

Scrapp Privacy Policy

Last Updated: January 23rd 2023

Welcome

This Privacy Policy explains how we collect, use, store, protect and share your personal information through our services.

It's important that you read this entire policy, but here's a summary to get you started:

- **We care about your privacy:** We are committed to delivering the best recycling possible to help people and our planet. Respecting user privacy is a top priority for us
- **We don't sell your personal data:** Our business model is based on providing accurate recycling guidance and tools to businesses, communities, and brands. We've taken the steps necessary to keep users anonymous to protect their privacy. The only information we share is data that is largely considered public domain i.e. the brand name or packaging of a product. Besides ourselves, our friends and family use the app too.
- **We limit what information is required:** We require the information that enables us to deliver accurate recycling guidance, provide our services, meet the commitments to our users, and maximize the positive impact we as a community can have on our planet. We also use certain information to identify user reported bugs.
- **We give you control:** We give you the ability to control your privacy while engaging with Scrapp's services. You can request any records we have about you at any time.

Scrapp is your place to recycle right

We built Scrapp to be your place to recycle right. Whether you're around the house, at the supermarket, or volunteering with your local community, Scrapp makes it easy to recycle right and positively impact the world around you.

Our "services" has the same meaning as defined in the Terms of Service. They include the Scrapp app, which can be accessed on mobile devices, the separation station, which is a service we provide direct to office and event spaces, and Scrapp for communities which is accessible via the mobile app as well as the web portal. We also have a website, blog, and support center, and we may collect your information through other means like surveys, emails,

and social media to deliver the best experience possible. This information is never connected to a device's scan history to create a "user profile"

We may share content posted in public spaces but only after contacting the individual for their permission or accrediting their contributions. These features are important to us for building the Scrapp community, and we believe they will make Scrapp even better for our users. You should take all of this into account when you are using our services.

We make money from paid subscriptions and the sale of digital (and sometimes physical) goods, not from selling your personal information to third parties.

The information we collect

We collect certain information when you use Scrapp. This includes information you provide to us, information we collect automatically, and information we receive from other sources.

Information you provide to us

- **Account information.** We do not require app users to create an account. The only time an email account is needed is when submitting feedback where you would like a response. This account only requires an email to correspond with. Once the issue is resolved the user is given the option to have the records deleted. They simply need to contact us and all personal data will be deleted. If the user does not specify, the record is archived to assist in future troubleshooting.
- **Purchase information.** If you buy any paid services through Scrapp, you may need to submit a valid payment method and associated billing information, including your full name and billing address. Our payment processors receive and process your payment information. Depending on the processor, we may also receive and store certain billing information, including the last four digits of the credit card number associated with the transaction. If we decide to process our own payments in the future, we would receive and process this information ourselves.
- **Information from actions you take.** We collect information about your use of and activities on the services. This includes the items you recycle, and where they are recycled. In light of using this information we reduce the specificity of

it. The information we use is device a randomized & anonymized user ID, timestamp, lat+lon (to compute the assessed location a.k.a scheme), item, and guidance all in the app. The only way in which this information is collected is if you actively engage with the app. We do not track location in the background or while the app is closed.

- **Information used to enable optional features.** Certain features, like rewards, may require that you provide additional information (or grant us access to such information) to make them work. This is information which we ask for your permission before these features are made active.
- **Other information you provide directly to us.** For example, you may choose to participate in some of our paid services for municipalities, businesses, or brands, which requires that you provide additional information about your community or your company. Or, you may participate in surveys where you can provide feedback on the product, or submit information to our Scrapp Support teams.

Information we collect automatically

We also collect information automatically from you when you use Scrapp. This includes:

- **Information about your device.** The information we collect varies based on the services you access. These services include our website, mobile application, and web portal. We collect information about the device you are using to access these services. This includes information like your IP address, operating system information, browser information, and information about your device settings, such as your microphone and/or camera.
- **Information about your use of the apps or websites.** We collect log and event information related to how and when you use our services (such as what is recycled and website pages interacted with).
- **Other information that we collect automatically.** When you take certain actions on other sites, we may receive information about you. For example, when we advertise for Scrapp on third party platforms, if you click on the ad, we may receive information about which ad you saw and on which platform. Similarly, we may also receive certain information when you click on a referral link, such as which website you came from.

We may receive information from cookies (small text files placed on your computer or device) and similar technologies. First-party cookies are placed by us (and our

third-party service providers) and allow you to use the services and to help us analyze and improve your experience and the services. The services use the following types of cookies:

- **Strictly Necessary Cookies:** These are required for services to function. If you try to use tools to disable these cookies, parts of the services may not work properly.
- **Functional Cookies:** These help us provide enhanced functionality on the services like remembering language preferences. Disabling these could affect some service functionality.
- **Performance Cookies:** These allow us or our third-party analytics providers to learn how you and others use and engage with the services so we can understand and improve them.

How we use your information

We use your information for the following purposes:

To fulfill our contract with you

- **To provide you with the services.** We use your information to provide you with Scrapp's services. For example, when you scan an item, we process your location to make that work. We similarly collect and store help requests to ensure best app performance and track functionality.
- **To personalize the product.** We use your information to provide, personalize and improve our services. This information powers our discovery surfaces (so that you see relevant communities or content first), and it helps us surface Scrapp features that may be of interest to you.
- **To contact you.** We may use your information to contact you in connection with your account, such as changes to recycling rules. We may also use your information to contact you about important product or policy changes, to send you information about products you have purchased, or just to let you know about new products or features we think you'll like. You may opt-out of receiving marketing communications. Where local law requires, we will obtain your consent before sending such communications.

- **To provide customer service.** We use your information to respond to your questions about our products and services, and to investigate bugs or other issues.

For our legitimate business interests

- **To protect our services.** We use information to keep our services secure, to prevent misuse, and to enforce our Terms of Service and other policies against users who violate them.
- **To report on our company's performance.** We use your information to track the fundamental metrics of our business, to perform financial reporting, to respond to regulatory obligations, and to debug billing issues.
- **To improve our services.** We use your information to help us understand how users interact with our services, what features or products users may want, or to otherwise understand and improve our services. This includes information about how you use our services and how servers are structured. We may also use public posts to better understand, for example, what topics public servers cover and what content is most interesting within those servers. As discussed in the "How to control your privacy" section below, you can control whether your data is used for these purposes.
- **To advertise our services on other platforms.** We are proud of the product we've built and spend money advertising it on other platforms in order to bring more users to Scrapp. As part of that, we use certain information to assist in the delivery of our advertising, to measure the effectiveness of advertisements for our own products, and to improve such advertisements in the future.

To comply with our legal obligations

We retain and use your information in connection with potential legal claims when necessary and for compliance, regulatory, and auditing purposes. For example, we retain information where we are required by law or if we are compelled to do so by a court order or regulatory body. Also, when you exercise any of your applicable legal rights to access, amend, or delete your personal information, we may request identification and verification documents from you for the purpose of confirming your identity.

With your consent

We may also collect and use personal information with your consent. You can revoke your consent at any time (mostly through our services directly), though note that you might not be able to use any service or feature that requires collection or use of that personal information.

To protect someone's vital interests

We may collect or share personal data if we think someone's life is in danger—for example, to help resolve an urgent medical situation.

How we share your information

- **When you tell us to.** When you add your content to the services, you are telling us to share that content with certain communities, people, or in the case of public spaces, with anyone who accesses it. Who can access that information is determined by who can access a particular community. Tenancy owners or admins set those permissions, and they control whether a tenancy is open and accessible to anyone. And these permissions, like the amount of residents in a tenancy, may change over time. You can control this sharing as described in the "How to control your privacy" section below. We may also share your information as you otherwise instruct us or provide us your consent to do so.
- **With our vendors.** We may share information with vendors we hire to carry out specific work for us. This includes payment processors like Stripe and PayPal that process transactions on our behalf and cloud providers like Microsoft that host our data and our services. We may also share limited information with advertising platforms to help us reach people that we think will like our product and to measure the performance of our ads shown on those platforms. We do this to help bring more users to Scrapp, and provide only the information required to facilitate these services. This may include information like the fact that you installed our app or registered to use Scrapp.
- **To comply with the law.** We may share information in response to a request for information if we believe disclosure is required by law, including meeting national security or law enforcement requirements. Where allowed and

feasible, we will attempt to provide you with prior notice before disclosing your information in response to such a request.

- **In an emergency.** We may share information if we believe in good faith that it's necessary to prevent serious harm to a person.
- **To enforce our policies and rights.** We may share information if needed to enforce our Terms of Service, or other policies, or to protect the rights, property, and safety of ourselves and others.
- **With our related companies.** We may share information with our related companies, including parents, affiliates, subsidiaries, and other companies under common control and ownership.
- **Sale, Acquisition, or Transfer of Assets.** We may share information if Scrapp is evaluating and/or engaging in a merger, acquisition, reorganization, bankruptcy, or sale, transfer, or change in ownership of Scrapp or any of its assets.
- **Aggregated or de-identified information.** We may share information about you that has been aggregated or anonymized such that it cannot reasonably be used to identify you. For example, we may share aggregated user statistics in order to describe our business to partners or the public. This is the primary mode in which we engage with data analytics.

Data retention

We retain personal information for as long as it is needed for the purposes for which we collected it. If your account is inactive for more than two years, we may delete it, and we may delete or anonymize any personal information associated with your account.

How we protect your information

We take a number of steps to help protect your information. All information sent within our services is encrypted both in transit and at rest. For example, we use Transport Layer Security ("TLS") to encrypt text and images in transit. We also enforce technical and administrative access controls to limit which of our employees and contractors have access to nonpublic personal information.

How to Control Your Privacy

Manage cookies

To control how information is collected and used from cookies on the services, you can take one or more of the following steps.

- You can disable and manage some cookies through your browser settings. You will need to manage your settings for each browser you use. You can find instructions for how to manage Cookies in popular browsers such as [Internet Explorer](#), [Firefox](#), [Chrome](#), [Safari \(iOS\)](#), [Safari \(Mac\)](#), and [Opera](#).
- To disable analytics cookies, you can use the browser controls discussed above or, for certain providers, you can use their individual opt-out mechanisms, such as [Google Analytics Opt-Out](#).
- Your mobile device may also include browser settings to manage the use of cookies. Your device may also have settings to control the collection and use information in your apps.
- Third party groups also enable you to limit how cookies are used for advertising purposes by participating third parties. You can learn more at [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and for users in the EU, the [European Interactive Digital Advertising Alliance](#).
- Depending on where you are accessing our services, you may be able to adjust your cookie preferences at any time through a cookies banner or by selecting “Cookie Settings” from the footer or menu on our website.

If you disable or remove cookies, some parts of the services may not function properly. Information may be collected to remember your opt-out preferences.

Questions or concerns about your privacy? You can email us at enquiries@scrapprecycling.com

International data transfers

We are based in the United States, and we process and store information on servers located in the United States & the United Kingdom. We may also store information on servers and equipment in other countries depending on a variety of factors, including the locations of our users and service providers. These data transfers allow us to provide our services to you. By accessing or using our services or otherwise providing information to us, you understand that your information will be processed, transferred, and stored in the U.S. and other countries, where different data protection standards may apply and/or you may not have the same rights as you do under local law. Data is

stored in the country most relevant to you and can be stored in specific jurisdictions upon request.

When transferring data outside the EEA, we use [standard contract clauses](#), and we rely on the European Commission's [adequacy decisions](#) about certain countries, as applicable, or other legally compliant mechanisms or conditions for such data transfer.

Data Protection Contact

You can contact Scrapp's Data Protection Team at mikey@scrapprecycling.com

Information for EEA, United Kingdom, and Brazil Users

Certain local laws, such as the European Union's General Data Protection Regulation (GDPR) and Brazil's Lei Geral de Proteção de Dados (LGPD), require services to provide information about the information they collect, how they use it, and the lawful basis for processing it. We've described most of that already in the earlier portions of this Policy.

Information for California Users

Consumers residing in California are afforded certain additional rights with respect to their personal information under the California Consumer Privacy Act or ("CCPA") and the "Shine the Light" Law. If you are a California resident, this section applies to you.

Our collection and use of personal information: We collect the following categories of personal information when they applicable: identifiers (such as your username, the email address you used to sign up, and your phone number if you've chosen to provide it); commercial information (a record of what you've bought from Scrapp, if anything); financial data (payment information and your history of purchases from Scrapp); internet or other network information (how you interact with the application); location information (because your geolocation may indicate your recycling guidance); and other information that identifies or can be reasonably associated with you. For more information about what we collect and the sources of such collection, please see the "The information we collect" section above. We collect personal information for the business and commercial purposes described in "How we use your information" above.

Disclosure of personal information: We may share your personal information with third parties as described in the "How we share your information" section above. We disclose the categories of personal information mentioned above for business or commercial purposes.

No sale of personal information: The CCPA sets forth certain obligations for businesses that sell personal information. We do not sell the personal information of our users. We do share information as outlined in the “How we share your information” section above and you can make choices with respect to your information as outlined in this policy.

Exercising your consumer rights: If you are a California resident, you have the right to request (1) more information about the categories and specific pieces of personal information we have collected and disclosed for a business purpose in the last 12 months, (2) the deletion of your personal information, and (3) to opt out of sales of your personal information, if applicable. Details on how to make these requests are in the “How to control your privacy” section above. We will not discriminate against you if you exercise your rights under the CCPA.

Requests received: please see this page for information on the number of data requests we have received.

Changes to this Privacy Policy

We will update this Privacy Policy from time to time. We always indicate the date the last changes were published, and if changes are significant, we'll provide a more prominent notice as required by law, such as by emailing you or highlighting the changes within the services.

Contact us

Email our data policy manager [mikey@scrapprecycling.com] with any questions about this Privacy Policy or how we process your information. We'll be happy to help.

Thank you for reading our Privacy Policy. We hope you enjoy using Scrapp!