Privacy Policy

Last updated: November 7, 2025

This Privacy Policy describes our policies and procedures on the collection, use, and disclosure of your information when you use the Service, and tells you about your privacy rights and how the law protects you.

We use your Personal Data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

If you have an investment with us, we will use and share any information that we collect from or about you in accordance with our Notice of Privacy Practices, which offers you certain choices with respect to the use and sharing of your personal information.

Interpretation and Definitions

Interpretation

Words whose initial letter is capitalized have definite meanings under the following conditions. The following definitions will have the same meaning regardless of whether they appear in the singular or the plural.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for you to access our Service or portions of our Service.
- **Business** shall have the meaning as set out in the California Consumer Privacy Act, as amended by the California Privacy Rights Act, and any amendments thereto ("CCPA").
- **Company** ("the Company," "We," "Us," or "Our") refers to Phoenix Energy One LLC, 18575 Jamboree Rd., Suite 830 Irvine, CA 92612.
- **Consumer** shall have the meaning as set out in the CCPA.
- **Cookies** are small files that are placed on your computer, mobile device or other device by a website, and contain details of your browsing history on that website, among other uses.
- **Country** refers to the United States.
- **Device** means any device that can access the Service, such as a computer, mobile phone, or digital tablet.

- **Do Not Track (DNT)** is a concept promoted by the regulatory authorities of the United States, in particular the Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism that allows Internet users to control the tracking of their online activities on different websites.

- **Personal Data** refers to any information that relates to an identified or identifiable person. For purposes of the CCPA, Personal Data means any information that identifies, relates to, describes, or can be associated with, or reasonably can be linked, directly or indirectly, with you.

- **Sale**, for purposes of the CCPA, means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating, orally, in writing, electronically, or by other means, a consumer's personal information to a third party in exchange for monetary or other valuable consideration.

- **Service** refers to the Website.

- **Service Provider** refers to any natural or legal person who processes data on behalf of the Company. Refers to third-party companies or individuals employed by the Company to facilitate the Service, provide the Service on behalf of the Company, perform Service-related services, or assist the Company in analyzing how the Service is used.

- **Subsidiary** refers to any company or venture owned by the parent, with the parent holding 51% or more the entity.

- **Usage Data** refers to data collected automatically, generated both by the use of the Service and by the infrastructure of the Service itself (for example, the duration of a visit to a page).

- **Website** refers to the website of Phoenix Energy, accessible from https://www.phoenixenergy.com/.

- **You** means the person accessing or using the Service, or the company or other legal entity on behalf of which such person accesses or uses the Service, as applicable.

Collection and Use of Your Personal Data

Types of data collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Email address

- Name and surname

- Phone number
- Address, state, province, zip code, city
- Accredited investor status
- Financial information, including the amount you are considering investing
- Usage Data

Usage Data

Usage Data is collected automatically when you use the Service.

Usage Data may include information such as the Internet Protocol address (e.g., IP address) of the device, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers, and other diagnostic data.

When you access the Service through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, the unique ID of your mobile device, the IP address of your mobile device, the mobile operating system you use, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our Service or when you access the Service through a mobile device.

Tracking Technologies and Cookies

We use cookies and similar tracking technologies to track activity on our Service and store certain information. The tracking technologies used may include beacons, tags, and scripts to collect and track information, as well as improve and analyze our Service. The technologies we use may include:

Cookies or Browser Cookies: A cookie is a small file that is placed on your device. You can instruct your browser to refuse all cookies or to alert you when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some parts of our Service. Unless you have adjusted your browser settings to refuse cookies, our Service may use cookies.

Web beacons: Certain sections of our Service and our emails may contain small electronic files known as web beacons (also called clear gifs, pixel tags, and single-pixel gifs) that allow the Company, for example, to count users who have visited those pages or opened an email, and to obtain statistics related to the Website (e.g., record the popularity of a certain section and check the integrity of the system and server).

Cookies can be “persistent” or “session”. Persistent cookies remain on your personal computer or mobile device when you are offline, while session cookies are deleted as soon as you close your web browser. You can learn more about cookies in the article on the TermsFeed website: https://www.termsfeed.com/blog/cookies/#What_Are_Cookies.

We use both session cookies and persistent cookies for the following purposes:

Necessary / Essential Cookies

- Type: Session cookies
- Purpose: These cookies are essential to provide you with the services available through the Website and allow you to use some of its features. They help authenticate users and prevent fraudulent use of user accounts. Without these cookies, the services you have requested cannot be provided, and we only use them to provide those services to you.

Functionality Cookies

- Type: Persistent cookies
- Purpose: These cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preferences. The purpose of these cookies is to provide you with a more personalized experience and to prevent you from having to re-enter your preferences each time you use the Website.

Tracking and Performance Cookies

- Type: Persistent cookies
- Purpose: These cookies are used to track information about traffic on the Website and how users use the Website. The information collected through these cookies can directly or indirectly identify you as an individual visitor. This is because the information collected is usually linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these cookies to test new pages, features or functionality of the Website and see how our users react to them.

Targeting and Advertising Cookies

- Type: Persistent cookies
- Purpose: These cookies track your browsing habits to allow us to display advertising that you are more likely to find interesting. These cookies use information about your browsing history to group you with other users who have similar interests. Based on that information, and with our permission, third-party advertisers may place cookies to display ads that we believe are relevant to your interests while you are on third-party websites.

For more information about the cookies we use and your choices regarding cookies, please see the *Detailed Information on the Processing of your Personal Data* section of this Privacy Policy.

Use of your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including monitoring the use of our Service.
- **To manage your account**: To manage your registration as a user of the Service. The Personal Data you provide gives you access to different functionalities of the Service that are available to you as a registered user.
- **For the performance of a contract:** For the development and performance of the contract with us through the Service.
- **To contact you**: To communicate with you by email, phone calls, text messages or other equivalent forms of electronic communication, such as push notifications from a mobile application, about updates or informational communications related to the Services contracted, including security updates when necessary or reasonable for their implementation.
- **To provide you with news** and general information about other Services and events we offer that are similar to those you have already consulted, unless you have opted out of receiving such information.
- **To manage your requests**: To attend and manage your requests to us.
- **To provide you with personalized advertising**: We may use your information to develop and display content and advertising (and work with third-party providers who do so) tailored to your interests and/or location, and measure their effectiveness.
- **For business transfers**: We may use your information to evaluate or carry out a merger, sale of assets, restructuring, dissolution or other transaction or transfer of all or part of our assets, whether as a going concern or as part of a bankruptcy, liquidation or other similar proceeding, in which Personal Data we hold about users of our Service is transferred as part of the assets.
- **For other purposes**: We may use your information for other purposes, such as analyzing data, identifying usage trends, determining the effectiveness of our promotional campaigns, evaluating and improving our Service, products, marketing, and your experience.

Disclosure of your Personal Data

We may share your Personal Data in the following situations:

- **With Service Providers**: We may share your personal information with Service Providers to monitor and analyze the use of our Service, to help maintain and support our Service, advertise on third-party websites after you have visited our Service, process payments, and communicate with you.

- **For business transfers:** We may share or transfer your personal information in connection with, or during negotiations related to, any merger, sale of Company assets, financing, or acquisition of all or part of our business by another company.

- **With subsidiaries**: We may share your information with subsidiary companies, in which case we will require them to abide by this Privacy Policy. This may include our parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under our common control.

- **With business partners**: We may share your information with our business partners to offer you certain products, services or promotions.

- **With other users:** When you share personal information or interact in public areas with other users, such information may be viewed by all users and may be publicly distributed outside of our control.

- **With your consent:** We may disclose your personal information for any other purpose with your consent.

- **For law enforcement:** Under certain circumstances, the Company may be required to disclose your Personal Data if required to do so by law or in response to valid requests from public authorities (e.g. a court or government agency).

- **For other legal requirements:** The Company may disclose your Personal Data in the good faith belief that such action is necessary to comply with a legal obligation, protect and defend the rights or property of the Company, prevent or investigate potential misconduct related to the Service, protect the personal safety of users of the Service or the general public, or protect against legal liability.

We will not share users' phone numbers with business partners, subsidiaries, or affiliates for marketing or promotional purposes.

Retention of your Personal Data

The Company will retain your Personal Data only for as long as necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

In addition, the Company will retain Usage Data for internal analysis purposes. Generally, Usage Data is retained for a shorter period of time, except when used to strengthen the security or improve the functionality of our Service, or when we are legally obliged to retain such data for longer periods.

The Transfer of your Personal Data

Your information, including Personal Data, is processed at the Company's operational offices and any other place where the parties involved in the process are located. This means that this information may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where data protection laws may differ from those in your jurisdiction.

Your consent to this Privacy Policy, followed by your submission of such information, represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy, and your Personal Data will not be transferred to an organization or country unless there are adequate controls in place, including the security of your data and other personal information.

Security of your Personal Data

The security of your Personal Data is important to us, however, no method of transmission over the Internet or electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee absolute security.

Links to Other Websites

Our Service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be redirected to that third-party site. We strongly encourage you to review the privacy policy of each website you visit.

We have no control over, and assume no responsibility for, the content, privacy policies, or practices of third-party sites or services.

Detailed Information on the Processing of your Personal Data

The Service Providers we use may have access to your Personal Data. These third-party providers collect, store, use, process and transfer information about your activity on our Service in accordance with their privacy policies.

We do not respond to Do-Not-Track signals at this time; however, please see the "Behavioral Remarketing" section below for information on how you can opt-out of certain tracking technologies.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and generates reports on website traffic. Google uses the collected data to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt out of making your activity on the Service available to Google Analytics by installing the Google Analytics opt-out add-on in your browser. This add-on prevents Google Analytics JavaScript code (gtag.js and dc.js) from sharing information with Google Analytics about visit activity.

For more information about Google's privacy practices, please visit the Google Privacy & Terms webpage: https://policies.google.com/privacy.

Email Marketing

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any or all of these communications from us by clicking the unsubscribe link, following instructions provided in any email we send you, or by contacting us.

We may use email marketing Service Providers including, but not limited to Active Campaign, SendGrid, and Phone Burner to manage and send emails.

SMS Marketing

We may use SMS to contact you with marketing, promotional, or transactional information surrounding your interactions with our Product. You may opt out of all of these communications aside from account verification, by responding with STOP.

We may use SMS marketing Service Providers including, but not limited to Twilio, Phone Burner, and Text Magic, to manage and send SMS messages.

Mobile information will not be shared with third parties/affiliates for marketing/promotional purposes. Any other mentions in this policy exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. If you wish to be removed from receiving future communications, you can opt out by texting STOP.

Payments

We may use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors, whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS, as administered by the PCI Security Standards Council, which is a joint effort of brands such as Visa, Mastercard, American Express, and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

When you use our Service to purchase securities and/or service by bank transfer, we may ask you to provide information to facilitate this transaction and verify your identity.

Behavioral Remarketing

The Company uses remarketing services to show you ads after you have accessed or visited our Service. We and our third-party vendors use cookies and non-cookie-based technologies to help us recognize your device and understand how you use our Service, so that we can improve our Service and display ads that are likely to be of most interest to you.

These third-party providers collect, store, use, process and transfer information about your activity on our Service in accordance with their privacy policies and to allow us to:

- Measure and analyze traffic and browsing activity on our Service
- Show you ads for our products and/or services on third-party websites or applications
- Measure and analyze the performance of our advertising campaigns

Some of these third-party providers may use non-cookie-based technologies that are not affected by browser settings that block cookies. Your browser may not allow you to block such technologies. You can use the following third-party tools to opt out of the collection and use of information to show you interest-based advertising:

- Digital Advertising Alliance Consumer Choice Tools: https://youradchoices.com/
- Network Advertising Initiative Opt-Out Platform: https://thenai.org/opt-out/

You can also opt out of personalized advertising by enabling privacy features on your mobile device, such as App Tracking Transparency (iOS) and Deleting Advertising ID (Android). Check your mobile device's help system for more information.

We may share information, such as encrypted email addresses (if available) or other online identifiers collected on our Service, with these third-party vendors. This allows our third-party vendors to recognize and show you ads across different devices and browsers. For more information about the technologies used by these third-party providers and their cross-device capabilities, please refer to each provider's privacy policy below.

The third-party providers we use are:

Google Ads

We use Google Ads, a service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, to deliver personalized advertisements.

You can opt out of Google Analytics for display advertising and personalize Google Display Network ads by visiting the Google Ads Settings page: https://myadcenter.google.com/home?sasb=true&ref=ad-settings.

For more information about Google's privacy practices, please visit Google's Privacy & Terms page: https://policies.google.com/privacy.

Meta Platforms, Inc

We use advertising services provided by Meta Platforms, Inc., including but not limited to Facebook Ads, Instagram Ads, and the Meta Audience Network, to serve personalized advertisements and measure ad performance. These services may collect or receive information from our website and use that information to provide measurement services and target ads.

You can learn more about Meta's interest-based advertising by visiting this page: https://www.facebook.com/help/516147308587266.

To opt out of receiving interest-based ads from Meta, follow these instructions provided by Meta: https://www.facebook.com/help/568137493302217.

For more information about Meta's privacy practices, please visit Meta's Data Policy: https://www.facebook.com/privacy/explanation.

Microsoft Corporation

We use advertising services provided by Microsoft to deliver personalized advertisements on Microsoft Advertising Platforms including but not limited to Linkedin, Bing, Yahoo, and Microsoft Audience Network.

You can opt-out of personalized ads on Linkedin by visiting the Linkedin Ads settings page and following the instructions available here: https://www.linkedin.com/help/linkedin/answer/a1342443. You can opt-out of personalized ads on Yahoo by visiting the Yahoo Privacy Dashboard and Controls available at: https://legal.yahoo.com/us/en/yahoo/privacy/dashboard/index.html. For other Microsoft platforms, please visit: https://account.microsoft.com/privacy/ad-settings.

For more information on how Microsoft collects, shares, and uses data, please visit: https://www.microsoft.com/en-us/privacy/privacystatement.

Taboola, Inc.

We use advertising services provided by Taboola to deliver personalized advertisements on various publishing sites.

For more information on Taboola's privacy practices and instructions on how to opt out of Taboola's personalized advertising, please visit: https://www.taboola.com/policies/privacy-policy.

Usage, Performance and Others

We may use third-party Service Providers to improve our Service, and these third parties may have access to information you provide to the Website.

Google

We use a captcha service called Google reCAPTCHA provided by Google LLC.

The reCAPTCHA service may collect information from you and your device for security purposes.

The information collected by reCAPTCHA is treated in accordance with Google's privacy policy: https://policies.google.com/privacy.

Sentry

We use Sentry to monitor and improve the performance of our Website. Sentry collects information about your interaction with the Website, including Usage Data and device data.

For more information on how Sentry handles your data, please visit their privacy policy: https://sentry.io/privacy/.

Cloudflare

We use Cloudflare for security and optimization purposes when you access our Website. Cloudflare collects technical information such as your IP address and browser settings.

For more information on how Cloudflare handles your data, please visit their privacy policy: https://www.cloudflare.com/privacypolicy/.

Trustpilot

We use Trustpilot to collect and display customer reviews. When you interact with our review features, certain personal and technical data may be collected and shared with Trustpilot.

For more information on how Trustpilot handles your data, please visit their privacy policy: https://legal.trustpilot.com/for-reviewers/end-user-privacy-terms.

Vimeo

We use Vimeo to enable videos on our Website. When you interact with videos on our Website, Vimeo collects Usage Data and device information.

For more information on how Vimeo handles your data, please visit their privacy policy: https://vimeo.com/privacy.

YouTube

We use YouTube to enable videos on our Website. When you interact with videos on our website, YouTube collects Usage Data and device information.

For more information on how YouTube handles your data, please visit Google's privacy policy: https://policies.google.com/privacy.

OptInMonster

We use OptInMonster to optimize our marketing. OptInMonster collects Usage Data and data on your interaction with our website to enhance user engagement and analyze campaign performance. Their privacy policy can be found at: https://optinmonster.com/privacy/.

California Resident Privacy Notice

This *California Resident Privacy Notice* section supplements the information contained in our privacy policy and applies solely to all visitors, users, and others residing in the State of California.

California residents who are employees or job applicants should review the CCPA Worker Notice and the CCPA Applicant Privacy Notice, as applicable, for details on how their information is collected, used, and shared for these purposes.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, can be associated with, or could be linked, directly or indirectly, with a particular consumer or device. Below is a list of categories of personal information that we may collect or that have been collected from California residents in the past twelve months, the sources of such personal information, and how we use and share such information for business purposes.

Personal Information Category set forth in Cal. Civ. Code § 1798.140	Source(s) of Personal Information Collection	Business or Commercial Purpose(s) for Collection/Use	Third Parties, Service Providers, and Contractors Receiving Personal Information Category	Retention Period
Personal identifiers, including real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license or passport number, or other similar identifiers.	Directly from you; indirectly from you as you browse our Service.	Business operations and client services; data analytics; advertising and marketing; security and monitoring; administrative and auditing; M&A and other business transactions; defending and protecting rights; compliance with	Affiliates; Service Providers; technology providers; data analytics providers; advertising networks.	We keep your information as long as we need it for our business purposes.

		applicable legal obligations.		
California Customer Records personal information (Cal. Civ. Code § 1798.80(e)), including name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	Directly from you.	Business operations and client services; security and monitoring; administrative and auditing; M&A and other business transactions; defending and protecting rights; compliance with applicable legal obligations.	Affiliates; Service Providers; technology providers; data analytics providers; advertising networks.	We keep your information as long as we need it for our business purposes.
Characteristics of protected classifications under California or federal law.	Indirectly from you as you browse our Service.	Advertising and marketing.	Data analytics providers, advertising networks.	We keep your information as long as we need it for our business purposes.
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or	Directly from you.	Business operations and client services; data analytics; advertising and marketing; security and	Affiliates; Service Providers; technology providers; data analytics providers; advertising networks.	We keep your information as long as we need it for our business purposes.

other purchasing or consuming histories or tendencies.		monitoring; administrative and auditing; M&A and other business transactions; defending and protecting rights; compliance with applicable legal obligations.		
Biometric information	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information about individual interactions with an Internet website, application, or advertisement.	Indirectly from you as you browse our Service; internet or mobile service providers.	Security and monitoring; data analytics; advertising and marketing; compliance with applicable legal obligations.	Affiliates; Service Providers; data analytics providers; advertising networks.	We keep your information as long as we need it for our business purposes.
Geolocation data	Indirectly from you as you browse our Service; internet or mobile service providers.	Security and monitoring; data analytics; advertising and marketing.	Affiliates; data analytics providers; advertising networks.	We keep your information as long as we need it for our business purposes.
Sensory data including audio, electronic, visual, thermal, olfactory, or similar information.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Professional or employment-related information.	We do not collect.	Not applicable.	Not applicable.	Not applicable.

Non-public education information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g; 34 C.F.R. Part 99**)**	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Indirectly from you as you browse our Services.	Data analytics; advertising and marketing.	Data analytics providers; advertising networks.	We keep your information as long as we need it for our business purposes.
Social security number, driver's license number, state identification card, or passport number.	We do not collect. .	Not applicable.	Not applicable.	Not applicable.
Account access credentials (user names, account numbers, or card numbers combined with required access code, security code or password to access an account).	Directly from you; indirectly from you as you browse our Services; internet or mobile service providers.	Business operations and client service; M&A and other business transactions; defending and protecting rights; compliance with applicable legal obligations.	Affiliates; Service Providers.	We keep your information as long as we need it for our business purposes.
Precise geolocation (location within a geographical area of a circle with a radius of 1850 feet or less).	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Racial or ethnic origin	We do not collect.	Not applicable.	Not applicable.	Not applicable.

Citizenship or immigration status	We do not collect	Not applicable.	Not applicable.	Not applicable.
Religious or philosophical beliefs	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Union membership	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Genetic Data	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Mail, email, or text messages where the content is not directed to us.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Unique identifying biometric information	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Personal information collected and analyzed concerning health.	We do not collect.	Not applicable.	Not applicable.	Not applicable.
Personal information collected and analyzed concerning sex life, or sexual orientation.	We do not collect.	Not applicable.	Not applicable.	Not applicable.

Under CCPA, personal information does not include:

- Publicly available information in government records.
- De-identified or aggregated consumer information.
- Information excluded from the scope of the CCPA, such as:
    - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Privacy of Health Information Act (CMIA), or clinical trial data.
    - Personal information covered by sector-specific laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or the California Financial Information Privacy Act (FIPA), and the Driver Privacy Protection Act of 1994.

Sharing of Personal Information

In the past twelve months, we have provided the following categories of information to affiliates, Service Providers, data analytics providers, and advertising networks for business or commercial purposes:

- Personal identifiers, such as unique personal identifier, online identifier, internet protocol address, device information and identifiers, and unique advertising identifiers and cookies; California Customer Records personal information; commercial information; Internet and other electronic network activity information; and account access credentials.

We disclosed these categories of information to these third parties in order to provide you with the Service, analyze use of our Service, and to personalize and improve our Service.

Sale of Personal Information

As defined by the CCPA, "sell" and "sale" mean selling, renting, disclosing, releasing, disseminating, making available, transferring, or otherwise communicating, orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party in exchange for valuable consideration. This means that we may have received some kind of benefit in exchange for sharing personal information, but not necessarily a monetary benefit.

We may sell and have sold in the last twelve months the following categories of personal information:

Personal identifiers, such as unique personal identifier, online identifier, internet protocol address, device information and identifiers, and unique advertising identifiers and cookies; commercial information; Internet and other electronic network activity information; geolocation information; and inferences drawn to create a profile about you.

We disclosed these categories of information to these third parties in order to analyze use of our Service, to personalize and improve our Service, and to market or advertise to you.

We have no actual knowledge of selling the personal information or the sensitive personal information of minors under 16 years of age.

Your Rights Under the CCPA

The CCPA gives California residents specific rights regarding their personal information. If you are a California resident, you have the following rights:

- **Right to be Notified:** You have the right to be informed about the categories of Personal Data being collected and the purposes for which the personal information is being used.

- **Right to Request:** Under the CCPA, you have the right to request that we disclose information to you about our collection, use, sale, disclosure for business purposes, and sharing of personal information. Once we receive and confirm your request, we will disclose the following to you:

- The categories of personal information we have collected about you.
- The categories of sources from which we have collected personal information 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 have collected about you.
- If we have sold your personal information or disclosed your personal information for a business purpose, we will disclose the following to you:
    - The categories of personal information sold.
    - The categories of personal information disclosed.

- **Right to Correct Inaccurate Personal Data:** You have the right to request the correction of any inaccurate personal information that we maintain about you.
- **Right to Opt Out of the Sale of Personal Data:** You have the right to tell us not to sell your personal information. To submit an opt-out request, please contact us.
- **The Right to Delete Personal Data:** You have the right to request deletion of your Personal Data, subject to certain exceptions. Once we receive and confirm your request, we will delete (and also instruct our Service Providers to delete) your personal information from our records, unless there is an exception. We may deny your deletion request if retaining the information is necessary for Us or Our Service Providers to:
    - Complete the transaction for which we collected the personal information, provide a good or service you have requested, take reasonably anticipated actions within the context of our ongoing business relationship with you, or perform our contract with you.
    - Detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for such activities.
    - Debug products to identify and repair errors that affect existing intended functionality.
    - Exercise freedom of expression, guarantee the right of another consumer to exercise their rights of freedom of expression, or exercise another right established by law.
    - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).

- Engage in scientific, historical, or statistical research in the public interest or peer-reviewed research that complies with all other applicable ethics and privacy laws, where deletion of the information would make it impossible or seriously impair the achievement of the research, if you have previously given your informed consent.

- Allow internal uses only that are reasonably aligned with consumer expectations based on your relationship with us.

- Comply with a legal obligation.

- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

- **The right not to be discriminated against:** You have the right not to be discriminated against for exercising any of your rights as a consumer, which prevents us from:

    - Denying you goods or services.

    - Charging you different prices or fees for goods or services, including the use of discounts or other benefits, or imposing penalties on you.

    - Providing you with a different level or quality of goods or services.

    - Suggesting that you will receive a different price or rate for goods or services, or a different level or quality of goods or services.

Exercising Your CCPA Data Protection Rights

To exercise any of your rights under the CCPA, if you are a California resident, you may contact us using any of the methods described in the *Contact Us* section.

Only you, or a person registered with the California Secretary of State whom you authorize to act on your behalf, may make a verifiable request regarding your personal information.

Your application must:

- Provide sufficient information to enable us to reasonably verify that you are the person from whom we collected personal information or an authorized representative.

- Describe your request in sufficient detail to allow us to understand, evaluate, and respond appropriately.

We cannot respond to your request or provide you with the required information if we are unable to:

- Verify your identity or authority to make the request, and

- Confirm that the personal information relates to you.

We will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period for providing the required information may be extended once for another 45 days when reasonably necessary and with prior notice.

For data portability requests, we will select a format for providing your personal information that is easily usable and that allows you to transmit the information from one entity to another without hindrance.

Do Not Sell My Personal Information

You have the right to opt out of selling your personal information.

If you would like to opt out of such disclosures, you may exercise your right by modifying your cookie settings, or, you may do so in a frictionless manner by activating the Global Privacy Control ("GPC") opt out preference signal to opt out of disclosures of your personal information through the browser you are using. To learn more about the GPC, please visit: https://globalprivacycontrol.org/.

California Shine the Light Act

In accordance with California Civil Code Section 1798 (California Shine the Light Act), California residents who have an established business relationship with us may request information once a year about the sharing of their Personal Data with third parties for those third parties' direct marketing purposes.

If you wish to request more information under California's Shine the Light law and are a California resident, you may contact us using any of the methods described in the *Contact Us* section.

Children's Privacy

Our Service is not directed to anyone under the age of 16. We do not knowingly collect personally identifiable information from anyone under the age of 16. If you are a parent or guardian and you become aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from someone under the age of 16 without verification of parental consent, we take steps to remove that information from our servers.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

In the case of a material change to your privacy rights, we will inform you by email and/or by means of a prominent notice on our Service prior to a change becoming effective and update the "Last Updated" date at the top of this Privacy Policy.

It is recommended that you review this Privacy Policy periodically for changes. Changes to this Privacy Policy will be effective when posted on this page.

Contact Us

If you have any questions about this Privacy Policy, you can contact us:

- By visiting this page on our Website: https://www.phoenixenergy.com/contact/
- By emailing us at: Privacy@PhoenixEnergy.com

We may also be reached at:

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Suite 830
Irvine, CA 92612