

# Personal Data Protection Policy

## Overview

XOOM Energy Japan GK is committed to protecting the privacy of our customer information. This document will provide information about XOOM Energy's policy relating to the collection, use and disclosure of personal information and of our customer's right to limit such collection, use or disclosure. All personal information relating to our customers is maintained in strict confidence by XOOM Energy and is not sold to third parties. For your protection, we utilize a Secure Socket Layer (SSL) on all pages that require you to complete personal information.

Our privacy policies and procedures are subject to change.

## Identifying Purposes

XOOM Energy collects personal information for a variety of purposes related to your request for services from XOOM Energy. Personal information is used to verify, process and administer your product and service requests, assess credit-worthiness, maintain our commercial relationship with you, and analyze, understand and respond to your service needs. XOOM Energy also analyzes and uses customer information to improve the products that we offer to our customers. We analyze personal information in order to identify the products and services offered by our affiliates or ourselves or by companies that we believe may be of interest to you, and to offer you those products and services.

Personal information is also used in order to communicate information related to billing, products/services, programs, promotions etc. XOOM Energy does not sell, rent or lease personal information to third parties. Personal Information may also be utilized for this purpose in the following situations: a customer enrolled but did not begin services or after the termination of a customer's services.

XOOM Energy may outsource certain account processing, or other customer service functions to a third party. In such cases, personal information will be provided to such third parties. However, XOOM Energy releases personal information only where that information will be maintained in confidence.

XOOM Energy is also required to report regulatory bodies or to present a summary of all our customer information, including your personal information, in statistical or analytical form to governmental authorities and industry organizations. When information is provided in statistical or analytical form, information that might specifically identify you will not be disclosed.

## Collection and Use

XOOM Energy will collect and use personal information for billing purposes, to provide and change service, to anticipate and resolve problems with your service, or to create and inform you of products and services that better meet your needs. This means that XOOM Energy may use your personal information, in conjunction with information available from other sources, to market new services to you that we think will be of interest to you, but we will not disclose your personal information to third parties who want to market products to you. In addition, in the event that the business undergoes a major change in structure (merger, company split, business transfer or other reasons), the customer's personal information may be kept by or used by the related businesses after the major change in structure. Personal Information may also be utilized for this purpose in the following situations: a customer enrolled but did not begin services or after the termination of a customer's services.

## Security

XOOM Energy has implemented and will update technological and security features to safeguard the privacy of your customer personal data from unauthorized access or improper use.

## E-mail Contents

The company will not read or disclose to third parties private e-mail communications that are transmitted using XOOM Energy services, except as required to operate the service or as otherwise authorized by law.

XOOM Energy will never request sensitive personal information through email. Do not respond to e-mails requesting credit information, account numbers, passwords or PINs. Call the company to verify the legitimacy of the e-mail.

## Disclosure to Third Party

XOOM Energy may also use customer identifiable personal data to investigate and help prevent potentially unlawful activity or if required by subpoena, search warrant, or other legal process.

## Joint Use

Our company may share private information regarding customers with the following parties※ 1: Depending on a customer's application route, personal information may be shared with other parties. Please confirm the applicable privacy policy at the time of enrollment. While in contract with XOOM Energy Japan, a customer's applicable privacy policy can be reviewed from the customer's MyXOOM account.

### (1) Joint Use Participants

- REU※<sup>2</sup>
- Utility Companies※<sup>3</sup>
- OCCTO
- Demand Response Providers※<sup>4</sup>

**Purpose of Joint Use Information**

- ① The execution, modification, and cancelling of the Wheeling Contract and the electricity supply adjustment agreement (hereafter referred to as the wheeling agreement).
- ② Retail supply contracts (including remote island supply and final security supply contracts) and power supply contracts (hereafter referred to as retail supply related contracts) cancellation※<sup>5</sup>
- ③ Confirming information related to Supply (power receiving) points
- ④ Actions performed by the utilities in accordance with their wheeling agreements including: Electricity amount meter reading; equipment maintenance, inspection, exchange; meter inspection related to electricity outage or disaster.
- ⑤ Actions performed in relation to demand response (negawatt) transactions.

**Joint Use Covered Information**

- ① Basic Information: Name, Address, Phone Number, & Retail Supply contract number.
- ② Supply (power receiving) points related information: Customer’s signed wheeling agreement utility’s service area, remote islands supply agreement subject, Site ID, Amount of wheeling agreement, Meter Amperage, Transmission Connection Service Menu, Power Factor, Supply Method, Wheeling Agreement Decision Method, Meter Information, Utility pole number, Grid connection equipment status, Date of switching, Meter read day, Contract State, Cancellation method.
- ③ Demand Response (negawatt) transaction related information: Power Generation Sales Volume, Demand Procurement Volume, Demand Response Volume, Baseline.

**Joint Used Administration Parties**

- ① Basic Information: Contracted Retail Provider (The utility in the case of remote islands supply agreements and final security supply contracts).
- ② Supply (power receiving) points related information: Utility administering the supply points.
- ③ Demand Response (negawatt) transaction related information: Demand Response Providers

※1 We only share customer’s personal data with necessary companies. This does not mean we share your information with all REUs, Utilities or Demand Response Providers.

※2 REU is not applicable to Electricity Business Act (Showa 39, July 11<sup>th</sup> Law-170) Article 2-5-1 registration non-acceptance but REU as registered by Minister of Economy, Trade and Industry (Include business that were registered as an REU after amendment on H.26 Law 72, revision of Electricity business Act.). (Please visit the [Agency for Natural Resources and Energy website](https://www.anc.go.jp/) for more details such as name of business, address, etc.)

※3 Utility companies are Hokkaido Electric Power Company, Tohoku Electric Power Company, Tokyo Electric Power Grid, Chubu Electric Power Company, Hokuriku Electric Power Company, Kansai Electric Power Company, Chugoku Electric Power Company, Shikoku Electric Power Company, Kyushu Electric Power Company and Okinawa Electric Power Company.

※4 Demand Response Providers are companies who provide demand volume suppression balancing services in contract with the utilities. (Including companies that have received a business number before signing such contracts.) (Please refer to the following link to learn more about Demand Response Providers such as their names and address: (<https://www.occto.or.jp/privacy/negawatt-jigyousya.html>))

※5 “Cancellation of supply agreement” means that an REU that has accepted enrollment from a customer will process their cancelation with their current supplier on the customer’s behalf.

**(2) Joint Use Participant**

- Our company may share private information regarding customer with:  
GK DAX

**Purpose for which your personal data will be used by the Joint User:**

Your personal data will be disclosed to the above companies for the purpose of properly performing necessary procurement management business functions.

**Joint Used Covered Information:**

- Utility
- Customer name
- Customer billing address
- Customer service address
- Customer utility account number
- Customer phone number

**(3) Joint Use Participant**

- Our company may share private information regarding customer with:  
Center for Development of Power Supply Regions

**Purpose for which your personal data will be used by the Joint User:**

Your personal data will be disclosed to the above organization to confirming eligibility of a subsidy for customers living near to power generation facilities.

**Joint Used Covered Information:**

Utility  
Customer name  
Customer billing address  
Customer billing representative  
Customer service address  
Customer utility account number  
Customer phone number  
Customer account subcategory  
Customer kW demand

**(4) Joint Use Participant**

- Our company may share private information regarding customer with:  
CGR 1 Go GK

**Purpose for which your personal data will be used by the Joint User:**

Your personal data will be disclosed to the above company in order to collect overdue account receivables.

**Joint Used Covered Information:**

Customer name  
Customer service address  
Customer utility account number  
Customer enrolment number  
Customer number  
Customer account number  
Customer usage and fee  
Customer email address  
Customer phone number  
Call log  
Enrolment background  
Enrolment date  
Termination date of the contract  
Service Category  
Customer billing address  
Billing date  
Billing history  
Payment date  
Payment history  
Payment method  
Period of use  
Customer work phone number  
Language  
Secret question to identify the customer

**Account Information**

Upon verifying a customer's identity, XOOM Energy may honor requests to review, correct, or delete a customer's personal data.

**Compliance and Review of Laws and Standards**

In compliance with laws related to personal data possession and other standards, XOOM Energy will review as necessary, and make efforts to improve, this policy.

**Contact**

Should you have any questions and requests with respect to the XOOM Energy Personal Data Protection Policy or if you do not consent to, or would like to limit, the manner in which information about you is collected, used or disclosed, please contact XOOM Energy at [customercare@xoomenergy.co.jp](mailto:customercare@xoomenergy.co.jp)