# Cradle to Cradle Products Innovation Institute Privacy Policy

We respect your privacy and are committed to protecting any personally identifying information you may share with us at the Cradle to Cradle Products Innovation Institute ("C2CPII"). Our Privacy Policy ("Privacy Policy") is designed to help you understand how we collect and use the information you decide to share, and help you make informed decisions when providing personally identifying information as a visitor or registered user at our website accessible at <a href="https://www.C2CCertified.org">www.C2CCertified.org</a> and other C2CPII-branded websites and domains, including <a href="https://www.circular-shift.com">www.circular-shift.com</a>. and any other websites that point to this Privacy Policy (collectively, "Site"), while using our various services, or while accessing or using other Site features such as through email subscriptions to receive news and updates.

By accessing the Site, using our services or Site features, or by providing us with your personally identifying information, you are accepting the practices and policies described in this Privacy Policy. Our Privacy Policy may change from time to time, and any changes will be posted on this page, and if the changes are significant, we will provide a more prominent notice.

Our Privacy Policy applies to our services, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy. Similarly, our Privacy Policy does not apply to services offered by other companies or individuals, including third party services used by C2CPII, or third party websites accessed through the Site. For these third party websites and services, we encourage you to familiarize yourself with the applicable third party privacy policies. If C2CPII makes use of the services of third parties that process your personal data, C2CPII shall use only processors providing sufficient guarantees to ensure the protection of your rights.

If you have questions or concerns regarding the Privacy Policy, to update your information maintained by C2CPII, or to address any other inquiry regarding our privacy practices, please first contact us at <a href="maintained">info@c2ccertified.org</a>.

## Who is the controller of your personal data?

The Cradle to Cradle Products Innovation Institute (C2CPII), an organization established under the laws of California, based in (CA 94612) Oakland, the United States of America.

The controller's legal representative in the EU is:

Cradle to Cradle Products Innovation Institute BV, Piet Heinkade 55, 1019 GM, Amsterdam, The Netherlands

#### **What Information Does C2CPII Collect?**

Information you share with us. We have access to information that you voluntarily provide us, including via email, while using our Site or services, or other contacts initiated by you, including for example all information you disclose to us when signing up for email newsletters or charitable solicitations, event registrations, webinars, meetings or conferences.

Information you share with us may include your personally identifiable information such as name, address, or other contact information, as well as various other information pertaining to your use of our services such as user data obtained through your Site visits. If you choose to register with us to receive email correspondence you are required to enter your email address.

Your personal data is collected and processed with the objective to deliver products, services and information to you. Without this information, we cannot provide the requested products, services or information.

Information we learn from your use of our Site or services. We may use browser session data to store your session data while you browse our site. Your data will be stored only for that browser session, though certain information may be saved by browser session and stored on our servers with a session ID.

Like many companies, we monitor the use of our Site and services, by collecting information such as browser type, operating system, IP address, and the like. This aggregate information may include various data pertaining to you and your use of our services. This information is used for our not for profit and public benefit purposes, including to improve usability, performance and effectiveness of the Site, and may be disclosed to third parties as aggregate data without any of your personally identifiable information.

Cookies. Pixel Tags. and other data identifiers. In some instances, we may collect aggregate data through cookies, pixel tags, web beacons, and other anonymous identifiers. We only use this data in aggregate form without access to any personally identifying information. The majority of web browsers accept cookies and similar files, but you can usually change the browser settings to prevent this. However, if you do so, some functionality of our site may be impaired or lost, particularly any site customization features.

Our website may provide links to third-party websites that are outside of our control and not covered by our Privacy Policy. We encourage you to review the privacy policies posted on these (and all) websites to learn about those websites' policies and practices with respect to your personally identifying information.

C2CPII uses cookies on the Site. A cookie is a simple text file that is stored on your computer by a web browser. You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that this may affect the functionality of the website.

The website does not use any tracking cookies or advertising cookies. The following functional and analytical cookies may be placed via the website without your prior consent:

Type of cookie	Purpose
exp_expiration	functional
exp_tracker	functional
exp_sessionid	functional
exp_last_activity	functional
exp_last_visit	functional
PHPSESSID	functional
ga (Google Analytics)	analytics
_gid (Google Analytics)	analytics
cfduid (Cloudflare)	functional
Uvc (Addthis)	analytics
Loc (Addthis)	analytics
Ouid (Addthis)	analytics
Na_tc (Addthis)	analytics
Uvc (Addthis)	analytics
Mus (Addthis)	analytics
Uid (Addthis)	analytics
Lidc (Linkedin)	functional
Metrics_token (Twitter)	analytics
Tfw_exp (Twitter)	functional
Lang (Twitter)	functional
FORMASSEMBLY (Form Assembly)	functional

More information about cookies can be found on www.allaboutcookies.org

<u>Charitable Solicitations & Email Subscriptions</u>. We also use the Site and email inquiries to solicit charitable donations from time to time in support of our public benefit mission and work to implement the Cradle to Cradle Certified Product Standard. We collect certain types of personally identifiable information (e.g., your name and address) and maintain records of your charitable activities in order to provide this service.

We do not collect or retain any financial information such as your credit card number, which information is securely maintained by our financial service provider <a href="Stripe.com">Stripe.com</a>. Your personally identifiable information, including your financial information and transaction data submitted as part of any charitable donation is maintained in accordance with PayPal's privacy policy.

By providing your email address and an authorization, from time to time we may send you email inquiries with news and information about our activities, or solicitations for charitable donations. We use the services provided by Mailchimp.com to provide this service. By subscribing, you have given permission for this processing. You can at any time unsubscribe from the e-mail list by clicking the "Unsubscribe" or "Manage Preferences" links at the bottom of any of the emails we send, or sending a message to info@c2ccertified.org requesting to be unsubscribed.

#### **How Does C2CPII Use This Information?**

We respect your privacy, and value the information you share with us. C2CPII will not use, process, sell, rent, or share with a third party any personally identifiable information other than as permitted by (i) the Privacy Policy (including for example by using such data in the aggregate), (ii) the relevant laws or regulations, or (iii) specifically requested or authorized by you when accessing or using our software and related services, for example to render or complete the services requested or authorized by you.

We use the information we collect to provide the service or transaction you requested, and importantly, to maintain and improve the services we provide, including for example by providing you with a better user experience when accessing our Site. We only use or process your information in a way that is compatible with and relevant for the purpose for which it was collected or authorized for use.

We may share your personally identifiable information with data processors, vendors, or contractors in order to provide you with a requested service or transaction, such as to collect charitable donations or provide email newsletters. For example, to provide you with email newsletters we must share your personally identifiable information with our email newsletter service provider as identified above. We also use information collected from cookies and other anonymous identifiers to improve your user experience and the quality of our services.

We may collect and share personally identifiable information when we have a good faith belief that access, use, or disclosure of such information is reasonably necessary to satisfy any applicable law, rule, regulation, or enforceable governmental or administrative request, enforce our applicable Terms of Service, including investigation of potential violations, detect, prevent, or address fraud, security or technical issues, or protect against harm to the rights, property or safety of the C2CPII, our users or the public.

Our use of information other than for the purpose of completing a requested transaction or service is on an opt-in basis. This means that you will not receive communications from us regarding, for example special events, promotions, or new certified products, unless you have given us affirmative permission to receive such communications. You may at any time update your email subscriptions, including to completely opt-out of receiving any further email solicitations from us. Our email

communications all include various links enabling you to modify or update your contact preferences, including to completely opt-out of further unsolicited contact, or you may contact us with your comments and inquiries at <a href="mailto:info@c2ccertified.org">info@c2ccertified.org</a>.

## **Is My Information Shared With Other Companies?**

Except as stated in our Privacy Policy, we will not disclose personally identifiable information about our users to any third party without your prior consent.

We share personally identifiable information with third parties only to the extent necessary to render services you have requested or authorized, for example to trusted business partners who process information on our behalf.

We may share non-personal, aggregate information regarding visitor demographics, traffic patterns and site usage with our partners, advertisers or sponsors. We may offer some services on or in collaboration with other Internet web sites. Personally identifiable information that you provide to those third-party sites may be sent to us so that we can deliver the requested service. We process such information under our Privacy Policy.

We may also provide you with access to third party applications, such as gadgets or extensions, through our website. Any information collected when you enable a third party application on our site is processed under our Privacy Policy, but any information collected by a third party application provider is governed by their privacy policies.

We may also share your personally identifiable information with third parties if we have a good faith belief that access to or use of this information, or the preservation or disclosure of this information is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request; to enforce our Terms of Service, including for investigation of possible violations; detect, prevent, or otherwise remedy fraud, security threats or breaches, or other technical issues; and to prevent harm to the personal or property rights of C2CPII, or other third parties, as permitted by applicable laws.

C2CPII is neither responsible nor liable for the processing of your personal data by third parties.

To the extent that a third party processes your personal data as a data processor of C2CPII, C2CPII will conclude a processor agreement with such party that meets the requirements set out in the relevant laws and regulations. We will require that third party processors agree to process such information based on our instructions and in compliance with our Privacy Policy, the relevant laws and regulations and any other appropriate confidentiality and security measures.

# **How Do I Access Or Change My Personal Information?**

To provide our services, and for you to gain the optimum benefits of our products and services, we need to store and provide you with access to your personal information when accessing or using our services. You can review, and update the personal information for your account by using the

appropriate links provided in our email communications, or by contacting us at <a href="mailto:info@c2ccertified.org">info@c2ccertified.org</a>.

When updating your personal information, we may ask you to verify your identity before we act on your request, and at our discretion, we may reject requests that are unreasonably repetitive, require disproportionate technical effort or are impractical, or risk the privacy rights of other users. We may not immediately delete copies of your outdated information from our servers and may not remove all outdated information from our backup systems after you delete this information. This residual retention period is necessitated to protect our information servers from accidental or malicious loss of data.

#### **Retention Period**

C2CPII will not store your data any longer than is necessary to achieve the purposes stated in this Privacy Policy or to comply with the relevant laws and regulations.

## Specific information for personal data collected from persons in the European Union

C2CPII's services are hosted and operated entirely within the United States of America, and any information you submit to C2CPII is presumed to be hosted on servers located within the United States, and you consent to this storage and processing of your personal information in the United States by accessing or using our services.

For transfers of data outside the EU, C2CPII makes sure that there is an adequacy decision from the European Commission for the receiving party, and if there is no adequacy decision, that there are appropriate safeguards to protect your personal data. You can e-mail <a href="mailto:info@c2ccertified.org">info@c2ccertified.org</a> to obtain information on the (agreed) safeguards.

Processing personal data of persons in the European Union will always be carried out in compliance with the General Data Protection Regulation (GDPR, EU Regulation 2016/679). This means that you have several rights as a person in the European Union with regard to the processing of your personal data. The following overview shows the rights in general terms.

**Access:** You have the right to request information about your own personal data that is collected and processed by C2CPII.

**Rectification:** If your own personal data is inaccurate of incomplete, you have the right to request a rectification.

**Objection and Erasure:** You have the right to object to the processing of your personal data and to request for an erasure of your personal data processed by C2CPII.

**Restriction of processing:** You have the right to request for a restriction of the processing of your personal data in the situations regulated by article 18 of the GDPR. For example, if the processing is unlawful but you oppose to erasure for legitimate reasons.

**Data portability:** When the processing is carried out by automated means and is based on your consent or based on an agreement, the personal data which you have provided shall be presented to you in a structured, commonly used and machine-readable format and you have the right to transmit the collected data to another controller.

**Withdrawal of consent:** When you have given consent for the processing of your personal data, you can at any time withdraw your consent.

For a complete overview, C2CPII refers to the text of the GDPR. Upon request, C2CPII will provide you more specific information based on the specific facts of your case.

All requests can be submitted via <a href="info@c2ccertified.org">info@c2ccertified.org</a> and will be taken care of within reasonable time. Your request will be followed up, except when C2CPII has a legitimate reason not to do so (for example when the processing is legitimate and/or C2CPII has a legitimate interest in processing the data, like when the personal data is needed to comply with obligations by contract or law or for a legal action).

You may bring any complaint with respect to our collection or use of your personal information under this Privacy Policy directly to our attention, in which case we will endeavor to respond to your complaint within one month of receipt. This period may be extended by two further months if necessary. If your complaint is not resolved to your satisfaction through our internal dispute resolution efforts, you may seek independent recourse to investigate and resolve your complaint. You may submit such complaints to your national data protection authority, or to binding arbitration provided through a neutral dispute resolution provider. C2CPII may refer unresolved privacy complaints to the independent BBB Privacy Shield Program as administered by the Council of Better Business Bureaus.

# What Are C2CPII's Information Security & Compliance Practices?

We store your personal data on a secure server that is password protected and shielded from outside access by a firewall. We practice safety procedures intended to ensure, as far as possible, the security and integrity of all our information, including your personally identifying information. When providing a charitable donation through our Site you will be redirected to a third party service provider who will use industry-accepted data security means, including for example by having your information transmitted via Secure Socket Layer technology to a third-party service provider which is then encrypted as a part of their transaction processing. Whether during or after a transaction your private credit card information will not be stored on our servers. However, no system or information can ever be fully protected against every possible hazard. As a result, we cannot assure or warrant the security or privacy of any information you provide to us and, accordingly, you do so at your own risk.

We also use a self-assessment approach to assure compliance with this Privacy Policy and to periodically verify that this policy is accurate, comprehensive for the intended purposes, and prominently displayed for consumer review. We encourage interested persons to share any concerns with us and we will investigate and attempt to resolve any complaints and disputes regarding the use or disclosure of your information. If a complaint or dispute cannot be resolved through our internal processes, then we agree to dispute resolution through a third party resolution provider such as the Council of Better Business Bureaus (BBB), TRUSTe, or Direct Marketing Assoc., that also incorporate the Safe Harbor Framework.

### **COPPA Disclaimer**

The Children's Online Privacy Protection Act (COPPA) was created to protect children under the age of thirteen from unsuspecting practices related to collecting, using, or disclosing any information about them. Our services are neither intended nor directed for use by children under the age of thirteen. C2CPII does not knowingly accept, collect, maintain or use any information from any child under the age of thirteen, and if a child whom C2CPII knows or suspects to be under the age of thirteen sends personal information to us online, we will only use that information to respond directly to that child, notify the parents, or seek parental consent.

## **Who Do I Contact With Other Questions?**

If you have any questions about our Privacy Policy, please contact us at <a href="mailto:info@C2CCertified.org">info@C2CCertified.org</a>. Complaints will be resolved internally in accordance with our complaints procedures.

This Policy does not supersede the Terms of Use that govern your use of the Site, and any conflict between this Privacy Policy and the Terms of Use shall be resolved in favor of the Terms of Use.

©2020 Cradle to Cradle Products Innovation Institute. All rights reserved. C2CPII reserves the right to make changes in services, terms, and other information contained in this document without prior notice. The reader should in all cases consult C2CPII to determine whether any such changes have been made. Revised 21 August 2020.