



Gatby Ventures, Inc.
(713) 581-6553
3120 Southwest Fwy., Suite 101, PMB 25976,
Houston, TX 77098

Gatby Ventures, Inc.

Privacy Policy

Effective Date: March 24, 2026

Last Updated: March 24, 2026

This Privacy Policy explains how Gatby Ventures, Inc. ("Gatby," "we," "us," or "our") collects, uses, shares, and protects personal information when you access or use our website, applications, communications, and related services (collectively, the "Services").

This Privacy Policy is incorporated by reference into the Gatby Terms of Service. Capitalized terms not defined here have the meanings set forth in the Terms of Service.

1. Who We Are

Gatby is a licensed energy broker and aggregator operating in Texas and in select deregulated energy markets in the Northeastern and Midwestern United States. Gatby is not a Retail Electric Provider ("REP"), Energy Service Company ("ESCO"), competitive energy supplier, electric utility, natural gas utility, Transmission and Distribution Service Provider ("TDSP"), Local Distribution Company ("LDC"), or billing entity. Electricity and natural gas service is provided solely by licensed suppliers under their own terms and conditions.

Gatby is registered with the Public Utility Commission of Texas ("PUCT") as an electricity broker (Broker Registration #BR230236) and holds applicable licenses or registrations in each state where it operates. A current list of Gatby's state-specific registrations is available on our website or upon request.

Gatby operates under both a marketplace model and an agency-based brokerage model depending on the jurisdiction:

- In Texas, customers may independently select and enroll in electricity plans through Gatby's marketplace or authorize Gatby to act as their limited agent. If authorized, Gatby may select, enroll, and manage energy supply contracts on the customer's behalf.
 - In Northeast and Midwest markets, Gatby operates solely as an agency-based managed brokerage service and does not provide a marketplace experience. Under this model, Gatby may select, enroll, and manage energy supply contracts on the customer's behalf.
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2. Information We Collect

We collect information you provide directly, information generated through your use of the Services, and information obtained from third parties as authorized by you.

2.1 Information You Provide

This may include:

- Identifiers such as name, email address, phone number, mailing address, and service address(es)
- Account credentials and preferences
- Utility or energy account credentials (such as account numbers, usernames, and passwords) provided by you for the purpose of accessing your utility account on your behalf in jurisdictions other than Texas
- Enrollment and authorization records, including agency authorizations and letters of authorization ("LOAs")
- Communications with Gatby customer support
- Payment-related instructions only if you separately opt in to a payment-facilitation feature (payment credentials are transmitted to suppliers or their processors and are not retained by Gatby unless required for service delivery)

2.2 Energy Service and Usage Information (Only When Authorized)

Texas Customers:

If you separately authorize usage access (for example, through Smart Meter Texas or a Letter of Authorization), we may collect:

- Electric Service Identifier(s) ("ESI ID(s)")
- Service address and TDSP information
- Electricity usage and interval data
- Billing determinants and copies of bills
- Enrollment, renewal, transfer, or switch status with REPs

Enrollment in Autopilot alone does not authorize Gatby to access electricity usage data.

Northeast and Midwest Customers:

Gatby may access your utility account information using credentials you provide. By providing such credentials, you authorize Gatby to access, retrieve, store, and use your utility account information as your agent.



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This may include:

- Utility account numbers and service identifiers
- Electricity and/or natural gas usage and interval data
- Billing data and copies of bills
- Service address and utility information
- Rate, tariff, and pricing information
- Enrollment and contract status information

2.3 Automatically Collected Information

When you use the Services, we may collect:

- Device identifiers, IP address, browser type, operating system
- Log data and usage analytics
- Cookies and similar technologies (see Section 11)

2.4 Publicly Available Information

Gatby may also collect, use, and display publicly available, aggregated, or anonymized energy market data that does not identify any individual or household, including data obtained from governmental or public sources.

Use of the Data Hub does not involve the collection of personal information about visitors and does not create a customer relationship unless the visitor separately enrolls in Gatby Services.

3. How We Use Information

We use personal information to:

- Provide, operate, and improve the Services
- Facilitate energy plan comparison, selection, enrollment, renewal, transfer, move-in, or switching with licensed suppliers
- Select, enroll, and manage competitive energy supply contracts on your behalf as your authorized agent when authorized
- Obtain and analyze energy usage data only when you authorize us to do so, including by accessing utility accounts using credentials you provide
- Communicate with you regarding enrollment status, plan details, renewals, switches, and customer support



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- Generate and execute letters of authorization ("LOAs") on your behalf where applicable
- Comply with legal, regulatory, and contractual obligations
- Detect fraud, secure our systems, and enforce our Terms of Service

We do not use energy usage data or payment information for unrelated marketing purposes.

4. Utility Data Access

4.1 Smart Meter Texas (Texas Customers)

Smart Meter Texas ("SMT") is a shared data platform operated by Texas TDSPs that provides authorized access to electricity usage, meter, and premise data.

- Gatby accesses SMT data only with your authorization
- Access is governed by SMT rules and terms
- Usage data is used solely to provide the Services you request
- You may revoke SMT authorization at any time through SMT
- Ending SMT authorization may limit certain features but does not affect your electricity contract with your supplier

4.2 Utility Account Access (Northeast and Midwest Customers)

In participating Northeast and Midwest states, Gatby accesses your utility account information using the account credentials you provide. By providing your utility account credentials to Gatby:

- You authorize Gatby to access, retrieve, store, and use your utility account information on your behalf as your agent
- You represent that you are the authorized account holder or have authority to grant such access
- You agree to keep your credentials current and notify Gatby of any changes
- You acknowledge that Gatby uses your credentials solely to provide the Services and does not use them for any unrelated purpose
- You may revoke this authorization at any time by contacting support@gatby.com or by changing your utility account credentials



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Gatby stores utility account credentials using commercially reasonable security measures. Gatby is not responsible for utility portal outages, data inaccuracies, or changes to utility portal interfaces that may temporarily affect service delivery.

Credentials are encrypted and transmitted to third-party service providers for the purpose of retrieving account data, including usage, billing, and service information.

You acknowledge that providing credentials carries inherent security risks and that Gatby is not responsible for unauthorized access resulting from circumstances outside of its control.

5. How We Share Information

We share personal information only as necessary to provide the Services or comply with law.

5.1 Suppliers

We share relevant information with licensed energy suppliers (including REPs in Texas and competitive suppliers or ESCOs in other states) to:

- Submit enrollments, renewals, transfers, move-ins, or switches for electricity and/or natural gas service
- Manage your energy service
- Enable billing, Autopay, or account setup (if you opt in)

5.2 Utilities and Distribution Companies

We share information with utilities, TDSPs, LDCs, Smart Meter Texas, ERCOT, and other applicable market operators or distribution companies as required to:

- Obtain authorized usage data
- Verify service eligibility
- Comply with market rules and regulatory requirements

5.3 Supply Brokerage Platforms

Gatby may work with third-party supply brokerage platforms to increase the number of rates and suppliers available through the Services. We may share your information with these platforms as necessary to solicit, compare, and secure energy supply offers on your behalf.



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5.4 Service Providers

We share information with vendors that provide services such as:

- Cloud hosting
- Analytics
- Communications (email, SMS)
- Security and fraud prevention

These providers may use information only to perform services for Gatby.

5.5 Legal and Regulatory Disclosures

We may disclose information:

- To comply with law, regulation, subpoena, or legal process
- To protect rights, safety, or property
- In connection with a corporate transaction (merger, acquisition, sale of assets)
- To state utility commissions, public service commissions, or other regulatory bodies as required by applicable law

5.6 No Sale of Personal Information

Gatby does not sell personal information.

6. Data Retention

We retain personal information for as long as reasonably necessary to:

- Provide the Services
- Administer Autopilot and managed brokerage services
- Comply with legal and regulatory obligations
- Resolve disputes
- Enforce our agreements

We may retain and use aggregated or anonymized data indefinitely.

We retain records of customer authorizations, notices, and opt-out responses as necessary to demonstrate compliance with applicable laws and regulations.



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7. Your Choices and Rights

7.1 Communications

- You may opt out of marketing emails or texts at any time
- Transactional and service communications may continue while you use the Services

7.2 Data Access and Deletion

You may request access to, correction of, or deletion of your personal information, subject to legal and operational limitations. To submit a request, contact us at support@gatby.com.

7.3 Revoking Authorizations

You may revoke:

- Autopilot or managed brokerage agency authority
- Usage access authorization (including SMT authorization in Texas and utility credential access in other states)
- Optional payment facilitation

Revocation of authorization applies prospectively and does not affect actions already submitted on your behalf.

8. State-Specific Privacy Rights

8.1 California Residents

If you are a California resident, the California Consumer Privacy Act ("CCPA") and the California Privacy Rights Act ("CPRA") grant you the following rights:

- The right to know what personal information we collect, use, disclose, and sell
- The right to request deletion of your personal information
- The right to opt out of the sale of your personal information (Gatby does not sell personal information)
- The right to non-discrimination for exercising your privacy rights
- The right to correct inaccurate personal information

To exercise these rights, contact us at support@gatby.com or call (713) 581-6553.



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8.2 Other State Privacy Laws

If you are a resident of a state with applicable consumer privacy legislation (such as Virginia, Colorado, Connecticut, or other states), you may have additional rights regarding your personal information. To exercise any applicable rights, contact us at support@gatby.com.

9. Children Under 13

The Services are not directed to children under thirteen, and Gatby does not knowingly collect personal information from children.

10. Security

We use commercially reasonable administrative, technical, and physical safeguards to protect personal information, including utility account credentials. Utility account credentials are encrypted in transit and at rest. No system is completely secure, and we cannot guarantee absolute security.

11. Cookies and Tracking Technologies

We use cookies and similar technologies to operate and improve the Services. You may manage cookie preferences through your browser settings.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Updates are effective when posted or communicated to you. Continued use of the Services constitutes acceptance of the revised policy.

13. Contact Us

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