

B Corp Certification - Disclosure Questionnaire Documentation

Disclosure Questionnaire category: [Selling or Sharing] User Data

Updated as of: 17/06/2025

Project36 Limited is involved in [selling or sharing] user data. Companies that [sell or share] user data are considered high-risk as it may lead to the destruction or corruption of databases, leakage of confidential information and/or theft of intellectual property. Certified B Corps are required to make transparent their involvement in such business practices.

Risk Review Committee Recommendations

Thanks for your transparency on this topic. Our existing standards require that companies in such an industry / with such a practice are required to make this issue transparent to ensure that stakeholders are aware. This disclosure, however, is not intended to imply a judgment against the company and does not imply that the company is violating the standards of B Corp Certification, as you are eligible to proceed with the certification and a high percentage of B Corps are required to have a disclosure on their profile. Given the size of your company, and therefore the overall scale of the potential impact of this issue, we have a standardized disclosure on the topic to ensure transparency and consistency with other companies.

In addition to this disclosure, recognizing the potential impact of this issue, we do nonetheless provide recommendations to companies to ensure that they are thoughtfully managing these topics. To that end, we recommend that the company take into extra consideration the following suggested actions as they continue to manage their impacts if you have not done so already:

- Be GDPR Compliant (if website is accessible in Europe)
- Clear Cookies/Privacy policy available online that is easily accessible and informs users of:
 - the reasons for collecting user data
 - the type of data being collected
 - who the user data is being shared/sold to
- Have employed a Data Protection Officer (large companies)
- Use encryption software to protect user data transmitted to and from their site
- Give the user the option to easily opt out of cookies onsite

While there is not an expectation of specific practices in place by the company at this time, these would be topics that would be asked should there be material complaints received through our complaints process, and may be further incorporated into our standards in the future as we continue to improve them. Please take them into consideration, and, otherwise, we will proceed with the finalization of your disclosure report.

Sincerely,

B Lab's Risk Review Committee