

# Data Use and Privacy Policy

This Data Use and Privacy Policy (“Policy”) outlines Carbon A List’s (“Carbon A List”, “we”, “us”, “our”) policy for data collection, use, and privacy for the Transforming the Farmer to Consumer Supply Chain through Partnerships for Climate Smart Commodities grant activities (“Grant”). This Policy covers our treatment of the data you provide as part of your application, perspective enrollment, and enrollment into a Grant program.

- This Policy may be modified from time to time at Carbon A List’s sole discretion and the most recent version of the policy controls how your data is governed.
- This Policy does not cover the practices of companies and people who have not agreed to this policy, including those we do not own, control, or manage.

By providing data to or participating in a Grant program, and in any other interactions you may have with us in any manner, you acknowledge that you accept the practices and policies outlined in this Policy, and you hereby consent, to the fullest extent permitted in your jurisdiction, that we will collect, use, and share your Data in the following ways.

## Data Collection

We gather and analyze various types of data from our users or prospective users, including Personal Data, and on-farm Agricultural, Environmental and Financial Data (“Data”). We collect this Data in order to establish the eligibility of prospective participants, manage our relationship with our users, conduct analysis in order to provide payment estimates and quantify environmental outcomes, contract with participating farmers, and provide payments per the terms of our contracts. Data we collect and how we collect it is as follows:

- **Electronic Collection:** When you use our online platforms or electronic services, we may gather and store certain information about your visit automatically. This can include data about crops, livestock, machinery, and other farm-related details, including but not limited to farm names, field names, field acreages, digitized field boundaries or maps, and crop and field information such as planting date, crop rotations, fertilization rates, seeding type and rates, row spacing, yield goal, tillage type, residue management, manure applications and other field level operational data necessary to compute environmental outcomes.
- **Physical Collection:** We may also collect data during on-site visits, surveys, or through physical forms that you fill out. This can include soil samples, crop yields, and other tangible data.
- **PII:** We do not collect any personally identifiable information (PII) without your explicit consent. PII may include: authentication details, including user ID, password and memorable information used to access our services; Communication records, including records of any communications between you and us via email, our website, telephone, social media and letter; contact details, including your name, title, home address, company name, company address, phone number, email address, and mobile number; device and electronic information when you access our services, including IP address, cookies, activity logs related to interactions with our systems, online identifiers, device type, operating system, browser, unique device identifiers, and geo-location data; Identification information used to verify your identity, including social security number and/or Employer Identification Number, date of birth, and proof of address; and Service usage, including when you are operating and accessing our services, the transactions you undertake,

information you select, logs of when you access the services and for how long, and any information that you choose to download.

- **Methods:** To improve our services to you and meet the Grant program objectives, we will also use additional methods in addition to data you provide directly to us using the following means:
  - **Cookies and similar technologies:** when you visit our website or use any of our mobile applications, we may employ cookies and similar technologies.
  - **Monitoring of platforms and services:** if you use any of our platforms, we may collect data on your platform usage.
  - **Third-party sources:** other organizations may provide us with access to specific data they have collected from you on our behalf, or if you are a customer of a third party and we have a relationship with that third party, we may receive information from them. See ‘Use of Data by Third-Parties’ section.

## Data Use

Depending on the Grant program you are enrolled in the specifics of that program, and where you are located, the purposes for which your data will be used are as follows:

- Processing enrollment applications for Grant programs
- Verifying your identity
- Provide standard and or personalized services to you and perform on our contracts with you
- Compliance with laws that apply to us and any other related lawful and legitimate interests
- Defending ourselves and bringing claims concerning legal proceedings
- Safeguarding our environments
- Security and protecting our systems

We understand the sensitive nature of farming data. All information, whether collected electronically or physically, is stored securely and is accessible only to authorized personnel.

We employ stringent security measures to prevent unauthorized access, alteration, or dissemination of your data.

## Data Sharing and Disclosure

We only share farming data with another entity if it directly relates to the grant reporting requirements for which we are collecting this information, or to facilitate a service we are providing to you, or as otherwise required by law. This could include circumstances where an organization obtained your explicit consent to share data in a previous agreement and seek data to provide your services or where we need to seek data to facilitate Grant-related services.

We retain the right to share and license aggregated data that does not include PII, subject to federal regulations and Grant restrictions, to third-party for purposes that, include but are not limited to:

- Collaboration with third-party agricultural experts or services to enhance our offerings
- Publish results of the Grant and specific programs
- Report required information to federal, state, or local governments
- As part of climate-smart commodity market-building efforts.

## Data Retention

Depending on the data collected and Grant program requirements, we will retain and destroy data as follows:

- Physical samples, such as soil or crop samples, may be stored for a duration necessary for analysis and thereafter will be disposed of securely.
- Electronic data will be retained as long as necessary for its intended purpose, after which it will be securely deleted.
- Data may require retention after the term of the Grant or the Grant Program agreement to satisfy federal regulations and Grant requirements.

## Data Security

We use technical, administrative, and physical security safeguards and other reasonable security measures to protect your Data against loss, misuse, interference, unauthorized access, modification, or disclosure. We seek to provide a secure online environment for your Data, but please be aware that, despite our ongoing efforts, no security measures are perfect or impenetrable. Moreover, we are not responsible for the security of information you transmit over networks that we do not control, including internet and wireless networks. We cannot warrant the security of any information you provide to us over the internet, and you do so at your own risk.

We cannot be responsible for personal data theft, loss, destruction, or inadvertent disclosure.

We will notify you in not more than forty-eight (48) hours after we learn of any security breach that may result in the loss or destruction or unauthorized access, use, disclosure, transfer, or alteration of your Data, and work with you to respond to and do damage limitation with respect to any such breach.

## Your Data Rights

Data rights are dependent on the jurisdiction in which you are located. Subject to local law, you have certain rights regarding your personal information. For example, specific rights may include:

- **Access:** request a copy of your data and information relating to how it is processed
- **Rectify:** request any inaccuracies in the data we hold about you be corrected
- **Erase:** request that we erase your data from our records
- **Restrict:** request that we no longer process your data
- **Object:** object to certain ways that we process your data
- **Transfer:** request that your data be shared with a third-party
- **Withdraw your consent:** where we are relying on your consent to process your data, then you can withdraw your consent at any time
- **Lodge a complaint:** you may be entitled to lodge a complaint with your local data protection authority.

To exercise any of your rights, please get in touch with us on the details set out in the Contact section of this Policy below.

Some of your rights are not absolute and there may be some circumstances where your request will not be fulfilled or will require additional time to complete. In some cases, you may be asked for more information to confirm your identity before a request can be made.

## Data Audit

You agree that Carbon A List, or a third-party designated by Carbon A List, can conduct an audit of your physical records or digital records for the purpose of compliance with federal regulations and Grant objectives. This may include physical access to your property and will require you or a designated representative to provide access to and explanation of records.

## Contact

If you have any questions or complaints about this Policy or our treatment of your Data, or if you would like to access or amend your Data, please get in touch with us at [Support@TransformF2C.com](mailto:Support@TransformF2C.com).

*Last Updated: November 21, 2023*