

PRIVACY POLICY

Effective date: April 25, 2024



Your privacy is a priority for Connexus Energy, and we are committed to protecting the information we hold about you. This privacy policy addresses information obtained from members, website visitors, and mobile application users and is intended to inform you about how Connexus Energy treats personal information that we collect and use.

If you are a current or former job applicant, employee, or contractor, this policy does not apply to you in those capacities. Your rights as a job applicant, employee, or contractor are described in a separate policy. [Review the Employee and Job Applicant Notice.](#)

Definitions

“Personal information” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include publicly available information, de-identified or aggregated information, or information covered by certain federal and state laws.

“You” means any Connexus Energy member, website visitor, or mobile application user.

How We Collect Your Personal Information

We may have collected personal information about you from a variety of sources:

- **From You.** When you interact with Connexus Energy, including when you visit our facilities, your personal information may be collected by phone, by mail, by text, by email, through our websites, our mobile apps, or through service providers who provide or deliver services on our behalf.
- **From Our Utility Meters and Other Equipment.** When you use electricity, energy usage data is collected by our metering systems. For some applications, we link usage information with your personal information.
- **From Providers.** We work with and receive personal information from third parties such as service providers, vendors, contractors, credit agencies, and market researchers who provide utility products and services on our behalf.
- **From Your Use of Our Website or Mobile Apps.** We collect information about your visits and use of our website and mobile apps, including information through cookies and other logging technologies.
- **From Other Sources.** We may supplement the information described above with information we obtain from other sources, including community choice aggregators and state and local government agencies.

What Personal Information We Collect

We may have collected the following categories of personal information about you:

- **Identifiers,** such as your name, social security number, passport number, driver’s license or government ID number, postal address, email address, account username, IP address, phone number, or other similar unique identifiers. We use this information to provide you with our services, maintain your account, operate our business, and to otherwise communicate with you. We may provide this information to service providers and contractors, regulatory authorities, financial services entities, or to other third parties as required by law.
- **Information Subject to Protection,** such as the identifiers above, your signature, bank account number, credit card number, or debit card number. We use this information to provide you with our services, maintain your account, and to otherwise communicate with you. We may provide this information to service providers, regulators, or to other third parties as required by law.
- **Protected Classification Characteristics,** such as your racial or ethnic origin. For more information, please see the “sensitive personal information” description below.

- **Sensitive Personal Information**, such as your social security number, driver's license or government-issued identification number, racial or ethnic origin, or specific geolocation. We do not use or disclose your sensitive personal information for any purpose other than as permitted by applicable law. We do not sell or share your sensitive personal information except as required to provide you with our services and as permitted by law. We may provide this information to service providers and contractors, financial services entities, or to other third parties as required by law.
- **Payment Information.** We or our service providers may collect your bank account, credit card, or debit card information. We use this information to process payments for our services. Payments and purchases are processed through our service providers.
- **Commercial Information**, such as record of personal property, products or services obtained or considered, or other information related to purchasing or consumer histories. We use this information to better understand your use of our services and for our internal business purposes. We may provide this information to service providers and contractors, regulatory authorities, financial services entities or to other third parties as required by law.
- **Geolocation Data.** We collect this information to provide you with our services and to better tailor our services to you depending on your geographical region. We may provide this information to service providers, contractors, regulators, or to other third parties as required by law.
- **Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information.** For safety purposes, we may collect photos of visitors to Connexus Energy facilities when they check-in. We may provide this information to service providers, contractors, regulators, or to other third parties as required by law.
- **Professional Information**, including information relating to your role as a representative or agent of a company or business, such as your work title and contact information. We use this to conduct business with you or your employer and provide you with services and otherwise communicate with you. We may provide this information to service providers, contractors, or with other third parties as required by law.
- **Internet and Other Electronic Activity Information**, such as your browsing history, search history, information about your interactions with our website, use of our mobile apps, or interactions with our digital advertisements. We may provide this information to service providers, contractors, or to other third parties as required by law. We may collect the following internet and other electronic activity data.
- **Your Visits to Connexus Energy's Website or Mobile Apps.** We collect information about visits to our website and mobile apps, such as the number of visitors and the number of users that click on certain links or use certain services.
- **Log Data.** We receive information that is automatically recorded by our servers when you visit our website or mobile apps, including your Internet Protocol (IP) address.
- **Cookies.** When you visit or use our website or online services, our server may create cookies, which are small text files that a website can send to your internet browser and may be stored in your browser or elsewhere on your computer. Connexus Energy may use cookies and other similar technologies on our website and online services. Cookies may be used to evaluate website usage, provide energy services to you, and to offer programs and/or services that you may be interested in.
 - » Connexus Energy cookies: Cookies may be used on our website to provide basic functionality to the website for purposes such as logging into the system, maintaining session information, and enhancing access to the features of this website.
 - » Google analytics: Our website uses Google analytics to help us analyze how users use the website and target users with appropriate advertisements. Read about Google's privacy practices.
 - » You may disable the usage of cookies through your browser settings. Please note that if you disable your browser's ability to accept cookies, you will be able to navigate Connexus Energy's website, but you may not be able to take advantage of certain features, such as "Remember My Username" and may not receive advertisements related to our programs or services that may be of interest to you.
- **Third-Party Cookies:** Third-party cookies may also be used on our website where a third party provides functionality to our website.

How We Use Personal Information

We may use your personal information for the following purposes:

- Provide energy services or products to you.
- Communicate with you regarding our services and other products or services that may be of interest to you.
- Operate and maintain safe, secure, and reliable utility services and equipment under Connexus Energy's legal obligation to serve you as a distribution utility in Minnesota.

- Comply with a valid warrant, subpoena, or court order or exercise or defend legal claims or otherwise comply with our legal obligations.
- Comply with a Minnesota Public Utilities Commission request or order, or comply with a request or order from other local, state, or federal governmental agencies with legal authority to obtain the personal information from Connexus Energy.
- Develop and implement marketing, education, and outreach plans to improve the services and products we provide to you and other consumers.
- Protect the safety and security of Connexus Energy's members, visitors, employees, and contractors by collecting and reviewing personal information to protect against fraud, other crimes, and threats to safety.
- Enable service providers and contractors to provide energy-related services, products, or equipment on behalf of Connexus Energy, as required in order to provide products and services to you, or for other business purposes consistent with Connexus Energy's commercial relationship with you, or to comply with Connexus Energy's legal obligations as a Minnesota electric cooperative, subject to appropriate confidentiality and security requirements.
- Notify credit reporting agencies and collection agencies to evaluate your credit or if your account is assigned for collection.
- Assist emergency responders in situations of threats to life or property.
- Web design and hosting vendor(s) may have access to all information (personal and non-personal information) collected through the website or mobile app, including through the technologies referenced above.
- For any other business or lawful purpose reasonably anticipated within the context of Connexus Energy's relationship with you.
- For any purpose for which we obtained your consent.

How We Disclose Your Personal Information

We may disclose your personal information in the following ways:

- **At Your Choice.** You may authorize other companies or persons to receive your personal information from Connexus Energy, including your energy usage data.
- **To Our Service Providers and Contractors.** We may disclose your personal information to service providers and contractors that provide services and support to us. We contractually require service providers and contractors acting on Connexus Energy's behalf to take reasonable steps to protect your personal information and to not use your personal information for any purpose other than that for which it was given to the service provider or contractor.
- **To Regulatory Authorities.** We may disclose your personal information to regulatory authorities such as the Minnesota Public Utilities Commission, Minnesota Attorney General, Minnesota Energy Commission, and other federal, state, or local agencies as required or permitted by applicable law.
- **To Financial Services Entities.** We may disclose your personal information to financial institutions, credit agencies, and other financial services entities that provide financial and auditing support services for our utility programs and services.
- **To Third Parties to Fulfill Legal Obligations.** From time to time, we may disclose your personal information with other parties as required pursuant to a valid legal warrant, subpoena, court order, or other legal or regulatory mandate, or as necessary for Connexus Energy to defend or to assert legal claims.
- **To Third-Party Analytics Companies.** We use selected third parties to collect data about how you interact with our website and apps. This information may be used to, among other things, improve the functionality of our website and services.
- **To Potential Business Partners.** We may disclose or transfer your information in connection with or during negotiations of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **To Other Parties.** From time to time, we may disclose your personal information to parties such as law enforcement or other government agencies when we, in good faith, believe you or others are acting unlawfully, when we believe it is necessary or appropriate to satisfy any law, regulation, or other governmental request to operate our business properly, to protect or defend our rights or the rights or well-being of our users, and when we believe disclosure is necessary or appropriate to protect the health and safety of our employees, other consumers, and the general public.

Selling and Sharing of Personal Information

Connexus Energy has not sold consumers' personal information in the preceding 12 months for any monetary value. In the past 12 months, we may have disclosed your internet activity or geolocation with third parties whose cookies are on our websites. These cookies are used to analyze usage of our website, provide you with relevant Connexus Energy advertising and products, and provide additional dynamic functionality to our websites.

Disclosing Aggregated and Deidentified Data

Connexus Energy may share aggregated or deidentified, non-member specific data and information derived from personal information with other entities for the purpose of performing activities that may help Connexus Energy provide and improve its utility products and services, including such programs as energy efficiency and demand response, or to inform energy policy as directed by the Minnesota Public Utilities Commission and other government agencies.

Financial Incentives

From time to time, we may offer financial incentives to consumers in exchange for the consumer sharing certain personal information with us. The specific instructions for how to participate and the rewards offered as incentives may vary and are set out within each program. Our good-faith estimate of the value of your information is the value of the benefit we offer to you. We have calculated that value by using the expense to us of operating the program related to the benefit obtained by our running of the program. To participate in any incentive-based programs you can opt in by signing up for the incentive when it is offered to you. Participation in our promotional programs is always optional, and you can terminate program participation at any time as explained in the applicable program terms. You can also contact us at 763.323.2650 to unsubscribe or cancel your participation in any program.

Links to Non-Connexus Energy Websites

While browsing Connexus Energy's website or online services not sponsored by Connexus Energy, you may encounter and choose to access websites or online services operated by Connexus Energy business partners, companies, or agencies that may not be associated with Connexus Energy by clicking on hypertext links or icons. These websites may collect data or personal information about you and your online activities. Connexus Energy does not control and is not responsible for what these other parties do in connection with their websites or online services or how they handle your personal information.

Email Communications: You can opt-out of receiving certain email communications from us at any time by following the unsubscribe link in the footer of the email or by contacting us in the manner described in the "Contact Us" section of this policy. If you are a member who has registered to use "Your Account" to access your account on our website, you can opt out of future mailings by updating the communication preferences section within the "Your Account" portal at connexusenergy.com. Opting out of email communications does not mean Connexus Energy will not contact you about your account or your electric service. For example, current members will continue to receive emergency notifications from Connexus Energy as required by law, and you cannot opt out of these communications.

Voice Calls, Texts, and SMS Messages: You may have the opportunity to receive occasional voice, text, and SMS messages from Connexus Energy to receive updates on our products and services or about products and services that we think may be of interest to you. Message frequency will vary. By providing your phone number and opting in to receive text messages, you expressly consent to receive these communications, including automated text messages, to the phone number that you provide. Consent to receiving text messages is not required in order to receive products or services from Connexus Energy. Message and data rates may apply, and your carrier's rates will apply. You can opt out of receiving future text messages or receive help by following the instructions in the text message you receive. As we are located in the United States, international rates may apply depending on your location. We may disclose your mobile phone number to service providers with whom we contract in order to send you automated text messages, but we will not disclose your mobile phone number to third parties for their own marketing purposes without your express consent. Opting out of calls, texts, and SMS messages does not mean Connexus Energy will not contact you about your account or your electric service. For example, current members will continue to receive emergency notifications from Connexus Energy as required by law, and you cannot opt out of these communications.

Right to Know and Access Personal Information

You have the right to access and know what personal information Connexus Energy collects about you, including the categories of personal information, the categories of sources from which your information is collected, the business or commercial purpose for collecting, selling, or sharing your information, the categories of third parties to whom we may disclose personal information, and the specific pieces of information that we have collected about you.

Right to Request Deletion of your Personal Information

You have the right to request that Connexus Energy delete the personal information it has about you subject to certain limitations. If we do not delete your personal information for reasons permitted under applicable law, we will let you know.

Right to Correct Inaccurate Personal Information

You have the right to request Connexus Energy to correct inaccurate personal information that we maintain about you.

Non-Discrimination

We will not discriminate or retaliate against you for exercising any of your privacy rights identified in this privacy policy.

Security

We take reasonable and appropriate measures designed to ensure the integrity of our systems and protect your personal information against unauthorized access, destruction, or alteration. We regularly implement and update administrative, technical, and physical security measures to help protect personal information about you from unauthorized access, destruction, or alteration. However, please understand that no method of transmission over the Internet or method of storing data is 100 percent secure. Therefore, we cannot guarantee absolute security.

Children's Privacy Online

Our services are not directed to children under 18 years of age, and Connexus Energy does not knowingly collect any personal information of children under 18 years of age unless required by applicable law. If you believe a child under 18 years of age has provided us with personal information, please contact us at info@connexusenergy.com with a brief description of your concern.

Changes to This Privacy Policy

This privacy policy may be updated from time to time. We reserve the right to modify the policy at any time without notice, so please review the policy frequently. Your continued use of our website, app, or services after we have posted any privacy policy changes indicates your agreement to the changes unless you notify us otherwise.

Terms of Privacy Policy Survive

To the extent any terms of this privacy policy are held invalid and/or unenforceable by a court of law or a competent jurisdiction, the remaining provisions of the privacy policy shall remain in full force and effect.

Applicable Law

This privacy policy is governed under the laws of the state of Minnesota without regard to its conflicts of law provisions. Any transaction that occurs through our website or app is deemed to have occurred in the state of Minnesota.

If any controversy or dispute between or involving Connexus Energy were to arise out of or in connection with this privacy policy, the parties shall attempt to resolve such dispute in a prompt manner and in good faith. You agree that any claim, dispute, action, or litigation arising out of or relating to this privacy policy will be brought and maintained exclusively in the state or federal courts located in Anoka County, Minnesota. Similarly, you agree and irrevocably submit to the jurisdiction of the state or federal courts located in Anoka County, Minnesota, for the purpose of any litigation as set forth above. You expressly waive any objection of venue and jurisdiction, including but not limited to, any argument that such litigation has been brought in an inconvenient forum.

Contact Us

If you have questions, concerns, or complaints about this privacy policy, you can contact us using the following options:

Connexus Energy

763.323.2600

info@connexusenergy.com