Connecticut Natural Gas Corporation's Privacy Notice for Connecticut Residents

Last Reviewed: June 30th, 2023

This privacy note applies to Connecticut Natural Gas Corporation ("CNG").

CNG is dedicated to protecting the personal information it collects and processes. This notice applies solely to residents of the State of Connecticut and provides specific information as required under the Connecticut Data Privacy Act ("CTDPA" or the "Act"). CTPDA requires us to provide Connecticut residents information about, among other, the personal information we collect and their rights under CTPDA. This notice is intended to meet the requirements of the Act. Any terms defined in the CTPDA have the same meaning when used in this notice.

This Notice does not apply to employment-related personal information collected from CNG's Connecticut-based employees, officers, job applicants, contractors, or similar individuals.

Under the CTPDA, "personal information" or "personal data" is any information that is linked or reasonably linkable to an identified or identifiable individual.

Please be aware that other sites accessible through CNG's website have their own privacy policies and data collection, use, and disclosure practices. The information practices of those other sites linked to CNG's website are not covered by this notice.

Personal Information We Collect

We collect personal information. The categories of personal information about Connecticut residents that we may have collected and/or disclosed within the last 12 months are identified below.

CATEGORIES OF PERSONAL INFORMATION	Do we collect?	Do we disclose for business purpose?	Do we sell?

NAME, CONTACT INFORMATION AND IDENTIFIERS: Identifiers such as 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	YES	NO
SENSITIVE DATA: Data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation or citizenship or immigration status; the processing of genetic or biometric data for the purpose of uniquely identifying an individual; personal data collected from a known child; or precise geolocation data. We will not process your sensitive data without obtaining your consent.	YES	YES	NO
COMMERCIAL INFORMATION: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories and tendencies.	YES	YES	NO
BIOMETRIC DATA: Identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans or other unique biological patterns or characteristics that are used to identify a specific individual.	NO	NO	NO
USAGE DATA: Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a resident's interaction with an internet website, application, or advertisement.	YES	YES	NO
PRECISE GEOLOCATION DATA: Precise geolocation location information that directly identifies the specific location of an individual.	NO	NO	NO
AUDIO/VISUAL: Audio, electronic, visual, thermal, olfactory, or similar information.	NO	NO	NO
EMPLOYMENT HISTORY: Professional or employment-related information.	YES	YES	NO
EDUCATION INFORMATION: Information that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	NO	NO	NO

PROFILES AND INFERENCES: Inferences drawn from any of the information identified above to create a profile about a resident reflecting the resident's preferences, and characteristics.	NO	NO	NO

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CTDPA's scope, like:
    - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Connecticut General Statute § 52-146o (2019).
    - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed in the chart above from the following categories of sources:

- Directly from you: For example, from forms you complete and from email correspondence with you.
- Third Parties (information we collect about you from third party sources): For example, identity verification services.

Use of Personal Information

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

- Maintenance, development, and control, in all its aspects, of the contractual relationship.
- Internal management of third parties.
- Preparation of surveys, statistics, and internal reports.
- Research, Analysis, and Efficiency Initiatives.
- Customer Assistance Programs, Collection, and payment management.
- Administrative management.

- Communicating initiatives or items of special interest (weather/outage updates).
- Management of the coordination of business activities and prevention of occupational hazards of contractors and health and safety.
- Submission of tax information.
- In connection with administrative and judicial proceedings and actions before public authorities.
- Management of complaints and inquiries in the ethical channel, analysis of possible conflicts of interest and analysis of solvency, anti-corruption, fraud, or related risks.
- Security activities.
- In case of the email of the contact person with Connecticut Natural Gas Corporation, to apply a dual authentication factor in the access to the information systems consisting of adding a second method of user verification.
- To keep the track record of previous agreements.
- To comply with applicable legal or regulatory requirements, legal process or orders from regulatory agencies and responding to government, judicial or regulatory requests.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is relevant for the transaction.
- 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 CTDPA.

Sharing of Personal Information

We disclose personal information to services providers and other persons for a business purpose.

The categories of personal information that we have disclosed within the last 12 months have been identified in the chart included in the **Personal Information We Collect** section of this notice. For each category of personal information identified, we may disclose and have disclosed within the last 12 months, personal information with the following categories of persons: (i) service providers, (ii) affiliates (consistent with applicable laws and regulations), (iii) federal, state and local government and regulatory agencies with authority to receive the information, and (iv) third parties receiving personal information pursuant to a

valid legal warrant, subpoena, court order or legal or regulatory mandate, or as necessary for CNG to exercise or defend legal claims.

In the preceding 12 months, we have not sold personal information or processed personal data for purposes of targeted advertising.

Connecticut Residents Rights

The CTDPA provides consumers (Connecticut residents) with specific rights regarding their personal information. This section describes your CTDPA rights and explains how to exercise those rights.

Do-Not-Sell: We do not sell your personal information.

Notice at Collection of Personal Information: We are required to notify Connecticut residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used.

Verifiable Requests for Right of Deletion, Right to Know and Data Portability: Subject to certain business and legal exceptions, Connecticut residents have the right to make the following requests, at no charge:

Right of Deletion: The right to request deletion of their personal information that we have collected about them, subject to certain business and legal exceptions and exemptions, and to have such personal information deleted, except where necessary that we maintain such personal information to:

- Complete the transaction or agreement for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.

- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Conduct internal research to develop, improve or repair products, services, or technology.
- Effectuate a product recall.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- Enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business.
- Comply with a legal obligation.
- Otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

Please note that the great majority of personal information we collect falls into the foregoing exemptions.

Right to Know, Right to Correction and Data Portability: (Once every 12 months) Connecticut residents have the right to confirm whether or not we are processing their personal data and access such data as well as the right to request that we correct inaccuracies in their personal data.

(Once every 12 months) Connecticut residents have the right to request that we disclose the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance. For security reasons, certain highly sensitive types of personal information, such as social security numbers, drivers' license numbers, and bank account numbers, will not be provided but we will inform you if we may have collected them during such 12-month period.

Right to Opt-Out of the Sale of Personal Information: CTDPA grants the right to opt-out from the sale of personal information. Connecticut Natural Gas Corporation does not sell personal information.

Submitting Verifiable Requests: Requests to exercise the right to deletion, right to know, right to correction and data portability rights may be submitted via email at Data Privacy Management. We will respond to verifiable requests received from Connecticut consumers as required by law.

Only the Connecticut resident, or someone authorized to act on his/her behalf, may make a verifiable consumer request related to their personal information. Connecticut residents may also make a verifiable consumer request on behalf of their minor children.

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, which may include your CNG account number.
- Describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to a request or provide the personal information if we cannot verify the identity of the Connecticut resident or authority to make the request and confirm the personal information relates to the Connecticut resident that requested the information.

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.

Incentives and Discrimination: The CTDPA prohibits discrimination or retaliation against Connecticut residents for exercising their rights under the CTDPA, and imposes requirements on any financial incentives offered to Connecticut residents related to their personal information

Discrimination: Businesses may not discriminate against residents who exercise their rights under CTDPA. Discrimination or retaliation may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices or rates or impose penalties on residents who exercise their CTDPA rights.

Disclosure of Incentives: If businesses offer any financial incentives for the collection, sale or deletion of their personal information, residents have the right to be notified of any financial incentives offers and their material terms, the right is not included in such offers without prior informed opt-in consent, and the right to be able to opt-out of such offers at any time. Businesses may not offer unjust, unreasonable, coercive, or usurious financial incentives. We do not offer any such incentives at this time.

Changes to our Privacy Notice: We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date.

Contact Information: If you have any questions or comments about this notice, the ways in which Connecticut Natural Gas Corporation collects and uses personal information described here or our privacy practice, you can email us at Data Privacy Management.