



## BALT USA LLC – PRIVACY POLICY

Effective Date: March 1, 2018

### Privacy Policy Scope

Welcome! An overview of this Balt USA LLC Privacy Policy is provided below. To see the full text, click on the links. This Privacy Policy applies to your use of any online services provided by Balt USA, LLC and its affiliates (collectively “**Balt USA**” “**we**” “**our**” or “**us**”) (e.g., website) that posts a link to this Privacy Policy, regardless of how you access or use it, as well as the account, contact and services information of our solar servicers (“**Customer Services**”) customers (collectively the “**Service**”).

- **Your Choices and Your CA Privacy Rights**

You have certain choices regarding information collection and communications options explained in Section 8, including:

- California residents have certain privacy rights detailed in Section 9;
- Although Balt USA does not look for or respond to “do not track” signals, you can find information on tracking technologies in Section 1.B and certain choice options regarding Tracking Technologies in Section 8;
- Your options regarding accessing and changing certain of your Personal Information are available in Section 7;

- **Collection of Information**

- Balt USA may ask you to provide Personal Information (e.g., name, address, e-mail, phone number, etc.), as well as other information which may be required to access certain content, features, and functionality. Section 1.A.
- Balt USA and third parties may collect information from you automatically as you access the Service (e.g., information about the devices you use to access the Service and your usage activities). Section 1.B.
- This may include use of cookies and other technologies to keep track of your interactions with the Service. Section 1.B.

- **Use of Information**

The information Balt USA collects is used for a variety of purposes as detailed in this Privacy Policy. For example, your information helps Balt USA communicate with you and operate Balt USA’s business. Section 2.

- **Sharing of Information**

- Balt USA may share the information Balt USA receives from or about you via the Service, including your Personal Information, for a variety of purposes, as detailed in this Privacy Policy. Section 3. These include, without limitation:
  - to deliver and improve Balt USA’s services;
  - for Balt USA and Affiliates’ (defined below) marketing and other purposes;
  - in connection with corporate transactions (e.g., merger or sale);
  - in connection with your use of third-party services (See Section 4)
- Balt USA may share your non-Personal Information, aggregate and/or de-identified information about you except as prohibited by applicable law.

- **Questions and How to Contact Balt USA**

For more information about Balt USA’s privacy practices regarding the Service, read the full Privacy Policy. You can also contact Balt USA if you have questions or concerns.

#### Balt USA

29 Parker, Irvine, CA 92618  
tel 949.788.1443 fax 949.788.1444

[balt-usa.com](http://balt-usa.com)



--The information Balt USA receives via the Service may be combined with information Balt USA receives from third parties and sources outside of the Service. Section 1.C.

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## FULL BALT USA PRIVACY POLICY

Thank you for visiting an online service (*e.g.*, website or mobile app) that posts a link to this Privacy Policy (“**Service**”) owned or operated by Balt USA or one of its family of companies (collectively, “**Balt USA**”). This Privacy Policy will provide you with information as to how Balt USA collects, uses, and shares information about you, including the choices Balt USA offers with respect to that information, and applies to your use of any Service, regardless of how you access or use it. It does not apply to Balt USA’s data collection activities offline or otherwise outside of the Service (unless otherwise stated below or at the time of collection). For certain Services, there may be additional notices about information practices and choices. Please read those additional privacy disclosures to understand how they apply to you.

By visiting or otherwise using the Service, you agree to the Service’s Terms of Use and consent to Balt USA’s data collection, use, and disclosure practices, and other activities as described in this Privacy Policy, and any additional privacy statements that may be posted on an applicable part of the Service. If you do not agree and consent, please discontinue use of the Service, and uninstall Service downloads.

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## 1. INFORMATION WE COLLECT

### A. Information about You that You Provide.

Balt USA, and/or its Service Providers (defined below), may collect information you provide directly to Balt USA and/or its Service Providers via the Service. For example, Balt USA collects information submitted through the “contact us” and “careers” features of our website. In addition, when you interact with Third-Party Services (defined below), you may be able to provide information to those third parties. For more information on Third-Party Services’ data collection and practices, see Section 4. For more information on Service Provider data collection and practices, see Section 3. Balt USA does not collect protected health information (“PHI”) as defined under 45 CFR § 160.103 about you via the Service.

Information Balt USA, its Service Providers and/or Third-Party Services may collect personally identifiable information, which is information that identifies you personally, such as your first and last name, e-mail address, phone number, and address (“**Personal Information**”). Personal Information, including, without limitation, Balt USA-Collected PI (defined below), once “**de-identified**” (i.e., the removal or modification of the data that is not Personal Information under this Privacy Policy or the extraction non-personally identifiable elements) is non-Personal Information and may be used and shared without obligation to you, except as prohibited by applicable law. To the extent any non-Personal Information is combined by or on behalf of Balt USA with Personal Information Balt USA itself collects directly from you on the Service (“**Balt USA-Collected PI**”), Balt USA will treat the combined data as Balt USA-Collected PI under this Privacy Policy.

### B. Information Collected Automatically.

Balt USA, its Service Providers, and/or Third-Party Services may also automatically collect certain information about you when you access or use the Service (“Usage Information”). Usage Information may include IP address, device identifier, browser type, operating system, information about your use of the Service, and data regarding network connected hardware (e.g., computer or mobile device). Except to the extent required by applicable law, or to the extent Usage Information is combined by or on behalf of Balt USA with Balt USA-Collected PI, Balt USA does not consider Usage Information (including, without limitation, unique device identifiers) to be Personal Information or Balt USA-Collected PI. For more information on Third-Party Services’ data collection and practices, see Section 4. For more information on Service Provider data collection and practices, see Section 3. For information on choices some of these third parties may offer you regarding automated data collection, see Section 8.

The methods that may be used on the Service to collect Usage Information include:

- **Log Information:** Log information is data about your use of the Service, such as IP address, browser type, Internet service provider, referring/exit pages, operating system, date/time stamps, and related data, and may be stored in log files.
- **Information Collected by Cookies and Other Tracking Technologies:** Cookies, web beacons (also known as “tracking pixels”), embedded scripts, location-identifying technologies, fingerprinting, and other tracking technologies now and hereafter developed (“**Tracking Technologies**”) may be used to collect information about interactions with the Service or e-mails, including information about your browsing and purchasing behavior.

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- **Cookies**

A cookie is a small text file that is stored on a user's device, which may be session ID cookies or tracking cookies. Session cookies make it easier for you to navigate the Service and expire when you close your browser. Tracking cookies remain longer and help in understanding how you use the Service, and enhance your user experience. Cookies may remain on your hard drive for an extended period of time. If you use your browser's method of blocking or removing cookies, some but not all types of cookies may be deleted and/or blocked and as a result some features and functionalities of the Service may not work. A Flash cookie (or locally shared object) is a data file which may be placed on a device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your device. HTML5 cookies can be programmed through HTML5 local storage. Flash cookies and HTML5 cookies are locally stored on your device other than in the browser and browser settings won't control them. To identify certain types of local shared objects on your device and adjust your settings, please visit: [www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html). The Service may associate some or all of these types of cookies with your devices.

- **Web Beacons ("Tracking Pixels")**

Web beacons are small graphic images, also known as "Internet tags" or "clear gifs," embedded in web pages and e-mail messages. Web beacons may be used, without limitation, to count the number of visitors to the Service, to monitor how users navigate the Service, and to count content views.

- **Embedded Scripts**

An embedded script is programming code designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from Balt USA's web server, or from a third party with which Balt USA works, and is active only while you are connected to the Service, and deleted or deactivated thereafter.

- **Location-identifying Technologies**

GPS (global positioning systems) software, geo-filtering and other location-aware technologies locate (sometimes precisely) you, or make assumptions about your location, for purposes such as verifying your location and delivering or restricting content based on your location. If you have enabled GPS or use other location-based features on the Service, your device location may be tracked.

- **Fingerprinting.**

Collection and analysis of information from your device, such as, without limitation, your operating system, plug-ins, system fonts, and other data, for purposes of identification and/or tracking.

Some information about your use of the Service and certain Third-Party Services may be collected using Tracking Technologies across time and services, and used by Balt USA and third parties for purposes such as to associate different devices you use, and deliver relevant ads and/or other content to you on the Service and certain Third-Party Services. See Section 8 regarding certain choices regarding these activities.

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Balt USA is giving you notice of the Tracking Technologies and your choices regarding them explained in Section 8 so that your consent to encountering them is meaningfully informed.

**C. Information Balt USA Collects From Other Sources.**

Balt USA may also obtain information about you from other sources, including Service Providers and Third-Party Services, and combine that with Balt USA-Collected PI. Notwithstanding anything to the contrary, except to the extent such data combined by or on behalf of Balt USA with Balt USA-Collected PI, this Privacy Policy is not intended to limit Balt USA's activities regarding such third-party-sourced, or non-Service-sourced, information (including Personal Information), and such data will only be treated as Balt USA-collected PI to the extent it is combined with Balt USA-collected PI. Balt USA is not responsible or liable for the accuracy of the information provided by third parties or for third party policies or practices.

**2. HOW WE USE THE INFORMATION WE OBTAIN.**

Balt USA may use information about you, including Balt USA-Collected PI and other Personal Information, for any purposes not inconsistent with Balt USA's statements under this Privacy Policy, or otherwise made by us in writing at the point of collection, and not prohibited by applicable law, including, without limitation, the following:

- Allow you to participate in the features we offer on the Service;
- Facilitate, manage, personalize, and improve your online experience;
- Provide services or information you request, respond to your comments, questions and requests, serve you content, and send you notices;
- Balt USA and Affiliates' marketing, in response to a submission to our "contact" web page, absent further request or consent;
- Improve the Service and for any other internal business purposes;
- Tailor our content;
- Fulfill other purposes disclosed at the time you provide Personal Information or otherwise where we are legally permitted or are required to do so;
- Determine your location and manage digital content rights (*e.g.*, territory restrictions); and
- Prevent and address fraud, breach of policies or terms, and threats or harm.

**3. information we share with third parties.**

Balt USA may share non-Personal Information, and Personal Information that is not deemed Balt USA-Collected PI hereunder (provided that Balt USA is aware of no restrictions of Balt USA's use, if any), with third

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parties or Balt USA's affiliates ("**Affiliates**") for any purpose. Balt USA's sharing of Balt USA-Collected PI is, however, subject to the following:

- **Marketing:** Subject to your communications choices explained in Section 8, and the rights of California residents explained in Section 9, we may use your Personal Information to send you marketing communications. Balt USA will not share your Balt USA-Collected PI with third parties for their own direct marketing purposes, except in connection with Corporate Transactions (defined below) absent your consent (which may be by means of third party interaction described in the next bullet point). However, if you request information about products or services our Affiliates offer, you consent to our sharing of your request and Balt USA-Collected PI with them and to their response to your inquiry.
- **Your Disclosure or Consent:** As more fully described in Section 4 (Third-Party Content, Third-Party Services, and Analytics), your activities on the Service may, by their nature, result in the sharing of your Balt USA-collected Personal Information (as well as your other Personal Information and your non-Personal Information) with third parties and by engaging in these activities you consent to that and further sharing and disclosure to third parties. Such third party data receipt and collection is subject to the privacy and business practices of that third party, not Balt USA.

Balt USA may also share any information about you (including, without limitation, Balt USA-Collected PI) for any purposes not inconsistent with this Privacy Policy, or our written statements at the point of collection, and otherwise not prohibited by applicable law, including, without limitation:

- Balt USA's agents, vendors, consultants, and other service providers (collectively "**Service Providers**") may receive, or be given access to your information, including, without limitation, Personal Information, Demographic Information, and Usage Information, in connection with their work on Balt USA's behalf. For more information on choices Service Providers may offer you, see Section 8.
- To comply with the law, law enforcement or other legal process, and in response to a government request; and
- If Balt USA believes your actions are inconsistent with Balt USA's terms of use, user agreements, applicable terms or policies, or to protect the rights, property, life, health, security and safety of Balt USA, the Service or its users, or any third party.

In addition, Balt USA may share your Balt USA-Collected Personal Information (as well as your other Personal Information and your non-Personal Information), in connection with or during negotiations of any proposed or actual merger, purchase, sale, joint venture, or any other type of acquisition or business combination of all or any portion of Balt USA assets, or transfer of all or a portion of Balt USA's business to another company ("**Corporate Transactions**").

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#### 4. **Third-Party Content, Third-Party Services, Social Features, AND ANALYTICS.**

The Service may include hyperlinks to, or include on or in connection with, the Service (e.g., apps and plug-ins), websites, locations, platforms, applications or services operated by third parties (“**Third-Party Service(s)**”). These Third-Party Services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit Personal Information from you.

Certain functionalities on the Service permit interactions that you initiate between the Service and certain Third-Party Services, such as third party social networks (“**Social Features**”). Examples of Social Features include: enabling you to send content such as contacts and photos between the Service and a Third-Party Service; “liking” or “sharing” Balt USA’s content; logging in to the Service using your Third-Party Service account (e.g., using Facebook Connect to sign-in to the Service); and to otherwise connect the Service to a Third-Party Service (e.g., to pull or push information to or from the Service). If you use Social Features, and potentially other Third-Party Services, information you post or provide access to may be publicly displayed by the Third-Party Service that you use. Similarly, if you post information on a third-party service that references the Service (e.g., by using a hashtag associated with Balt USA or other Affiliates in a tweet or status update), your post may be used on or in connection with the Service or otherwise by Balt USA and Affiliates. Also, both Balt USA and the third party may have access to certain information about you and your use of the Service and any Third-Party Service.

Balt USA may use Google Analytics, Adobe Analytics or other Service Providers for analytics services. These analytics services may use cookies and other Tracking Technologies to help Balt USA analyze Service users and how they use the Service. Information generated by these services (e.g., your IP address and other Usage Information) may be transmitted to and stored by these Service Providers on servers in the U.S. (or elsewhere) and these Service Providers may use this information for purposes such as evaluating your use of the Service, compiling statistic reports on the Service’s activity, and providing other services relating to Service activity and other Internet usage.

Except to the extent we combine information we receive from Service Providers, Third-Party Services, or other third parties with Balt USA-Collected PI, in which case Balt USA will treat the combined information as Balt USA-Collected PI under this Privacy Policy (see Section 1(c)), data obtained by Balt USA from a third party, even in association with the Service, is not subject to Balt USA’s limitations regarding Balt USA-Collected PI under this Privacy Policy, however such data remains subject to any restrictions imposed on Balt USA by the third party, if any. Otherwise, the information collected, stored, and shared by third parties remains subject to their privacy policies and practices, including whether they continue to share information with Balt USA, the types of information shared, and your choices on what is visible to others on Third-Party Services.

Balt USA is not responsible for, and makes no representations regarding, the policies or business practices of any third parties, including, without limitation, analytics Service Providers and Third-Party Services associated with the Service, and encourages you to familiarize yourself with and consult their privacy policies and terms of use. See Section 8 for more on certain choices offered by some third parties regarding their data collection and use, including regarding analytics.

#### 5. **Data Security and MONITORING.**

Balt USA takes reasonable measures to protect Balt USA-Collected PI (excluding public UGC) from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the internet and online digital storage are not completely secure and Balt USA does not guarantee the security of your information collected through the Service.

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To help protect you and others, Balt USA and its Service Providers may (but make no commitment to) monitor use of the Service, and may collect and use related information including Balt USA-Collected PI and other Personal Information for all purposes not prohibited by applicable law or inconsistent with this Privacy Policy, including, without limitation, to identify fraudulent activities and transactions; prevent abuse of and investigate and/or seek prosecution for any potential threats to or misuse of the Service; ensure compliance with the Terms of Use and this Privacy Policy; investigate violations of or enforce these agreements; and otherwise to protect the rights and property of Balt USA and Affiliates, third parties, and other users. Monitoring may result in the collection, recording, and analysis of online activity or communications through our Service. If you do not consent to these conditions, you must discontinue your use of the Service.

## **6. INTERNATIONAL TRANSFER.**

Balt USA is based in the U.S. and the information Balt USA and its Service Providers collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information, including Personal Information, in the U.S. as set forth in this Privacy Policy.

## **7. Accessing aND Changing Information.**

Balt USA may provide web pages or other mechanisms allowing you to delete, correct, or update some of the Balt USA-Collected PI. Balt USA will make good faith efforts to make requested changes in Balt USA's then-active databases as soon as practicable, but it is not always possible to completely change, remove or delete all of your information or public postings from Balt USA's databases and residual and/or cached data may remain archived thereafter. Further, we reserve the right to retain data (a) as required by applicable law; and (b) for so long as reasonably necessary to fulfill the purposes for which the data is retained except to the extent prohibited by applicable law.

## **8. choices: TRACKING AND Communications OPTIONS.**

### **A. Tracking Technologies Generally.**

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them separately. Also, tools from commercial browsers may not be effective with regard to Flash cookies (also known as locally shared objects), HTML5 cookies, or other Tracking Technologies. For information on disabling Flash cookies, go to Adobe's website <http://helpx.adobe.com/flash-player/kb/disable-third-party-local-shared.html>. Please be aware that if you disable or remove these technologies, some parts of the Service may not work and that when you revisit the Service your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

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Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no consensus among industry participants as to what “Do Not Track” means in this context. Like many online services, Balt USA currently does not alter Balt USA’s practices when Balt USA receives a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you can visit <http://www.allaboutdnt.com>, but Balt USA is not responsible for the completeness or accuracy of this third party information. Some third parties, however, may offer you choices regarding their Tracking Technologies. One way to potentially identify cookies on our web site is to add the free Ghostery plug-in to your browser ([www.ghostery.com](http://www.ghostery.com)), which according to Ghostery will display for you traditional, browser-based cookies associated with the web sites (but not mobile apps) you visit and privacy and opt-out policies and options of the parties operating those cookies. Balt USA is not responsible for the completeness or accuracy of this tool or third party choice notices or mechanisms. For specific information on some of the choice options offered by third party analytics, see the next section.

**B. Analytics Tracking Technologies.**

You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on. You may exercise choices regarding the use of cookies from Adobe Analytics by going to <http://www.adobe.com/privacy/opt-out.html> under the section labeled “Tell our customers not to measure your use of their web sites or tailor their online ads for you.”

**9. Your California Privacy Rights.**

We do not share personal information as defined by California Civil Code Section 1798.83 (“Shine The Light law”) with third parties, other than our Affiliates, for their direct marketing purposes and will only share such information with our Affiliates for such purposes when you have contacted us requesting information about products or services that our Affiliates may offer. If you are a California resident, you may request information about our compliance with the Shine the Light law by sending a letter to Balt USA, 29 Parker, Irvine, CA 92618, (Attention: Legal Counsel). Any such request must include “California Privacy Rights Request” in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

**10. Changes to This Privacy Policy.**

We reserve the right to change this Privacy Policy prospectively effective upon the posting of the revised Privacy Policy and your use of our Service indicates your consent to the privacy policy posted at the time of use. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

**11. EEOC / Affirmative Action Reporting.**

In conjunction with laws and regulations enforced by the Equal Employment Opportunity Commission (“EEOC”), the Office of Federal Contract Compliance Programs (“OFCCP”) and similar state and local

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regulatory agencies, we may ask you to provide us with self-identifying information (such as veteran status, gender and ethnicity). Providing such self-identifying information is voluntary, but if you do provide us with such information, we may submit that information, to the EEOC, the OFCCP and similar state and local regulatory agencies or otherwise use or disclose it for business-related purposes, including, without limitation, responding to information requests, fulfilling regulatory reporting requirements and defending against employment related complaints.

**12. Contact BALT USA.**

If you have any questions about this Privacy Policy, please contact Balt USA at Balt USA, 29 Parker, Irvine, CA 92618 (Attention: Legal Counsel).

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