



Demand Side Analytics
DATA DRIVEN RESEARCH AND INSIGHTS

Privacy Policies



Demand Side Analytics, LLC
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1 CONTRACTOR PRIVACY POLICY

Demand Side Analytics provides research and data analytics services to utilities, regulators, and system operators. We specialize in analyzing data from smart meters, connected devices, and transmission, distribution, and utility systems for applications in program evaluation, planning, forecasting, and valuation. We also often work with monthly usage data and information about participation in programs, rates, or installation of distributed energy resources (e.g., solar, battery storage).

We do not engage in advertising or sell data. We do not run credit cards or collect consumer financial information, and at no time do we access confidential information such as social security numbers or medical data.

CONTRACTOR COMMITMENT TO PRIVACY

As a contractor for our clients:

- We do not sell or share any personal information provided to us by our clients
- We do not retain, use, or disclose the personal information provided to us by our clients for any purpose other than for the business purposes specified in the contract. Specifically, we do not retain, use, or disclose personal information provided to us by our client for a commercial purpose other than the business purposes specified in the contract.
- We do not retain, use, or disclose the personal information provided by our clients outside of the direct business relationship between the contractor and the business.
- We do not combine the personal information provided by our clients with other sources of personal information.
- We minimize the data requested from clients to essential data needed to complete the research project.
- We delete personal information provided to us by or collected on behalf of our clients upon request within 45 days.
- We allow our clients to monitor our compliance and, if needed, conduct audits, or other technical and operational testing.

INFORMATION WE COLLECT

As part of our work, we obtain the personal information listed above from the following categories of sources:

- Directly from our clients or their agents. For example, from data that our clients provide to us related to the services for which they engage us. This may include Advanced Metering Infrastructure (AMI) data, connected device (e.g., smart thermostats, battery data), program participation data, utility tariff information, and other information needed for the project.
- Directly from our client's customers through online/telephone surveys and site visits performed on behalf of clients at their request.
- Directly from our client's customers through websites set up for turnkey pilots of emerging technologies at our client's request.
- Directly and indirectly from activity on our web site. For example, from submissions through our Contact Us page, employment application, or site usage data collected automatically.

Personal information does not include:

- Publicly available data from government records.
- De-identified or aggregated consumer information.
- Information exempted from the California Consumer Privacy Act (CCPA) or Consumer Privacy Rights Act (CRPA)

The table below summarizes the types personal information we work with as a contractor for our clients.

Category	Examples	Data use
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, address, telephone number	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, gender.	Yes, if requested by our clients as part of a survey

Category	Examples	Data use
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 similar network activity.	Online forms or information on a consumer's interaction with a website or application.	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.	Yes
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

HOW WE USE DATA

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

- To provide our clients with information on services that they requested from us – typically evaluation, forecasting, targeting, or valuation analyses.
- To improve our web site.
- To respond to law enforcement requests, court orders, or government investigation, or to satisfy regulatory requirements of our clients
- To fulfill the purpose described to our clients when requesting the personal information.

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 advance notice.

INFORMATION WE SHARE

We may disclose personal information only for business purposes as prescribed by our clients. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires both parties to keep that personal information confidential and not use it for any purpose except in the performance of the contract.

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

- Clients
- Subcontractors and consultants
- Third parties to whom our clients authorize us to disclose their customer's personal information

Demand Side Analytics does not sell any aggregated or individual personal information to third parties.

HOW WE PROTECT AND RETAIN PERSONAL INFORMATION

Demand Side Analytics will retain your personal information provided to us by our clients as specified in the contract. If the contract does not include a data destruction dates, we will store the data for as long as reasonably necessary to fulfill the purposes for which we collected it, and to satisfy any applicable legal, regulatory, or reporting requirements. By default, we retain data for 36 months after project completion.

CONSUMER RIGHTS

The CCPA and CRPA provides consumers with specific rights regarding their personal information. This section describes r CCPA rights and explains how to exercise those rights.

ACCESS TO PERSONAL INFORMATION

Our clients have the right to request that we disclose certain information about our collection of personal information, including:

- The categories of personal information we collected.
- The categories of sources for the personal information we collected.
- The business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected.
- If we disclosed your personal information for a business purpose, a list identifying the personal information categories that each category of recipient obtained.

DELETION REQUESTS

Our clients have the right to request that we delete any personal information collected or provided by them, unless they are necessary to comply with DSA's legal obligations.

Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers, subcontractors, and consultants to delete) the personal information provide or collected, unless an exception applies.

EXERCISING YOUR RIGHTS

To request access to your personal information or request deletion, please submit a verifiable consumer request to: dataprivacy@demandsideanalytics.com

Only a client project manager listed on the contract or a person authorized to act on the client's behalf may make a consumer request related to personal information. The request must:

- Provide sufficient information to allow us to reasonably verify you are the client who provided or for whom we collected personal information, or an authorized representative.
- Describe the request with sufficient detail to allow us to properly understand, evaluate, and respond to it.

We cannot provide personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. 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

Our goal is to respond to a verifiable consumer request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We will provide your personal information in a format that is readily useable and should allow you to transmit the information without hindrance.

We will not charge a fee to process or respond to your request unless it is excessive or repetitive. If we determine that the request warrants a fee, we will provide you with the basis for that decision and a cost estimate before completing your request.

NON-DISCRIMINATION

We will not discriminate against anyone for exercising any of your CCPA rights. Unless permitted by the CCPA or CRPA, we will not:

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

CHANGES TO OUR PRIVACY POLICY

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 notify you through a notice on our web site.

CONTACT INFORMATION

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

dataprivacy@demandsideanalytics.com

2 DEMAND SIDE ANALYTICS WEBSITE PRIVACY POLICY

Data privacy is important to us. Our demandsideanalytics.com Website Privacy Policy applies to the personal information we collect, how we use the information and with whom we share it, and customer rights and choices regarding our use of the information .

INFORMATION WE COLLECT

Users of our website have the option to provide personal information, such as:

- Contact information (such as full name, company, job title, industry, phone number, and email address);
- For job applicants, personal information typically contained in a resume (such as contact information, employment history, education history, and references), and where legally permissible, ethnicity, race, gender, disability status, and veteran status.

Demand Side Analytics does not consider demographic information regarding an applicant in evaluating the applicant's qualifications for employment with us. This information will be used only for Equal Employment Opportunity reporting and other legal compliance purposes.

INFORMATION WE COLLECT BY AUTOMATED MEANS

Demand Side Analytics follows generally accepted best practices to collect and store information about site visits, such as date and time visited, pages visited, type of device, type of browser, and IP address. Demand Side Analytics uses cookies and similar technologies to collect this information. The information is used only by Demand Side Analytics for internal statistical and marketing purposes.

We use third-party web analytics services such as WordPress Jetpack on our site. These service providers help us analyze how our site is used. The information collected for this purpose will be disclosed to or collected directly by these service providers.

The providers of third-party plug-ins on our site, such as social media sharing tools, may use automated means to collect information regarding use of the site and interactions with the plug-ins. This information is subject to the privacy policies or notices of the plug-in providers.

HOW WE USE DATA

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

- To provide site users with information on services that they request from us;

- To provide site users with newsletters, event registrations, white papers, and other items that may be of interest to them;
- To improve our web site;
- To respond to a law enforcement request, court order, or government investigation; or
- To fulfill the purpose described to the site user when collecting their personal information.

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 advance notice.

INFORMATION WE SHARE

Demand Side Analytics will not sell or disclose personal information collected on our website to any third party, except when disclosure is:

- Required by law or through a legal process;
- Formally requested by law enforcement authorities or other government entities;
- Necessary or appropriate to prevent harm or financial loss; or
- Required in connection with an investigation of suspected or actual espionage, cybersecurity or security events, or other fraudulent or illegal activity.

HOW WE PROTECT AND RETAIN PERSONAL INFORMATION

Demand Side Analytics is committed to securing personal information and will take reasonable precautions to protect it from loss, misuse, unauthorized access, alteration, or destruction. In addition, we limit access to personal data to those employees who have a business need to know. They are required to process personal data for specified purposes and on our instructions, and they are subject to a duty of confidentiality.

Demand Side Analytics will retain personal information for as long as reasonably necessary to fulfill the purposes for which we collected it, and to satisfy any applicable legal, regulatory, or reporting requirements. To determine the appropriate retention period, we evaluate the intended use, amount, and sensitivity of the personal information.

Demand Side Analytics is committed to protecting children's privacy online. Our website is not designed for or directed at children. In accordance with the Children's Online Privacy Protection Act of 1998 ("COPPA"), we will not intentionally collect, maintain, or distribute information about anyone under the age of 13. If we become aware that we have inadvertently received personal information from a user under the age of 13, we will delete the information from our records.

CONSUMERS RIGHTS AND CHOICES

Site users opt out of receiving future promotional email communications from us by following the instructions in the footer of promotional email communications, or by contacting us in accordance with the "Contact Us" section below.

Where provided by law, site users have the right to obtain a copy of, correct, or request deletion of personal information they provided to us.

If you have any questions or comments about this Policy, the ways in which we collect and use personal information, your choices and rights regarding such use, or wish to exercise your rights, contact us in writing at: dataprivacy@demandsideanalytics.com. Please note that you may be required to prove your identity before we can fulfill your request.