

Privacy Policy

The Eco Option LLC

Privacy Policy

Last Updated: July 30, 2020

This "Privacy Policy" describes the privacy practices of The Eco Option LLC (together with our affiliates, "Eco Option", "Company" "we", or "us"). Eco Option is headquartered in the United States and partner with individual consumers, as well as major consumer product companies, retailers, manufacturers, municipalities, and small businesses across 20 different countries. At Eco Option, we provide recycling solutions for traditionally hard to recycle materials (the "Services").

Office address: 121 New York Avenue, Trenton, NJ 08638, USA

This Privacy Policy describes how we collect, use, disclose and otherwise process personal information in connection with our Services, and explains the rights and choices available to individuals with respect to their information. This Privacy Policy governs any of the Services on which the Privacy Policy is posted.

Individuals who are Californian residents should be sure to read the important information provided in *Notice to Californian residents – your California privacy rights*.

Individuals located in the European Union should be sure to read the important information provided in Additional Information for European Union Users.

1. Personal Information We Collect
2. Changes to your personal information
3. Cookies and Similar Technologies
4. How We Use Your Personal Information
5. How We Share your Personal Information
6. Your Choices

7. Security
8. Children
9. Sensitive Personal Data
10. Other Important Privacy Information
11. International Transfer
12. Additional Information for European Union Users
13. Changes to this Privacy Policy
14. Contact Us

1. Personal Information We Collect

Information you give us

Personal information that you may provide through the Services or otherwise communicate with us includes:

- Shipping information, we collect information from you when you request a shipping label on the Site,
- Feedback and correspondence, such as information you provide in your responses to surveys, when you participate in market research activities, sweepstakes, contest or giveaway, report a problem with the Services, receive customer support or otherwise correspond with us;
- Usage information, such as information about how you use the Services and interact with us;
- Marketing information, such your preferences for receiving marketing communications and details about how you engage with them;

Information we get from others.

We may also get information about you from other sources, for example from Google, if you are signed into Google, we may get demographic data (e.g. gender, age), if you are not signed in, we may receive geographical and technical data (e.g. browser type, location) and we may add this to information we get from the Services.

We may combine other publicly available information, such as information related to the organization for which you work, with the personal information that you provide to us through our Services.

Information where we act as a data processor

We also process personal information on behalf of our customers in the context of supporting our products and services. Where a customer subscribes to our Services (whether this is using a Eco Option developed frontend or a proprietary interface), they will be the ones who are responsible for what data is collected and stored on the systems.

You will need to refer to the Privacy Policies of our customers to find out more about how such information is handled by them.

Information automatically collected

We may automatically log information about you and your computer or mobile device when you access our Site. For example, we may log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Sites, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Sites. We collect this information about you using cookies. Please refer to the Cookies and Similar Technologies section for more details.

2. Changes to your personal information

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us by contacting our customer support indicated below.

3. Cookies and Similar Technologies

What are cookies?

We may collect information using “cookies” or similar technologies (altogether, “Cookies”). Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of Cookies: (1) first party Cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Site; and (2) third party Cookies, which are served by service providers on our Site, and can be used by such service providers to recognise your computer or mobile device when it visits other websites.

Cookies we use

Our Site uses the following types of Cookies for the purposes set out below:

Type of cookie: Local Storage

Purpose: This technology allows our Site to remember choices you make when you use our Site. The purpose of this is to provide you with a more personal experience and to avoid you having to re-select your preferences every time you visit our Site.

Type of cookie: Analytics and Performance Cookies

Purpose: These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered may include the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information, monitor the level of activity on our Site, and improve the Site.

We use Google Analytics for this purpose. Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies [here](#) and about how Google protects your data [here](#). You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available [here](#).

Disabling Cookies

You can typically remove or reject Cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the "settings," "help" "tools" or "edit" facility). Many browsers are set to accept Cookies until you change your settings.

Further information about Cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org.

If you do not accept our Cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site.

Pixel tags

We may also use pixel tags (which are also known as web beacons and clear GIFs) on our Site to track the actions of users on our Site. Unlike Cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our

marketing campaigns and compile statistics about usage of the Site, so that we can manage our content more effectively.

Do Not Track Signals

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not currently respond to do not track signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

4. How We Use Your Personal Information

To provide our Services

If you use our Services, we use your personal information to:

- operate, maintain, administer and improve the Services;
- manage and communicate with you regarding your shipping label request including by sending you service announcements, technical notices, updates, security alerts, and support and administrative messages;
- better understand your needs and interests, and personalize your experience with the Services;
- provide support and maintenance for the Services; and
- respond to your service-related requests, questions and feedback.

To communicate with you

If you request information from us, or participate in our surveys, promotions or events, we may send you Company-related marketing communications as permitted by law. You will have the ability to opt out of such communications as described below.

For research and development

We use information automatically collected and other information to analyze trends, administer the Services, analyze users' movements around the Site, gather demographic information about our user base as a whole, improve the Services and develop new products and services.

To provide you with advertising

We may use your personal information to serve ads on the Services or on third party sites and to tailor ads to your interests and browsing history. Please refer to the Cookies and Similar Technologies section for more details.

To comply with law

We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

With your consent

We will request your consent to use your personal information where required by law, such as where we use certain cookies or similar technologies or would like to send you certain marketing messages. If we request your consent to use your personal information, you have the right to withdraw your consent any time in the manner indicated when we requested the consent or by contacting us at privacy@ecooption.com or 1-800-865-1543.

To create anonymous data

We may create anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by excluding information that makes the data personally identifiable to you, and use that anonymous data for our lawful business purposes.

For compliance, fraud prevention and safety

We use your personal information as we believe necessary or appropriate to (a) enforce the terms and conditions that govern the Service; (b) protect our rights, privacy, safety or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

Use for new purposes

We may use your Personal Information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your Personal Information for an unrelated purpose, we will notify you and explain the applicable legal basis.

5. How We Share your Personal Information

Affiliates

We may disclose your personal information to our subsidiaries and corporate affiliates for purposes consistent with this Privacy Policy.

Service Providers

We may employ third party companies and individuals to administer and provide the Services on our behalf (such as customer support, hosting and storage, analytics, email delivery, marketing/advertising and database management services). These third parties may use your information only as directed by Company and in a

manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

Professional advisors

We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

Compliance with Laws and Law Enforcement; Protection and Safety

Company may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern the Service; (c) protect our rights, privacy, safety or property, and/or that of you or others; and (d) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

Business Transfers

Company may sell, transfer or otherwise share some or all of its business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.

SNSs

The Services may enable you to post content to SNSs. If you choose to do this, we will provide information to such SNSs in accordance with your elections. You acknowledge and agree that you are solely responsible for your use of those websites and that it is your responsibility to review the terms of use and privacy policy of the applicable website or service. We will not be responsible or liable for: (i) the availability or accuracy of such website or service; (ii) the content, products or services on or availability of such website or service; or (iii) your use of any such website or service.

Third parties partners/organizations

We may disclose your personal information to third parties in compliance with the applicable data protection laws.

We may disclose your personal information to third parties that act as agents, consultants, and contractors to perform tasks on behalf of and under our instructions. Such third parties must agree to use such personal information only for the purposes for which they have been engaged by us and they must either:

- comply with the Privacy Shield principles or another mechanism permitted by the applicable EU & Swiss data protection law(s) for transfers and processing of personal information;
- or agree to provide adequate protections for the personal information that are no less protective than those set out in this policy;

We also may disclose personal information to third parties when you have consented to or requested such disclosure.

We are liable for appropriate onward transfers of personal data to third parties.

However, such sharing may link to third-party websites and services that are outside our control. We are not responsible for the security or privacy of any information collected by these third parties, which operate pursuant to their respective privacy policies.

6. Your Choices

Marketing communications

You may opt out of marketing-related emails by contacting us at privacy@ecooption.com or 1-800-865-1543. You may continue to receive service-related and other non-marketing emails.

Choosing not to share your personal information

Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the Services. We will tell you what information you must provide to receive the Services by designating it as required in the Services or through other appropriate means.

7. Security

The security of your personal information is important to us. We take a number of organizational, technical and physical measures designed to protect the personal information we collect, both during transmission and once we receive it.

These include but are not limited to:

- Forcing APIs (REST and Pub/Sub) to operate over encrypted ports (HTTPS and TLS).

- Data encryption between services within the cloud based systems used by Eco Option.
- File encryption over file servers.
- Highly restricted access to Production Environments.

However, no security safeguards are 100% secure and we cannot guarantee the security of your information. We will comply with applicable laws and regulations requiring that we notify you in the event your personal information is compromised as a result of a breach of our security measures.

8. Children

Our Services not directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at privacy@ecooption.com or 1-800-865-1543. If we learn that we have collected personal information from a child under age 16, will delete such information from our files as soon as reasonably practicable.

9. Sensitive Personal Data

We ask that you not send us, and you not disclose, any sensitive personal data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Site or otherwise to us.

If you send or disclose any sensitive personal data to us when you use the Site, you must consent to our processing and use of such sensitive personal data in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal data, you must not submit such sensitive personal data to our Site.

10. Other Important Privacy Information

Third party sites and services

The Services may contain links to other websites and services. These links are not an endorsement, authorization or representation that we are affiliated with that third party. We do not exercise control over third party websites or services, and are not responsible for their actions. Other websites and services follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies of the other websites you visit and services you use.

User generated content

We may make available on our Sites, or link to, features that allow you to share information online (e.g., on message boards, in chat areas, in file uploads, through

events, etc.). Please be aware that whenever you voluntarily disclose personal information online, that information becomes public and can be collected and used by others. We have no control over, and take no responsibility for, the use, storage or dissemination of such publicly-disclosed personal information. By posting personal information online in public forums, you may receive unsolicited messages from other parties.

California Privacy Rights

We may share your personal information with third parties (and in some cases, affiliates) for their direct marketing purposes. Under California Civil Code sections 1798.83- 1798.84, California residents are entitled to request certain information regarding such disclosures within the immediately preceding calendar year. To make such a request, email us at privacy@ecooption.com. You must put the statement "Your California Privacy Rights" in the subject field of your e-mail or include it in your writing if you choose to write to us at the designated mailing address. You must include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labelled or sent properly, or do not have complete information. BECAUSE WE DO NOT CONTROL THE PRIVACY PRACTICES OF THESE THIRD PARTY COMPANIES, YOU SHOULD READ AND UNDERSTAND THEIR PRIVACY POLICIES.

NOTICE TO CALIFORNIAN RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

The California Consumer Privacy Act ("CCPA") provides you with specific rights regarding your personal information. This section describes your CCPA rights and explain how to exercise those rights.

Access, data portability, deletion rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. You also have the right to request that we delete some or all of your personal information.

If requested as described below, we will disclose to you

- The categories of personal information we collected about you
- The categories of sources for the personal information we collected about you
- Our business or commercial purpose for collecting or selling that personal information
- The categories of third parties with whom we share the personal information
- The specific pieces of personal information we collected about you (also called a data portability request)
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - Sales, identifying the personal information categories that each category of recipient purchased, and

- Disclosure for a business purpose, identifying the personal information categories that each category of recipient obtained.

To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to us by contacting us at privacy@ecooption.com or 1-800-865-1543. You must put the statement "Your California Privacy Rights" in the subject field of your e-mail or include it in your writing if you choose to write to us at the designated mailing address.

You may only make a verifiable consumer request for access or data portability twice within a 12 months periods. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information related to you. We are not responsible for notices that are not labelled or sent properly, or do not have complete information. **BECAUSE WE DO NOT CONTROL THE PRIVACY PRACTICES OF THESE THIRD PARTY COMPANIES, YOU SHOULD READ AND UNDERSTAND THEIR PRIVACY POLICIES.**

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make a request.

Non discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods and services
- Charge you different prices or rates for goods or services
- Provide you a different level or quality of goods or services
- Suggest that you may receive a difference price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates or quality levels. Any CCPA permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Sharing personal information – Right to opt out of the sale of personal information

We may share the following personal information with third parties (and in some cases, affiliates): name, email address, mailing address.

11. International Transfer

Company is headquartered in the United States and has affiliates and service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction.

European Union users should read the important information provided below in Additional Information for European Union Users about transfer of personal information outside of the European Economic Area.

12. Additional Information for European Union Users

Personal information

References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

Controller and Data Protection Officer

Company is the controller of your personal information for purposes of European data protection legislation. See the Contact Us section above for contact details.

Legal basis for processing

We only use your personal information as permitted by law. We are required to inform you of the legal basis of our processing of your personal information, which are described in the table below. If you have questions about the legal basis of how we process your personal information, contact us at privacy@ecoption.com or 1-800-865-1543.

Processing purpose: To provide the Services

Legal basis: Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services.

Processing purpose: To communicate with you; to provide you with advertising; to create anonymous data; for compliance, fraud prevention and safety

Legal basis: These processing activities constitute our legitimate interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our

legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Processing purpose: To comply with law

Legal basis: Processing is necessary to comply with our legal obligations

Processing purpose: With your consent

Legal basis: Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us at privacy@ecooption.com or 1-800-865-1543.

Use for new purposes

We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Marketing communications

By default, you should not receive marketing communications. If we want to send you marketing communication, you will need to first provide an expressed interest in "opting in" to communications. When you are filling out a contact or other form, if you click "Sign me up for the newsletter" when you sign up, you are opting in to marketing communications emails. You can later opt in or out by contacting us at the contact information stated in this policy.

Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Information) for legal or regulatory requirements, this can include but is not limited to tax and audit purposes.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

Your rights

European data protection laws give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

Inform. Know about the collection and use of personal information.

Opt-out. Stop sending you direct marketing communications. You may continue to receive service-related and other non-marketing emails.

Access. Provide you with information about our processing of your personal information and give you access to your personal information.

Correct. Update or correct inaccuracies in your personal information.

Delete. Delete your personal information.

Transfer. Transfer a machine-readable copy of your personal information to you or a third party of your choice.

Restrict. Restrict the processing of your personal information.

Object. Object to our reliance on our legitimate interests as the basis of our processing of your personal information.

You can submit these requests by email to privacy@ecoption.com or our postal address provided in Contact Us. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us as described or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Cross-Border Data Transfer

Whenever we transfer your personal information out of the EEA to countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based on one of the following safeguards

recognized by the European Commission as providing adequate protection for personal information, where required by EU data protection legislation:

- the country to which we send the personal information may be approved by the European Commission or;
- the recipient may have signed a specific contract approved by the European Commission as providing adequate protection of personal information. For further details, see the European Commission's website for model contracts for the transfer of personal information to third countries, or;
- for transfers to third parties in the United States, ensuring they participate in the EU-US Privacy Shield Framework

EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield

We commit to comply with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. We have certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

We don't carry HR Certification for SW-US Certification with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship.

We are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). You may have the possibility, under certain conditions to invoke binding arbitration.

In compliance with the US-EU and Swiss-US Privacy Shield Principles, we commit to resolve complaints about your privacy and our collection or use of your personal information. EU and Swiss individuals with questions or concerns about the use of their personal information should contact us at privacy@ecoption.com or 1-800-865-1543.

We have further committed to refer unresolved Privacy Shield complaints to ICDR/AAA, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <https://www.icdr.org> for more information or to file a complaint. The services of ICDR/AAA are provided at no cost to you.

If your question or concern cannot be satisfied through this process, we have further committed to refer unresolved privacy complaints under US-EU Privacy Shield and Swiss-US Privacy Shield to an independent dispute resolution mechanism.

13. Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make changes to this Privacy Policy we will post them on the Site and update the Last Updated date above. If we make material changes to this Privacy Policy you will be notified via e-mail (if we have your contact information) or another manner through the Services that we believe reasonably likely to reach you. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

14. Contact Us

If you have any questions or concerns at all about our Privacy Policy, please feel free to contact us at privacy@ecooption.com or 1-800-865-1543 or write to us at:

The Eco Option LLC

121 New York Avenue, Trenton, NJ 08638, USA