

PRIVACY NOTICE

FACTS

WHAT DOES NATIONAL ENERGY IMPROVEMENT FUND, LLC, (“NEIF,” “we,” or “us”) DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security Number and income
- Account balances and transaction history
- Credit history and credit scores

How?

All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons National Energy Improvement Fund, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does NEIF share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	Yes
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes - information about your credit worthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

To limit our sharing

- Call toll-free [888-961-6343](tel:888-961-6343), option 5 – our menu will prompt you through your choice

Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

Call toll-free at 888-961-6343, option 5

Who we are	
Who is providing this notice?	National Energy Improvement Fund, LLC; https://www.neifund.org/
What we do	
How does National Energy Improvement Fund, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does National Energy Improvement Fund, LLC collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Apply for financing or pay your bills • Provide employment information or give us your income information • Provide account information <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes — information about your credit worthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an application I hold jointly with someone else?	Your choices will apply to everyone on your account – unless you tell us otherwise.
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • <i>Our affiliates include financial companies such as RBFunding LLC, NEIF-MSH Financial, LLC, Go Greener Capital LLC and NEIF-MSH Insurance, LLC</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • <i>Nonaffiliates we share with can include companies included in the application process, companies that perform services on our behalf, approved contractors, companies that may own the loans, or as required by law, law enforcement or government agencies.</i>
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>NEIF doesn't jointly market.</i>
Other important information	
<p>Plaid, Inc. NEIF uses a nonaffiliate, Plaid Inc. (“Plaid”), to gather your data from financial institutions and to facilitate instant account verification. NEIF may share your information with Plaid for our everyday business purposes. Plaid may store your information for verification and transaction purposes or use your information on a per-transaction basis for fraud prevention, as well as help verify a sufficient balance is available to process your</p>	

transaction. For more information on how Plaid collects, uses, and protects your information, please visit Plaid's Privacy Policy at <https://plaid.com/legal/#end-user-privacy-policy>.

State Specific Disclosures

California

We will not sell, share, transfer, or otherwise disclose your nonpublic personal information to or with affiliates or nonaffiliated third parties, other than as permitted by California law, unless you authorize us to make those disclosures. For example, nonpublic personal information may be shared to effect, administer, or enforce a transaction requested or authorized by you, or in connection with servicing or processing a financial product or service requested or authorized by you, or in connection with maintaining or servicing your account.

Vermont

NEIF will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

Additional information concerning our privacy policies can be found at <https://www.neifund.org/privacy-policy/> or call toll-free 888-961-6343.

California Consumer Privacy Act Privacy Statement (“CCPA/CPRA Statement”)

This CCPA/CPRA Statement supplements the information contained in our Privacy Notice and applies solely to visitors, users, and others who reside in the State of California. National Energy Improvement Fund LLC (“NEIF”) adopts this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), the California Privacy Rights Act of 2020 (“CPRA”), and other California privacy laws. Any terms defined in the CCPA/CPRA shall have the same meaning when used in this notice. This policy does not apply to personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA), the California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Your rights under CCPA/CPRA

As of January 1, 2020, California law permits residents of California to request certain details about how their personal information is shared with third parties or affiliated companies for direct marketing purposes. In the first part of our Privacy Policy we explain how NEIF collects, uses and seeks to safeguard the personal data you provide to us on our websites, mobile applications, via email, texting or telephone calls, and through our service providers and distribution partners.

Understanding Personal Information under CCPA/CPRA

Under the CCPA/CPRA, we want to clarify to you that we collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. This information is called “personal information” under CCPA/CPRA.

Personal information does not include:

- Publicly available information.
- Lawfully obtained, truthful information that is a matter of public concern.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA/CPRA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA), the California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

How We Collect Personal Information

We obtain certain categories of personal information (listed as A through L, below) from certain sources:

- Directly from our customers. For example, in order to purchase products or services, it may be necessary for you to disclose personal data, including your name, address, email address, phone number, credit card details and other personally identifying information.
- From customer directed persons or entities or from institutions representing customers.

- Directly and indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically.
- From third parties that interact with us in connection with the services we perform (e.g., credit reporting agencies, customer due diligence providers, internet service providers, social networks, government entities, contractors, your bank or credit union, and data brokers). For example, if you visit NEIF by "clicking through" from a site operated by one of our business partners, and you have registered with that partner, then personal data about you that you have provided to that partner may be shared with us, such as contact information and demographic information. As another example, if you access third party services, such as social media services, through our website or before coming to our website, we may collect information such as your username and other information made available to us through those services. We will work with our existing partners and potential future partners to improve and personalize your use of our website in accordance with the practices outlined in this Privacy Policy.
- From public record sources (federal, state or local government sources).
- From our affiliates.

In particular, here are examples of categories of personal information from consumers, and we have noted which categories we have collected from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO

I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
L. Sensitive personal information.	“Sensitive personal information” is personal information revealing a consumer's social security number, driver's license and passport numbers, account numbers and credentials, passwords, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, biometric information, and citizenship or immigration status.	YES (limited to categories A, B, C, and D, as well as account credentials, passwords, and mail or email where NEIF is not the intended recipient.)

Use of Personal Information under CCPA/CPRA

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, most commonly this would be to fulfill your interest in, or purchase of, NEIF products and services.
- To provide you with information on NEIF products or services that you request from us.
- To perform services on behalf of NEIF, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of NEIF.
- To provide you with advertising and marketing services, except for cross-context behavioral advertising, including email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA/CPRA.
- To prevent and detect fraud against you or NEIF.
- To conduct checks to identify you and verify your identity.

- To comply with our legal and regulatory obligations, including gathering and providing information required by audits, enquiries, or investigations by regulatory authorities.
- For operational reasons, such as training, improving efficiency, and quality control.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- For our legitimate business or commercial reasons or those of a third party.
- Where you have given consent.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosure of Personal Information under CCPA/CPRA

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose (using the listed A through L categories from above):

Category A:	Identifiers.
Category B:	California Customer Records personal information categories.
Category C:	Protected classification characteristics under California or federal law.
Category D:	Commercial information.
Category F:	Internet or other similar network activity.
Category L:	Sensitive personal information

We may disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers, such as individuals and companies that provide services such as website hosting, email delivery, information technology, marketing, banking, legal expertise, storage, and providers who provide us information on consumers interested in our products and services.
- Third parties in connection with products or services we provide to you.
- Credit reporting agencies.
- Our bank.
- External Auditors
- Other persons or entities with which you may use or direct us to intentionally interact with or disclose your Personal Information.

We may disclose and exchange information with law enforcement agencies, government agencies, and regulatory bodies to comply with our legal and regulatory obligations.

Sale or Sharing of Personal Information under CCPA/CPRA

In the preceding twelve (12) months, we have not sold or shared any personal information. “Sold” means the disclosure of personal information to a third-party for monetary or other valuable consideration. “Share” means "sharing, renting, releasing, disclosing, 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 for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.” We do not consider personal information as “sold” or “shared” if, as discussed above, it was disclosed for a business purpose to those individuals and companies that were necessary to fulfill your transaction with us.

Your Rights and Choices under CCPA/CPRA

The CCPA/CPRA provides consumers (California residents) with specific rights regarding their personal information. The following sections describe your CCPA/CPRA rights and explains how to exercise those rights.

Right to Understand and Receive Your Specific Information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you, including sensitive personal information.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting, selling, or sharing that personal information.
- The categories of third parties with whom we share that personal information, if any, the categories of personal information that were disclosed, if any, and the purpose for disclosing the personal information about you.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - Sales of personal information, identifying the personal information categories that each category of recipient purchased; and
 - Disclosures of personal information for a business purpose, identifying the personal information categories that each category of recipient obtained.

Right to Opt-Out of Sales or Sharing of Your Specific Information

You have the right to request to opt out of our sale or sharing of your personal information to third parties for the purpose of targeted behavioral advertising. This means that, if you opt out, going forward, we will not sell or share your information with such third parties to use for their purposes unless you later direct us to do so.

Right to Limit Use of Sensitive Personal Information

You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary to:

- Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services;
- To perform the following services: (1) Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business; and (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business; and
- As authorized by further regulations

You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.

Right to Delete Your Specific Information

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, unless an exception applies, we will delete your personal information from our records, notify any service providers or contractors to delete your information from their records, and notify all third parties to whom we have sold or shared the personal information to delete your personal information unless this proves impossible or involves disproportionate effort.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).

6. Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the ability to complete such research, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which the consumer provided the information.
8. Comply with a legal obligation.

Right of Correction

If we maintain inaccurate personal information about you, you have the right to request that we correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.

Exercising Your Rights

To exercise your rights described above, please submit a verifiable consumer request (which we explain below) to us by:

- Calling us toll-free at 888-961-6343, option 5;
- E-mailing us at compliance@neifund.org;
- Completing the online Personal Information Request Form which can be found in our online California Privacy Policy located at <https://www.neifund.org/california-privacy-policy/>; or
- Writing to us at:
National Energy Improvement Fund LLC
Attn: Privacy Officer
1005 Brookside Road, Suite 200
Allentown, PA 18106

Only you, a person registered with the California Secretary of State that you authorize to act on your behalf, or a person who has power of attorney or is acting as a conservator for the consumer, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response to your account (if applicable), by mail, or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For example, we will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA/CPRA rights. Unless permitted by the CCPA/CPRA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

How Long We Retain Personal Information

The length of time that we intend to retain each category of Personal Information will depend on several criteria, including the length of time:

- we are required to keep records required by law;
- we may need to retain Personal Information for our business and commercial purposes for which the Personal Information is collected, used, or disclosed;
- required to respond to any questions, complaints or claims made by you or on your behalf; or
- required for quality control purposes.

Different retention periods apply for different types of personal information.

Changes to Our Privacy Notice

We know that our business will continue to evolve, and, as such, from time to time this Privacy Policy may be reviewed and revised. NEIF reserves the right to change this Privacy Policy by posting the changes on its website. You can determine when this Privacy Policy was last updated by reviewing

the *Last Updated* legend stated at the top of this Privacy Policy and any revisions will take effect upon posting. We will notify our customers of material changes to this Privacy Policy by either sending a notice to the email address you provided to us or by placing a notice on our website. We encourage you to check this Privacy Policy from time to time to review the most current version.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

National Energy Improvement Fund LLC
Attn: Privacy Officer
1005 Brookside Road, Suite 200
Allentown, PA 18106
(484) 838-5460
(888) 961-6343
Email: compliance@neifund.org

You also have the right to lodge a complaint to the supervisory authority about the way we process your personal data. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

If you contact us by phone, the conversations may be recorded. You will be notified of these recordings at the beginning of the call. We use these recordings to improve the quality or compliance of our customer service, to verify the accuracy of the information you provide, to ensure the prevention of fraud and to train our teams. We keep these recordings for as long as necessary, and then erase them. Your personal data collected during a call is processed in accordance with the provisions of this Privacy Policy.