

## PHELAN GAS PRIVACY POLICY

*Last updated: May 10, 2026*

**PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND YOUR CHOICES AND RIGHTS. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY, YOU SHOULD NOT ACCESS OR USE OUR SERVICES.**

### **SECTION I INTRODUCTION**

**Phelan Gas Company** (also referred to herein as “**Phelan Gas**”, “**we**,” “**us**,” and “**our**”) takes data privacy and security seriously and believes in transparency.

This Privacy Policy (the “**Policy**”) describes how we collect, use, share, protect, and disclose your personal information when you visit our website, <https://phelangas.com/>, or otherwise interact with our websites, webpages, subdomains, and mobile applications (“**Sites**”), and any other features, content, functionalities, services, media, applications, or solutions offered by us (“**Offerings**”, which together with Sites are collectively referred to as the “**Services**”) in accordance with the privacy rights under applicable U.S. privacy laws. For purposes of this Policy, the term “**you**” or “**your**” refers to a natural person that interacts with our Services.

For **California residents**, please review the “**Notice at Collection**” available at [Section II \(Information We May Collect\)](#), [Section III \(How We May Use or Exchange Your Information\)](#), [Section III \(Data Retention\)](#), and [Section IV \(Your Consumer Rights and Privacy Choices\)](#).

PLEASE NOTE: This Policy does **not** apply to

- (i) our affiliates, such as [Suburban Propane](#) or [Agway Energy Services](#), each of which posts its own privacy policy on their respective websites;
- (ii) our HR-related data collection practices, where you are acting as our job applicants, employees, independent contractors, or corporate officers. A separate HR-related privacy policy will be made available to you in that case;
- (iii) certain information collected via Phelan Gas’s customer portal at <https://webhub.rccbi.com/v2/?logical=phegasd1>, which is operated by a third party.

### **SECTION II INFORMATION WE MAY COLLECT**

In the preceding 12 months, we may have collected information that could directly or indirectly identify you as an individual directly from you, your devices, your interactions with our Services, and/or indirectly from other sources (such as our service providers, public databases, payment processors, credit reporting agencies, etc.) and may include the following (together, “**personal information**”), depending on the circumstances:

#### **1. Identifiers:**

- **Contact Information**, such as your first and last name, email addresses, mailing addresses, telephone numbers, professional title and business name.

- **Communications Data**, such as information you provide through online web forms, when you contact us (or our channel partners) with questions, feedback, surveys, or otherwise choose to provide when you correspond with us online.
- **Profile Data**, such as your username and password that you may set to establish an online account with us and any content uploaded to the Services (such as text, images, audio, and video, along with the metadata associated with the files you upload), including the account information relating to your customer portal.

2. **Demographic Information:**

- Name, signature, and ID number.

3. **Commercial Information:**

- **Registration Data**, such as information that may be related to a service, your account or an event you register for.
- **Transaction Data**, such as information about payments to and from you and other details of your interaction with the Services, and ordering or consuming histories.
- **Marketing Data**, such as your preferences for receiving communications about our activities, services, among others, and details about how you engage with our communications.

4. **Internet or other similar activity**

- **Usage Data**, such as information about how you use the Services and interact with us, including Information associated with any content you upload to the websites or otherwise submit to us, information you provide when you use any interactive features of the Services;
- **Device ID** or information collected by Cookies.

5. **Geolocation data**, such as region, country, state, Zip or postal code, or information collected via Cookies and other similar tracking technologies;

6. **Audio and Visual information**, such as customer support call recordings.

7. **Professional or employment-related information**, which may include your occupation, industry, professional profile that you display publicly or that you voluntarily provide to us at trade shows or any online or offline corporate events.

8. **Inferences** drawn from usage data or other information collected by Cookies.

Please Note: If you register an account via Phelan Gas’s customer portal at <https://webhub.rccbi.com/v2/?logical=phegasd1>, you will set up your user ID and password. We will use your account information to post your invoices, and deliver tickets and statements. If you choose to use the online bill payment feature of the Phelan Gas Customer Portal, you will be directed from the portal to a third-party website, where you may enter bank account or credit/debit card information that will be used for the sole purpose of processing your payment transactions. Your activity on that third-party website will be subject to the privacy policy of that site and not to this Policy.

### SECTION III HOW WE MAY USE OR EXCHANGE YOUR INFORMATION

1. **How do we use the information:** To the extent permitted by applicable law, we *may* use the information described above in connection with certain business or commercial purposes in the preceding 12 months, including:
  - A. **Auditing relating to Ad Impression Verification**, which refers to using your personal information collected via Analytics Cookies, such as device identifier or IP address, to count ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
  - B. **Security and Integrity**, which may include using your personal information as reasonably necessary and proportionate to verify your identity, mitigate and investigate unauthorized or illegal activities on your account, enforcing terms of agreements or protecting legal rights, property, or safety.
  - C. **Debugging and Error Repair**, which may include using your personal information, such as error logs, and account activity information, to identify and resolve technical errors that impair the intended functionality of our Services.
  - D. **Short-Term, Transient Use**, including, but not limited to, non-personalized advertising shown as part of a consumer’s current interaction with the business.
  - E. **Performing Services on Behalf of our organization**, such as responding to feedback, requests, questions, or inquiries (e.g., retaining email and response for follow-up), assisting with calls to customer service representatives or visits to service locations, issuing invoices, and/or managing your account, and other related purposes.
  - F. **Advertising and Marketing Services**, such as customizing offers of products and services based on interests, demographics, and contact preferences, and providing email alerts, event registrations, and notices concerning products, services, events, or news.
  - G. **Internal Research and Technological Development**, which may include administering and improving Services; testing, research, analysis, and product development, creating de-identified or anonymous data by removing personally identifiable components (“Aggregated Data”, which is not subject to this Policy upon aggregation).
  - H. **Quality and Safety Assurance**, which may include evaluation, analysis, improvement, and development of our products or services, performance of security and quality controls of the Website.
2. **How we may disclose or share the information:**

Where permitted by applicable law, we may disclose your personal information described above for business purposes in the following contexts:

- **Service Providers:** We may share your personal information with other parties who perform functions on our behalf such as customer services, or who offer products and services specifically requested by you (including online payment).
- **Business partners** that we use to promote our products, such as marketing agencies, resellers, or distribution partners;
- **Online advertisers or data analytics providers**, such as Meta and Google, for advertising purposes or for assessing our advertising and marketing campaigns and learning more about you and other users of our Sites;
- **Corporate Affiliates:** We may share your personal information with our subsidiaries or affiliates, and with their respective officers, directors, employees.
- **Acquisition and Similar Transactions:** If we sell, transfer, or otherwise share some or all of our assets in connection with a merger, reorganization, liquidation, dissolution, bankruptcy, or sale of assets, we may transfer your personal information as a part of the assets transferred as a result of the transaction without your consent.
- **Regulatory Compliance, Legal Processes, or Defense of Legal Claims:** We may disclose personal information as required by law, court orders, subpoenas, or other legal process or if we reasonably believe such action is necessary to comply with the laws.
- **Professional Advisors:** We may share your personal information with our attorneys, accountants, and/or other fiduciaries and consultants that need access to your information to provide operational or other support on our behalf.
- **Investors, Insurers, Brokers, and Banks**
- **With Your Consent or at Your Direction:** We may ask, from time to time, if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this Policy. We may disclose your information in this context with your permission or upon your direction.

During the preceding 12-month period, we may have exchanged your device IDs, IP address, geolocation data, internet activities information, certain commercial information, and inferences derived from the foregoing with our marketing partners, and/or online advertisers or data analytics providers. As broadly defined under certain state privacy laws, these data exchanges may constitute a “sale” or “sharing” of personal information. Further, to our knowledge, we do **not** “sell” personal information of consumers under the age of 16 years old, as defined in applicable privacy laws. We therefore provide this notice in accordance with applicable laws and the instructions to opt out. You may use the settings on the Cookie Banner, adjust your browser settings, broadcast an opt-out preference signal (i.e. [Global Privacy Control](#)), or select other options as fully described in the section titled “[Cookies and Similar Technologies](#)”.

### SECTION III DATA RETENTION

We retain and use your information for as long as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements.

We take reasonable steps to delete the personal information we collect when (1) we have a legal obligation to do so; (2) we no longer have a purpose for retaining the information; or (3) if you ask us to delete your personal information, *unless* we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations.

#### SECTION IV YOUR CONSUMER RIGHTS AND PRIVACY CHOICES

**1. Your Consumer Rights:** This section describes California residents' rights under the California privacy laws with respect to your personal information we have collected about you during the preceding 12-month period subject to certain exceptions.

- **Rights to Know/Access.** You have the right to request to access or know (i) the specific pieces of personal information we have about you; (ii) the categories of personal information we have collected about you; (iii) the categories of sources from which that personal information was collected; (iv) the categories of personal information we have disclosed for a business purpose, sold, or shared; (v) the categories of third parties to whom your personal information was disclosed, sold, or shared; and (vi) the purposes for collecting, selling, or sharing your personal information. Generally:
  - We have collected the categories of personal information detailed in the section titled "[Information We May Collect](#)" above.
  - We have disclosed, sold, or shared certain categories of personal information detailed in the "[How We May Use or Exchange Your Information](#)" section above.
- **Right to Correct.** Subject to certain exceptions, you may have the right to request that we correct the personal information that we have collected or maintain about you.
- **Right to Deletion.** Subject to certain exceptions, you may have the right to request that we delete the personal information that we have collected or maintain about you. We may deny your request under certain circumstances, such as if we need to comply with our legal obligations or complete a transaction for which your personal information was collected. If we deny your request for deletion, we will let you know the reason why.
- **Right to restrict or opt out of the sale and "sharing" of your personal information.** You may have the right to opt out of the sale or sharing of your personal information and can do so by using the settings on the [Cookie Banner](#) or select other options as fully described in the section titled "[Cookies and Similar Technologies](#)".

- **Right to Limit Use and Disclosure of Sensitive Personal Information.** In certain circumstances, a California resident has the right to limit the use and disclosure of sensitive personal information. Our use of your sensitive personal information is necessary to provide our Services as reasonably expected by an average consumer and not for those purposes for which you may exercise a right to limit the use or disclosure under California privacy laws. While this Consumer right is not applicable to how we collect or use your sensitive personal information, we provide this information as this is a core part of consumer rights available to California residents.
  
- **Right to be Free from Discrimination.** If you choose to exercise any of these rights, we will not discriminate against you. Unless permitted by the California laws, 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; or
  - Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We reserve the right to request additional information from you to verify your identity or to process your request. We will respond to your request within the timeframe required by applicable law.

Depending on the state where you are a resident, you may be able to designate in writing an authorized agent to make a request on your behalf. As permitted by law, we may require the agent to provide proof that you have made the authorization prior to processing any request from the agent.

**Methods to Submit a Request:** To exercise your privacy rights, please refer to the “[Contact Us](#)” section below.

2. **California Shine the Light.** Under California Civil Code Section 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us once a calendar year information about the information we shared, if any, with other businesses for direct marketing uses. Please be aware that not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing, if any, will be included in our response. As part of the California Online Privacy Protection Act, all users of our Services may make any changes to their information at any time via the “[Contact Us](#)” details at the end of this Policy.

If you have questions or concerns regarding this Section or would like to exercise your consumer rights (to the extent available under applicable U.S. state privacy laws), please use the “[Contact Us](#)” details at the end of this Policy.

### 3. **Other Opt-Out Options and Choices**

**Email Opt-Out.** If you no longer wish to receive communications from us via email, you may opt-out by clicking the “unsubscribe” link at the bottom of our emails, or by contacting us via the “**Contact Us**” details at the end of this Policy and providing your name and email address so that we may identify you in the opt-out process.

**Accuracy and Updating Your Information.** If any of the information you have provided to us changes, please let us know via the “**Contact Us**” details at the end of this Policy. If you become aware of inaccurate personal information about you, you may want to update your information. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete personal information that you provide to us.

**Complaints.** If you believe your rights relating to your personal information have been violated, please contact us via the “**Contact Us**” details provided at the end of this Policy.

## SECTION V      COOKIES AND SIMILAR TECHNOLOGIES

We (and where applicable, in conjunction with third parties) use cookies, pixel tags, scripts and similar technologies (collectively referred to as “**Cookies**”) to automatically collect and record information about your browsing activities, and use of the Services. We may combine this “Usage Information” with other personal information that we collect about you.

### 1. First and Third-Party Cookies

A “cookie” is a small file created by a web server that can be stored on your device through our Services.

- **Session vs. Persistent Cookies.** “Session” cookies are temporarily stored on your hard drive and only last until they expire at the end of your browsing session. “Persistent” or “permanent” cookies remain stored on your hard drive until they expire or are deleted by you.
- **First-Party vs. Third Party Cookies.** “First-party cookies” are set by the website you’re visiting, and they can only be read by that site. “Third-party cookies” are set by a party other than that website. You can block and control cookies using the information noted below. If you block all cookies, certain functionalities on the Services may not work.

### 2. Other Similar Technologies

In addition, there are other automatic data collection technologies, such as Internet tags, web beacons (clear gifs, pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.), HTML Local Storage, Social Widgets, or UTM Codes that can be used to collect data as users navigate through and interact with a website or emails. These similar technologies can be embedded in a web page or in an email to transmit information, which may include personal information.

### 3. What Cookies and Similar Technologies Are in Use and Why Do We Use Them?

Type of Cookies	Description
<b>Required Cookies</b>	<p>Required cookies enable a website visitor to navigate the Sites and use its features.</p> <p>Certain Cookies allow the website operator to remember choices a website user makes (such as username, language, or the region).</p>
<b>Performance/ Analytics cookies</b>	<p>These cookies collect usage information about the Sites, including which pages website visitors go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identifies a natural person. All information these cookies collect is aggregated and anonymous. It is only used to improve how the Sites functions and performs.</p> <p>From time-to-time, a business may engage third parties to track and analyze usage and volume statistical information from individuals who visit the Sites.</p>
<b>Advertising Cookies</b>	<p>From time to time, a business may partner with a third-party ad network to either display advertising on its websites or to manage its advertising on other third-party sites. These ads may be targeted to an individual based on information that the business, the advertiser, and/or other third parties have collected about such individual's online behavior or interests.</p>

**4. Your Privacy Choices with respect to Cookies**

- **Cookie Management Tools.** You may disable these features by following the “[Cookie Preference](#)” link on the Cookie banner or by selecting the “Accept Required Cookies” button.
- **Google Analytics.** We may use Google Analytics to collect and process data about how visitors use our Sites and report on activities and trends. The data collected includes data related to your device/browser, your IP address, and on-site activities to measure and report statistics about user interactions. You can [learn about Google's practices](#), and opt out by visiting <https://tools.google.com/dlpage/gaoptout> to install the opt-out browser add-on feature.
- **Web Browser Settings:** Most web browsers are set by default to accept Cookies. If you do not wish to receive Cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being sent by website tracking technologies and advertising.

If you decline the use of cookies, you may not have access to the full benefits of the Sites. Further, your opt-out only applies to the web browser you use, so you must opt out of each web browser on each computer you use. Additional information is provided below about how to disable cookies or manage the cookie settings for some of the leading web browsers *(PLEASE NOTE: these third-party links are provided for your convenience, and we may not actively monitor the content of these links):*

<b>G o o g l e Chrome</b>	<a href="https://support.google.com/chrome/answer/95647?hl=en">https://support.google.com/chrome/answer/95647?hl=en</a>
<b>Firefox</b>	<a href="https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences">https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences</a>
<b>I n t e r n e t Explorer</b>	<a href="http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies">http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies</a>
<b>M i c r o s o f t Edge</b>	<a href="https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09">https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09</a>
<b>Safari; iOS</b>	<a href="https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac">https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac</a> and <a href="https://support.apple.com/en-us/HT201265">https://support.apple.com/en-us/HT201265</a>
<b>Adobe Flash Cookie</b>	<a href="https://www.macromedia.com/support/documentation/en/flashplayer/help/help09.html">https://www.macromedia.com/support/documentation/en/flashplayer/help/help09.html</a>

For more information on how to modify your browser settings to block or filter cookies, visit <http://www.aboutcookies.org/> or <http://www.cookiecentral.com/faq/>.

#### SECTION VI DATA SECURITY

We recognize the importance of safeguarding your personal information and we endeavor to maintain reasonable and appropriate physical, technical, and organizational safeguards, such as the implementation of reasonable security measures or protocols, designed to protect your personal information against accidental loss and unauthorized access, use, alteration, or disclosure, and to detect fraudulent identity verification activity and mitigate risks concerning your personal information. While our security measures seek to protect your information in our possession, no security system is perfect, and no data transmission is 100% secure. As a result, while we strive to protect your information, we cannot guarantee or warrant the security of any information transmitted to or from the Services. Please keep your password confidential. Do not share your password with anyone.

#### SECTION VII CHILDREN'S PRIVACY

The Children's Online Privacy Protection Act ("COPPA"), as well as other data privacy regulations, restricts the collection, use, or disclosure of personal information from and about children on the Internet. Our Services are not directed to children aged 18 or younger, nor is information knowingly collected from children under the age of 18. No one under the age of 18 may access, browse, or use the Services or provide any information to or on the Services. If you are under 18, please do not use or provide any information on the Services (including, for example, your name, telephone number, or email address). If we learn that we have collected or received personal information from a child under the age of 18 without a parent's or legal guardian's consent, we will take steps to stop collecting that information and delete it. If you believe we might have any information from or about a child under the age of 18, please contact us via the "**Contact Us**" details provided at the end of this Policy.

For more information about COPPA, please visit the Federal Trade Commission's website at: <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>.

#### SECTION VIII OTHER IMPORTANT INFORMATION

**Third Party Applications or Technologies.** We have no control over and do not endorse the privacy practices of websites or applications that are owned or operated by third parties. If you follow any links that direct you away from the Services, including links to social media sites or to other websites, your activity on the other sites that you visit will be subject to that third party applications or websites' privacy policy.

**Changes To This Policy.** We may change this Policy at any time. You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Policy prior to using the Services, and from time to time, so that you are aware of any changes. Your continued use of the Services after the "**Last Updated**" date indicates your acceptance of the changes. All changes are effective on the date listed at the top of this page and will apply to all information that we have about you.

## SECTION IX CONTACT US

For more information, or if you have any questions or concerns regarding this Policy, you may contact us using the information below, and we will do our best to assist you. Please note, if your communication is sensitive, you may wish to contact us by postal mail or telephone.

**In Writing:**      **Phelan Gas Company**  
4590 Phelan Road  
Phelan, CA 92371

**Phone:**         **1-800-PROPANE**

**By Email:**      [Privacy@phelangas.com/](mailto:Privacy@phelangas.com/)