

## Champion Energy Services, LLC

### Privacy Policy

#### **Our Privacy Commitment**

Champion Energy Services (“Champion”) cares about our customers and is committed to protecting their privacy. This Privacy Policy (referred to herein as “Privacy Policy” or “Policy”) is intended to inform you of the type of personal information Champion collects from you, how it is used and what steps are taken to ensure that your personal information is kept confidential and safe. This Policy also outlines how customers can make their preferences known regarding when and how Champion may send marketing communications to you.

#### **What Information We Collect**

Champion only collects personal information that is provided voluntarily by you. Personal information collected by Champion is primarily used to provide retail electricity services to you. The information is used for customer enrollment, internal analysis, communications and marketing purposes. The information we collect is not sold to or shared with others except as otherwise required by law or as disclosed to you in this Privacy Policy.

The following information is typically needed to establish your electricity service with Champion: name, address, government-issued identification card number, social security number, telephone number, and email address. As an option, customers may elect to provide credit card or banking information to facilitate electronic payment either at the time of enrollment or at a later date. Additionally, active and potential customers may be asked to provide additional information related to energy use such as the characteristics of the residence, age, gender and family size. Opting to not provide this additional information may result in Champion being unable to deliver certain promotions or product offerings.

As a standard practice Champion requests an email address and two phone numbers from all customers and occasionally will send emails describing new products, promotions or events. These email services are optional and you may opt-out of these services, solicitations and offers completely, at any time, by selecting the opt-out option within any communication. This opt-out option does not apply to emails sent for other reasons such as responding to your requests for service, information or matters relative to your account. If you do not wish to receive email from Champion, simply select the opt-out option on any email you receive and you will be removed from all future mailings.

Champion also collects certain non-personal public data in the course of normal business. Examples of this non-personal data include web log information such as your web browser, operating system, pages visited, time of day, source IP address, browser type, ISP, etc. Additionally, when contacting the Champion call center a record of the phone call is also maintained which includes date, time of day and caller id information. The purpose of such monitoring and recording is for training, quality assurance purposes and to review specific transaction requests.

For time to time Champion may purchase personal information from outside sources. This information is used to identify potential new customers as well as analyze the existing customer base. The information purchased from outside sources is strictly for internal use and it is not sold or shared with others.

#### **How We Collect Information**

Champion is required to collect personal information during the electricity service enrollment process and this information may be collected in a variety of ways.

To enroll for and fully utilize Champion's services, Champion's customers are required to provide the minimum amount of personal information necessary to activate the account. This personal information may be collected through online web forms, hand written forms that are faxed, verbally over the phone or through personal interaction with a Champion representative (i.e. sales and customer service personnel).

Champion may also run contests, sweepstakes and other promotions. Entrants may be asked to provide personal information that is needed in order to administer the contest, sweepstakes or promotion and to notify winners.

Occasionally, Champion customers will have the opportunity to forward promotional opportunities or other information to friends and family. This personal referral information is recorded but it is not used without the consent of the recipient.

Champion may occasionally ask customers to complete surveys and provide opinions about interests, needs, and viewpoints. These surveys help Champion provide better services and products to meet our customer's needs.

When customers contact the Champion customer service department it may be necessary to obtain personal information for record keeping and follow-up.

### **How We Use Your Information**

Primarily, Champion uses the information our customers provide to contact them for account service, billing and marketing purposes. For example, we may send marketing or promotional materials related to new service offerings or we may need to contact a customer in the course of fulfilling a service request. Most commonly we use personal information to confirm and verify service enrollment status and financial information to process the initial credit approval requirements or to restore a delinquent account. Champion does not collect personal information automatically or without the customers consent. However, for analysis purposes Champion may combine non-personal public information that is collected automatically, via the internet or phone system, with personal information. We may also enhance or merge personal information with data obtained from third parties for the same purposes. This merged and combined data is for internal use only and is not shared with or sold to others.

Except in the event of a business transfer or acquisition, Champion will not share, trade or sell personal information about customers to others. When companies acquire other businesses or sell all or substantial portions of a business then customer information generally is one of the transferred assets. If Champion or substantially all of Champion's assets are transferred through merger, acquisition, bankruptcy or any other change of corporate control then, customer information will be one of the transferred assets.

Sometimes Champion may send offers to customers on behalf of another businesses. When this happens, customer information is not shared with the other business and Champion controls the information as well as the communication.

Aggregated and statistical data from our web site and phone systems may be shared with our partners. For example, we may let a business partner know the total number of visitors to a site on a given day or total number of customers calling at a given time.

All employees, contractors and other independent companies engaged by Champion to perform work that involves access to personal information are contractually required to keep the information confidential and private and are not permitted to use it in any way other than what is necessary to perform their work for Champion.

Champion may release personal data, including account information, when we believe release is appropriate to comply with laws, regulations or judicial orders; or to protect the rights, property, or safety of Champion, our customers, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Champion also reserves the right to share the information to respond to duly authorized information requests of governmental, regulatory and law enforcement in accordance with applicable law.

#### **Web Site Information**

Champion automatically collects non-personal information from all visitors to the company web site. The collection of this non-personal information is done using a variety of technologies, including log analysis, "cookies" and "web beacons". None of our methods for collecting this information allows for the collection of personal information. The information collected is used to help tailor the visitor's internet site experience including but not limited to personalized content, advertising and meaningful information.

#### **Children's Privacy**

Champion believes that it is especially important to protect children's privacy online. The Champion web sites are directed at an adult audience and we therefore do not knowingly collect personal information from children.

#### **Data Security**

Champion is committed to keeping our customers personal data private and secure. Champion works hard to take reasonable precautions to protect our customer's personal information from loss, misuse or alteration. These precautions include limiting access to such information to authorized individuals only. Personal information is destroyed once it is determined it is of no use or outdated. Agents, contractors, or partners of Champion who have access to personal information are required to keep the information confidential and are not permitted to use this information for any other purpose than to carry out the services they are performing for Champion.

#### **Your Preferences**

Champion allows customers to choose to receive or stop receiving solicitations from us at any time. We accomplish this by maintaining a "Customer Preference File" in which customer preferences are recorded as they related to billing (paper or electronic), communications and solicitations. Champion attempts to determine customer preferences by using data provided by the Direct Marketing Association and the National Do Not Call Registry. In addition, Champion uses the statewide do-not-call and electric do-not-call lists maintained by the Public Utility Commissions when available. The statewide do-not-call list is used to identify those consumers that do not wish to be contacted by telephone regarding any solicitation. The electric do-not-call list is used to identify consumers or businesses that do not wish to be contacted by telephone regarding their choice of electric provider.

Customers may inform us of their preference to not receive solicitations from us by emailing us at [support@championenergyservices.com](mailto:support@championenergyservices.com) or by writing to us at:

Champion Energy Services  
Attn: Customer Privacy Department  
1381 Northwest Freeway, Suite 250  
Houston, TX 77040

When contacting us by email or mail, be sure to include your name, account number, address, telephone number, and email address. In addition, please indicate your preferences for postal mail, telephone and email communications from Champion.

#### **Complaints**



Champion is committed to working with consumers to obtain a fair and rapid resolution of any complaints or disputes about privacy. Please send us your questions or comments regarding our privacy practices by either sending us an email at [support@championenergyservices.com](mailto:support@championenergyservices.com) or writing a letter to:

Champion Energy Services  
Attn: Customer Privacy Department  
1381 Northwest Freeway, Suite 250  
Houston, TX 77040

#### **Links to Other Sites**

Some Champion web sites may contain links to other sites. Champion is not responsible for the privacy practices or the content of such web sites. We recommend you carefully read the privacy policies of each site you visit.

#### **Policy Changes**

We reserve the right to make changes to this Privacy Policy at any time so please check back periodically so you are familiar with our current Policy. If in the future we wish to use your information in a manner not previously disclosed, we will post the policy changes here and if significant, we will provide a more prominent notice to customers of these changes and provide the ability to opt-out. Continued use of our web sites after receiving notice of a change in our Policy indicates your consent to the use of newly submitted information in accordance with the amended Champion Privacy Policy.

#### **Acceptance of Our Privacy Practices**

Acceptance of this Privacy Policy is signaled by either subscribing for service from Champion or by using the company's web site or interactive banner ads. By accepting this Policy the customer agrees to adhere to the terms and conditions posted on the web site and contained herein. Visitors, callers, customers or potential customers that do not agree with any of these terms, should not use the web site or submit any personal information to Champion.

The English version of this Privacy Policy shall always prevail in case of conflicts between it and any translations of our Privacy Statement.