

# Participant Privacy Policy

*Updated May 10, 2018*

## I. Purpose

The Privacy Policy describes what data Pecan Street collects and explains how Pecan Street collects, uses, shares, stores and safeguards on our servers, databases and third party storage platforms, the information we collect from our research participants and users of our Sites (“Sites”, as used here, refers to our websites, mobile websites, microsites, mobile applications, Pecan Street profiles on Pecan Street social media sites and any other digital services and platforms officially operated or used by Pecan Street from time to time).

## II. Information Pecan Street Collects

1. **Personal Data:** Pecan Street may collect (online, by phone, by paper, or other means) from individuals participating in its research (“Research Participants”) or users of its Sites (“Users”), information that identifies, or that could reasonably be used to identify a person as an individual (“Personal Data”). The types of Personal Data that Pecan Street collects may include name, address, phone number, and email address.
2. **Other Data:** All other data other than Personal Data is referred to as “Other Data”. We collect Other Data through a variety of sources including, but not limited to, data streams from our field sensors installed in Research Participants’ homes, cookies and other technologies that record data about the use of our Sites. Other Data that we may collect include:
  - **Field sensors data:** this data includes, but is not limited to, information from energy monitoring sensors, volumetric water sensors, volumetric natural gas sensors, temperature sensors, and other instrumentation installed by Pecan Street (or its designee) on the premises of its Research Participants (collectively, “field sensors” or “devices”);
  - **Browser, cookie and tracking technology data:** this data includes, amongst others, browser information, Internet Protocol (IP) address, operating system, internet browser type, cookies, tags, web beacons and other tools. Cookies are small text files that are stored in a computer’s web browser memory. They help website providers with things like understanding how people use a website, remembering a user’s login details, and storing website preferences. Cookies may be placed on our Site by us or third-party advertisers. Tags and web beacons refer to code scripts that are primarily used to track visitors’ activities on our Sites by web analytics software. Specifically, the types of Other Data we collect on our Sites through the use of the

aforementioned, and other tools, from time to time, may include: User search terms, new or returning User information, browser information, computer type, operating system, internet service providers, website usage, referring or exit pages, platform type, date or time stamp, number of clicks, and similar other information. Additionally, cookies, tags and other tools placed on our Sites by third parties may collect Other Data about our Users and their visits to our Sites and elsewhere on the Internet including, but not limited to, their business or academic institution, business size, title, etc.).

### III. Data Collection Procedures

The data we collect is from multiple input sources, and can be evaluated in three different cohorts - (a) data collected automatically from Research Participants using field sensors that store and transmit data, (b) data we receive from our Sites, such as when a User creates an account on one of our Sites or when we receive an email from a User, and (c) data collected in a non-automatic manner (non-electronic, manual, or for ad-hoc purposes). The classification of the data as Personal Data or Other Data dictates our storage and access procedures, as depicted in Figure 1.

1. Field sensors data collection procedures: Field sensors data never contains Personal Data; it does not contain any information that can identify a home, location or person; it only contains the device name along with the device readings which are transmitted to Pecan Street's servers. The devices are each referenced by a random name (either generated by the device manufacturer, for example, egaugeXXXXX, where XXXXX is a decimal number— or created by Pecan Street), which has no reference to, and thus cannot, identify the Research Participant from whom the data is collected. For example - when field sensors collect energy data, the data transmitted to Pecan Street's servers from such devices contain only: the Research Participant's energy use data (measured in kilowatt (kW), voltage (V), total harmonic distortion (THD), current, and Amperes (A)), along with the device name (egaugeXXXX, lgXXXX). The same is true with water data, or other data collected from our field sensors.
2. Sites data collection procedures: Pecan Street offers Sites (for example Dataport web portal or BluWater mobile app) through which we receive information directly from Users or visitors to the Sites. Personal Data collected from the Sites are routed to Salesforce, ensuring that no Personal Data collected through the Sites are stored on Pecan Street's servers. Email addresses are collected for secure user login to the Sites, and these are encrypted on Pecan Street's servers, as discussed in more detail in Section VIII, User ID and Password.
3. Non-automatic data collection procedures: Pecan Street collects information directly from Research Participants on paper or electronically for general or ad-hoc research purposes. Personal Data collected in this manner is entered into Pecan Street's secure Customer Relationship Management (CRM) platform, which is Salesforce, where it is anonymized and stored separately from Pecan

Street’s database servers. Other Data collected in this manner is entered into the Pecan Street’s database server. For instance, when a new record for a Research Participant is created in Salesforce, a randomly generated identifier (DataID) is created to anonymize the Personal Data and allow all incoming associated non- personal data to be referenced back to the unique person-home. Pecan Street’s database server only contains the DataID and the Other Data (such as, for example, energy usage information and device ID), and excludes Personal Data. Using this method of decoupling the Personal Data from the Other Data, Pecan Street is able to maintain a robust and secure database server system, and make accessible for research, field device data and Other Data without disclosing associated Personal Data.

4. Data collection oversight: Pecan Street has a designated Controller (Pecan Street Data Director) who oversees the management and processing of Personal Data. Only Pecan Street CEO-approved personnel whose job duties necessitate access to Salesforce are granted Salesforce account access privilege, which must be unique to each personnel. Such designated staff must that have successfully completed a background check and undergone security training, as detailed below. Salesforce account access allows designated personnel to view Personal Data as well as the identifier that links person-home to Other Data in Pecan Street’s database servers.

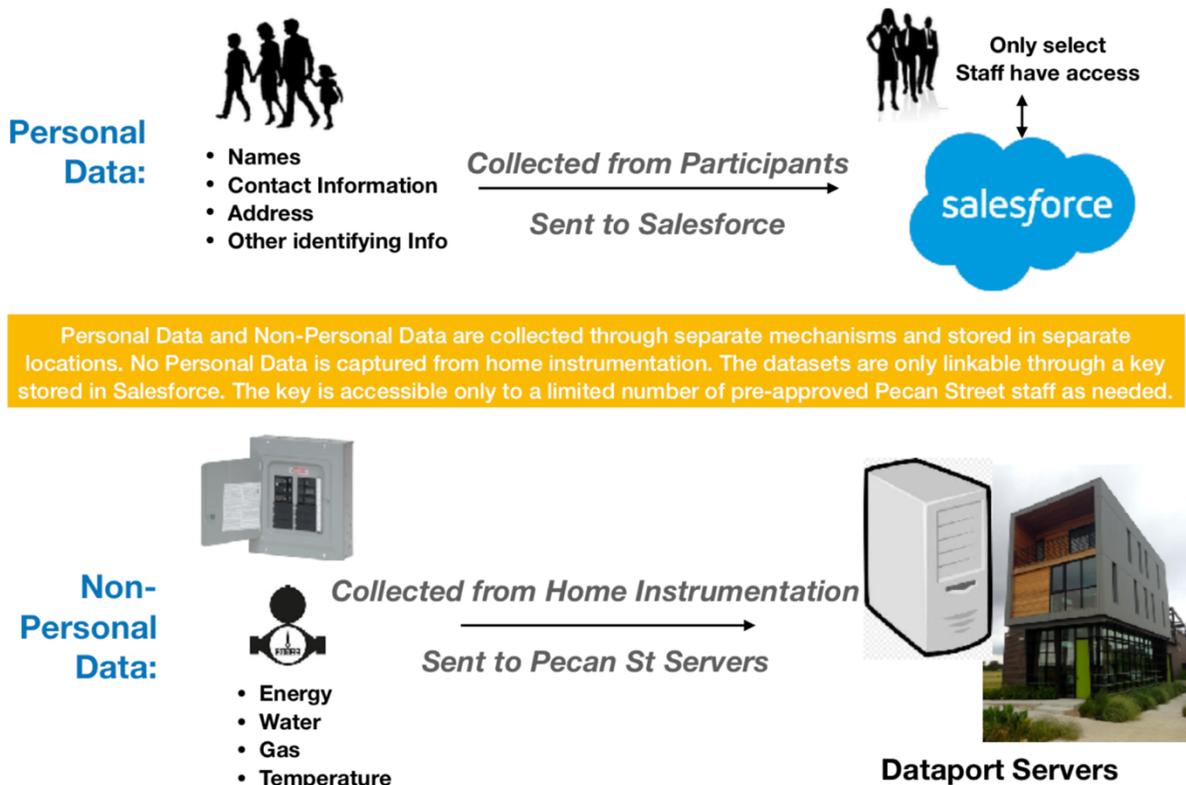


Figure 1. Differentiated data collection and storage process for Personal and Non-Personal Data

#### **IV. Storage of Personal Data:**

All Personal Data collected by Pecan Street from Research Participants and from the Sites is stored in Salesforce. All paper documents containing Personal Data are securely locked and stored at Pecan Street's lab in Austin, Texas. Only designated personnel approved by Pecan Street's CEO have access to the locked documents.

Pecan Street has verified that Salesforce has appropriate security measures in place to protect against data loss, mis-use or alteration of information we store on its platform. Salesforce.com is hosted in a secure server environment that uses a firewall to prevent access from outsiders. All customer data is backed up nightly by Salesforce.com and stored on mirrored disks to ensure data is not lost.

When Pecan Street personnel access Salesforce.com through a supported web browser, Secure Socket Layer (SSL) technology protects the information via server authentication and data encryption. Personnel logging into Salesforce must verify the secure connection by ensuring they can see a small lock icon at the bottom of the browser display, indicating that a secure connection has been established to the server.

Personnel that are permitted to access Salesforce are given a unique username and password that must be entered each time they log in to their Salesforce account.

Each has unique credentials and can be tracked by Pecan Street's administrative Salesforce account each time Salesforce is accessed or when changes are made to a record.

#### **V. Use and Sharing of Personal Data**

Pecan Street does not sell Personal Data or make it available to third parties without express permission from the Research Participant or User. From time-to-time, Pecan Street's project partners desire to undertake research trials that may involve Research Participants' Personal Data. In these cases, Pecan Street notifies its Research Participants requesting voluntary participation. A desire to participate in such a trial must be effected by an agreement (paper or electronic) signed by the Research Participant. The agreement describes the nature of the research trial, specifies the purpose for which the data will be collected, and provides Pecan Street with the Research Participant's express consent to share his/her specifically identified Personal Data with the third party project partner.

Pecan Street may disclose Personal Data if required to do so by law or in the good-faith belief that such action is necessary to: (a) conform to legal requirements or comply with legal process served on Pecan Street; (b) protect and defend the rights or property of Pecan Street; or (c) protect the personal safety of Pecan Street personnel or members of the public in appropriate circumstances. In addition, if Pecan Street and/or its assets (or a portion of its assets) are sold, assigned, transferred, or



merged, or if it undergoes some other change including a change to its corporate form as part of a bankruptcy proceeding or otherwise, information may be transferred as part of that transaction or change.

## **VI. Use and Sharing of Other Data**

Pecan Street uses Other Data for a range of different purposes, provided we comply with applicable law and our contractual commitments. For example, we make Other Data available, through our Dataport web portal and other external dispatch methods, to researchers and other partners under free and paid data licensing agreements. Other Data may also be included in reports, proposals, presentations, amongst others, to funders and other entities as needed to further Pecan Street's mission.

## **VII. Information Security**

Pecan Street implements commercially reasonable security measures to help protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data. Except for the sharing of information as set forth in this Privacy Policy, Pecan Street provides access to personal information to certain entities who may need to know that information in order to operate, develop, or improve our services. These individuals or partner organizations are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, and despite our efforts, Pecan Street cannot guarantee or warrant the security of any information transmitted to us, or to or from our online products or services.

## **VIII. User ID and Password**

Certain areas of our Sites may require the use of a user ID, email address, or password as an additional security measure that helps protect user information. For maximum protection of customer privacy, all login information - including usernames and passwords - will be hashed (that is, obscured) and stored in a non-reversible format. The stored Personal Data will be permanently irrecoverable and cannot be viewed by any party, including Pecan Street. This essentially disallows login without hashed credentials. By disallowing non-hashed login information, Pecan Street further reduces the risk of inadvertent disclosure of Personal Data. Furthermore, to help protect customer privacy, the Sites have tools that allow Users to log in and log out at their option.

In order to ensure security and prevent interruption in our operations, Pecan Street utilizes security measures including web encryption, database security, and web security. These techniques, in combination with user ID and password hashing, allow



for secure data collection and retention, well above best industry practices for securing websites and mobile applications.

## **IX. Compliance Audit**

At the beginning of each Pecan Street fiscal year (October 1st), Pecan Street's CFO and CTO will conduct a compliance audit to ensure all data collected by Pecan Street is managed and protected in accordance with this Privacy Policy. A report will be authored by December 31st of each year and stored on Dropbox, and available to any parties as requested, detailing the findings of the audit. Any areas found to not be in compliance with the Privacy Policy will be remedied within 30 days.