



Carbon RX Privacy and Data Management Policy

Revised June 16, 2023

At Carbon RX, we understand how important your privacy is and we are dedicated to safeguarding your personal information in accordance with relevant privacy laws. Our Privacy and Data Management Policy (“Privacy Policy” or “Policy”) outlines the personal information that we collect, manage, and safeguard in relation to the following:

- The Carbon RX website,
- All Carbon RX projects,
- Any marketing or communications initiatives,
- Facilitating connections between users and our representatives.

All references in this Policy to “Carbon RX”, shall be referred to as “we”, “us”, and “our”.

How we collect and manage your personal information

As a general rule, Carbon RX usually collects personal information directly from you. This information may be collected in person, over the phone, through the mail or through electronic medium. These include:

Carbon RX Website

Usage Data

We may use data collected from your website activity. This data may include IP address, log files, unique device identifiers, cookies, viewed pages, access timestamps, content of requests, usernames, passwords, usage data, device type, browser settings, language preferences, aggregate statistics, data transfer volume, and website referral information.

Contact Us

When using the Contact Us form on the website, we collect your information, including First and Last Name, and email address. We retain this information to assist you in the future and to improve our customer service and service offerings. We also use personal information to establish and manage our relationship with you.

We may call you to confirm your affiliation with a business or commercial operation offering carbon offset credits for sale.



Carbon RX Projects

Land data and personal information are collected for all Carbon RX projects, including all nature-based (agriculture, forestry, and grasslands) and hydrocarbon projects. The information collected includes, but is not limited to land type, fuel usage, fertilizer usage, equipment usage, crop type, tillage practices, tree species, soil texture, and soil zone.

Marketing and Communications

Carbon Credit Marketing

To assist with the exchange of carbon credits, certain personal information may be collected.

If you are selling credits, we may gather relevant data associated with the project such as location, satellite imagery, photographs, agronomic data, map data, recordings, and details regarding the generation of the credits. Additionally, we may access publicly available information from sources like land registries, records databases, and government agencies. The purpose of collecting this information is to facilitate the exchange of carbon offset credits, verify your affiliation with the business or commercial entity connected to the marketed carbon offset credits, and ensure the legitimacy of the carbon offset credits offered through our services.

If you are buying credits, we may collect personal information about you, including your name, job title, and employer. We also gather information about your sales history, including specific details of any carbon offset transactions offered or completed. This data is collected to support and enhance the process of carbon offset credit exchange.

Communications

To keep you informed about our products, services, programs, events, campaigns, functions, or news updates, we may request your email address and other optional information for communication purposes.

Other

From time to time, we may use the services of third parties, including our affiliates and in our business. We may also receive personal information collected by third parties in the course of the performance of their services for us. In this case, we take reasonable steps to ensure that such parties have represented to us that they have the right to disclose your personal information to us.



We restrict the collection of personal information to what is necessary to meet the purpose intended. We require the consent of the individual prior to collecting, using or disclosing their personal information. Your consent to the collection, use and disclosure of information may be express, deemed or implied from your conduct with us, your actions or your inaction. We may ask for your consent in writing or electronically, but in some circumstances, we may accept your oral consent. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information.

How We Share Your Information

We may transfer your personal information to our affiliates and third-party service providers who assist us with verification services, analysis, security, marketing, and IT services. These service providers are given access to the necessary information solely for performing their designated functions and are not authorized to utilize or disclose personal information for their own marketing or other purposes.

It's important to note that our service providers may be located in the U.S., Canada, or other foreign jurisdictions. If you have any questions regarding transfers to foreign affiliates or third-party service providers, including their processing locations and purposes, please contact the Carbon RX office.

In certain cases, we and our Canadian, U.S., or other foreign service providers may disclose your personal information in response to a valid search warrant, subpoenas, inquiry, court order, or to other organizations for the purposes of investigating breaches of agreements, contraventions of laws, fraud detection, suppression, prevention, or as required or permitted by applicable Canadian, U.S., or other laws or legal processes or regulatory requirements. Such disclosures may involve lawful access by U.S. or foreign courts, law enforcement agencies, or government authorities. Additionally, your personal information may be disclosed when necessary to establish, exercise, or defend legal claims, investigate or prevent actual or suspected loss or harm to individuals or property.

In the event of a grant of a security interest in all or part of Carbon RX or its assets, a corporate merger, consolidation, sale of assets, share sale, investment transaction, or other corporate rearrangement or business venture, we may sell, transfer, or disclose our database of personal information to an actual or potential successor entity, purchaser, or investor.

We will endeavour to disclose only such personal information as is required under the circumstances, and to ensure such party is bound by appropriate obligations to use or disclose personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy and the applicable legislation.



Please note that you have the right, as permitted by applicable law, to withdraw your consent for us to use or disclose your personal information at any time. If you wish to withdraw your consent, please contact our office. It's important to be aware that withdrawing consent may result in the inability to provide certain services to you, as outlined in this Privacy Policy.

Security and Retention of Your Personal Information:

We prioritize the security of your personal information and employ suitable measures to protect it against unauthorized or unlawful processing, accidental loss, destruction, or damage. These measures may include physical, technical, or organizational safeguards. We also ensure that our employees who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect personal information.

To ensure compliance with legal, regulatory or business requirements, we have established record retention processes that retain personal information only for as long as necessary for the purposes outlined in this Policy. We may, instead of destroying or erasing personal information, choose to make it anonymous such that it cannot be associated with or tracked back to a specific individual.

Access to and Correction of Your Personal Information:

We strive to maintain accurate, complete, and up-to-date personal information. If any of your details have changed or are inaccurate, please contact the Carbon RX office.

You have the right to request access to the personal information we hold about you by contacting Carbon RX in writing or emailing your request to info@CarbonRX.com. We will respond to your request in a timely manner; however, we may require satisfactory verification of your identity before disclosing any personal information.

There may be circumstances where we refuse access to or correction of your personal information if it would be unlawful, when granting you access would have an unreasonable impact on other people's privacy, to protect Carbon RX's rights and property and where the request is frivolous or vexatious. In addition, your personal information may have been destroyed, erased, or made anonymous in accordance with our record retention obligations and practices, and may not be available to provide to you. We will inform you if such circumstances arise, subject to any legal or regulatory restrictions.



Managing Your Privacy:

You have the right to unsubscribe from any communications from Carbon RX, subject to legal or contractual restrictions and reasonable notice. If you choose to do so, please contact the Carbon RX office. Please note that you may still receive transactional or account-related communications from us.

You have the option to limit the collection of certain website information by deleting or disabling cookies. Most internet browsers allow you to erase stored cookies, block all cookies, or receive a warning before a cookie is stored. Disabling cookies may impact your ability to use specific features on the websites.

Please be aware that many opt-out mechanisms utilize browser cookies or device controls and are specific to the device or browser you are using. If you purchase a new computer, switch web browsers or devices, or delete cookies on your computer, you may need to opt out again.

By accessing or receiving a copy of this Privacy Policy, or providing personal information to Carbon RX, unless you advise us otherwise, you will be deemed to have given consent to the collection, use, and disclosure of your personal information in accordance with and for the purposes stated in this Privacy Policy. This includes any other purposes stated or reasonably implied at the time the personal information was provided to Carbon RX, or for which you have subsequently or otherwise received notice, and, where your consent is required by law, we have obtained your consent.

Privacy Policy Updates:

This Privacy Policy will be periodically reviewed to account for new laws and changes in our operations. We recommend that you periodically review this policy for any updates. We reserve the right to amend this Privacy Policy from time to time.

We have established procedures to receive and address complaints or inquiries regarding our handling of personal information, compliance with this Privacy Policy, and applicable privacy laws. To discuss our compliance with this Privacy Policy or to request access or amendments to your personal information, please contact the Carbon RX office. If any complaint is found to be justified, then we will take appropriate measures to resolve the matter to the satisfaction of the complainant.

This Privacy Policy is not intended to create or confer upon any individual any rights, or impose upon Carbon RX any rights or obligations outside of, or in addition to, any rights or obligations imposed by federal and provincial privacy laws. Should there be, in any specific case, any inconsistency between this Privacy Policy and the applicable federal and provincial Privacy laws, this Privacy Policy shall be interpreted to give effect to and comply with such Privacy laws.