

## CARBON PAYMENT TECHNOLOGIES LLC

### PRIVACY POLICY

Effective date: October 1, 2019

Carbon Payment Technologies LLC (“Carbon,” “us”, “we”, or “our”), recognizes the importance of privacy. In this privacy policy (“Privacy Policy”) we describe how we collect, process, use, and disclose information that we obtain through our website, carbonpay.app, or any other Carbon website displaying this Privacy Policy (collectively, the “Sites”), as well as our widgets, analytics tools, and other technical applications that we may provide either through our Sites or through third-party websites (collectively, the “Services”).

When you visit the Sites or use or interact with any of our Services, we will collect information from or about you or your device, and this information will be handled as described herein.

We may use information collected through the Sites and Services in various ways, depending on whether you are a (i) publisher of online content utilizing our Services (“Customer”); (ii) a user who utilizes our Services to make contributions to Customers (“User”); or (iii) a visitor to our Sites, or online content which features our widgets or other Services (“Visitor”).

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data. We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

#### **1. Information Collection and Use**

We collect several different types of information for various purposes to provide and improve our Service to you.

##### **a. Types of Data Collected**

###### ***i. Personal Data***

When you register for an account, as either a Customer or a User, you will provide us with information about yourself and payment information (“Personal Data”).

Carbon utilizes a third-party payment processing service to process your payment. We do not retain any such payment or financial information following your transaction. If you believe your payment information has been submitted without your consent, please contact us immediately and we will work with you to resolve any concern with our payment processing service. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- ZIP/Postal code

Carbon's third-party payment processing service, Stipe, collects, stores and utilizes payment information, including, without limitation, credit card, debit card, bank account or other payment data. See Section 10(a) below for more information.

***ii. Usage Data***

We may also collect information on how the Service is viewed, accessed and used ("Usage Data") from Users and Visitors. This Usage Data may include: (a) information related to the devices you use to access or interact with the Service, such as: IP addresses, geolocation information, unique device identifiers and other information about your mobile phone or other mobile device(s), browser types and browser language; and (b) information related to the ways in which you interact with the Service, such as: the pages that have directed you to the Service and pages that you go to when exiting the Service, as well as URLs, platform type, the number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the date and time you used the Service, and other similar information. We may collect different types of information about your location, including general information (e.g., IP address, zip code) and more specific information (e.g., GPS-based functionality on mobile devices used to access the Service), and we may use that information to customize the Service with location-based information and features.

We may obtain this data from third-parties, such as online content publishers.

You may also see or interact with our Services via third-parties. What data such third-parties collect and how they handle that data is governed by their respective Privacy Policies.

Furthermore, our widget may obtain such data from the webpage in which it is embedded, including, which pages were opened, which pages the widget become visible, the amount and type of contributions made through the widget, and other information.

Usage data will be collected and utilized in a way that does not identify you (i.e. aggregate and/or anonymized), and we may provide that information to others. In those cases of aggregation or anonymity, the information collected through the Service will not identify you. We may use such information for any purpose, including for research and marketing purposes, and our use and disclosure of such information is not subject to any restrictions under this Privacy Policy.

***iii. Tracking Cookies Data***

We may use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

**b. Use of Data**

Carbon uses the collected data for various purposes:

***i. Personal Data.***

Carbon may share your Personal Data with third parties for the purposes of providing the Service to Customers and Users and as needed to implement the Service. We will share your name and email and contribution amount with Customers to whom you have made contributions. We may also use this information to communicate with our Customers and Users, including through promotional or information emails. Whether you receive such communications will depend on whether you opted-in to such communications when creating your account. You may update or change your Personal Data, or opt-in or out, at any time.

Regarding User's Personal Data, in addition to the uses set forth above, we may utilize your Personal Data to tailor the content and information that we may send or display to Users, or otherwise personalize your experience.

In all other cases, we will ask your consent before disclosing your Personal Data to an unaffiliated third-party or for a purpose other than those for which it was originally collected or specifically authorized subject to the provision herein. Third parties to which Carbon may disclose personal information include the Service Providers set forth below.

**ii. Usage Data.**

Carbon may collect and share Usage Data collected from Users and Visitors with third parties for any purpose, including, without limitation, to gather analysis or valuable information so that we can improve our Service, to tailor the content and information that we may send or display to Users, marketing and advertising, and to monitor the usage of our Service and/or to detect, prevent and address technical issues. We may also disclose Usage Data to our Customers, which may include online content publishers and authors.

**2. Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)**

Carbon Payment Technologies LLC's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Carbon Payment Technologies LLC may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- For payment processing purposes
- To comply with the law

**3. Retention of Data**

Carbon Payment Technologies LLC will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies and for as long as your account remains open.

Carbon Payment Technologies LLC will also retain Usage Data for internal analysis purposes. Usage Data is the exclusive property of Carbon Payment Technologies LLC and may be retained for any period of time.

#### **4. Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we may transfer the data, including Personal Data, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Carbon Payment Technologies LLC will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

#### **5. Disclosure of Data**

##### **a. Business Transaction**

If Carbon Payment Technologies LLC is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

##### **b. Disclosure for Law Enforcement**

Under certain circumstances, Carbon Payment Technologies LLC may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

##### **c. Legal Requirements**

Carbon Payment Technologies LLC may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Carbon Payment Technologies LLC
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public

- To protect against legal liability

## **6. Security of Data**

Carbon uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information consistent with industry standards. We cannot, however, ensure or warrant the security of any information you transmit to Carbon or guarantee that your information on the Service may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. In the event that personal information is compromised as a result of a breach of security, Carbon will promptly notify those persons whose personal information has been compromised, in accordance with the notification procedures set forth in this Privacy Policy, or as otherwise required by applicable law.

## **7. Our Policy on "Do Not Track" Signals under the California Online Protection Act (CalOPPA)**

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **8. Your Data Protection Rights under the General Data Protection Regulation (GDPR)**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Carbon Payment Technologies LLC aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data, even if you are not a resident of the EEA. For the purposes of the GDP, "Data Controller" means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data. "Data Processor" (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

Under Chapter 3 of the GDPR, you have certain rights, including:

1. **The right to be informed;** This means anyone processing your personal data must make clear what they are processing, why, and who else the data may be passed to.
2. **The right of access;** this is your right to see what data is held about you by a Data Controller.
3. **The right to rectification;** the right to have your data corrected or amended if what is held is incorrect in some way.
4. **The right to erasure;** under certain circumstances you can ask for your personal data to be deleted. This is also called 'the Right to be Forgotten'. This would apply if the personal data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been withdrawn, or the personal data has been unlawfully processed.
5. **The right to restrict processing;** this gives you the right to ask for a temporary halt to processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.
6. **The right to data portability;** a you have the right to ask for any data supplied directly to the Data Controller by him or her, to be provided in a structured, commonly used, and machine-readable format.
7. **The right to object;** you have the right to object to further processing of their data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.

Rights in relation to automated decision making and profiling; Data Subjects have the right not to be subject to a decision based solely on automated processing.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the EEA.

## **9. Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

#### **a. Payments**

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

#### **Stripe**

Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>

### **10. Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

### **11. Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

### **12. Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

If you have any questions about this Privacy Policy, please contact us:

- By email: [admin@carbonpay.app](mailto:admin@carbonpay.app)