

ECGO Privacy Policy

Last Modified Date: March 2, 2024

Introduction

This Privacy Policy (“Policy”) explains how your (“you,” and “your”) Personal Information (defined below) is collected, used, shared, and processed by Conserve Innovations Inc. (“ECGO,” “we,” “us,” and “our”) via use of our website or mobile application (collectively, the “Site”) and underlying platform for proper waste disposal (the “ECGO Platform,” collectively, with the Site, the “Services”). Personal information includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, as defined by applicable privacy laws and does not include data that has been effectively irreversibly anonymized or aggregated so that it can no longer enable us or others, whether in combination with other information or otherwise, to identify an individual (“Personal Information”).

In connection with the Services, you may upload photographs to our ECGO Platform for our AI-powered waste management solutions. These photographs should not contain any Personal Information or any Personal Information should be masked where possible. We do not require or seek such Personal Information for the functionality of the Services.

Please read the ECGO Terms and Conditions [\[insert hyperlink\]](#) and this Policy before accessing or using the Site or our Services. If you cannot agree with this Policy or our Terms and Conditions, then please do not access or use the Site or our Services.

Policy Modification: We may change this Policy from time to time, to reflect how we process your data, and if we make changes, we will revise the last modified date at the top of this Policy. If we make changes that materially affect your privacy rights, we will attempt to provide advanced notice (in nearly contemporaneous disclosures) or otherwise via the Site, or by some other means of contact so that you have a reasonable opportunity to review the changes before you continue to use the Site or our Services. If you do not agree with a future, modified version of this Policy, then please stop using the Site and our Services at such future time.

1. How We Collect and Use Your Personal Information

Information provided by you.

We collect certain Personal Information when you use the Site and our Services for example, to request information from us, browse the Site, or sign up for marketing:

- **Identifier Information**, including name, email address, date of birth, organization affiliate, and other contact methods you provide to us;
- **Biometric Information**, including, as optional, a profile picture uploaded to your Account profile;
- **Testimonial Information**, including your name, organization, and any information provided within the testimonial.

Please note: When communicating with us (whether by text message, email, or through the Site or other means), please do not send us any sensitive information pertaining to yourself or others. We do not intend to collect or store sensitive information or special categories of information.

Information automatically collected by the Site

We may use cookies, tags, web pixels, and similar technologies to automatically collect information on the Site. Information within this section describes our use of these technologies and your ability to control the use of these technologies.

- *Cookies.* Cookies are small web files that a website or its provider transfers to your device's hard drive, through your web browser, that enable the site's or provider's system to recognize your browser and remember certain information. "First-party cookies" are cookies set by us on the Site. "Third-party cookies" are cookies set by other companies whose functionality is embedded into the Site (for example, those set by Google). Generally, we may use first-party and third-party cookies for the following purposes: to make the Site function properly; to provide a secure browsing experience during your use of the Site; to collect passive information about your use of the Site; to measure how you interact with our marketing campaigns; to help us improve the Site and Services; and to remember your preferences for your convenience.

- Web Pixels. To see how successful our marketing campaigns or other goals of the Site are performing, we may use conversion pixels, which fire a short line of code to tell us when you have clicked on a particular button or reached a particular page. We may also use web pixels to analyze usage patterns on the Site. The use of a pixel allows us to record that a particular device, browser, or application has visited a particular webpage.

- Other Tracking Technologies. We may also use tracking technologies to collect "clickstream" data, such as the domain name of the service providing you with internet access, your device type, IP address used to connect your computer to the internet, your browser type and version, operating system and platform, the average time spent on the Site, pages viewed, content searched for, access times and other relevant statistics, and assign unique identifiers to the device or other credentials you use to access the Site for the same purposes.

- Location Information. We may collect your location information, including IP address, approximate location, and precise geolocation.
 - Certain Services may collect the below geolocation information through use of the Services:
 - Approximate Location, we may collect your approximate location for internal purposes, such as improving the Services and providing you with requested services.
 - Precise Geolocation, we may collect information that is used or intended to be used to locate you within a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet. If you are located in a region which requires express consent, we will collect this precise geolocation data only with your consent and your consent will expire after a period of time and renewed consent will be required.

 - You may be able to adjust the settings of your device so that information about your physical location is not sent to us or third parties by (a) disabling location services within the device settings; or (b) denying certain websites or mobile applications

permission to access location information, by changing the relevant preferences and permissions in your device or browser settings.

2. Your Choices. Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. You can exercise your preferences in relation to cookies on the Site by taking steps outlined below.

- **First-Party Cookies**. You can use the browser with which you are viewing the Site to enable, disable or delete cookies. To do this, follow the instructions provided by your browser (usually located within the "Help", "Tools" or "Edit" settings). Please note, if you set your browser to disable cookies, you may not be able to access certain secure areas of the Site. Also, if you disable cookies, other parts of the Site may not work properly. You can find more information about how to change your browser cookie settings at <https://www.allaboutcookies.org>.
- **Third-Party Cookies**. If you wish to opt-in or opt-out of third-party advertising networks and similar entities that use advertising cookies, then please visit <https://www.aboutads.info/choices>. For more information about third-party advertising networks and similar entities that use these technologies, please see <https://www.aboutads.info/consumers>.
- **Unsubscribing from Marketing Communications**. If you do not want us to use your email account to send you marketing emails or non-transactional promotional materials, please directly click on the unsubscribe link at the bottom of any of our email messages to you.

3. Purpose of Collection of Personal Information

We may process your Personal Information for the following purposes:

- To provide and administer the Services and any related or underlying services to you;
- To fulfill a service to you. For example, if you email us a question, we may use your email address to process your request and respond to your question;
- To publish testimonials on the Site;
- To monitor and analyze trends and aggregate information;
- To protect and prevent against fraud and misuse of the Services;
- To send updates, newsletters and notifications to you relating to the Site and underlying services, special events, or contests;
- To improve our Services;
- To personalize our Services to you;
- To fulfill any other purpose for which you provide it;
- To fulfill other purposes disclosed at time of collection;
- To fulfill any legal or regulatory requirements and any of our internal policies;
- As set forth in a separate agreement between you and us;
- For any other purpose with your consent; and
- As otherwise set forth in this Policy.

4. Sharing Your Personal Information

Except as otherwise described in this Policy, we will not sell Personal Information that we collect from the Services to any third party for monetary or other valuable consideration, unless notice has been provided and only with your consent:

- **Subsidiaries and Affiliates.** We may disclose Personal Information about you to our subsidiaries and affiliates for business purposes to help us provide the Site underlying services and to support our internal and business operations, including marketing, analytics, security, and advertising.
- **Service Providers & Contractors.** To help us provide superior service, your Personal Information may be shared with our service providers, contractors, and other third parties we use to support our business. Such third parties may help us with aspects of our business such as fraud prevention, providing customer service, maintaining and analyzing data, sending customer communications on our behalf, and entry collection, winner selection and prize fulfillment for contests, sweepstakes, and other promotions.
- **Analytics & Marketing Partners.** We may share your Personal Information, including without limitation your contact information with entities that perform marketing or data analytics services on our behalf. We may share Personal Information, including without limitation your device information, location, usage data, and IP address, to analytics-based technologies to assist with personalization and marketing. These technologies capture how you interact with the Site through behavioral metrics to improve and market our underlying services, products, and Services.
- **Authorized Representatives.** If another individual is managing your relationship with us or your email account which the Site connects to on your behalf (for example, a wife controlling the family relationship), as authorized by you or as a personal representative under applicable law, that person can view all Personal Information about you on the Site.
- **In the Event of Merger, Sale, Divestitures, or Change of Control.** We reserve the right to transfer Personal Information to a buyer or other successor in interest that acquires rights to that information as a result of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of us or substantially all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about you is among the assets transferred.
- **With Your Consent.** We may share your Personal Information for other purposes pursuant to your consent or at your direction.
- **Other Disclosures.** We may disclose your Personal Information if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) conform to legal requirements and comply with any court order, law, or legal process, including responding to any government, law enforcement, or regulatory request; (ii) enforce our Terms and Conditions, other agreements, including between you and us, and any other documents included or referenced therein (all of which are incorporated into and made a part of this Policy by reference); (iii) fulfill the purpose for which you provide it; (iv) detect, prevent, or otherwise address fraud or security issues; or (v) protect against harm to our, your, or third parties' rights, property, or safety.

We may share and disclose de-identified and/or aggregate analytics with third-party partners for any legal purpose, including, when and where applicable, sharing and disclosing non-personally identifiable information combined with Personal Information.

5. Security Precautions

We take information security very seriously and use reasonable administrative, technical, and physical measures to protect your Personal Information from unauthorized access. Unfortunately, no security system can be guaranteed to be 100% secure. Accordingly, we cannot guarantee the security of your information and cannot assume liability for improper access to it.

6. Retention

We may retain your Personal Information, including any correspondence you have with us, for as long as is necessary for the purposes set out in this Policy, including retaining Personal Information to comply with our legal obligations, to resolve disputes, for information security purposes, and to enforce our legal rights, terms, or policies.

7. Third-Party Websites

The Site may contain links to third-party services, websites, mobile applications, and/or contain advertisements from third parties that are not affiliates with us – and which may link to other websites, services, or applications. While we endeavor to work with third parties that share our respect for user privacy, we are not responsible for the privacy policies or privacy practices of such third parties. Any information collected by third parties are not covered by this Policy. You are responsible for knowing when you are leaving the Site to visit a third-party website, service, or application and for reading and understanding the terms of use and privacy policy statements for each such third party.

8. Social Media

Any information, communications, or material of any type or nature that you submit via public sites (including, but not limited to any social media platforms or websites such as Facebook, Instagram or Twitter) by email, posting, messaging, uploading, downloading, or otherwise (collectively, a “**Submission**”), is done at your own risk and without any expectation of privacy. We cannot control the actions of other users of any social media platform or website; therefore, we are not responsible for any content or Submissions contained on such social media platforms and website. By visiting the public sites contained on a social media platform or website, you are representing and warranting to us that you have reviewed the applicable privacy policy and terms of use of such platform or website and that you will abide by all such provisions contained therein.

9. Surveys, Contests, Promotions, and Giveaways.

You may be asked to participate in surveys about your experience with the Services. When participating in surveys, any information you provide in the comments field will be shared with us, so please do not include any sensitive Personal Information or other information you do not wish to share.

We may conduct giveaways, contests and other promotions on the Services in which we may ask you for additional information in order to participate. We use and treat this information in accordance with the terms of this Privacy Policy. We may also transfer your Personal Information to certain ad partners that you have explicitly requested to receive information from. Participation in such giveaways and contents is not necessary to use the Services, and you may choose whether you wish to participate in any particular giveaway or contest, without affecting your general use of the Services. You should carefully review the Official Rules of any promotion, sweepstakes, or contest in which you participate, including any option to opt-out of receiving special offers and marketing material by unchecking the appropriate box when registering for such offering.

10. Children

The Site and our other Services are not directed to, and we do not knowingly collect Personal Information from, children under the age of 18 or minors (as defined by applicable laws). If you are a minor, please do not attempt to fill out our forms or send any Personal Information about yourself to us. If a minor has provided us with Personal Information without parental or guardian consent, the parent or guardian should contact us immediately to remove the relevant Personal Information and unsubscribe the minor. If we become aware that a minor has provided us with Personal Information, we will take steps to promptly delete such Personal Information from our files.

11. Extraterritorial Transfers of Personal Information

This Site is hosted in the United States. Please also note that if you are providing data or using the Site from outside of the U.S., your Personal Information will be accessed and transferred to the United States. The United States may have data protection laws that are less protective than the laws of the jurisdiction in which you reside. For such data transfers, we rely on your consent. If you do not want your information transferred to, processed, accessed, or maintained in the United States, then you should immediately cease accessing the Site and using our Services.

12. Contact Us

If you have any questions or concerns regarding any privacy-related information included in, or omitted from, this Policy, then please contact us. You may submit any privacy-related inquiries or complaints to us through this link: <https://www.ecgo.co/solutions#contact-us>

ECGO

ATTN: Privacy

[Insert ECGO address]

Atlanta, Georgia] [Zip]