



## Overview

Xcel Energy Inc., its wholly owned affiliates and subsidiaries (collectively, "Xcel Energy") understands that privacy is important to you, and we respect your privacy concerns. This Privacy Policy describes our privacy practices.

The Policy explains:

- What information we collect from and about you when you use our products and services, communicate with us, visit our websites, or interact with us through social media
- How we use and share the information we collect
- The choices we offer you regarding how we use and disclose information about you, and how to exercise those choices
- How you can access and request that we correct the information we maintain about you
- How we safeguard the information we maintain, and
- How you can ask questions about our privacy practices and seek resolution of any concerns you may have regarding our handling of your information

## Information we collect

We may obtain information about you through various sources, such as:

- Phone, fax, e-mail, social media and other means by which you communicate with us
- A utility meter we have installed at your home or business
- Xcel Energy websites, social media pages, mobile applications and other interactive assets that you access
- Surveys, contests, sweepstakes and other promotions
- Our parent, affiliate or subsidiary companies
- Our service providers and other third parties (such as credit reporting agencies)

The types of information we may obtain about you include:

- Contact information (such as name, postal address, e-mail address, phone number)
- Demographic data (such as date of birth, home ownership status and household income)
- Details about your home (such as dwelling age, size and type, and details about appliances and other energy-related equipment used in the home)
- Customer service addresses and dates of service
- Information about your participation in our renewable energy, energy efficiency, or energy conservation programs

- Account history with Xcel Energy (such as disconnection notices issued, disconnection and reconnection dates, payment arrangement dates, late payment notices, and applied late fees)
- Account notes detailing our interactions with you via phone, e-mail, fax, and/or social media
- User name or ID and password for an account you may establish on our websites
- Energy Usage Data specific to your account (the type of Energy Usage Data collected from utility meters and the frequency with which we collect that information varies depending on the type of meter installed; our website provides **more information about our metering technology**)
- Customer payment history and details, including: payment amounts and dates, financial account number, routing number, and billing address
- Information from credit reporting agencies
- Information from you about the medical condition of individuals in your home (to the extent we need such information to promote your safety or the safety of Xcel Energy employees)
- Your Social Security Number
  - We ask for and use SSNs when setting up new service to confirm the customer's identity
  - We also use SSNs to protect against fraud by confirming that we are speaking to the customer of record before providing account access or taking action on the account, and to aid our ability to collect on past-due debts
  - In Colorado, Texas, and New Mexico, with your permission, we may also use your SSN to obtain a credit indicator from a consumer reporting agency to help us determine whether a deposit will be required before we establish the residential service you request. We do not obtain full credit reports or credit scores from consumer reporting agencies when establishing residential service
- Other information you may provide to us

## Web browsing details

When you visit our websites or social media pages we may collect certain information by automated means, such as cookies and web beacons. A "cookie" is a text file that a website sends to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser.

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A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, is used to transmit information back to a web server. We also may use website analytics tools that collect information about visitor traffic on our websites or social media pages. Examples of the information we may collect by automated means include details about the devices our visitors use to access the Internet (such as the Internet service provider, IP address and device, browser and operating system type); URLs that refer visitors to our websites; dates, times, and lengths of visits to our websites; site navigation patterns; a general geographic location from which a visitor accesses our websites; and search terms that visitors use to reach our websites.

**How we use the information we collect**

We may use the information we obtain about you to:

- Assist you in establishing your account with Xcel Energy
- Provide, bill and collect for Xcel Energy products and services
- Communicate with you, respond to your questions and comments, and provide customer support
- Provide you access to your information via the My Account site
- Administer your participation in events, programs, surveys, and other offers and promotions
- Operate, evaluate and improve our business and the regulated products and services we offer (including developing new products and services, analyzing our products and services, optimizing customer experience on websites, managing our energy distribution system and our communications, reducing costs and improving service accuracy and reliability, and performing accounting, auditing and other internal functions)
- Create aggregated or de-identified energy usage data
- Protect against and prevent fraud, unauthorized transactions, claims and other liabilities, including past due accounts
- Manage risk exposure
- Comply with applicable legal and regulatory requirements

We may supplement the information you provide with additional data received from third parties to perform analytics (such as market research, trend analysis, and customer segmentation).

**Online advertising**

You may see ads about our products and services on other websites because we participate in advertising networks. Ad networks allow us to target our advertising to users through demographic, behavioral and contextual means. These networks track your online activities over time by

collecting information through automated means, including through the use of cookies, web server logs, web beacons and other methods. The ad network vendors may collect information about your visits to websites that participate in the vendors’ advertising networks, such as the pages or advertisements you have viewed, and the actions you take on the sites. The networks use this information to show you advertisements for our products and services. This data collection and ad targeting take place both on our websites and on third- party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts.

**Information disclosures****Overview**

We do not disclose information about you except as described in this Privacy Policy. This means that, with the exception of disclosures of the information described in this Policy and any disclosures you or your authorized agent have specifically authorized, you can expect that we will keep the information that we maintain about you private or confidential, and not otherwise disclose it.

As we explain in the next section, certain disclosures of information about you do not require your consent because they are specifically permitted or required by applicable laws and regulations. Other disclosures will only occur after we obtain your explicit authorization.

Nothing in this Privacy Policy precludes you from directly sharing your own information with a third party that may or may not be affiliated with Xcel Energy. In such circumstances, Xcel Energy is not responsible for unauthorized disclosure or use of that information by the third party to which you disclose your information.

**Information disclosures for which authorization is not required**

We may disclose information about you as required or permitted by law or applicable regulations, including to a federal, state or local governmental agency with the power to compel such disclosure, or in response to a subpoena or court order.

We may disclose information about you to service providers who perform services on our behalf, such as companies that assist us in providing products and services to customers, billing customers, or processing credit card payments. We prohibit these service providers from using or disclosing the information we provide them, except as necessary to perform specific services on our behalf or to comply with legal requirements.

Except for the instances listed in this section, we will not

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disclose to third parties your Social Security Number, banking or credit card information, driver license number, credit reporting information, bankruptcy or probate information.

We may disclose aggregated or de-identified energy usage data to third parties. We aggregate and/or anonymize the information in accordance with applicable legal and regulatory requirements, including those designed to prevent the re-identification of the information.

We also reserve the right to disclose information about you in connection with: (1) referral of past due accounts for collection or sale of such accounts; or (2) a transfer of service rights to another utility provider (which would generally be subject to your state Public Utility or Public Service Commission review and approval). Should such a sale, merger or transfer occur, we will use reasonable efforts to direct the recipient to use information you have provided to us in a manner that is consistent with our Privacy Policy. Following such a sale, merger or transfer, you may contact the entity to which we transferred your information with any inquiries concerning the processing of that information.

### Information disclosures that require customer authorization

You may access your energy usage information and share it with a third party using My Energy and Green Button. Find more information on our **website**.

We may share certain information about you with a third party if you have previously authorized the disclosure in writing, including:

- Energy Usage Data – The following links provide access to our Energy Usage Data release authorization forms:
  - In **English**
  - In **Spanish**
- Requests for disclosure of customer information other than Energy Usage Data:
  - Service Verification Letters
  - Credit Reference Letters
  - Lock Authorization Forms
  - Custom Letters – for example, written verification of start/stop orders, disconnection dates, explanation of a payment arrangement, confirmation that the account is current, recap of a phone call, etc. Custom letters typically include the customer's name, account number, service address, and alternate mailing address (when applicable)
  - The following link provides access to our **One-Time Release of Information (other than Customer Energy Usage Data)**

Prior to authorizing the disclosure of your information to a third party, you should consider the third party's proposed scope, purpose, and use of the information – including whether they can use it for other purposes that may extend beyond the purpose for which you initially authorized its disclosure.

With respect to disclosures of Customer Energy Usage Data, please note that, depending on the type of metering equipment and supporting infrastructure, it may be possible to obtain insight into activities within your home or business through analysis of Energy Usage Data. If you decline a request from a third party to authorize access to your Energy Usage Data, that decision will not affect the provision of any service you receive from Xcel Energy.

### Revoking consent

You may at any time terminate or limit any consent previously provided that authorizes a third party or HomeSmart from Xcel Energy to access or use your information by sending a request to us via e-mail (**[datarequest@xcelenergy.com](mailto:datarequest@xcelenergy.com)**), fax (866.208.8732), or mail (P.O. Box 8, Eau Claire, Wisconsin 54702).

### Your choices

You have certain choices about what information we collect from you and how we communicate with you:

#### Marketing emails

You may choose not to receive marketing e-mail communications from us by clicking on the "unsubscribe" link in a marketing e-mail we send to you. We will discontinue this type of contact with you within ten days after we receive your 'unsubscribe' request. Please note that even if you opt out of our marketing e-mail communications, you will continue to receive non-marketing e-mails related to your account transactions.

#### Cookies

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies you may not be able to take full advantage of our websites' features.

#### Online advertising

To opt out of receiving marketing communications through the advertising networks of our ad network vendors, please click the "Online advertising opt-out" link, then click "Select all" on the linked site, and then press the "Submit" button.

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### Access and correction

You may request a copy of the information we maintain about you in the ordinary course of business, and request us to make an update or correction of inaccuracies in that information, free of charge. You can make changes to some of your information via our My Account site or you can contact us as specified in the How to Contact Us section at the end of this Privacy Policy. In some cases we may deny your request for information. If we deny your request for access to information we maintain about you, we will notify you of our reason for the denial.

### Links to other websites

Our websites may contain links to other sites for your convenience and information. These sites may be operated by companies not affiliated with Xcel Energy. Linked sites may have their own privacy policies or notices, which you should review if you visit those websites. We are not responsible for the content of any websites not affiliated with Xcel Energy, any use of those sites, or those sites' privacy practices.

### How we protect your information

We maintain administrative, technical and physical safeguards designed to protect the privacy and security of the information we maintain about you. Please note that no electronic transmission of information can be entirely secure. We cannot guarantee that the security measures we have in place to safeguard information will never fail, or that those measures will always be sufficient or effective.

To help protect yourself, we recommend that you protect the confidentiality of any user name or ID and password you use to access any online services, including those provided by Xcel Energy. You are responsible for all activity on the website accessed using your user name or ID and password. You should also sign off your accounts and close your browser window when you have finished your visit to our websites. We will never ask for your Xcel Energy My Account site password via e-mail or phone.

Our website includes tips about steps you can take to help protect your information, including identifying potential scams and securing information you may access online about your Xcel Energy account.

### Children's privacy

Our websites are general audience websites; we do not intend or knowingly use them to collect any personal information from children younger than the age of thirteen (13). If we discover that we have collected personal information from an individual younger than the age of thirteen (13), we will use commercially reasonable efforts to delete that personal information. If you are the parent or legal guardian of a child younger than age 13 and believe that Xcel Energy has collected personal information from your child, please contact us as indicated in the "Contact Us" section of this policy.

### Updates to our Privacy Policy

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our information practices. Please regularly review the content of this Privacy Policy. We will post a prominent notice on our websites to notify you of material changes to our Privacy Policy. We also have indicated at the bottom of the Policy when it was most recently updated. Amendments to this Privacy Policy will become effective when posted on our websites. Your continued use of our websites, products and services provided by Xcel Energy after such posting will be deemed your acceptance of any changes to our Privacy Policy.

### How to contact us

For more information regarding our privacy practices, if you have any questions or comments about this Privacy Policy, or if you would like us to update information we have about you or your preferences, please contact us by e-mail at [inquire@xcelenergy.com](mailto:inquire@xcelenergy.com), or call **800.895.4999**.

Effective date: **March 25, 2020**

