

Privacy Policy

Last modified: 10/XX/2020

Sungas Renewables Inc. ("We", "Us", or "Our") respects your privacy and is committed to protecting your Personal Information in the manner described herein.

This policy applies whenever we collect your Personal Information (including when you use our website, mobile applications, electronic services, social networking sites, on-site data collection, or other platforms where we may collect your Personal Information (collectively "Services"). This policy does not apply to information collected by any third-party website or service that may link to, or be accessible from, our Services.

Please read this policy carefully to understand our practices regarding your information and how we will treat it. By accessing or using our Services, you agree to this policy. **IF YOU DO NOT AGREE WITH THIS POLICY AND/OR OUR PRACTICES, PLEASE DO NOT PROVIDE US WITH YOUR PERSONAL INFORMATION OR INTERACT WITH OUR SERVICES.**

In this policy, "Personal Information" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with an individual (e.g. you) or household. Personal Information does not include aggregated information to the extent that an individual's identity cannot reasonably be derived from it.

Personal Information We Collect About You

We collect several categories of Personal Information from and about users of our Services, such as:

Direct Identifiers, such as: name, postal address, E-mail address, telephone number, birthdate, unique personal identifiers, and federal or state issued identification numbers included social security number and driver license number.

Protected Characteristics, such as age, marital status, gender, medical and disability information.

Commercial Information, such as information about your property, products or services obtained and consumption of utility services; including energy and water usage and other information provided to or made available to us by or on behalf of you, as well as generated by us in the course of providing our services to you.

Personal Records, any background information provided by you or collected by us as part of our business processes **Internet Usage Information**, such as information about your internet connection, the equipment you use to access our Services, and usage details; and information about your social media accounts when you register for our services using a social media (such as Facebook, Google, or Microsoft) account

Geolocation Data

Professional & Employment-related Information

Education Information

Inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics

How We Collect Personal Information

We collect Personal Information:

- Directly from you when you provide it to us, including:
 - Information that you provide by filling in forms on our Services, including information provided at the time of registering to use our Services, subscribing to our service, or requesting further services;
 - Records and copies of your correspondence (including email addresses), if you contact us; and
 - Details of transactions you carry out through our Services and of the fulfillment of your orders and requests;
- Automatically as you navigate through our Services, including:
 - Details of your visits to our Services, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Services; and
 - Information about your computer and internet connection, including your IP address, operating system, and browser type; and
 - Information provided to us through your social media login to our Services

The technologies we use for such automatic data collection may include cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. We use them to improve our Services and to deliver a better and more personalized service. The information we collect automatically in this manner is statistical data and does not include Personal Information. You may refuse to accept browser cookies by activating the appropriate setting on your browser. Although you are not required to accept cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through our Services. Unless you have activated your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our websites.
- From Program and Project Partners and other third parties which may include federal, state, and local governments or private companies.

How We Use Personal Information

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our Services and their contents to you;
- To provide you with information, products, or services that you request from us;
- To confirm registrations, respond to your inquiries or fulfill your requests;
- If you contact us through our Services, to keep a record of your contact information and correspondence to use when responding to you;
- To analyze use of our Services to help us detect problems, prevent fraud, identify usage trends and improve user experience;

- To authenticate your identity to our Services;
- To carry out our obligations and enforce our rights arising from any contracts you entered with us, including for billing and collection;
- To allow you to participate in interactive features on our Services;
- To enable user-to-user communications on our platforms and Services;
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- To contact you about our services, training and events that may be of interest to you;
- To verify your identity
- In any other way we may describe when you provide the information;
- To fulfill any other purpose for which you provide it;
- For any other purpose with your consent;
- To allow you to send content through our Services; and
- If you apply for employment with us, to process your employment application and other related activities.

Disclosure of Personal Information

We may disclose aggregated information about our users that does not identify any individual, without restriction.

We may disclose your Personal Information that we collect, or you provide, as described in this policy:

- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide the information;
- With your consent;
- To our subsidiaries and affiliates;
- To our industry partners, when the Personal Information is collected in connection with services we provide on their behalf;
- To contractors, service providers, and other third parties we use to support our business;
- To a successor in the event of a merger, sale, 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 Services users is among the assets transferred;
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request; and
- If we believe disclosure is necessary or appropriate to protect our rights, property, or safety, or those of our customers or others.

Third-Party Use of Cookies and Other Tracking Technologies

Our Services may contain links to other websites. We are not responsible for the privacy practices or the content of such websites.

Cookies may be set by parties other than us. These “third-party cookies” may, for example, originate from websites such as YouTube, Twitter, LinkedIn or other social media services for which we have implemented “plug-ins.” The cookie policies of these sites change over time and you should determine their policies by visiting the privacy policy pages of these sites directly. We do not control these third parties' tracking technologies or how they may be used.

Marketing Emails

If you do not wish to receive marketing-related emails from us, please click email a request to us using the information in the section “Contact Us” at the end of this policy.

Data Security

We have implemented measures designed to help prevent your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we attempt to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Services. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our Services.

Information Retention

We will keep your Personal Information for as long we believe it is necessary to carrying out the purpose for which it was collected, unless a longer retention period is required or permitted by law or through contract with our industry partner.

How “Do Not Track” requests are handled

Our Services do not support “Do Not Track” requests.

Your California Privacy Rights

If you are a California resident, you have the privacy rights listed below with respect to your Personal Information.

California’s Shine the Light Law: Under California Civil Code Section 1798.83, California residents are entitled to request information relating to whether a business has disclosed Personal Information to any third parties for the third parties’ direct marketing purposes. We do not sell or share your Personal Information with third parties for their direct marketing purposes without your consent.

Data Storage and Processing Conducted in the United States

Regardless of where you are located, our Services collect information and process and store that information in databases located in the United States. If you are visiting our Services from a country outside the United States, you should be aware that you may transfer Personal Information about yourself to the United States, and that the data protection laws of the United States may not be as comprehensive as those in your own country. By visiting our Services and submitting any Personal Information, you consent to the transfer of such Personal Information to the United States.

Users located in the European Economic Area

If you are located in the European Union, Iceland, Liechtenstein or Norway, the General Data Protection Regulation (GDPR) may provide you with additional rights regarding our use of your Personal Information. We are the data controller for our Services. We process Personal Information it collects through our Services for our legitimate business purposes, for example to fulfill any requests you may make in connection with your submission of Personal Information, to monitor and improve the quality of our Services, and to protect and defend our rights, property or safety or that of our clients and other users of the Services. You may contact us to inquire about your Personal Information, ask questions, or take actions on the following:

- (i) Request access to your Personal Information, including reasons for holding it and parties it may be disclosed to.
- (ii) Ask us to change/correct any of your Personal Information
- (iii) Ask us to delete any of your Personal Information
- (iv) Ask us to restrict the processing of your Personal Information.
- (v) Express concerns you may have about our use of your Personal Information.

To exercise your rights under this policy or if you have a complaint, please send us a request using the “Contact Information,” section below. If you are located in the European Union, you may also contact the Data Protection Authority (DPA) for your country regarding a complaint.

Persons Under the Age of 18

Our Services are not intended for persons under 18 years of age. No one under age 18 is permitted to provide any Personal Information to, or on, our Services. If we learn we have collected or received Personal Information from a person under age 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a person under 18, please contact us at security@frontierenergy.com.

Changes to Our Privacy Policy

We reserve the right to change this policy at any time without advance notice. The date this policy was last revised is identified at the top of the page. You are responsible for periodically visiting this policy to check for any changes to it.

Contact Information

To ask questions or comment about this policy and our practices regarding your information, or to register a request or complaint, contact Daniel S. LeFevers at

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