



California Royalty Interest Owner Privacy Notice

Last Updated: 08.07.2024

This California Royalty Interest Owner Privacy Notice (the “**Notice**”) applies to any California residents who are royalty interest owners in oil and gas leases held by Sentinel Peak Resources California LLC, together with its parent companies, subsidiaries, affiliates, brands and divisions, as may change from time to time (collectively, “**Sentinel Peak**”, “**we**”, “**us**”, “**our**”) and about whom we have collected personal information in the course of your business relationship with us (collectively, “**you**”). This Notice pertains to your information if you have communicated with us regarding your royalty interest.

For the purposes of this Notice, except where a different definition is noted, “**personal information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

We provide this Notice to comply with applicable privacy laws, including the California Consumer Privacy Act of 2018 and as amended by the California Privacy Rights Act of 2020 (together, the “**CCPA**”). The CCPA provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of personal information, as well as rights to access, correct, delete, and restrict the sale, use, and disclosure of certain personal information we collect about them, unless exceptions apply. California residents also have the right not to receive discriminatory treatment by us for the exercise of their privacy rights under the CCPA. For purposes of the CCPA, we do not sell or share the personal information or sensitive personal information of our interest royalty owners.

For information about Sentinel Peak general privacy practices, please review our disclosures in the Sentinel Peak Resources Privacy Policy <https://sentinelpeakresources.com/privacy-policy/>. If you have any questions about the information disclosed in this Notice, you may contact us at Spr-ownerrelations@eag1source.com.

If you are a visually-impaired individual, an individual with another disability, or an individual seeking support in another language, you may access this Notice by emailing us Spr-ownerrelations@eag1source.com.

1. Personal Information We Collect

We may have collected the following categories of personal information about you over the past twelve (12) months:

- **Identifiers**, including your first and last name, email address, postal address, phone number, Social Security number, your business contact information, and similar information you choose to disclose to us.
- **Commercial information**, including personal property records.
- **Other personal information not listed above and described in California Civil Code § 1798.80(e)**, including signature, bank account number, or any other financial information you may disclose to us.

Sensitive personal information. Certain of the personal information that we collect may constitute “**sensitive personal information**” under California law, including Social Security number.

Please note that because of the overlapping nature of certain of the categories of personal information identified above, which are required by state law, some of the personal information we collect may be reasonably classified under multiple categories.

2. Sources of Personal Information

We may collect personal information about you from the following categories of sources:

- **From you**, including from when you communicate with us, such as in-person or via email, telephone, electronic messaging, postal mail, social media, and similar means, as well as any other ways you choose to share information with us.

- **From publicly available information**, from third parties or otherwise provided to us.

We may supplement the information described above with information we obtain from other sources, including from both online and offline information providers.

3. How We Use Your Personal Information

We may collect or use your personal information for the following purposes relating to your business relationship with us:

- Communicating with you.
- IT and systems operations, maintenance, and security.
- Risk management and audits.
- Legal compliance.
- Protecting the legal rights, safety, privacy, and property of us, you, and others.
- Fulfilling tax and other government filing requirements.

We may use the categories of sensitive personal information identified in Section 1 for any of the purposes listed above.

4. To Whom We Disclose Your Personal Information

We may disclose your personal information to our service providers for one or more **business purposes** related to your business relationship with us, as applicable. 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 to use it for any purpose except performing the contract.

5. Your California Privacy Rights

California residents about whom we have collected personal information have the right to submit the following requests:

- **Right to Know.** The right to, up to twice in a 12-month period, to know what personal information we collect, use, disclose, and sell and/or share, as applicable.
- **Right to Delete.** The right to request under certain circumstances that we and our service providers and contractors delete the personal information that we collect about you.
- **Right to Opt-Out of Sale and/or Sharing.** The right to opt-out of our sale and/or sharing of your personal information, as those terms are defined by the CCPA. Please note that we do not “sell” or “share” personal information that is collected of our royalty interest owners.
- **Right to Correct.** The right to request the correction of inaccurate personal information.
- **Right to Limit Use and Disclosure.** The right to limit the use or disclosure of sensitive personal information to only the uses necessary for us to provide our services to you, or for certain other authorized purposes.
- **Right to Non-Discrimination.** The right not to receive discriminatory treatment for the exercise of the privacy rights described above.

How to submit a request. To exercise the rights described above, please submit a request to us by emailing us at Spr-ownerrelations@eag1source.com or through the other contact methods available at <https://sentinelpeakresources.com/contact/>.

Any request you submit to us is subject to an identification and residency verification process (“**Verifiable Consumer Request**”) as permitted by the CCPA. We will not fulfill your request unless you have provided sufficient information that enables us to reasonably verify that you are the consumer about whom we collected the personal information on. We will only use personal information provided in a verifiable or authenticated consumer request to verify your (or your authorized agent’s as applicable) identity or authority to make the request.

Generally, a rights request must include:

- Sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative, which must include, at a minimum, your first and last name and email address.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to the request.

Please note that we may require you to provide appropriate documentation to support your correction request, which we will use only for purposes of actioning your request.

We will respond to your request within forty-five (45) days after receipt of a Verifiable Consumer Request for a period covering twelve (12) months and for no more than twice in a twelve-month period. We reserve the right to extend the response time by an additional forty-five (45) days when reasonably necessary and provided consumer notification of the extension is made within the first forty-five (45) days.

Authorized agents. You may also designate an authorized agent, in writing or through a power of attorney, to request to exercise the above rights on your behalf. If you designate an authorized agent to exercise your various rights under the CCPA, we may require that you provide your authorized agent with written permission to exercise your various rights and to verify your own identity with us. If your authorized agent does not submit proof that they have been authorized by you to submit verified requests, we reserve the right to deny such a request that we have received and will explain to your authorized agent why we have denied such request.

The authorized agent may submit a request to exercise these rights by emailing the letter of authorization or power of attorney to Spr-ownerrelations@eag1source.com.

6. Retention

Sentinel Peak will retain your Personal Information for the period of time that is necessary to fulfill the original purposes for which it has been collected. Please keep in mind that, in certain cases, a longer retention period may be required or

permitted by law or to allow us to pursue our business interests, conduct audits, comply with our legal obligations, enforce our agreements or resolve any dispute.

The criteria used to determine our retention periods include:

- Time needed to provide you access to Sentinel Peak access portals, interfaces, and properties.
- Legal, contractual, or similar obligations to retain your data, such as mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of contract or litigation.

7. Changes to This Notice

We reserve the right, at our discretion, to modify, add, or remove portions from this Notice at any time. However, if at any time in the future we plan to use any data in a way that materially differs from this policy, we will post such changes here. We will alert you to changes that have been made by indicating the Last Updated date at the top of this Notice.

8. Contact Us

If you have any questions about this California Royalty Interest Owner Notice, please contact us at Spr-ownerrelations@eag1source.com.