



## H2O America Privacy Policy

Effective as of July 5, 2025

This Privacy Policy describes how H2O America and our subsidiaries and affiliated companies (collectively, “H2OA,” “we,” or “us”) collect, use, disclose and otherwise process information about you. This Privacy Notice applies to information we collect when you access or use our websites (collectively, the “**Website**”), our water services (the “**Services**”), or when you (the customer) otherwise interact with us, such as through our customer support channels.

The following provisions apply to our processing of your information, including Sensitive Personal Information (“**SPI**”), that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you (“**Personal Information**”).

This Privacy Notice does not address our privacy practices relating to H2OA job applicants, employees, and other employment-related individuals, nor data that is not subject to applicable data protection laws (such as deidentified or publicly available information). This Privacy Notice is also not a contract and does not create any legal rights or obligations not otherwise provided by law.

### 1. Updates to This Privacy Notice

We may change this Privacy Notice from time to time. Non-material changes to this notice will be noted by an update to the effective date of this notice. If we make material changes, we will provide you with additional notice. We encourage you to review this Privacy Notice regularly to stay informed about our information practices and the choices available to you.

### 2. Categories of Personal Information Collected

We have collected the following categories of Personal Information within the last 12 months from the sources listed in the “**Sources of Personal Information**” Section:

**(a) Personal Identifiers**, such as name, unique personal identifier, account number, email address, IP Address, account name, or other similar identifiers.

**(b) Commercial Information**, such as payment and payment history.

**(c) Internet or other similar network activity**, including, but not limited to, browsing history, search history, IP address, browser settings like language preference, and information regarding your interaction with our Website, application, or advertisement.

**(d) Sensory data**, such as voicemails and videos.

**(e) Sensitive Personal Information**, such as account login information allowing access to an account, credit card number, debit card number, or other payment information. Please note we do not collect SPI for the purpose of inferring characteristics about you.

### 3. Sources of Personal Information

We collect this information from the following categories of sources:

- Directly from you, when you register for an account on our Website, stop or start service, pay your bill, enroll in automatic payment service, report an outage, or contact us through phone, email or the Website;
- Directly from your device, when you browse our Website, use our online services or interact with our advertisements. See the **“Cookies and Other Technologies”** Section below for additional information;
- Real estate developers/public records;
- Government agencies;
- Water services technology; and
- Service providers.

#### **4. Cookies and Other Technologies**

When you visit our Website, we, and our third-party partners, automatically collect information you provide to us and information about how you access and use our products and services when you engage with us. We typically collect this information through the use of cookies or other related technologies. Cookies are stored on your browser to collect information. The information collected might relate to you, your preferences, or your device, and is mostly used to make the site work as you expect it to and to provide a more personalized web experience. However, you can choose not to allow certain types of cookies, which may impact your experience of the site and the services we are able to offer, by making your selection in the “Your Privacy Choices” tab at the bottom of the Website.

Certain pages on the Online Services and social media pages may contain web beacons (also known as Internet tags, pixel tags, and clear GIFs), which are small bits of code embedded in pages or images on our Websites (“Web Beacons”). The Web Beacons may be used with cookies to understand how you interact with us, so we can manage and improve those interactions. We may also include Web Beacons in e-mails we send to you to learn if messages have been opened, acted on, or forwarded. This helps us improve future messages and makes them more meaningful to you.

We, and our third-party partners, use these automatic data collection technologies to automatically collect the following data when you use our services or otherwise engage with us:

- **Information About Your Device and Network**, including the device type, manufacturer, and model, operating system, IP address, browser type, Internet service provider, and unique identifiers associated with you, your device, or your network (including, for example, a persistent device identifier or advertising ID). We employ third-party technologies designed to allow us to recognize when two or more devices are likely being used by the same individual and may leverage these technologies (where permitted) to link information collected from different devices.
- **Information About the Way Individuals Use Our Services and Interact With Us**, including the site from which you came, the site to which you are going when you leave our services,

how frequently you access our services, whether you open emails or click the links contained in emails, whether you access our services from multiple devices, and other browsing behavior and actions you take on our services (such as the pages you visit, the content you view, videos you watch, the communications you have through our services, and the content, links and ads you interact with). We employ third-party technologies designed to allow us to collect detailed information about browsing behavior and actions that you take on our services, which may record your mouse movements, scrolling, clicks, and keystroke activity on our services and other browsing, search or purchasing behavior. These third-party technologies may also record information you enter when you interact with our products or services, or engage in chat features or other communication platforms we provide.

- **Information About Your Location**, including general geographic location that we or our third-party providers may derive from your IP address.

## **5. Purposes for Processing your Personal Information**

For this Privacy Notice, the term Processing includes any operation that is performed with Personal Information that includes but is not limited to the collecting, recording, storing, transferring, or manipulating the data. We use the Personal Information for a variety of purposes such as:

### **(a) Service Delivery:**

We use your information to provide, manage, and maintain our Services, including delivery of water to you, to process your payments, including using third-party vendors/platforms, and to authenticate your account.

### **(b) Research and Improvement:**

We use your information to analyze and improve our Services, including to test and analyze water system performance, evaluate risk and prioritize assets for maintenance and replacement, and promote efficiency/conservation. We also use information to improve our customer support services.

### **(c) Communication:**

We use your information to send you notices of Public Utility Commission hearings, alert you to changes in pressure/contaminants, respond to your complaints, claims, and inquiries, inform you of price changes or the cost for new services, and send you bills or other transactional or relationship messages. We may also use your information to send you newsletters or promotional emails. You can stop receiving promotional email communications from us by clicking on the “unsubscribe” link provided in any of our email communications. Please note you cannot opt-out of service-related email communications (such as, account verification, transaction confirmation, or service update emails).

### **(d) Marketing and Advertising:**



We use your information to send direct marketing messages. We share your information with marketing and advertising partners for cross-contextual advertising purposes, so that they can provide you with personalized offers that you might like or need. You can opt out of the marketing messages they send by following the instructions in those communications or by contacting us.

**(e) Conducting Analytics:**

Your information helps us to monitor and analyze Website trends, usage, and activities, improve our Website, and generate de-identified data that we will not attempt to re-identify.

**(f) Protection and Compliance:**

We use information to make regulatory filings, document and process claims and complaints, detect, investigate, and help prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity, help protect the rights and property of H2OA and others, and comply with our legal and financial obligations.

We may combine Personal Information about you with other information we have acquired from third parties in accordance with applicable law. We will treat the combined information as Personal Information under this Privacy Notice.

Unless we notify you separately, we do not process your Personal Information for profiling in furtherance of “decisions that produce legal or similarly significant effects” as such term is defined under applicable law.

We may also use the information we collect for our operational purposes, purposes for which we provide you additional notice, provided that such additional purposes are compatible with the context in which the Personal Information was collected, or with your consent.

Within the last 12 months, we have disclosed Personal Information for our business purposes. To learn more about the categories of third parties with whom we share such information, please see the “**How We Share Your Information**” Section below.

## **6. How We Share Your Information**

We may share your information as follows:

- **H2O America:** We may share your information with the H2O America parent and affiliate companies that may use your Personal Information as described in this notice. We may share for the purpose of protecting the rights, safety, security, and property of our customers, associates, and the public. We may also disclose this information to protect and enforce our rights (including for fraud prevention purposes and to prevent, investigate and prosecute criminal activities) and to assist others to do the same.
- **Service Providers:** We may share your Personal Information with vendors, service providers, and our affiliated companies that we engage to provide services to us on our behalf, such as support for the internal operations of our Website and mobile applications (including payment processors and third parties we use to process services on our behalf),

electronic mail, mobile messages, product and service delivery, managing payments and answering your questions. Service providers only use the information they receive from us for the purposes we hired them for. By contract, we do not allow them to retain, use, disclose or otherwise handle Personal Information for their own purposes.

- **Advertising Partners:** We may share your contact information with our advertising partners so that they can provide you with insurance services. We also work with third-party ad networks and advertising partners to deliver advertising and personalized content on our services, on other websites and services, and across other devices. These parties may collect information automatically from your browser or device when you visit our Websites and other services through the use of cookies and web beacons. The information is used to provide and inform targeted advertising, as well as to provide advertising related services such as reporting, attribution, analytics, and market research.
- **Government Authorities:** We may share your Personal Information where we believe the disclosure is required by law, or otherwise necessary to comply with the law, regulatory requirements, requests from public authorities, or to enforce our agreements or policies, to protect the rights and property of our customers, the company, our partners or the public (including for fraud prevention purposes and to prevent, investigate and prosecute criminal activities).
- **Other Corporate Entities:** We may disclose Personal Information, as part of any actual or contemplated merger, sale, transfer of assets, acquisition, bankruptcy, or similar event, including related to due diligence conducted prior to such event, where permitted by law.
- **With Notice or Consent.** We may also disclose information about you, including Personal Information, to other third parties, where we have provided specific notice to you or asked for your consent, as required by law.

## 7. Your Privacy Choices

The following privacy choices are made available to all individuals with whom we interact. You may also have additional choices regarding your personal data depending on your location or residency. Please refer to our **Privacy Notice Addendum for California Residents** and **Privacy Notice Addendum for Other States** below for information about additional privacy choices that may be available to you.

### Email Communication Preferences

You can stop receiving promotional email communications, including newsletters, from us by clicking on the “unsubscribe” link provided in any of our email communications. Please note you

cannot opt-out of service-related email communications (such as, account verification, transaction confirmation, or service update emails).

### **Automatic Data Collection Preferences**

Certain of our services may provide you the ability to adjust your preferences regarding our use of automatic data collection technologies. For example, there is a “Your Privacy Choices” manager linked in the footer of our Websites that allows you to adjust your preferences regarding certain automatic data collection technologies on the specific website you are visiting for the specific device and browser you are using at that time (which means you will need to change your preferences on each device and browser you use to interact with the specific website you are visiting).

Where a H2OA-specific preference manager or privacy setting is not available, you may be able to utilize third-party tools and features to further restrict our use of automatic data collection technologies. For example, (i) most browsers allow you to change browser settings to limit automatic data collection technologies on websites, (ii) most email providers allow you to prevent the automatic downloading of images in emails that may contain automatic data collection technologies, and (iii) many devices allow you to change your device settings to limit automatic data collection technologies for device applications. Please note that blocking automatic data collection technologies through third-party tools and features may negatively impact your experience using our services, as some features and offerings may not work properly or at all. Depending on the third-party tool or feature you use, you may not be able to block all automatic data collection technologies, or you may need to update your preferences on multiple devices or browsers. We do not have any control over these third-party tools and features and are not responsible if they do not function as intended.

### **Targeted Advertising Preferences**

You may be able to exercise control over the advertisements you see by leveraging one or more targeted advertising opt-out programs. For example:

- **Global Privacy Control.** We process opt-out preference signals from Global Privacy Control (“GPC”). GPC is a browser-level technical specification that you can use to inform Websites that you opt-out of sales or sharing of data for cross-context behavioral advertising or targeted advertising. If you use GPC, our Website will treat the browser and device you use to access our Website as opted-out from sales or sharing to the extent we engage in such processing. You may learn how to set up GPC by visiting <https://globalprivacycontrol.org/>.
- **Device-Specific Opt-Out Programs:** Certain devices provide individuals the option to turn off targeted advertising for the entire device (such as Apple devices through their App Tracking Transparency framework or Android devices through their opt out of ads personalization feature). Please refer to your device manufacturer’s user guides for additional information about implementing any available device-specific targeted advertising opt-outs.

- **Digital Advertising Alliance:** The Digital Advertising Alliance allows individuals to opt out of receiving online interest-based targeted advertisements from companies that participate in their program. Please follow the instructions at <https://optout.aboutads.info/> for browser-based advertising and <https://www.youradchoices.com/appchoices> for app-based advertising to opt out of targeted advertising carried out by our third-party partners and other third parties that participate in the Digital Advertising Alliance’s self-regulatory program.
- **Network Advertising Initiative:** The Network Advertising Initiative similarly allows individuals to opt out of receiving online interest-based targeted advertisements from companies that participate in their program. Please follow the instructions at <https://thenai.org/how-to-opt-out/> to opt out of browser-based targeted advertising carried out by our third-party partners and other third parties that participate in the Network Advertising Initiative’s self-regulatory program.
- **Platform-Specific Opt-Out Programs:** Certain third-party platforms provide individuals the option to turn off targeted advertising for the entire platform (such as certain social media platforms). Please refer to your platform provider’s user guides for additional information about implementing any available platform-specific targeted advertising opt-outs.

Please note that when you opt out of receiving interest-based advertisements through one of these programs, this does not mean you will no longer see advertisements from us or on our services. Instead, it means that the online ads you do see from relevant program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third parties’ opt-out options or programs or the accuracy of their statements regarding their programs. In addition, program participants may still use automatic data collection technologies to collect information about your use of our services, including for analytics and fraud prevention as well as any other purpose permitted under the applicable advertising industry program.

### **Partner-Specific Preferences**

Certain of our third-party providers and partners offer additional ways that you may exercise control over your personal data, or automatically impose limitations on the way we can use personal data in connection with the services they provide:

- **Device-Specific / Platform-Specific Preferences:** The device and/or platform you use to interact with us (such as you mobile device or social media provider), may provide you additional choices with regard to the data you choose to share with us. For example, many mobile devices allow you to change your device permissions to prevent our products and services from accessing certain types of information from your device (such as your contact

lists or precise geolocation data), and many social media platforms allow you to change your platform permissions to prevent integrated products and services from accessing certain types of information connected with your profile. Please refer to your device or platform provider's user guides for additional information about implementing any available platform-specific targeted advertising opt-outs.

- **Google Analytics:** Google Analytics allows us to better understand how our customers interact with our services. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's website here: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Add-On here: <https://tools.google.com/dlpage/gaoptout/>. We may also utilize certain forms of display advertising and other advanced features through Google Analytics. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to our services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://myadcenter.google.com/>.

## 8. Retention

We retain Personal Information for the length of time needed to carry out the processing purposes described in Section “**Purposes for Processing your Personal Information**”. We also retain information for related business purposes, security, legal compliance, and disputes and claims handling, consistent with our retention policy and as permitted by applicable law.

## 9. Third-Party Websites and Services

Our services may include links to third-party websites, plug-ins, applications, and other services. Except where we post, link to, or expressly adopt or refer to this Privacy Notice, this Privacy Notice does not apply to any personal data practices of third parties. To learn about the personal data practices of third parties, please visit their respective privacy notices.

## 10. Contact Us

If you have any questions or complaints about this Privacy Notice or how we or our service providers collect, use, or disclose your Personal Information, please contact us using any of the methods below:

- Email us at [privacy@h2o-america.com](mailto:privacy@h2o-america.com)
- Call us at 1-888-266-5885

## 11. Privacy Notice Addendum for California Residents

If you are a California consumer, the following provisions apply to our processing of information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“California Personal Information”). For California consumers, the provisions of this California Addendum prevail over any conflicting provisions in other sections of this Privacy Notice.

This notice does not apply to workforce-related Personal Information collected from California-based employees, job applicants, contractors, or similar individuals but does apply to Personal Information collected in the context of business-to-business (B2B) transactions.

### **Categories, Sources and Purposes for Processing Personal Information Collected**

You can learn more about the categories of Personal Information and SPI that we collect about consumers and the purpose for processing your Personal Information by visiting the “**Categories of Personal Information Collected**”, “**Sources of Personal Information**” and “**Purposes for Processing Your Personal Information**” Sections above.

### **Personal Information Disclosed for a Business Purpose**

During the prior 12 months, we have disclosed Personal Information for the following business purposes:

- To provide you with products and services
- To operate our businesses
- To conduct marketing, personalization, and advertising
- To communicate with you
- For research purposes
- To design and develop new service offerings
- To conduct business analytics
- For safety and security purposes
- To improve our products and service offerings
- For other internal business purposes
- To fulfill our legal obligations

The table below describes the categories of recipients to whom information was disclosed for a business purpose during the prior 12 months:

<b>Category of Personal Information</b>	<b>Categories of Third-Parties</b>
<b>Personal Identifiers</b>	- Service Providers - Advertising Partners

Category of Personal Information	Categories of Third-Parties
	- Legal Authorities
<b>Commercial Information</b>	- Service Providers - Advertising Partners - Legal Authorities
<b>Internet Activity Information</b>	- Service Providers - Advertising Partners - Legal Authorities
<b>Sensory Data</b>	- Service Providers - Advertising Partners
<b>Inferences</b>	- Service Providers
<b>Sensitive Personal Information</b>	- Service Providers

### Personal Information that is Sold or Shared During the Prior 12 Months

In the past 12 months, we may use or disclose your Personal Information in a manner that is considered a “sale” or “sharing” under California law. We have shared California Personal Information such as California residents’ use of our Online Services with our marketing and advertising partners for cross-contextual advertising purposes as further described in the “**Cookies and Other Technologies**” Section above. In addition, from time to time, we may share your contact information with our advertising partners (e.g., insurance services companies) so that they can provide personalized offers that you might like or need. When we work with these companies, your privacy, data integrity and security remain a priority.

The table below identifies the categories of Personal Information that we have sold or shared and the categories of third parties to whom that Personal Information was sold or shared to during the last 12 months. We do not knowingly sell or share the Personal Information of consumers under the age of 16.

Category of Personal Information	Categories of Third-Parties	Purpose for Disclosing
<b>Personal Identifiers</b> , such as a name, email address, and IP address.	- Advertising Partners	To market our products and services to you

### Your Consumer Rights and How to Exercise Them

As a California consumer, you have certain rights related to your Personal Information, including:

- **Right to Know/Right to Access** - You have the right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you. You also have the right to request access to and obtain a copy of any Personal Information that we may hold about you.
- **Right to Correct** – You have the right to request that we correct inaccuracies in your Personal Information.
- **Right to Delete** – You have the right to request that we delete Personal Information we have collected from or obtained about you, subject to certain exceptions. For example, we may not be able to delete your information if you are a current and active customer.
- **Right to Opt-out of Sale/Share** – You may request that we stop disclosing or making available your Personal Information in a way that is considered a “sale”, including the right to opt-out of the disclosure of personal data to third parties for the third parties’ direct marketing purposes under California’s “Shine the Light” Law.
- **Right to Opt-out of Targeted Advertising** – You may request that we stop disclosures of your Personal Information for targeted advertising. If you wish to opt out of the sharing of Personal Information for cross-context behavioral advertising, please visit our Your Privacy Choices tab, located in the footer of our Website and/or see the “**Cookies and Other Technologies**” Section for more information.
- **Right to limit use or disclosure of your Sensitive Personal Information** – We do not use or disclose Sensitive Personal Information for purposes that, under applicable law, require us to support the right to limit the use or disclosure of Sensitive Personal Information.
- **Right to Non-Discrimination** - If you choose to exercise any of the privacy rights described above, we will not deny our products or services to you, charge you different prices or provide a different level or quality of products or services to you unless those differences are related to the value of your Personal Information.

You may request to exercise these rights by:

- Completing our privacy rights request form found here: [Privacy Rights Request Form](#).
- Calling us toll-free at 1-888-266-5885

As required under applicable law, we will take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide your first name, last name, email address on file, service address, information related to a recent interaction, account number, last four digits of your social security number, company name, or your work email to exercising requests of the above type. We may limit our response to your



exercise of the above rights as permitted under applicable law. When you submit a request to exercise your rights above, we will use the information you provide only for the purpose of processing your request and will maintain a record of your request and our response for at least 24 months, as permitted under applicable law.

You may use an authorized agent to submit your request to Know/Access, Correct, or Delete your Personal Information. If you use an authorized agent to submit a request, we will require that the authorized agent provide us with proof that you gave the agent signed permission to submit the request. In addition, we will also require you to do either of the following: (1) verify your own identity directly with us; or (2) directly confirm with us that you have provided the authorized agent permission to submit the request on your behalf. These requirements of proof do not apply if the agent has a Power of Attorney pursuant to California Probate Code.

You may also use an authorized agent to exercise opt-out rights and to limit the use of Sensitive Personal Information. In each case the agent must provide us with documentation demonstrating that you have provided signed permission to the agent to exercise these rights with us on your behalf. We may deny the request if we do not receive such proof.

We may deny a request from an authorized agent if the agent cannot meet the above requirements.

### **Shine the Light**

We do not disclose “Personal Information” subject to California Civil Code §1798.83 (the “**Shine the Light law**”) with third parties for the third parties’ direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light law by contacting us at the address set forth in the next section. Any such request must include “California Shine the Light Request” in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address.

## **12. Privacy Notice Addendum for Other States**

The disclosures in this section supplement our general privacy notice and are made pursuant to the following state consumer privacy laws:

- Connecticut Data Privacy Act
- Texas Data Privacy and Security Act

For the purposes of this section, these laws will be referred to collectively as the “State Consumer Privacy Laws”. References to “Personal Information” in our general privacy notice describe our practices with respect to “personal data,” as defined under these State Consumer Privacy Laws.

### **Personal Information that is Sold to or Shared with Third Parties**

From time to time, we may use or disclose your Personal Information in a manner that is considered a “sale” or “sharing” under State Consumer Privacy Laws.



We share Personal Information such as our customer's use of our Online Services with our marketing and advertising partners for cross-contextual advertising purposes as further described in the "**Cookies and Other Technologies**" Section above.

We may share your contact information with our advertising partners (e.g., insurance services companies) so that they can provide personalized offers that you might like or need. When we work with these companies, your privacy, data integrity and security remain a priority.

### **Your Privacy Rights**

You may have the following rights, in each case to the extent set out in applicable law:

- **Right to Access and Portability** – You have the right to request access to and obtain a copy of any Personal Information that we may hold about you and, where required by law, the right to obtain a copy of the Personal Information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- **Right to Correct** – You have the right to request that we correct inaccuracies in your Personal Information.
- **Right to Delete** – You have the right to request that we delete Personal Information we have collected from or obtained about you.
- **Right to Opt-out of Sale/Share** – You may request that we stop disclosing or making available your Personal Information in a way that is considered a "sale".
- **Right to Opt-out of Targeted Advertising** – You may request that we stop disclosures of your Personal Information for targeted advertising. See the "**Cookies and Other Technologies**" Section for more information on how to opt-out of targeted advertising.
- **Right to Appeal** – If you are unsatisfied with our decision not to take action on your request to exercise one of your privacy rights, you may appeal our decision via the [Privacy Rights Request Form](#).
- **Right to Non-Discrimination** - If you choose to exercise any of the privacy rights described above, we will not deny our products or services to you, charge you different prices or provide a different level or quality of products or services to you unless those differences are related to the value of your Personal Information.

You may request to exercise these rights by:

- Calling us toll-free at 1-888-266-5885
- Completing our privacy rights request form found [Privacy Rights Request Form](#).

As required under applicable law, we will take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide your first name, last name, email address on file, service address, information related to a recent interaction, account number, last four digits of your social security number, company name,



or your work email to exercising requests of the above type. We may limit our response to your exercise of the above rights as permitted under applicable law. When you submit a request to exercise your rights above, we will use the information you provide only for the purpose of processing your request and will maintain a record of your request and our response for at least 24 months, as permitted under applicable law.

Under applicable law, you may use an authorized agent (a person or entity acting on your behalf) to submit a request to opt-out out of our processing of Personal Information for the purposes of targeted advertising or sales. If you use an authorized agent to submit a request, we will not act on that request unless we are able to authenticate, with commercially reasonable effort, both your identity and the authorized agent's authority to act on your behalf.

We may deny a request from an authorized agent if the agent cannot meet the above requirements.