

# **PRIVACY AND SECURITY POLICY APPLICABLE TO THE AMERICAN CARBON REGISTRY and THE AMERICAN CARBON REGISTRY WEBSITE**

## **Introduction**

This Privacy and Security Policy ("Privacy Policy") applies to your use of the American Carbon Registry, a registry provided by the American Carbon Registry, an enterprise of Winrock International ("ACR"), and the use of the ACR website [www.americancarbonregistry.org](http://www.americancarbonregistry.org) (the ACR website may be referred to individually as the "Website"). ACR is committed to protecting the privacy of personal information you might provide via the ACR and/or the Website. This Privacy Policy explains how ACR manages personal information and the security precautions taken.

In this Privacy Policy:

- "we" or "us" refers to ACR
- the "ACR" refers to the carbon registry facility operated by or on behalf of ACR and accessible via any domain address that ACR provides to you or through which you are permitted to access the facility
- "Website" means any websites or pages on any websites that are hosted by or on behalf of ACR.

## **1. Collection of personal information**

We may collect information about users of the ACR and the Website, including:

- personal information provided voluntarily when opening a registry account and/or using the registry facility
- website usage information through tracking individual website users' click behavior
- aggregated statistical data, measuring traffic to the Websites but not relating to you personally.

## **2. Protection of personal information**

When you open a registry account or access the ACR facility in any way, or when you log into the Website for any reason, a secure server is used. Our security procedures provide that, in addition to any password, which you may require to gain access to the ACR facility or information on the Website, you may have to provide proof of identification before we will release personal information to you at your request. Multiple incorrect attempts or invalidation, result in a lockout from your ACR or your Website account. We undergo periodic reviews of our security policies and procedures to ensure that our systems are secure and protected.

We employ appropriate technical security measures to protect your personal information and to ensure that it is not accessed by unauthorized persons (unless in the case of your information on the ACR, you have indicated otherwise to us during your account set up procedures).

Information is held on secure servers and is encrypted wherever this is possible.

### **3. Use of information**

It is the policy of ACR to use personal information for the purpose for which it was collected and to offer and provide related services. ACR collects personal information for the following purposes:

- to provide the relevant issuers and you with registry and registry related services, or with other information you have requested including for the avoidance of doubt, publishing publicly accessible information regarding the listing, transfer, cancellation and retirement of offsets
- to conduct (if required by law) checks on you in relation to your use of the ACR (in which case, you agree to use your best efforts to assist ACR in carrying out any such legal obligations)
- to enable you and other users to use the ACR most effectively
- to process any instructions you request the ACR to carry out for you or on your behalf
- internal research and external (aggregated and non-identifiable) research and data analysis and distribution
- to verify your identity and assist you if you forget your login or password details on the ACR or the Website
- to notify you about other issuer or ACR services relating to the purpose for which your personal information was collected
- other uses consistent with operation of the ACR or the Website
- any other use that you authorize.

### **4. Disclosure of personal information**

Our policy is designed to maintain the confidentiality of all personal information. We will take all reasonable steps to protect your personal information from misuse and loss, and from unauthorized access, modification or disclosure.

*We will not sell, or allow third parties access to your information without your prior approval. When using the ACR, you can indicate in your account settings, your approval to allow ACR to pass information to third parties.*

However, from time to time ACR may disclose information collected to:

- Other registries or issuers to enable transfers to or from the ACR or to otherwise enable the efficient operation of your accounts on the ACR
- Third parties to which we contract out specialized functions (including maintenance and operation of ACR, mailing houses and printing companies). If so, we take reasonable steps to ensure that those contractors comply with applicable privacy laws, and are authorized only to use personal information in order to perform these functions.

Otherwise, your information will not be passed on to any other third party unless we believe in good faith that we are authorized or required to do so by law.

## **5. Access to and correction of information**

You may request access to and correction of your information, or request that we access and correct your information, at any time. If you have registered as a user on the ACR or on the Website, you may access and update your information by logging in with your username and password. If at any time you are unsure of how to access or correct your information, please contact us at [registry@americancarbonregistry.org](mailto:registry@americancarbonregistry.org). We may require proof of your identity before making any changes.

## **6. Cookies**

A cookie is a small text file which we may put on your computer's hard disk in order to recognize your computer at a later time. A cookie cannot read your hard drive or perform any commands on your computer and does not contain your name, address, telephone number, or email address. You may configure your web browser to not accept cookies, however you may experience a loss of functionality as a result.

We do not currently use cookies. However, we may in the future use cookies and may use the information collected by cookies to:

- track website usage patterns
- display content more relevant to you, based on information we collect when you visit our Website
- enable you to use certain services on our Website
- assess effectiveness of marketing and customer engagement campaigns

## **7. Material changes**

When we materially modify this Privacy Policy, a notice will be placed on our home page. We also recommend you routinely review this Privacy Policy to understand how we manage the personal information that you provide and before giving or confirming to us any information.

## **8. Contact details**

If you have any questions about the privacy and security of your personal information, please contact us at [registry@americancarbonregistry.org](mailto:registry@americancarbonregistry.org).

This policy was last updated in July 2009.

## **9. Acceptance of Privacy and Security Policy**

Your access to, use of or linking to, the ACR, or your access to the Website, is confirmation that you have read and understood this Privacy Policy and as applicable, the Member Agreement for the ACR and the Terms and Conditions of use for the ACR Website ("TOU"), and such access and use constitutes your agreement to be bound by the Privacy Policy and TOU's. We reserve the right to amend the Privacy Policy at any time and users are deemed to be aware of and bound by the amendments to the Privacy Policy upon publication on the Websites.