

Better Buying Institute Privacy Policy

We care about the privacy of the information you provide to us through the Better Buying Institute websites at https://betterbuying.org/ and other affiliated sites and access to any BBI newsletters or other mailings not created or distributed pursuant to any other agreement or contract with BBI ("Site" or "Sites"). This privacy policy ("Privacy Policy") explains our practices, defines Site visitor's ("you" or "your" or "Site Visitor") privacy options, and describes how Site Visitor's information is collected and used by the Better Buying Institute ("we," "us," "our," or "BBI") through your use of the Sites. If a Site Visitor is also a customer of BBI ("Customer") pursuant to an agreement between Customer and BBI ("Agreement") the terms of the Agreement will govern BBI's collection of Customer's information, except as otherwise provided in an applicable Agreement.

This Privacy Policy governs your use of the Sites and any information you may provide or we may access through your use of the Sites.

By using or accessing the Sites, Site Visitor agrees to the collection and use of information in the manner described in this Privacy Policy. Site Visitor agrees to be bound by this Privacy Policy for the duration of Site Visitor's use of the Sites. BBI shall have right at any time and without prior notice, at its sole discretion, to revise this Privacy Policy. Such revisions and additions shall be effective immediately upon notice, which may be given by any means, including but not limited to posting the revised or additional terms on the Sites. Site Visitor is responsible for reviewing the Sites periodically for any modification to this Privacy Policy. Site Visitor's continued use of the Sites constitutes Site Visitor's continued consent to be bound by the then current Terms of Service and Privacy.

This Privacy Policy is part of <u>BBI's Terms of Service</u>. If Site Visitor does not agree to the practices in this Privacy Policy and BBI's Terms of Service, Site Visitor should not use or access the Sites.

Information Collected

This Privacy Policy applies to all information collected on the Sites and any information Site Visitor provides to BBI directly through or otherwise related to Site Visitor's use of the Sites, primarily Personal Information, which deals with individuals, rather than organizations or businesses. "Personal Information" uniquely identifies an individual or can identify an individual by combining it with other data. It includes financial and account information, as well as email addresses, phone numbers and other information associated with the individual. The legal name and definition of personal information differs

from jurisdiction to jurisdiction. BBI will not use or share Personal Information other than as described in this Privacy Policy.

We collect Personal Information about you that may include but is not limited to your name, e-mail address, general usage metrics of the Sites, email communication history with BBI, participation and usage history and other information associated with you, as well as other information that may or may not specifically identify you. The information collected on the Sites may be stored at servers, computers, or other media located in the United States.

<u>Information Collection Technology</u>

We may use various technologies, including "cookies" to collect information, pursuant to your use of the Sites, from your electronic device about your activities using the Sites. We may collect and store non-personally identifying information through cookies, and third-parties to profile user activity and preferences. Technical and specification information about your device and settings may be collected when you use the Sites. This information may include your Internet Protocol ("IP") address, your browser type, operating system, access time(s), the content of previously accepted "cookies" from us, and the website address that referred you to the Sites.

A cookie is data stored on your device that tracks non-personal information about you. When using the Sites, we may assign your device one or more cookies that enable us to improve the quality of the Sites and to personalize your experience. Cookies allow us to automatically collect information about your activity on the Sites, such as the content you access while using the Sites, the links you click, and other activity you conduct while using Sites. You may choose to modify your device setting to disable cookies or limit their use. If you choose to disable or limit cookies, or otherwise limit your device permissions to the Sites, you may experience diminished performance from the Sites and/or may be prevented from using some or all features of the Sites. Our cookies generally fall into one of four categories: Essential, Functional, Analytics and Target.

Personal Information About Users Under 18 Years of Age Not Collected

Usage of the Sites are meant for adults and those who have reached the age of majority as defined by the laws of their domicile. The Sites are not meant for individuals under the age of eighteen (18) or those defined by the laws of their domicile as minors. Nonetheless, this Privacy Policy is still designed to comply with the Children's Online Privacy Protection Act ("COPPA") to the extent COPPA applies to BBI. Accordingly, BBI does not knowingly collect or retain any personal information about Site Visitor or other individuals about a child under the age of 13, that information will be promptly deleted from our databased and all other media. Since we do not collect information from Site Visitors who are under 13 years old, no such information is disclosed to third-parties.

Information Use and Sharing

We may use and share Site Visitor's personal information for any legally permissible purpose. We may match, use, and share any of the information we collect from Site Visitor to any personally identifiable information we obtain through third-parties. Examples of some ways we may use or share personal information that we collect about you include:

- providing you with use of the Sites or other services contracted for with BBI;
- providing you with or advertising products or services, whether from BBI or any of its Affiliates. For the purposes of this Privacy Policy, the term "Affiliate" shall any entity, individual, firm, or corporation, directly or indirectly, through one or more intermediaries, controlling, controlled by, or under common control with BBI;
- providing you with customized content and offerings;
- providing technical or customer support;
- performing research and analysis to gauge the use of the Sites;
- communicating with Site Visitor by e-mail, postal mail, telephone, text message, and/or mobile devices about products or services that may be of interest to you from BBI or its Affiliates;
- enforcing BBI's Privacy Policy, Terms of Service, any agreements or to otherwise manage its business; and
- performing functions as otherwise described to you at the time of collection.

In order to perform certain services on your behalf, we may publish certain information that you provide. You agree that any testimonial feedback or other comments provided by you to BBI becomes its sole and exclusive property and that such information may be used for any legally permissible purpose, including, but not limited to marketing and advertising the Sites and other available services provided by BBI.

You acknowledge and agree that BBI may use and disclose your personal and non-personal information to public or private third-parties: (i) for inspection by law enforcement officials (including in the case of potential criminal activity); (ii) to respond to cease and desist letters, arbitration proceedings, legal actions and suits, criminal and civil subpoenas, any court orders; (iii) to enforce or apply the terms of this Privacy Policy or any other agreement between us; and (iv) to protect BBI's, our users', and others' rights, property, or safety whether during or after the term of your use of the Sites.

Accept as otherwise provided in this Privacy Policy, BBI will not sell, rent, license or trade Site Visitor's Personal Information to a third party.

Unless otherwise provided in this Privacy Policy, we shall not disclose Personal Information you submit to us except (i) with Affiliates, partners, licensees, and successors, (ii) when we have your permission, or (iii) as necessary to:

- third parties who provide information technology services such as website hosting, computer systems maintenance, or data security and privacy services;
- our partners, vendors or others who help us operate the Sites or assess your interest or satisfaction with the Sites, our organization, or our products, provided they have contractually agreed to adhere to this Privacy Policy; or

• To comply with our legal obligations, enforce our <u>Terms of Service</u>, this Privacy Policy or otherwise to protect the rights, property or safety of our users and business partners.

In addition, we may share and sell aggregate, deidentified, non-individual information, incapable of identifying a particular person, with third parties for any lawful purposes.

Communications from Us

Unless you opt out of certain communication features, we may use your information to communicate with you, such as through e-mail, newsletters, and other electronic communications. You may opt out and/or unsubscribe to communications at any time. See the <u>Opt-Out Provisions and Updating Your Information</u> section below for applicable contact information and directions.

<u>Legal Process and Investigation Issues</u>

From time to time, BBI may be required to respond to a subpoena or similar investigative demand from law enforcement, a court order, a government agency, or a private litigant. BBI reserves all rights to defend, within its sole discretion, against such legal requests, demands, and claims. For instance, BBI may raise or waive legal objections or rights. BBI also reserves the right to disclose your information, as allowed by applicable law, when we believe it is reasonably appropriate based on the situation. Such disclosure may occur, but is not limited to, disclosing your information in connection with efforts to: investigate, prevent, or commence other actions regarding suspected illegal activity or other wrongdoing; to protect; defend the rights, property or safety of our company, our users, our employees, or others; comply with applicable law or cooperate with law enforcement; or enforce this Privacy Policy, Terms of Service or other agreements or policies.

Opt-Out Provisions and Updating Your Information

You may contact BBI to review, update and correct your Personal Information.

BBI emails will include a link to opt out from receiving further electronic communications from BBI. At places on our website where Site Visitor may provide personal information, Site Visitor may opt out of receiving those communications. Site Visitor may also opt out of future electronic communications by contacting us as provided below.

We may need to verify Site Visitor's identity before providing you with Personal Information or updating it in our system.

Third Party Privacy Policies May Be Applicable

This Privacy Policy does not cover any third party's use or handling of Site Visitor's information once it is shared. Instead, the privacy policy of the third-party will govern. BBI encourages Site Visitor to visit the websites of those third-parties and fully read and understand their privacy policies and terms of service. Some of these entities will have different privacy terms than we do and their servers may be located outside the United States.

Links

The Sites may link to other websites. BBI disclaims any and all responsibility for the privacy practices of third-parties that may have links to or from the Sites. BBI encourages Site Visitor to review the privacy policies/statements of every website that Site Visitor visits which may collect personally identifiable information.

Information Retention and Security

We may store your information from the time of initial submission, as well as automated personal information about you.

We take reasonable security measures to protect users' information against unauthorized access, loss, alteration, or destruction. These measures include encryption, intrusion detection, intrusion prevention, anti-malware endpoint protection and industry standard data center security measures to guard against unauthorized access to systems where we store personal information, and the usage of reputable third-party vendors. Despite these reasonable measures, we cannot guarantee our security measures are impenetrable. Therefore, although we take reasonable steps to secure your information, we cannot and do not promise or warrant that your information will always remain secure.

Visitors Outside the United States

This Privacy Policy is intended to cover collection of information through the Sites from residents of the United States. The laws in other countries may or may not be as comprehensive as those in the United States. If you are a resident of another country and/or are using the Sites from outside the United States, you acknowledge and agree that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated.

EU Resident Rights under the GDPR

These disclosures apply only to our processing of Personal Information within the scope of the General Data Protection Regulation ("GDPR") from one or more of the European Union Member States plus Iceland, Lichtenstein and Norway (together known as the "European Economic Area" or "EEA").

The GDPR went into effect on May 25, 2018. As a resident of the EU or EEA, you have certain rights with respect to the processing of your personal data, including:

- Access. You have the right to know if we are processing personal data about you and, if so, to
 access and obtain a copy of personal data about you, as well as information relating to the
 processing of that data.
- <u>Correction</u>. You have the right to have us promptly correct or update any personal data about you that is inaccurate or incomplete.
- <u>Erasure</u>. You have the right to request deletion or erasure of your personal data in a number of circumstances as required by law, including when no longer need the personal data for the purposes for which it was collected, you have withdrawn consent or, when we are relying on legitimate interests as a legal basis, and your rights override our legitimate interests.

• <u>Portability</u>. You have the right to obtain a copy of the personal data we hold about you in a structured machine-readable format and to have it transmitted to another controller. This right only occurs where we are relying on your consent or performance of a contract as our legal basis and the processing is carried out automatically.

• Restriction of Processing. You have the right to restrict or limit the ways in which we process your personal data when you contest the accuracy of the personal data, when your data has been obtained by us unlawfully, when you have objected to our processing of the data and we are considering whether to cease processing, or when we no longer need to process the personal data.

• <u>Withdrawal of Consent</u>. When we rely on consent as the basis for processing personal data, you have the right to withdraw your consent.

• <u>Objection</u>. You have the right to object to our processing of your personal data when we are relying on legitimate interests as our legal basis and your rights override our legitimate interests in processing their personal data. You also have the right to object to our processing of their personal data for direct marketing purposes.

• <u>Complaint</u>. You have the right to make a complaint about our personal data handling practices to your local Supervisory Authority.

Terms of This Privacy Policy Survive

If any terms of this Privacy Policy are held invalid and/or unenforceable by a court of law or a competent jurisdiction, the remaining provisions of this Privacy Policy shall remain in full force and effect.

Changes to This Privacy Policy

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our information practices or relevant laws. BBI encourages you to frequently check this page for any updates. If material changes are made, we will add them to a Change Log in this document and, in some cases, may provide additional notice such as a pop-up message or a statement on our homepage.

Change Log

April 6, 2022: Added a section about how changes to this Privacy Policy will be addressed.

Contact Us:

Contact BBI at info@betterbuying.org

On any email you send, please include "Privacy" in the subject line.

Date Last Modified: July 11, 2022