

PRIVACY NOTICE FOR CUSTOMERS

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: <ul style="list-style-type: none"> • Social Security Number • Credit Scores • Account balances and transaction history • Credit history and income
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	<ul style="list-style-type: none"> • Call 484-838-5460, option 5 <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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Questions?	Call 484-838-5460
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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 • Give us your income information • Provide employment information • Pay your bills • 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.</p>
What happens when I limit sharing for an application I hold jointly with someone else?	<ul style="list-style-type: none"> • If you limit sharing with affiliates, your choices will apply individually unless you tell us otherwise. Any account holder may express a privacy preference on behalf of the other joint account holders • If you limit sharing with third parties, your choices will apply to everyone on your account
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"> • Our affiliates include RBFunding LLC, NEIF-MSH Financial, LLC and NEIF-MSH Insurance, LLC
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"> • 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.
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"> • NEIF doesn't jointly market.

State Disclosures	
Connecticut	<p>1. Collection of Social Security Numbers.</p> <p>NEIF collects the Social Security numbers of prospective customers only for legitimate business purposes.</p> <p>2. Access to Social Security Numbers</p> <p>NEIF restricts access to the Social Security numbers it collects to only NEIF employees and certain third parties</p>

	<p>who are authorized to access this information. Authorized employees are those whom NEIF has determined have a legitimate business need to access this information. Authorized third parties are those who have a legitimate need to access this information and owe a duty to maintain its confidentiality.</p> <p>3. Use and Disclosure of Social Security Numbers.</p> <p>NEIF prohibits the disclosure and use of Social Security numbers unless such disclosure and use complies with this policy and with applicable law. Documents, materials or computer screens that display Social Security numbers shall be shown only to authorized employees and third parties and shall be kept out of public view at all times.</p> <p>4. Safeguarding Social Security Numbers.</p> <p>NEIF safeguards the confidentiality of the Social Security numbers it collects in accordance with its internal policies and procedures governing the protection of confidential and personal information. Such policies and procedures address the physical, technical and administrative safeguards NEIF has adopted and implemented to protect Social Security numbers and other confidential and personal information.</p>
Delaware	<p>The types of personal information NEIF collects and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security Number and name • Email address and telephone number • Account balances and transaction history • Credit history and income <p>NEIF restricts access to this information and only certain third parties who have a legitimate need to access this information and owe a duty to maintain its confidentiality are permitted to access this information.</p> <p>This section is effective as of January 15, 2019. NEIF may change this section by publishing revised terms and posting these revised terms on its website.</p> <p>NEIF does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, many Internet browsers allow you to set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked.</p>

Vermont	<p>NEIF will not disclose nonpublic personal financial information about you to nonaffiliated third parties (other than as permitted by law) unless you consented (“opted-in”) us to make that disclosure.</p> <p>NEIF will not share credit reports and/or creditworthiness information with affiliates unless you consented to (“opted-in”) to such sharing.</p>
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California Consumer Privacy Act Privacy Statement (“CCPA Statement”)

This CCPA Statement supplements the information contained above 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”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Your rights under CCPA

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 explained 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

Under the CCPA, 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.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA'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 (FCRA), the Gramm-Leach-Bliley Act (GLBA) or 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 K, 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.
- 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. 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.

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

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 provide you with 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.
- 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.

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.

Sharing Personal Information under CCPA

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 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 K 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.

We 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 may host our internet web sites and provide us information on consumers interested in our products and services.
- Third parties to whom you authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information. “sold” means the disclosure of personal information to a third-party for monetary or other valuable consideration. We do not consider personal information as “sold” 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

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA 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.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- 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 of Your Specific Information

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

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, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

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, 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. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
4. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
5. 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 information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Your Rights

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

- Calling us toll-free at 888-961-6343, option 5
- Completing the online [Personal Information Request Form](#)

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, 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. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response 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 rights. Unless permitted by the CCPA, 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.

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 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.