**Source: https://www.aacctt.org/privacy-policy**

**PRIVACY POLICY**

We know you take your privacy seriously — so do we.

Here is how we process and protect your personal information.

**DEFINITIONS**

**Privacy Policy** — this document, presenting the ways in which personal data are processed by ACT and Your rights under the GDPR regulations.   
**ACT, we, our, us** — ACT cooperative corporation AS (registered in Norway, company registration no. [914927420](https://w2.brreg.no/enhet/sok/detalj.jsp?orgnr=914927420)), who offers services on the ACT website and the ACT Apps.   
**ACT Apps, the Apps** — a mobile marketplace application and other apps developed by ACT, which can be downloaded voluntarily and free of charge by any user for personal use.  
**Website** — website developed by ACT, to be found under the address: [https://www.aacctt.org](https://aacctt.org/).   
**You, Your** — the ACT Apps user and/or Website page user/visitor.  
**Services** — Website and the ACT Apps mentioned together.  
**ACT Seller** — shops who cooperate with ACT and pay a small fee for each transaction facilitated by the ACT apps.  
**Payment Service Provider** — a company that provides ACT with online payment solutions  
**ACT team** — ACT employees, volunteers, and contractors

**DATA ADMINISTRATOR**

ACT cooperative corporation AS, org. No. 914 927 420, is the administrator of Your personal data. Should You have any questions or inquiries regarding your personal data, please contact us at [privacy@aacctt.org](mailto:privacy@aacctt.org). Please bear in mind we can only refer to Your inquiry if it is possible to verify Your ownership of the personal data in question. Should this Privacy Policy require updating, all the changes will be published and available for You in this document.

**PERSONAL DATA**

According to the European Commission's definition: *“Personal data is any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data. (…) Examples of personal data: a name and surname; a home address; an email address such as name.surname@company.com, an identification card number; location data (for example the location data function on a mobile phone); an Internet Protocol (IP) address; a cookie ID; the advertising identifier of your phone; data held by a hospital or doctor, which could be a symbol that uniquely identifies a person.”*

In other words, personal data is any information you provide ACT with, which makes it possible to identify You as a person. Providing Your data is non-obligatory, but we do require Your contact details (e.g. email address or phone number) if you want to set up an account on the Website or the ACT Apps. This is crucial for the user-verification process, protects us from having fake users or bots spam our platform, and protects You from receiving biased or manipulated information from our Services.

**WHERE, WHY AND WHAT PERSONAL DATA DO WE COLLECT?**

* Questionnaire: From time to time we will set up questionnaires. They help us identify our passionate supporters, examine user experience, and gather Your feedback. This is where we may ask You to share Your contact details and, if You give us Your consent, we will contact You with further instructions on how You can help us build this groundbreaking platform. As we will use external tools for questionnaires (such as Google Forms, Typeform, or others), Your email address may be processed by those entities, with whom relevant agreements have been signed, guaranteeing the protection of Your personal data.
* Sign in: If You want to set up an account in our Services, we will ask You for Your email address and/or phone number to verify that You are not a bot and to make sure You set up a profile for Yourself.
* Newsletter: if You want to receive ACT’s latest news in our newsletter, You will enter Your name and email address in the relevant fields. Registration is not necessary to receive the newsletter.
* Home delivery: if You order home delivery, You will be asked to provide Your name, surname, contact details, and delivery address. This data is processed by the selected online retailers or their delivery providers, with whom relevant agreements have been signed, guaranteeing Your personal data protection. Please note, that online shops have their own privacy policies — make sure to read them carefully before sharing Your personal data. ACT **does not store or process ANY delivery details You provide**. You may be asked to store you delivery details for easier future use, which will only be done if you give Your explicit consent.
* Mobile payment: if You want to use the mobile payment feature with ACT Sellers, we will ask You for payment details. Please note, that ACT **does not store or process ANY payment details You provide**. This data is processed by ACT's Payment Service Providers with whom relevant agreements have been signed, guaranteeing Your personal data protection. You may be asked to store relevant payment information for easier future use, which will only be done if you give Your explicit consent.

**NON-PERSONAL DATA:**

* Your shopping choices – in order to operate smoothly, attract talent, expand to new countries, and thus gradually enable global collaboration on the quest against the climate crisis, ACT needs to generate revenue. Since we want to be transparent with our users and we want You to use our ACT Apps completely free of charge, ACT Sellers are currently ACT's exclusive revenue source. If this changes in the future, we update this Privacy Policy. What we offer those Sellers in return of a transaction fee, is the overview of their grocery market and the infrastructure ACT provides them, which may or may not include exclusive features for ACT Sellers. The overview means that we share select database segments presenting the shopping choices of ACT Apps Users with the Sellers, so that they can adjust their prices and inventory to real market demand. We believe that the shift in consumer's choices toward more sustainable goods facilitated by the ACT Apps will make retailers include more and more sustainably-produced products in their inventories. As a consequence, producers who are more sustainable will be rewarded with a higher demand for their goods. On a larger scale, these new market trends may force the entirety of the food production industry to follow the lead of sustainable producers in order to retain their customers. In short, ACT will help You easily find better products on the shelves that have less of an environmental impact. Subsequently, this demand will make producers want to do better — enabling a sustainable production cycle. Please note, that we **do NOT share Your personal data with the retailers**. We provide them exclusively with **anonymous** data on products and prices that are chosen by ACT Apps users.

**WHAT DO WE DO WITH THE DATA YOU PROVIDE US WITH?**

* We **do not sell Your personal data** to any third party.
* We only make Your data available to a third party when it is required to complete Your shopping (online payment) or ordering process (online shopping with home delivery). We have signed relevant agreements with all third parties involved, guaranteeing the safety and protection of Your personal data. However, please take into consideration that external services may ask You to consent to their own Privacy Policies. ACT has no responsibility for any further processing of data You provide by external services.
* We **do share information about Your shopping choices** with ACT Sellers. Wherever used, that data is **not Your personal data** as it **will not make it possible to identify You** as a person (i.e. it cannot be used for direct marketing customized to You personally). They will be used as insights to collectively present an overview of grocery markets. We can also use those insights for public education and information in reports, statistics, and presentations, which we may present in our marketing channels and Services, internal and external communication with partners, clients and investors.
* If You decide to subscribe to our Newsletter, we will send You periodical updates on our progress and achievements, plans and developments, as well as educational content available on our blog. You can unsubscribe from the Newsletter, or adjust the frequency and type of the emails You receive, at anytime.
* If You decide to contact us via any online or offline channel, and thus provide us with Your contact details, it will be treated as giving us Your **implied consent** to be contacted in regard to Your inquiry. We will not use Your contact details for any other purposes but Your inquiry (e.g. we will **not** start sending You the Newsletter just because You provided us with Your email address when using the contact form).

**HOW LONG WILL WE STORE YOUR PERSONAL DATA?**

We keep Your personal data until You delete Your account or contact us with a request to delete Your data. We do not delete Your data or account just because You are no longer active in the ACT Apps — we want to make it easy for You to come back anytime in the future.

**SECURITY OF YOUR PERSONAL DATA**

We protect Your personal information on data servers that are stored in a controlled, secure area that is protected from unauthorized access, use and/or disclosure. All personal information is protected by adequate physical, technical and organizational measures.

**DATA PROCESSORS — WHO CAN ACCESS YOUR DATA?**

As You know, each company has its subcontractors — these can be external services such as transport companies, payment service providers, or marketing platforms, such as Facebook, Instagram, Google tools, email marketing tools and others. So does ACT.

Whenever Your activity in our Services requires giving access to Your personal data to external services (e.g. subscribing to the newsletter, which is handled with the help of MailChimp), You can be sure that we either have relevant agreements signed with those entities to ensure proper protection and handling of Your personal data, or that the entity is listed on the [EU-US Privacy Shield List](https://www.privacyshield.gov/list). The companies listed guarantee that they will respect the European regulations on personal data protection. This is to ensure that Your data will never be processed for purposes other than the ones You have consented to.

**EMPLOYEES’ COMMITMENT AND OUR COMMITMENT TO OUR EMPLOYEES**

All ACT employees, volunteers, and contractors (collectively referred to as the “ACT team”) sign relevant confidentiality agreements along with their job contracts. These documents regulate the rights and obligations of ACT team members who have access to Your personal data. Only selected ACT team members have access to users’ personal data.

We also guarantee proper and safe processing of ACT team members’ personal data and make sure that only relevant employees (HR/recruitment team, CEO and COO) have access to their personal data. The personal data of the ACT team is not processed for any purposes other than recruitment processes and internal HR issues.

**WHAT ARE YOUR RIGHTS UNDER GDPR?**

You have:

* The **right** to be informed (about what personal data of Yours are in our database and how we process that data)
* The **right of** access (to Your personal data)
* The **right** to rectification (that allows You to update or correct incorrect personal data).
* The **right** to erasure (if You no longer want us to be in possession of Your personal data, i.e. want to delete Your account and data).
* The **right** to restrict processing (e.g. if You no longer want us to send You the Newsletter, but You agree that we can keep Your email address for log-in purposes).
* The **right** to data portability (if You want to transfer the personal data You provided to another entity).
* The **right** to object (if You no longer want us to process Your data in particular way/s).

To exercise Your rights, please contact us at: [privacy@aacctt.org](mailto:privacy@aacctt.org). The processing time for Your request is no longer than 30 days. Please remember that we can only effectively process Your request if it is possible to verify that You are the owner of the personal data in question (i.e. You own an email address or a phone number) and if the request is lawful.

**ADDITIONAL INFORMATION**

* User Profile Settings

Your ACT profile is by default set to be public to Your friends. This means that Your friends will see the profile picture/avatar and any content You publish. You can modify Your privacy settings in Your profile.

* Success stories, reviews, results

We love sharing good experiences Users have on our Services with others, which is why we will gladly publish success stories, reviews and results our users achieve or share with us. In the even that we publish any of the aforementioned with personal data (name, surname, nickname, etc.), we will ask You for Your consent.

* Mobile notifications

When You use the ACT Apps, You may receive notifications about new challenges, results of Your friends, Your results and new functionalities in the Apps. You can regulate the frequency of notifications in Your personal settings. You can also choose what You want to be notified about or switch off notifications completely.

* Analytics

When You browse our website, we track and collect information about Your behavior, and limited information about Your hardware and software with the use of Cookies, Analytics tags, and Facebook tags. This data may include information about the device You use, Your geographic location, the source and duration of Your visit, as well as which subpages of our Website You visited. This information helps us:

* + constantly improve our technical services to offer You the best possible user experience.

analyze the strengths and weaknesses of our Services and improve the quality of our content.

* + advertise our Services via Social Media to those, who expressed interest in joining our journey by entering and browsing our Website. We will **NEVER** use information collected by cookies to advertise third-party products or services on our Website or Apps to You.
  + decide on the next target locations (countries, cities) where we notice the highest traffic and interest from the ACT Apps.
* Processing data of users under 18.

Our website and Apps are not intended for children under the age of 16, and we do not intentionally collect personal information of children. Children under the age of 16 can use ACT’s services, but only with or under the supervision of their parent or guardian.

We did our best to make this document as clear as understandable as possible, but we are aware that legal language can be challenging. If You have any doubts or questions regarding this Privacy Policy, please feel free to [contact us](mailto:privacy@aacctt.org) and let us know. We will be happy to assist You.

*Updated: December 2022*