

## **ACORN VT PRIVACY POLICY FOR EAT LOCAL VT**

*Last Updated: 2.25.22*

### **Welcome to the ACORN VT Privacy Policy for Eat Local VT.**

Addison County Relocalization Network, Inc. (“ACORN” or “our” or “we” or “us”) is committed to protecting and respecting your personal data and privacy in connection with your use of the App. This Privacy Policy explains how information about you is collected, used, disclosed, and safeguarded by ACORN. This Privacy Policy applies to information we collect when you use our mobile or web-based applications that we offer now or that we may develop and offer in the future (collectively, the “App”). This Privacy Policy applies to your use of the App and should be read together with, and is incorporated into, the ACORN Terms of Service (“TOS”). Any conflict between this Privacy Policy and the TOS will be determined in favor of the TOS. All terms in this Privacy Policy that are defined in the TOS have the meanings ascribed to them in the TOS.

Your use of the App and/or provision of Personal Information (as defined in this Privacy Policy) via the App constitutes your consent to our use, storage, processing, and transfer of that information in accordance with this Privacy Policy. By using the App, you acknowledge and agree that you have read and accepted the terms of this Privacy Policy. Without prejudice to the generality of the foregoing, you expressly and unequivocally consent to: (a) the collection and processing of your Personal Information by us in accordance with the indicated purposes and this Privacy Policy and the TOS; and (b) the collection and processing of Personal Information on your behalf, as indicated in this Privacy Policy.

We reserve the right to change this Privacy Policy from time to time and in our sole discretion. If we make any changes, we will notify you by revising the date at the top of this Privacy Policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you an email notification). Any such changes will be effective immediately upon posting. Your continued use of the App will constitute your acceptance of such changes. Because this Privacy Policy may change from time to time, it is important that you regularly review this Privacy Policy to ensure that you are updated as to any changes. We encourage you to review the Privacy Policy whenever you access the App to stay informed about our information practices and the ways you can help protect your privacy. This Privacy Policy, and any posted changes to its terms, shall remain in full force and effect while you use the App.

As provided in the TOS, the App is intended for access and use by United States residents only, and it is not intended for use by anyone under 18 years of age.

### **COLLECTION OF INFORMATION**

#### **Personal Information**

"Personal Information" includes any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier, or one or more factors specific to you. Personal Information includes pseudonymized Personal Information but excludes anonymous information or information that has had the identity of an individual permanently removed ("deidentified").

As we add features and capabilities to the App, we may collect additional information, which you would have the option of providing in order to use these features. The types of information we may collect include, but is not limited to, your name, email address, postal address, phone number, mobile number, credit card information, and other personal, identifying, or preference information you choose to provide. If this information is to be collected, you will be notified and you will have the option of providing or choosing not to provide it.

### **Consent to Use of Personal Information**

By accessing or using the App, you are consenting to have your information, including Personal Information, transferred to, processed, and stored in the United States.

If you are providing Personal Information to us relating to a third party, you confirm that you have the consent of the third party to share such Personal Information with us and that you have made the information in this Privacy Policy available to the third party.

If you choose not to provide us with your Personal Information, you still may visit most of the App. Please note, however, that you may be unable to access certain content on the App or receive certain services or offerings otherwise provided.

### **How We Collect Information.**

We may collect information about you, including Personal Information, as follows:

***Information You Provide to Us.*** We collect information you provide directly to us. For example, we collect information when you fill out a form, post User Generated Content, make a donation, send us an email, sign up to receive email updates, sign up as a volunteer, participate in a contest or promotion, make a purchase or contribution, communicate with us, request information, or otherwise communicate with us. We collect information that you provide when you communicate with us through the App or otherwise (such as by email, phone, regular mail, or via our website or social media pages). We may collect your Personal Information if we monitor the App.

***Information We Collect Automatically When You Use the App.*** When you access or use our App, we automatically collect certain information about you, including:

- **Log Information:** We log information about your use of the App, including the type of browser you use, access times, pages viewed, your IP address, and the page you visited before navigating to the App.

- **Device Information:** We may collect information about the computer or mobile device you use to access the App, including the hardware model, operating system and version, device identifiers, and mobile network information.
- **Information Collected by Cookies and Other Tracking Technologies:** We use various technologies to collect information, and this may include sending cookies to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory that helps us to improve the App and your experience, see which areas and features of the App are popular, and count visits. We may also collect information using web beacons (also known as “tracking pixels”). Web beacons are electronic images that may be used in the App or emails and help deliver cookies, count visits, understand usage and campaign effectiveness, and determine whether an email has been opened and acted upon. For more information about cookies and how to disable them, please see “Your Choices” below.
- **Location Information:** In order to provide you with the best functionality of the app’s services, we use your location in combination with Google's location services to calculate distance to the farms.

## USE OF INFORMATION

We may use information about you, including Personal Information, for various purposes in accordance with the terms of the Privacy Policy in effect at the time of such use, including to:

- Provide, maintain, and improve the App;
- Provide and deliver information you request, process contributions and transactions, and send you related information, including confirmations and invoices;
- Send you confirmations, technical notices, updates, security alerts, and support and administrative messages;
- Request feedback and otherwise contact you about your use of the App;
- Respond to your comments, questions, and requests and provide customer service;
- Send you newsletters and otherwise provide you with information or services you request or that we think will be of interest to you, such as sending you information to keep you informed about various issues, events, resources, promotions, products, and services;
- Determine your eligibility, including verifying your identity or determining your eligibility for certain aspects of the App, such as promotions, services, products, which may include verification of your age, date of birth, and state of residence;
- Communicate with you about this Privacy Policy or the TOS, changes to the App, feedback requests;
- Monitor and analyze trends, usage, and activities in connection with the App;
- Personalize and improve the App and provide advertisements, content, or features that match user profiles or interests;

- Link or combine with information we get from others to help understand your needs and provide you with better service;
- Carry out our contractual obligations, including any obligations arising from any agreement entered into between you and us, including the TOS;
- Help maintain the safety, security, and integrity of the App, products, services, databases, technology assets, and business assets, and to help prevent and detect fraud;
- Administer and protect our business and the App, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, protecting and enforcing our legal rights, protecting our company;
- Comply with all applicable laws or legal processes, including providing information on individual users to the appropriate governmental authorities where required by law enforcement or judicial authorities; responding to law enforcement requests and as required by applicable law, court order, or governmental regulations; and
- Carry out any other permissible purpose for which the information was collected.

## SHARING OF INFORMATION

We may share information about you as follows or as otherwise described in this Privacy Policy. We reserve the right to disclose and share your Personal Information:

- With third-party service providers, vendors, consultants, and volunteers (together, “service providers”) engaged to assist us in providing the App, including the content, to you or to carry out one or more of the purposes described above or in the TOS. These service providers are permitted to use your Personal Information only to provide this assistance. When we use such service providers, we provide limited access to your information so that such service providers can perform the tasks on our behalf;
- With business advisors, such as accountants and lawyers, who assist us in carrying out our business activities;
- In response to a request for information (such as a subpoena, warrant, or other court order) if we believe disclosure is in accordance with any applicable law, regulation, or legal process, or as otherwise required by any applicable law, rule, or regulation, or to respond to an emergency situation;
- If we believe your actions are inconsistent with the spirit or language of the TOS, any user agreements or policies, or to protect the rights, property, or safety of ACORN, our employees, volunteers, or others persons associated with ACORN;
- In connection with, or during negotiations of, any reorganization, formation of new organization, asset sale or transfer, financing or lending transaction, or in any other situation where personal information may be disclosed or transferred as one of the assets of ACORN;
- With a third party if we have reason to believe that disclosing Personal Information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our

rights or property, other App users, or anyone else who could be harmed by such activities.

- With governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when: (1) permitted or required by law; or, (2) trying to protect against or prevent actual or potential fraud or unauthorized transactions; or, (3) investigating fraud that has already taken place. The information is not provided to these companies for marketing purposes.
- With your consent or at your direction, including if we notify you through the App that the information you provide will be shared in a particular manner and you provide such information.

***Deidentified or Aggregated information.*** We may share statistical, deidentified, or aggregated non-Personal Information about our users with business partners, affiliates, sponsors, and/or other third parties, including but not limited to Google Analytics. Such data may be used to customize our website content to deliver a better experience to our Users. You may opt out from Google Analytics implementations and features that we use (see the “Your Choices” section of this Privacy Policy).

***Your actions.*** When you use the App, User Generated Content that you post or share with third parties may be shared with other users in accordance with this Privacy Policy and your preferences. Please keep in mind that if you disclose Personal Information that is publicly available in any User Generated Content or other way, this information may become publicly available. All such sharing of information is done at your own risk. **DO NOT POST USER GENERATED CONTENT** if you do not want it to be used or made available to the general public as set forth in the TOS. Everything you share is voluntary; do not share anything you wish to remain private.

***Social Sharing Features.*** The App may offer social sharing features and other integrated tools (such as the Facebook “Like” button), which let you share actions you take on the App with other media, and vice versa. The use of such features may enable the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

## **THIRD PARTY LINKS**

The App may contain links to third-party websites. As provided in the TOS, those websites are not controlled by us and we are not responsible for the content of any such website. We are not responsible for the privacy practices of other websites. We encourage our users to be aware of when they leave the Site and to read the privacy policies of each and every website that collects Personal Information. This Privacy Policy applies solely to information collected by us through

the App.

## **ANALYTICS AND SERVICES PROVIDED BY OTHERS**

We may allow third parties to use cookies or other technologies to provide analytics services and to serve ads on other websites based on your visits to this site and other sites across the Internet. These entities may collect information about your use of the App and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked, and conversion information. This information may be used by ACORN and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests and better understand your online activity.

We may use Google Analytics to better understand how App users interact with the App. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, you can review Google's site "How Google uses data when you use our partners' sites or apps" (available at <https://policies.google.com/technologies/partner-sites>). You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Ad-On (available at <https://tools.google.com/dlpage/gaoptout/>).

The App uses Google Firebase and Google Firestore to host data about participating sellers. These data are transferred to users' devices. As a recipient of this data, you are subject to Google Firebase's privacy policy (available at <https://policies.google.com/privacy?hl=en-US>). The App uses Google Maps to display the map in the App. Because of this, you are subject to Google Maps privacy policy (available at <https://policies.google.com/privacy>).

## **SECURITY**

The App uses security measures at least equal to those reasonably expected in the industry, to protect against the loss, misuse, and alteration of your Personal Information under our control. These measures include commercially reasonable industry-standard physical, administrative, and technological methods to protect your Personal Information.

We cannot guarantee that unauthorized third parties will never be able to defeat our security measures or use your Personal Information for improper purposes. In the event that any information under our control is compromised as a result of a breach of security, we will take commercially reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

Please keep in mind that you are responsible for the security of any Personal Information in your control. You should log out of your browser at the end of each computer session to ensure that

others cannot access your Personal Information and correspondence, especially if you share a computer with someone else or are using a computer in a public place such as a library or Internet cafe. When you see either a solid key icon or a locked padlock icon at the lower portion of your browser window, this indicates that the site is secured through Secure Sockets Layer. If you do not see one of these icons, please contact your Internet service provider.

## **YOUR CHOICES**

**Cookies.** Most web browsers are set to accept cookies by default. If you prefer, you may be able to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the App.

**Promotional Communications.** You may opt out of receiving updates and newsletters from ACORN by following the instructions in those emails or by emailing us [info@acornvt.org](mailto:info@acornvt.org). If you opt out, we may still send you other types of emails, such as those about your use of the App or any donations or transactions.

## **CHILDREN'S INFORMATION**

The App is not intended for use by children under 13 years of age, and we do not knowingly collect Personal Information from children under the age of 13. If you are a parent or guardian of a child under the age of 13 and believe that such child has disclosed Personal Information to us, please contact us at [info@acornvt.org](mailto:info@acornvt.org). A parent or guardian of a child under the age of 13 may review and request deletion of the child's personal information.

## **CONFLICT IN TERMS**

Some browsers utilize privacy enhancing technology to translate our Privacy Policy into a computer readable format and then translate it back into human readable format for you to read. This translation back into human readable format is often referred to as a "Policy Summary." To the extent that this Policy Summary is inconsistent with, fails to address, or addresses an issue not raised in our Privacy Policy, you should rely on our Privacy Policy as it is the controlling authority.

## **NOTICE TO USERS OUTSIDE THE UNITED STATES**

As detailed in the TOS, the App is designed to be used by residents of the United States. If you are a user located outside of the United States, be advised that any information you enter on the App may be transferred outside of the European Union or your country to the United States of

America, which may not offer an equivalent level of protection to that required in the European Union or your country. In particular, you are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. **By using the App, you unambiguously consent to the transfer of all such information to the United States of America, which may not offer an equivalent level of protection to that required in the European Union or your country, and to the processing of that information by ACORN on our servers located in the United States.**

## STATE SPECIFIC DISCLOSURES

We may choose or be required by law to provide different or additional disclosures relating to the processing of personal information about residents of certain states. Please see below for disclosures that may be applicable to you:

### **Nevada**

Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. To submit such a request, please contact us with the subject line “Nevada opt-out.” Email us at [info@acornvt.org](mailto:info@acornvt.org).

### **Privacy Notice for California Residents**

**California Consumer Protection Act.** Because ACORN is a nonprofit charity recognized by the IRS as a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code, it is not subject to the California Consumer Protection Act of 2018 (CCPA).

**Other California Privacy Rights.** California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of the App who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [info@acornvt.org](mailto:info@acornvt.org).

## CONTACT US

**To change your Personal Information or preferences** (such as to modify your Personal Information, opt out of or change your preferences regarding receiving communications or information:

Email us at: [info@acornvt.org](mailto:info@acornvt.org)

Write us at: P.O. Box 404 Bristol, VT 05443

**For legal matters**, including notices of violation of this Privacy Policy:

Email us at: [info@acornvt.org](mailto:info@acornvt.org)

Write us at: P.O. Box 404 Bristol, VT 05443

Please note: When you contact us, provide your name and address exactly as it appears on correspondence you have received from us.

You are entitled to make an anonymous complaint or inquiry in relation to this Privacy Policy or your privacy rights; however, we may require you to identify yourself if required by law or it is impracticable for us to address your matter otherwise.