information to optimize third-party offers of products and/or services. We also may share aggregated demographic and preference data to third parties to enable the provision of targeted information.

2. Information Ageto May Collect From You

Ageto receives and stores any information you enter on the Ageto Platform or give to us in any other way. Types of information you may provide include:

- **Contact Information.** When you sign up for an Account, request Services, or purchase one of our Products, you may be required to give us your name, business name, email address, street address, billing address, phone number, and additional information that enables you to sign up for and use the Ageto Platform, Services, and Products.
- **Payment Information.** While we strive to use a third party service provider to process payments, from time to time, we may collect Personal Data such as your credit card number or expiration date when you use our Services or purchase one of our Products.
- **Location.** We may collect your location when you use our Services or purchase certain Products. User location is important to your use of the Services and Products, and without it may affect your use of the Services and Products.
- **Energy Data.** We collect energy and load data from our customers that purchase Products.
- **Information You Submit or Post.** We may collect information you submit to us using any of our feedback tools or website questionnaires. For example, when you contact customer support, we may receive your name, email address, phone number, the contents of a message or attachments that you may send to us, and other information you choose to provide.
- **Phone Information.** If you use the Ageto Platform on your mobile device or tablet, it may require special permission such as access to the camera, microphone, pictures, location, read and write external storage, network access, etc., those permissions allow the Ageto Platform to work properly on your device. If you do not allow all required permission to the Ageto Platform, it may not work properly.
- **Survey and Testimonial Information.** Ageto may also collect information and data provided by you from our responses to surveys that we might ask for research purposes to improve our Services and our Products. Ageto may post testimonials on the Ageto Platform. We may also post or share news, events, results, accomplishments, marketing materials from individuals or companies. Requests to remove posted materials should be submitted to info@agetoenergy.com. Reasonable efforts will be made to remove posts upon receiving written notice.
- **Information from Third Parties.** In addition to the information we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources.

3. Automatically Collected Information

When you visit or access certain areas of the Ageto Platform, Ageto may collect certain information from you automatically, such as information provided by your website browser or mobile device, including but not limited to:

- **Device Identifiable Information.** We may collect information that is linked to your computer or device (“**Device Identifiable Information**”). This information may include your IP address, browser type and language, access times, pages visited, and operating system.
- **Mobile Device Information.** We may collect information from any mobile device you use to access the Ageto Platform and Services, including device type and model, network provider, and unique device identifier.
- **Cookies and Similar Technologies.** We may collect technologies such as “cookies,” “pixels,” and “widgets.”
 - Cookies are unique identifiers that we transfer to your device to enable our systems to recognize your device and to provide features, such as personalized advertisements on other websites, and storage of items in your shopping cart between visits. If you do not wish for Ageto to place and use cookies on your computer, you may modify and control how cookies are handled in your browser settings. If you choose to disable cookies, certain functions of the Ageto Platform may not function correctly.
 - Pixels/Web Beacons (also known as Web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our Services for several purposes, including to deliver or communicate with Cookies, to track and measure the performance of our Services, to monitor how many visitors view our Services, and to monitor the effectiveness of our advertising. Unlike Cookies, which are stored on the user’s hard drive, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).
 - Social Media Widgets such as a share button to Facebook or Twitter may be on our Ageto Platform. These features may collect your IP address and what page you are visiting on the Ageto Platform.
- **Google Analytics.** We may also use Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behavior and visitor demographics on some of our Services, and to develop website content. This analytics data is not tied to any Personal Data. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google’s collection and Processing of data generated by your use of the Services by going to tools.google.com/dlpage/gaoptout.

The Ageto Platform does not currently support Do Not Track, which is a privacy preference you can set in your web browser to indicate that you do not want certain information about your web page visits tracked and collected across websites.

4. How We Use Your Information

We use, store, and process information, including Personal Data about you, to provide, understand, improve, and develop the Ageto Platform, Services, and Products. This information is collected for the necessary purposes set out below:

- To carry out our Services and obligations from any contracts entered between you and Ageto
- To deliver Products which you purchase

- Notify you of Service expirations and renewals
- To monitor the energy resources in the Products and systems to which they attach
- To provide both active and historic alarms and events for the Products
- To provide historical data with regard to the Products
- To provide real-time monitoring of Products
- To provide customized, personalized content through our Ageto Platform, Products, and Services
- Notify you about changes to our Ageto Services or policies
- To allow you to participate in new features and Services on our Ageto Platform
- To track your purchase history, suggest Products, and to contact you for account and promotional purposes
- For training machine learning in our Products
- To facilitate the delivery of content or advertisements that we feel may be relevant to you
- To communicate new or existing Products or Services that we feel can help you
- For any other purpose with your consent
- To detect and prevent fraud, to collect amounts owing to us and to maintain business records.

5. How We Share Information We Collect

Ageto customer information, user data, and Personal Data may be shared with certain third party companies for the purposes set forth below:

- Ageto may share certain personal information with its affiliates (including parent company, sister companies and subsidiaries)
- Ageto may sometimes need to share your Personal Data, user data, or customer information to help facilitate technical and administrative aspects of Ageto' Services and Products (credit card processing, hosting, installation of Products, delivery of Products, citation building & management). Ageto will take reasonable steps to ensure that these third party service providers are notified of their obligations to reasonably protect Personal Data on Ageto's behalf. Notwithstanding the above, we cannot guarantee that such third party service providers will adhere to the contractual obligations or acceptable business practices.
- We may share your Personal Data with third parties that we have partnered with to create and offer a Product or Service. These partners may use your Personal Data to market and offer Ageto-related Products, unless you have given consent for other uses. Additionally, to the extent permitted by law, Ageto's partners may share your personal information with us to better serve you.
- We may share your Personal Data with our developers and manufacturers when you purchase Products.
- We may provide your anonymized and aggregated personally identifiable information to third parties for their marketing and/or advertising purposes.
- The Ageto Platform may allow you to connect with other websites, products, or services that we don't have control over. If you use these services, we will provide the third party with information about you to allow them to provide the service to you. We can't speak to the privacy practices of these third parties, and we encourage you to read their privacy policies before deciding whether to use their services.
- Ageto may release information when we believe it is necessary in order to comply with a legal obligation under applicable law, or respond to valid legal process, such as a search warrant, a

court order, or a subpoena. We will also share your Personal Data where we believe it is necessary for the purpose of our own, or a third party's legitimate interest relating to national security, law enforcement, litigation, criminal investigation, or protecting the safety of any person, provided that such interest is not overridden by your interests or rights and freedoms requiring the protection of your Personal Data.

- A third party may use technology (e.g., a cookie) to collect information about your use of our website and other websites so that they can provide advertising about products and services tailored to your interest. That advertising may appear either on our website, or on other websites.
- We may disclose certain Personal Data while negotiating or in relation to a change of corporate control such as a restructuring, merger or sale of our assets. We may sell information and Personal Data with any successor to all or part of our business.
- We may disclose Personal Data whenever you consent to the sharing.

6. Your Choices

You can always unsubscribe from our commercial or promotional emails, but if you continue to use the Services or purchase Products, we may still send you transactional and relational emails about your use of the Services and the Products you purchase.

If you create an Account to use the Ageto Platform, Services, or purchase Products, you may be asked to choose a password for your account, in which case your account information shall be protected by your password. You should not disclose your password to any other person. You are responsible for maintaining the confidentiality of your password and are fully responsible for all activities that occur under your password or account. You can access and update information in your account profile at any time by logging into the account with your login name and password. Once you have logged in, you can update certain information such as your name, photo, email, password, billing information, and security preferences.

If you would like to terminate your account, please contact us through our customer support with your request. If you choose to terminate your account, we will deactivate it for you but may retain information from your account for a certain period of time and disclose it in a manner consistent with our practices under this Privacy Policy for accounts that are not closed. We also may retain information from your account to collect any fees owed, resolve disputes, troubleshoot problems, analyze usage of the Ageto Platform, assist with any investigations, prevent fraud, enforce our Terms and Conditions, or take other actions as required or permitted by law.

7. California Residents

This section of the Privacy Policy applies only to any natural person "enjoying the benefit and protection of laws and government" of California. If you live in California you have certain rights under the California Consumer Protection Act of 2018 ("**CCPA**").

In accordance with the CCPA, this Privacy Policy discloses:

- what categories of Personal Data and the specific pieces of Personal Data we collect;
- how that Personal Data is collected and how we use it;

- the categories of Personal Data that are sold or shared with third parties;
- the categories or types of third parties with whom Personal Data with whom we share Personal Data.

As a California resident you can request a list of the Personal Data we collected from you, a list of the Personal Data we have shared with third parties, and a list of the names of third party with whom we have shared your Personal Data. You may make such a request twice per year at no charge to you.

You may also request that we do not sell or disclose your Personal Data to third parties. However, to provide you with most Services and the Ageto Platform we need to share certain aspects of your Personal Data with our third party service providers. Accordingly, such request may affect how you use and access the Services and Ageto Platform.

To make any of the foregoing requests, email us at info@agetoenergy.com with the subject line "California Consumer Protection Act."

8. **EU General Data Protection Regulation**

This section of the Privacy Policy applies only to any natural person who are residents of the European Union ("EU"). As a resident of the EU, you have certain rights under the General Data Protection Regulation ("GDPR").

We process Personal Data for the purposes set out in this Privacy Policy, as described above. Our legal basis to process Personal Data includes:

- As necessary to fulfill our responsibilities under our agreements with you (e.g., to provide Services and Products);
- As necessary to comply with our legal obligations (e.g., to prevent or detect fraud);
- As necessary for our legitimate interests, including our interest in providing secure services and improving the Ageto Platform, our Products, and our Services; and
- Where you have consented to data processing or to receiving marketing communications, which may subsequently be withdrawn at any time.

You can choose not to provide us with information; however, not providing us with your name, location, and access to data, may materially affect your use of our Products and Services. Such information is needed to facilitate the Services and Products we provide, and take advantage of such features as your full use of the Ageto Platform.

The nature of our business means that the Personal Data collected through our website, Services, and Products will be transferred to the United States. We take appropriate steps to ensure that recipients of your Personal Data are bound to duties of confidentiality and we implement measures such as standard data protection contractual clauses to ensure that any transferred Personal Data, remains protected and secure.

You can opt out of receiving our marketing emails. To stop receiving our promotional emails, you may opt-out by one of the following methods:

- Selecting the "Unsubscribe" link in any promotional email

- contacting us here: info@agetoenergy.com

Even if you opt out of getting marketing messages, we may still send you transactional messages. These include responses to your questions.

If you receive promotional emails from a third party, you will need to separately opt-out with them.

You can request access or correction to your Personal Data. You can request a copy of the Personal Data we hold about you and check that we are lawfully processing it or to request a rectification if it is not accurate, complete, or updated.

You can request erasure of your Personal Data. You can ask us to delete or remove Personal Data where there is no good reason for us to continue to process it. We may postpone or deny your request if your Personal Data is in current use for which it was collected or for other legitimate purposes such as compliance with legal obligations.

You can object to and request restriction of processing of your Personal Data. You can ask us to suspend the processing of your Personal Data or you can object at any time on legitimate grounds to the processing of this personal information.

If you object to such processing, Ageto will no longer process your Personal Data for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defense of legal claims.

To make any of the foregoing requests, email us at info@agetoenergy.com with the subject line "GDPR Request."

For purposes of GDPR and similar data protection regimes, we generally act as a Data Controller, meaning we determine the purposes and means of processing your personal information.

9. We Store Information in the United States

The nature of our business means that the Personal Data collected through our Ageto Platform and Services will be transferred to the United States. Information we maintain is stored within the United States. If you live outside of the United States, you understand and agree that we may transfer your information to the United States. This site is subject to U.S. laws, which may not afford the same level of protection as those in your country. Also, the Ageto personnel and the third-parties to whom we disclose Personal Data are located in the United States.

10. Miscellaneous

Ageto reserves the right, in its sole discretion, to alter this Privacy Policy at any time without prior notice to you or any User, including to comply with privacy laws, regulations, and/or our own or industry standards, business practices, or otherwise. We encourage you to review this Privacy Policy each time you access or use the Ageto Platform or Services. Your use of the Ageto Platform or Services at any time, including after any change to this Privacy Policy, indicates your acceptance of this Privacy Policy and any change made to this Privacy Policy.

We take reasonable precautions to protect the privacy, accuracy, and reliability of any information you provide and to protect such information from loss, misuse, unauthorized access, disclosure, alteration and destruction. Personal Data is stored within databases that are controlled by us or by our service providers. As we deem appropriate, we use security measures consistent with industry standards, such as firewalls and encryption technology, to protect your information. However, since no security system is impenetrable, we cannot guarantee the security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. As a result, you transmit any information to or from the Ageto Platform and Services at your own risk.

We understand and share your concerns regarding your children's access to Internet and the Internet's access to your children. The Ageto Platform and Services are not directed to children. Consistent with the Children's Online Privacy Protection Act of 1998 (COPPA), we do not knowingly request or accept Personal Data submitted to the Ageto Platform by any visitor under 13 years of age. If we become aware that an individual under age 13 has provided information to Ageto through the Ageto Platform, we will make commercially reasonable efforts to delete such information from our databases.

This Privacy Policy shall be governed by the laws of the State of Colorado, without regard to conflicts of law principles. Any action relating to this Privacy Policy must be filed and maintained in a state or federal court of competent jurisdiction located in Denver, Colorado, and you consent to exclusive jurisdiction and venue in such courts for such purpose. Ageto makes no representation that this Privacy Policy and such practices comply with the laws of any country outside the United States.

DISPUTES REGARDING THIS PRIVACY POLICY ARE GOVERNED BY THE ARBITRATION CLAUSE IN OUR TERMS AND CONDITIONS. THESE PROVISIONS WILL, WITH LIMITED EXCEPTION, REQUIRE YOU TO SUBMIT CLAIMS YOU HAVE AGAINST AGETO TO BINDING AND FINAL ARBITRATION ON AN INDIVIDUAL BASIS, NOT AS A PLAINTIFF OR CLASS MEMBER IN ANY CLASS, GROUP OR REPRESENTATIVE ACTION OR PROCEEDING.

If you have any questions or comments about this Privacy Policy or our privacy practices, or to report any violations of this Privacy Policy or abuse of the Ageto Platform, Services, or Products, please contact us by mail or email at the following:

Attn: Privacy Concerns

Address: 19 Old Town Square, #238, Fort Collins, CO 80524

E-mail: info@agetoenergy.com