

# Privacy Policy

## **Introduction**

Welcome to ECO2 Systems and thanks for visiting our privacy policy (the “Policy”).

ECO2 Systems, LLC (referred to in this Policy as "ECO2 Systems," "we," "us," or "our") respects your privacy. We appreciate your trust, and we will continue to work hard to earn it. We know that you care about your personal information and how we use and share it.

To better protect you, this Policy will outline, describe and summarize the types of information we may collect from you or that you may provide to us when you visit our website at <https://eco2waterheater.com> or any subdomain thereof (the “Website”), or when purchasing products or services offered by us in existence now or in the future (collectively, and together with the Website, our “Services”), and the procedures we may use to collect, use, maintain, protect, and/or disclose this information.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not use the Services. By purchasing products or accessing or using the Services, you agree to the terms of this Policy. This Policy may change from time to time as described below. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

## **Scope of Application**

This Privacy Policy describes how we collect, use, and disclose personal information in connection with our Website, Services, communications, marketing activities, and other interactions with individuals.

By using our Services, you acknowledge that you have read and understood and agree to be bound by this Policy and that we may proceed with the gathering and processing of your personal data on the terms outlined below.

This Policy applies to the following individuals:

- Visitors of the Website with whom ECO2 does not have a contractual relationship
- Distributors and end-user customers who purchase our products or services, including their representatives
- Independent contractors who use our Services
- Suppliers who provide products or services to ECO2
- Candidates
- Prospects
- Participants of webinars, conferences, trade events, surveys, etc.

References to “you” or “your” are to you as an individual using our website or otherwise contacting us (whether on behalf of yourself, or another individual, or organization).

**Information We Collect**

ECO2 collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (collectively, “Personal Information”), about those individuals who use its Services, including for credit card payments, product registration, installation, warranty purposes, to provide the goods/services requested by users, and for text messaging communications regarding product or service delivery. This Personal Information can be used on its own or in combination with other information to identify you, and may include information such as name, title, company name, address, telephone number, or e-mail address. We may also collect photographs and images of installed products and services for operational, insurance, warranty, and marketing purposes, subject to your consent as described below. In particular, we may collect the following categories of Personal Information in connection with your use of the Services:

<b>Category of Personal Information</b>	<b>Description / Examples</b>
<b>Identifiers</b>	Real name, alias, username, unique personal identifier, online identifier, Internet Protocol (IP) address, account name, customer number, or other similar identifiers.
<b>Contact Data</b>	Physical or postal addresses, billing and shipping addresses, email addresses, telephone numbers, and mobile phone numbers (including for text messaging purposes).
<b>Account Credentials</b>	Usernames, account IDs, passwords, password hints, authentication information, and security credentials used to access accounts.
<b>Demographic Information</b>	Date of birth, age, gender, marital status, household composition, and similar demographic characteristics.
<b>Commercial Information</b>	Records of products or services purchased, obtained, or considered; transaction histories; order details; and payment status.
<b>Payment and Financial Information</b>	Credit card numbers, debit card numbers, bank account information, billing information, and other financial data necessary to process payments (typically processed by third-party payment processors).
<b>Internet or Network Activity</b>	Browsing history, search history, interaction with websites, applications, advertisements, emails, or other online services, and related analytics data.

<b>Category of Personal Information</b>	<b>Description / Examples</b>
<b>Consents</b>	Permissions, consents, or preferences that you provide.
<b>Geolocation Data</b>	Approximate or precise location information derived from IP address, GPS, Wi-Fi, Bluetooth, or similar technologies.
<b>Audio, Visual, and Electronic Information</b>	Photographs, images, videos, audio recordings, voicemail messages, call recordings, or other similar content.
<b>Customer Support and Communications</b>	Information provided in communications with us, including emails, chat messages, customer service inquiries, feedback, and survey responses.
<b>User-Generated Content</b>	Content submitted, uploaded, or posted by users, including comments, reviews, files, messages, or other materials.
<b>Preferences and Profile Information</b>	Preferences, interests, marketing choices, and inferred profile information based on interactions with our services.
<b>Marketing and Advertising Data</b>	Information related to marketing campaigns, promotional responses, advertising interactions, and subscription preferences.
<b>Third-Party Information</b>	Personal information received from third parties, affiliates, service providers, data brokers, or publicly available sources, consistent with applicable law.
<b>Inferences</b>	Inferences drawn from other personal information to create a profile reflecting preferences, characteristics, behavior, or interests.
<b>Legal and Compliance Information</b>	Information required to comply with legal obligations, respond to lawful requests, enforce agreements, or protect rights, property, or safety.
<b>Other information</b>	Any other information you choose to provide to us through all available channels, including through our social media presence on platforms such as Facebook, participating in user/customer surveys, or otherwise visiting and interacting with our Website and/or Services; and photographs or images of products and services we provide to you.

For the avoidance of doubt, personal information shall not include (a) publicly available information from government records, or (b) any personal information which is anonymized or deidentified. ECO2 may also collect and use non-personal information to analyze the

effectiveness of our Services and to improve our Services. We may collect non-personal information through the Services and through cookies, as described in more detail below.

### **How We Collect Personal Information from You**

We use multiple methods to collect Personal Information from you. Please note that we may collect Personal Information through other channels in the future, and the types of Personal Information we may collect from you can vary according to the method through which it was attained. The following are ways we currently collect Personal Information from you:

*Through Interacting with the Services and Website. We may obtain your Personal Information from you when you interact with our website, request information about our products or services, register products, request installation or warranty services, make purchases through our distributors, provide us with payment information for services, send us emails with questions or comments, sign up for our emails, mobile messages, or social media notifications, when you make a purchase or otherwise provide us with payment information, when you write a product review, leave comments, suggestions, or other input, and when you otherwise provide Personal Information to us (e.g., shipping and billing addresses, payment details including credit card details, etc.).*

#### *Information We Collect Automatically.*

- **Usage Information:** We track and collect Personal Information through your interactions with our Services, such as the pages you visit, the features and tools you utilize, and your navigation patterns within ECO2 and our Services. This also covers the tasks you engage in, browsing activities and patterns, the projects and teams you access, and your communications with us and others within the Services.
- **Device and Connection Details:** Detailed information about the devices you use, such as your computer, smartphone, or tablet, is collected. This includes your device type, operating system, browser specifics, connection quality, and settings. Your IP address and crash reports are also recorded to approximate your location for a tailored service experience.
- **Cookies and Behavioral Analytics:** We use limited, standard technologies—such as cookies and similar tools—that are necessary to operate our Website and to collect aggregated information about how users interact with it. These technologies help us understand Website performance, monitor usage trends (such as page visits, session duration, and general geographic region), and improve functionality and content. The information collected is used in an aggregated and de-identified manner and is not used to track users across unaffiliated websites or for targeted advertising purposes. Most web browsers allow you to control cookies through their settings. You may choose to disable cookies via your browser; however, doing so may affect the availability or functionality of certain features of the Website.
- **Statistical and Diagnostic Data:** Log files and other diagnostic tools collect anonymized data such as user IP addresses, browser types, and domain names. This

statistical information is crucial for administering our services, analyzing trends, and ensuring system integrity. When such non-personally identifiable information is associated with personal data, it is treated with the highest privacy standards as outlined in our Privacy Policy.

*Information We Receive from Other Sources.* We may receive Personal Information about you from various third parties (including public sources) worldwide as set out below:

- Technical Data from parties such as:
  - analytics providers;
  - search information providers; and
  - advertising networks.
- Contact, financial and transaction information from providers of technical and payment services, such as Stripe and other payment processors we may use, and from our distributors who process customer orders.
- Identity and contact information from data brokers or aggregators.
- Identity and contact information from publicly available sources such as LinkedIn

**How We Use and Process the Information We Collect**

We use information we collect about you or that you provide to us, including any of your Personal Information, for the following reasons. *We do not sell Personal Information to anyone. We may share Personal Information with third-party vendors, employees, and independent contractors for the purposes of providing the goods and services requested by you, including for installation, warranty services, and product delivery purposes.*

Why We Use the Information (Our Reason)	Lawful Basis
To oversee our relationship with you and for general communication, such as informing you about updates to this Policy and inviting you to review our Services or participate in surveys, and to generally fulfill or meet the reason you provided the information.	Necessary to fulfill our contract with you. Necessary for our legitimate interests (e.g., maintaining our records accurately and analyzing how our services are used). Based on your consent to share your data with us.
For enrolling you as a new client, creating, customizing, and securing an account with us, contacting you for services.	Necessary to fulfill our contract commitment to provide Services to you. Based on your consent to share your data with us.
To offer timely assistance, such as supporting our services or addressing your inquiries.	Necessary for our legitimate interests (e.g., to provide efficient service)).

	Based on your consent to share your data with us.
To handle your account and personalize your service experience.	Undertaking required to fulfill our contract with you. Based on your consent to share your data with us.
For processing and completing your orders, requests, purchases, transactions and payments, which includes processing any fees and any additional charges, processing and forwarding payments for services to our payment provider, preventing transactional fraud, and pursuing payment of outstanding debts.	Necessary to fulfill our contract with you. Necessary for our legitimate interests (e.g., to collect debts owed to us).
To manage, improve and secure our business and Website, which includes troubleshooting, data analysis, conducting research and analysis, testing, system upkeep, fraud prevention, support, reporting, and hosting of data.	Necessary for our legitimate interests (e.g., business operation, IT services provision, security, fraud prevention). Necessary for compliance with legal obligations (e.g. complying with privacy requirements relating to the security of your information).
To provide you with relevant website content and advertisements, to send marketing communications and other information regarding products, services, and promotions, and to evaluate the effectiveness of our advertising campaigns.	Necessary for our legitimate interests (e.g., to understand how our services are used, to develop our offerings, to expand our business, and to plan our marketing strategy). Consent.
To utilize data analytics for enhancing and improving the effectiveness of our website, products/Services, marketing strategies, customer relationships, and experiences.	Necessary for our legitimate interests (e.g., to categorize our customers for our products/services, to keep our Website current and appealing, to develop our business, and to plan our marketing strategy).
To offer recommendations and suggestions for services or products you might find interesting, based on your purchases or subscription.	Essential for our legitimate interests (e.g., to evolve our products/services and expand our business). Consent.

Marketing and Communication.

We may also use your Personal Information to send you newsletters, promotional messages, and other targeted advertisements, marketing communications, or other information we think might interest you through email, phone, or mail. To tailor our offerings, we analyze your information we gather to tailor your experience of the Services and identify products, services, and offers that might be relevant for you. If you've engaged with us by requesting information or purchasing Services, you may receive these communications unless you opt out. However, you can opt out of these types of communications at any time by following the “unsubscribe” link located in our marketing emails or by contacting us directly at the email address provided at the end of this Policy. Please note that opting out of marketing communications will not affect our ability to send you transactional or service-related messages, which are necessary to provide the products or services you have requested.

### **Sharing Information with Third Parties**

The Personal Information ECO2 collects from you is stored in one or more databases hosted by third parties located in the United States. These third parties do not use or have access to your Personal Information for any purpose other than cloud storage and retrieval, except as specifically disclosed below. On occasion, ECO2 Systems LLC engages third parties, including employees and independent contractors, to provide the goods and services you have requested, which may include sharing your Personal Information (including cell phone numbers for text messaging purposes) with such third parties. By providing your phone number, you expressly consent to receive text messages from us and our authorized third parties regarding the goods and services you have requested. This consent is not a condition of purchase. Message and data rates may apply. Message frequency may vary. By agreeing to this Policy, you acknowledge and expressly consent to ECO2 Systems, LLC and its authorized third parties taking and sharing photographs and images of the goods and services provided to you, which may include images of your property, for operational, insurance, warranty, and marketing purposes. You have the right to refuse consent for marketing purposes without affecting our provision of services to you.

We reserve the right to disclose Personal Information to our service providers, employees, independent contractors, the government, law enforcement agencies, or other third parties under certain circumstances where a formal request has been made (such as in responding to a court order, law, legal process, including to respond to any government or regulatory request, subpoena, or judicial proceeding) as we, in our sole and absolute discretion, deem necessary and appropriate. We may also disclose your Personal Information to enforce or apply our Terms of Use Agreement available at <https://eco2waterheater.com/Terms-of-Use/>, or if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, or others.

We use third-party payment processors to process credit card payments for the goods and services you request. We also engage third-party vendors, employees, and independent contractors to provide product registration, installation, warranty services, and delivery of the goods and services you have requested. We may use other third parties for other services from time to time. These third parties have no authority to use your Personal Information for their

own promotional purposes, but these third parties will have access to your Personal Information (including cell phone numbers for text messaging purposes) in order to provide the goods and services you have requested. By providing your cell phone number to us, you are expressly consenting to receive text messages from us and our authorized third parties regarding the goods and services you have requested, including service updates, delivery notifications, and appointment reminders. Message and data rates may apply. Message frequency varies based on your service requests. You may opt-out of text messages at any time by replying "STOP" to any message. After you send "STOP," we will send you a confirmation message and you will no longer receive texts from us except as legally required.

Except as otherwise set forth herein, we do not otherwise disclose your Personal Information to third parties for their independent use unless: (1) you request or authorize it; (2) it is necessary to provide the goods or services you have requested; (3) the information is provided to comply with the law (for example, compelled by law enforcement to comply with a search warrant, subpoena, or court order), enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others; (4) the information is provided to our employees, independent contractors, agents, vendors or service providers who perform functions on our behalf, including fulfilling orders, processing payments, providing product registration and warranty services, and delivering goods or services that you have requested; (5) to address emergencies or acts of God; (6) to our affiliates; (7) to a buyer or other successor in the event of 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 the Service users is among the assets transferred; (8) to fulfill the purpose for which you provide the Personal Information; or (9) to address disputes, claims, or to persons demonstrating legal authority to act on your behalf. We may also gather aggregated data about our Services and Website visitors and disclose the results of such aggregated (but not personally identifiable) information to our partners, service providers, advertisers, and/or other third parties without restriction.

Our Website may contain links to other websites or other third-party platforms. We are not responsible for the privacy practices of these third-party services, and we do not endorse or otherwise accept responsibility for the content or privacy policies of those sites and platforms. Your interactions with such platforms are governed by their respective privacy policies, and accordingly we encourage you to read the privacy policies of each such platform you visit prior to disclosing your Personal Information.

### **Protection of Your Personal Information**

You may contact us personally, by telephone, mail, over the Internet or other electronic medium through the contact information provided below. We have implemented appropriate technical and organizational security measures designed to keep your Personal Information secure and to protect the Personal Information we hold from misuse, loss, unauthorized access, modification or disclosure. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your Personal

Information, transmission of Personal Information to and from the Service is at your own risk. WE DO NOT REPRESENT, WARRANT AND/OR GUARANTEE THAT PERSONAL INFORMATION WILL REMAIN SECURE, and we cannot and do not guarantee, and you should not expect, that your Personal Information or private communications will always remain private. You should only access the Website within a secure environment. In the event there is a breach of security, confidentiality, or integrity of stored Personal Information or we are made aware that your Personal Information could be jeopardized, we will take all necessary measures required by applicable law to communicate these issues to you so that you can take steps to protect yourself.

### **Rights Related to Your Personal Information**

Various privacy laws provide certain rights for individuals. If you are located in a jurisdiction with applicable privacy laws (such as the GDPR for individuals in the European Economic Area, or state privacy laws in California, Virginia, Colorado, Connecticut, Utah, and other U.S. states with comprehensive privacy legislation), you may have the following rights under certain circumstances:

- **Right of access:** to obtain a copy of your Personal Information you have provided us or that we hold, together with information about how your Personal Information is processed. If you require details of your Personal Information held by us, we will need to verify your identity before meeting your request, which we will process in a reasonable time;
- **Right to rectification:** Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- **Right to erasure:** enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- **Right to restrict processing:** to object the processing of your Personal Information where we're relying on a legitimate interest (while we verify or investigate your concerns with this information, for example);
- **Right of data portability:** to obtain a portable copy of your Personal Information, or to have a copy transferred to a third party controller;
- **Right to object:** object to the further processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something

about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;

- **Rights related to automated decision-making including profiling:** to object to decisions that are based solely on automated processing or profiling;
- **Request the transfer:** We will provide you, or a third party you have chosen, with your Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you; or
- **Withdraw consent:** You have the right at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

In addition to the above, you have the right to lodge a complaint with a supervisory authority for data protection.

To exercise these rights you may contact us by emailing [info@eco2systemsllc.com](mailto:info@eco2systemsllc.com).

We may ask you for additional data to confirm your identity and for security purposes, before disclosing the information requested to you. If you would like to submit a request on behalf of another individual, you may do so by providing proof of authorization by the individual to submit such a request on their behalf. We reserve the right to charge a fee where permitted by law. We may also decline to process requests that jeopardize the privacy of others, are excessive, or would cause us to take any action that is not permissible under applicable laws. Additionally, as permitted by applicable laws, we may need to retain certain Personal Information for a limited period of time for record-keeping, accounting and fraud prevention purposes.

### **Additional Privacy Rights for California Residents**

This Section applies to all users who reside in the State of California and is adopted to comply with the CPRA. This Section does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

The CPRA provides consumers (California residents) with specific rights regarding their Personal Information. This Section describes your CPRA rights and explains how to exercise those rights.

#### ***Access to Specific Information and Data Portability Rights***

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request (see “*Exercising Access, Data Portability, and Deletion Rights*” below), we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (also called a data portability request);
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

#### *Deletion Request Rights.*

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see “*Exercising Access, Data Portability, and Deletion Rights*” below), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
- Debug products to identify and repair errors that impair existing intended functionality;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information’s deletion may likely render impossible or seriously

impair the research's achievement, if you previously provided informed consent;

- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

*Exercising Access, Data Portability, and Deletion Rights.*

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by sending us an email at the address provided below.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent please email us at the email address provided below and provide your name and phone number as well as the authorized agents' name and contact information (phone number or email address) and let us know what the scope of the authorized agents' rights are to act on your behalf. If your authorized agent requests sensitive information about you then we may ask you to provide us with a sworn declaration to further verify your identity.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative, which may include your full name, email address, phone number and zip code; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

*Response Timing and Format.*

We attempt to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will cover the 12-month period preceding the verifiable consumer request's receipt, or such other period as required by applicable law. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or unreasonable. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### *Non-Discrimination.*

We will not discriminate against you for exercising any of your privacy rights under applicable law, including CPRA. Unless permitted by the CPRA, 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; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

#### *"Shine the Light" Law.*

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits users who are California residents to request and obtain from us, once a year and free of charge, information about categories of Personal Information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared Personal Information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

#### **Opt-Out of Sale/Sharing**

The use of technologies, such as cookies, may constitute a "sale" of personal information under the CPRA. In addition, we may use your personal information in a way that constitutes "sharing" under the CPRA. You can opt out of the "sale" or "sharing" at any time by contacting us using the contact information provided in this policy or broadcasting the global privacy control signal. Note that due to technological limitations, if you visit our website from a different computer or device, or clear cookies on your browser that store your preferences, you will need to return to this screen to select your preferences and/or rebroadcast the signal. We will honor opt-out preference signals in a frictionless manner as required by the CPRA.

#### **Data Storage and Retention**

Your Personal Information is stored by ECO2 on its servers, and on the servers of the cloud-based database management services ECO2 engages, which are located in the United States and may be transferred to and processed in other jurisdictions where our service providers operate. By using our Services, you consent to the transfer of your Personal Information to the United States and other countries, which may have different data protection laws than your jurisdiction of residence. ECO2 retains the information it collects for the duration of the customer's business relationship with ECO2 and for a period of time thereafter as necessary to fulfill the purposes outlined in this Policy, comply with our legal obligations, resolve disputes, enforce our agreements, and as otherwise permitted or required by applicable law (such as tax, accounting or other legal requirements). The specific retention period varies depending on the type of information and the purpose for which it was collected. ECO2 retains Personal Information until such time as ECO2 has no ongoing legitimate business need to process your Personal Information and is either purged from ECO2 systems or anonymized. If purging or anonymizing your Personal Information is not possible (e.g, because your Personal Information has been stored in backup archives), then ECO2 will securely store your Personal Information and isolate it from any further processing until deletion is possible. All Personal Information that ECO2 controls may be deleted upon verified request from you or your authorized agents, as more fully described above under "Rights Related to Your Personal Information". For more information on where and how long your Personal Information is stored, and for more information on your rights of erasure and portability, please contact us at: [info@eco2systemsllc.com](mailto:info@eco2systemsllc.com).

### **Children's Data**

The Website and Services we provide are not designed for, intended to collect Personal Information from, or directed at, children under age 13 in the United States or under age 16 where required by applicable law (the "Consent Age"). So that we may comply with the Children's Online Privacy Protection Act, if you are under the Consent Age, you are not permitted to provide any information to or on the Website or the Services. ECO2 does not knowingly collect or solicit Personal Information from children under the Consent Age. If you are under the Consent Age, do not use or provide any information on the Website, through the Services, or through any of their features, and do not provide any information about yourself to us, including your name, address, telephone number, email address, or any screenname or username you may use. If we learn we have collected or received Personal Information from a child under the Consent Age, we will delete that information. If you believe we might have any information from a child under the Consent Age, we ask that a parent or guardian please contact us at [info@eco2systemsllc.com](mailto:info@eco2systemsllc.com).

### **Privacy Contact**

ECO2 has appointed an internal data protection officer for you to contact if you have any questions or concerns about ECO2's personal data policies or practices. If you would like to exercise your privacy rights, please direct your query to ECO2's data protection officer. ECO2's data protection office may be contacted at [info@eco2systemsllc.com](mailto:info@eco2systemsllc.com).

### **Agreement to our Terms and Changes to this Policy**

By ordering any products or using our Services, you acknowledge that you have read and understood this Policy and consent to the collection and use of your Personal Information by ECO2 as described in this Policy. We reserve the right to modify this Policy at any time. The updated version of this Policy will be indicated by an updated “Last Updated” date below, and the updated version will be effective as soon as it is accessible. If we make material changes to this Policy, we may notify you either by prominently posting a notice of such changes on our Website or by directly sending you a notification. We encourage you to review this Policy frequently to be informed of how we are protecting your information.

### **Questions, Concerns or Complaints**

If you have questions, concerns, complaints, or would like to exercise your rights, please contact us at:

ECO<sub>2</sub> Systems LLC

PO BOX 1358

Walled Lake, MI 48390

[info@eco2systemsllc.com](mailto:info@eco2systemsllc.com)

Phone: 1-844-726-3262

Fax: 1-248-694-2006

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