



125 Rowell Court
Falls Church, VA 22046
RECYCLINGPARTNERSHIP.ORG

THE RECYCLING PARTNERSHIP PRIVACY POLICY

Effective Date: **October 1, 2020**

To download and/or print this Privacy Policy (“Privacy Policy”), click [here](#).

FULL RECYCLING PARTNERSHIP PRIVACY POLICY

This Privacy Policy will provide you with information as to how The Recycling Partnership collects, uses, and shares information about you, including the choices The Recycling Partnership offers with respect to that information, and applies to your use of any Service, regardless of how you access or use it. It does not apply to The Recycling Partnership’s data collection activities offline or otherwise outside of the any software or data of The Partnership (unless otherwise stated below or at the time of collection).

By visiting or otherwise using software or services of The Partnership, you agree to the [Terms of Use](#) and consent to The Recycling Partnership’s data collection, use, and disclosure practices, and other activities as described in this Privacy Policy, and any additional privacy statements that may be posted. If you do not agree and consent, please discontinue use of any of The Partnership’s software and services including all downloads and applications.

INFORMATION WE COLLECT

Information about You that You Provide.

The Recycling Partnership, and/or its Service Providers. For example, The Recycling Partnership collects information when you use or register for any service provided by The Partnership. In addition, when you interact with Third-Party Services (defined below), you may be able to provide information to those third parties. For more information on Third-party Services’ data collection and practices see **Section 6**. For more information on Service Provider data collection and practices see **Section 3**.

Information The Recycling Partnership, its Service Providers and/or Third-Party Services may collect may include: (1) personally identifiable information, which is information that identifies you personally, such as your first and last name, e-mail address, phone number, and full payment account number (“**Personal Information**”); and (2) demographic information, such as your gender, age, state residence, zip code, and interests (“**Demographic Information**”). Except to the extent required by applicable law, Demographic Information is “**non-Personal Information**” (i.e., data that is not Personal Information under this Privacy Policy). In addition, Personal Information, including, without limitation, Company-Collected PI (defined below), once “**De-identified**” (i.e., the removal or modification of the personally identifiable elements, or the extraction non-personally identifiable elements including through anonymization, pseudonymization, and/or hashing) is also non-Personal Information

and may be used and shared without obligation to you, except as prohibited by applicable law. However, we do not make assurances that De-identified data is not capable of re-identification. To the extent any non-Personal Information is combined by or on behalf of The Recycling Partnership with Personal Information, The Recycling Partnership itself collects directly from you on the Service (“**Company-Collected PI**”), The Recycling Partnership will treat the combined data as Company Collected PI under this Privacy Policy.

Information Collected Automatically. **The Recycling Partnership, its Service Providers, and/or Third-Party Services may also automatically collect certain information about you when you access or use software or services of The Partnership (“Usage Information”). Usage Information may include IP address, device identifier, browser type, operating system, information about your use of the Service, and data regarding network connected hardware (e.g., computer or mobile device). Except to the extent required by applicable law, or to the extent Usage Information is combined by or on behalf of The Recycling Partnership with Company-Collected PI, The Recycling Partnership does not consider Usage Information (including, without limitation, unique device identifiers) to be Personal Information or Company-Collected PI. For more information on Third-Party Services’ data collection see Section 6. For more information on Service Provider data collection and practices see Section 3. For information on choices some of these third parties may offer you regarding automated data collection see Section 11.**

The methods that may be used to collect Usage Information include:

- **Log Information:** Log information is data about your use of software or services of The Partnership, such as IP address, browser type, Internet service provider, referring/exit pages, operating system, date/time stamps, and related data, and may be stored in log files.
- **Information Collected by Cookies and Other Tracking Technologies:** Cookies, web beacons (also known as “tracking pixels”), embedded scripts, device recognition technologies, and other tracking technologies now and hereafter developed (“**Tracking Technologies**”) may be used to collect information about interactions with The Partnership or emails, including information about your browsing.

THE ABOVE ARE DEFINED AS:

- **Cookies**

A cookie is a small text file that is stored on a user’s device, which may be session ID cookies or tracking cookies. Session cookies make it easier for you to navigate and expire when you close your browser. Tracking cookies remain longer and help in understanding how you use software or services of The Partnership, and enhance your user experience. Cookies may remain on your hard drive for an extended period of time. If you use your browser’s method of blocking or removing cookies, some but not all types of cookies may be deleted and/or blocked and as a result some features and functionalities of software or services of The Partnership may not work. A Flash cookie (or locally-shared object) is a data file which may be placed on a device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your device. HTML5 cookies can be programmed through HTML5 local storage. Flash cookies and HTML5 cookies are locally stored on your device other than in the browser and browser settings won’t control them.

To identify certain types of local shared objects on your device and adjust your settings, please visit [this page](#). Services and software of The Partnership may associate some or all of these types of cookies with your devices.

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- **Web Beacons (“Tracking Pixels”)**

Web beacons are small graphic images, also known as “Internet tags” or “clear gifs,” embedded in web pages and e-mail messages. Web beacons may be used, without limitation, to count the number of visitors to the Service, to monitor how users navigate the Service, and to count content views.

- **Embedded Scripts**

An embedded script is programming code designed to collect information about your interactions. It is temporarily downloaded onto your computer from The Recycling Partnership’s web server, or from a third party with which The Recycling Partnership works, and is active only while you are connected, and deleted or deactivated thereafter.

- **Device Recognition Technologies.**

Technologies, including application of statistical probability to data sets, as well as linking a common unique identifier to different device use (e.g., Facebook ID), which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user or household) (“**Cross-device Data**”).

Some information about your use of the Service and certain third-party services may be collected using Tracking Technologies across time and services, and used by The Recycling Partnership and third parties for purposes such as to associate different devices you use, and deliver relevant ads and/or other content to you on services and software of The Partnership and certain third-party services. See Section 11 regarding certain choices regarding these activities.

The Recycling Partnership is giving you notice of the Tracking Technologies and your choices regarding them explained in Section 11 so that your consent to encountering them is meaningfully informed.

Information The Recycling Partnership Collects From Other Sources. **The Recycling Partnership may also obtain information about you from other sources, including Service Providers and Third-Party Services, and combine that with Company-Collected PI. Notwithstanding anything to the contrary, except to the extent such data combined by or on behalf of The Recycling Partnership with Company-Collected PI, this Privacy Policy is not intended to limit The Recycling Partnership’s activities regarding such third-party-sourced, or non-Service-sourced, information (including Personal Information), and such data will only be treated as Company collected PI to the extent it is combined with Company-collected PI. The Recycling Partnership is not responsible or liable for the accuracy of the information provided by third parties or for third party policies or practices.**

HOW WE USE THE INFORMATION WE OBTAIN.

The Recycling Partnership may use information about you, including Company-Collected PI and other Personal Information, for any purposes not inconsistent with The Recycling Partnership's statements under this Privacy Policy, or otherwise made by us in writing at the point of collection, and not prohibited by applicable law, including, without limitation, the following:

- Allow you to participate in the features we offer;
- Facilitate, manage, personalize, and improve your online experience;
- Process your registration for the State Recycling Leaders Forum, manage your account and/or upload your User Generated Content ("UGC"). (For more information on how UGC is treated under the Service's Terms of Use click [here](#). For more on the public nature of UGC, see Section 5;
- Transact with you, provide services or information you request, respond to your comments, questions and requests, serve you content and/or advertising, and send you notices;
- The Recycling Partnership's marketing and other purposes;
- Improve the Service and for any other internal business purposes;
- Tailor our content, advertisements, and offers;
- Fulfill other purposes disclosed at the time you provide Personal Information or otherwise where we are legally permitted or are required to do so; and
- Prevent and address fraud, breach of policies or terms, and threats or harm.

The Recycling Partnership may share non-Personal Information, and Personal Information that is not deemed Company-Collected PI hereunder (provided that The Recycling Partnership is aware of no restrictions of The Recycling Partnership's use, if any), with third parties or The Recycling Partnership affiliates ("**Affiliates**") for any purpose. Without limiting the generality of the foregoing, we and third parties may convert your Personal Information, including Company-Collected PI, to non-Personal Information, including without limitation through hashing it or substituting a unique identifier for the Personal Information and we and third parties may use and share that data as permitted by applicable law, including to match data attributes to and from other sources. Any such third-party activities are subject to their privacy policies and practices. The Recycling Partnership's sharing of Company Collected PI is, however, subject to the following:

- **Marketing:** Subject to your communications choices explained in Section 11.D, and the rights of California residents explained in Section 12], we may use your Personal Information to send you marketing communications. Absent your consent (which may be by means of opt-in, your election not to opt-out, or a third-party interaction described in the next bullet point), The Recycling Partnership will not share your Company-Collected PI with third parties, other than Affiliates, for their own direct marketing purposes, except in connection with Corporate Transactions (defined below).

- **Your Disclosure or Consent:** As more fully described in Section 5 (Information You Disclose Publicly or to Others) and Section 6 (Third-Party Content, Third-Party Services, Social Features, Advertising and Analytics), your activities on the Service may, by their nature, result in the sharing of your Company-collected Personal Information (as well as your other Personal Information and your non-Personal Information) with third parties and by engaging in these activities you consent to that and further sharing and disclosure to third parties. Such third-party data receipt and collection is subject to the privacy and business practices of that third party, not The Recycling Partnership.

The Recycling Partnership may also share any information about you (including, without limitation, Company-Collected PI) for any purposes not inconsistent with this Privacy Policy, or our written statements at the point of collection, and otherwise not prohibited by applicable law, including, without limitation:

- The Recycling Partnership's agents, vendors, consultants, and other service providers (collectively "**Service Providers**") may receive, or be given access to, your information, including, without limitation, Personal Information, Demographic Information, and Usage Information, in connection with their work on The Recycling Partnership's behalf, provided however, The Recycling Partnership does not authorize its Service Providers to use Company Collected PI provided by The Recycling Partnership to the Service Providers to send you direct marketing messages other than related to The Recycling Partnership and The Recycling Partnership Affiliates absent your consent. For more information on choices Service Providers may offer you see Section 11.
- To comply with the law, law enforcement or other legal process, and, where permitted, in response to a government request; and
- If The Recycling Partnership believes your actions are inconsistent with The Recycling Partnership's terms of use, user agreements, applicable terms or policies, or to protect the rights, property, life, health, security and safety of The Recycling Partnership, or its users, or any third party.

In addition, The Recycling Partnership may share your Company-Collected Personal Information (as well as your other Personal Information and your non-Personal Information), in connection with or during negotiations of any proposed or actual financing of our business, or merger, purchase, sale, joint venture, or any other type of acquisition or business combination of all or any portion of The Recycling Partnership assets, or transfer of all or a portion of The Recycling Partnership's business to another company, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding ("**Corporate Transactions**").

Sweepstakes, Contests, and Promotions

The Recycling Partnership may offer sweepstakes, contests, and other promotions (each, a "**Promotion**"), including Promotions jointly sponsored or offered by third parties, which may require submitting Personal Information. If you voluntarily choose to enter a Promotion, your information, including Personal Information, may be disclosed to The Recycling Partnership, co-sponsors, Service Providers, and other third parties, including for administrative purposes and as required by law (e.g., on a winners list). By entering, you are agreeing to the official rules that govern that Promotion, which may include consent to additional or differing data practices from those contained in this Privacy Policy. Please review those rules carefully.

Information You Disclose Publicly or to Others

Services and software of The Partnership may permit you to post or submit UGC, such as via the State Recycling Leaders Forum, including, without limitation, written content, user profiles, audio or visual recordings, computer graphics, pictures, data, or other content, including Personal Information. If you choose to submit UGC to any public area of the Service, your UGC will be considered “public” and will be accessible by anyone, including The Recycling Partnership. UGC submitted in the State Recycling Leaders Forum will be accessible only by Forum members and by The Forum Recycling Partnership, however UGC submitted via the Forum is considered “public.” Notwithstanding anything to the contrary, unless otherwise explicitly agreed by us, Personal Information included in UGC is not subject to The Recycling Partnership’s usage or sharing limitations, or other obligations, regarding Company Collected PI or other Personal Information under this Privacy Policy or otherwise, and may be used and shared by The Recycling Partnership and third parties to the fullest extent not prohibited by applicable law. The Recycling Partnership encourages you to exercise caution when making decisions about what you disclose in such public areas. For more information on how UGC is treated under The Partnership Terms of Use click [here](#).

Additionally, The Partnership’s services and software may offer you the option to send a communication to a friend or other contact. If so, The Recycling Partnership relies on you to only send to people that have given you permission to do so. The recipient’s Personal Information you provide (e.g., name, e-mail address) will be used to facilitate the communication, but not used by The Recycling Partnership for any other marketing purpose unless The Recycling Partnership obtains consent from that person. Your contact information and message may be included in the communication.

Third-Party Content, Third-Party Services, Social Features, Advertising And Analytics

The Partnership’s services and software may include hyperlinks to, or include on or in connection with e.g., plug-ins, websites, locations, platforms, applications or services operated by third parties (“**Third-Party Service(s)**”). These Third-Party Services may use their own cookies, web beacons, and other tracking technology to independently collect information about you and may solicit Personal Information from you.

Certain functionalities on services and software of The Partnership permit interactions that you initiate between services and software of the Partnership and certain Third-party Services, such as third-party social networks (“**Social Features**”). Examples of Social Features include: enabling you to send content such as contacts and photos between The Partnership’s services and software and a Third-Party Service; “liking” or “sharing” The Recycling Partnership’s content; logging in using your Third-Party Service account (e.g., using Facebook Connect to sign-in); and to otherwise connect the Service to a Third-Party Service (e.g., to pull or push information to or from The Partnership’s website). If you use Social Features, and potentially other Third-Party Services, information you post or provide access to may be publicly displayed on (see Section 5) or by the Third-Party Service that you use. Similarly, if you post information on a third-party service that references services and software of The Partnership (e.g., by using a hashtag associated with The Recycling Partnership or other The Recycling Partnership Affiliates in a tweet or status update), your post may be used on or in connection with the Service or otherwise by The Recycling Partnership and The Recycling Partnership Affiliates. Also, both The Recycling Partnership and the third party may have access to certain information about you and your use of services and software of The Partnership and any Third-Party Service.

The Recycling Partnership may engage and work with Service Providers and other third parties to serve advertisements on The Partnership’s properties and/or on third-party services. Some of these ads may be

tailored to your interest based on your browsing elsewhere on the Internet, sometimes referred to as “interest-based advertising” and “online behavioral advertising” (“**Interest-based Advertising**”), which may include sending you an ad on a third-party service after you have left services and software of The Partnership (i.e., “retargeting”).

The Recycling Partnership may use Google Analytics or other Service Providers for analytics services. These analytics services may use cookies and other Tracking Technologies to help The Recycling Partnership analyze users and how they use services and software of The Partnership. Information generated by these services (e.g., your IP address and other Usage Information) may be transmitted to and stored by these Service Providers on servers in the U.S. (or elsewhere) and these Service Providers may use this information for purposes such as evaluating your use of services and software of The Partnership, compiling statistic reports with your activity, and providing other services relating to Service activity and other Internet usage.

Except to the extent we combine information we receive from Service Providers, Third-Party Services, or other third parties with Company-Collected PI, in which case The Recycling Partnership will treat the combined information as Company-Collected PI under this Privacy Policy (see Section 1(c)), data obtained by The Recycling Partnership from a third party, even in association with The Partnership’s services and software, is not subject to The Recycling Partnership’s limitations regarding Company-Collected PI under this Privacy Policy, however such data remains subject to any restrictions imposed on The Recycling Partnership by the third party, if any. Otherwise, the information collected, stored, and shared by third parties remains subject to their privacy policies and practices, including whether they continue to share information with The Recycling Partnership, the types of information shared, and your choices on what is visible to others on Third-Party Services.

The Recycling Partnership is not responsible for, and makes no representations regarding, the policies or business practices of any third parties, including, without limitation, analytics Service Providers and Third-Party Services associated with The Partnership’s services and software, and encourages you to familiarize yourself with and consult their privacy policies and terms of use. See Section 11 for more on certain choices offered by some third parties regarding their data collection and use, including regarding lowercase Advertising and analytics.

Data Security and Monitoring

The Recycling Partnership takes reasonable measures to protect Company-Collected PI (excluding public UGC) from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the Internet and online digital storage are not completely secure and The Recycling Partnership does not guarantee the security of your information collected through The Partnership’s services and software.

To help protect you and others, The Recycling Partnership and its Service Providers may (but make no commitment to) monitor use of The Partnership’s services and software, and may collect and use related information including Company-Collected PI and other Personal Information for all purposes not prohibited by applicable law or inconsistent with this Privacy Policy, including, without limitation, to identify fraudulent activities and transactions; prevent abuse of, and investigate and/or seek prosecution for, any potential threats to or misuse; ensure compliance with the [Terms of Use](#) and this Privacy Policy; investigate violations of or enforce these documents; and otherwise to protect the rights and property of The Recycling Partnership, Affiliates, third parties, and other users. Monitoring may result in the collection, recording, and analysis of online activity or communications through The Partnership’s services and software. If you do not consent to these conditions, you must discontinue your use.

International Transfer

The Recycling Partnership is based in the U.S. and the information The Recycling Partnership and its Service Providers collect is governed by U.S. law. If you are accessing The Partnership's services and software from outside of the U.S., please be aware that information collected through The Partnership's services and software may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of The Partnership's services and software or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information, including Personal Information, in the U.S. as set forth in this Privacy Policy.

Children's Privacy

The Partnership's services and software is intended for a general audience and not directed to children less than 13 years of age. The Recycling Partnership does not intend to collect personal information as defined by the U.S. Children's Privacy Protection Act ("**COPPA**") ("**Children's Personal Information**") in a manner that is not permitted by COPPA. If we obtain knowledge that we have collected Children's Personal Information in a manner not permitted by COPPA, we will remove such data to the extent required by COPPA.

Accessing and Changing Information

The Recycling Partnership may provide web pages or other mechanisms allowing you to delete, correct, or update some of the Company-Collected PI, and potentially certain other information about you (e.g., profile and account information). The Recycling Partnership will make good faith efforts to make requested changes in The Recycling Partnership's then-active databases as soon as practicable, but it is not always possible to completely change, remove or delete all of your information or public postings from The Recycling Partnership's databases and residual and/or cached data may remain archived thereafter. Further, we reserve the right to retain data (a) as required by applicable law; and (b) for so long as reasonably necessary to fulfill the purposes for which the data is retained except to the extent prohibited by applicable law.

Tracking and Communications Options

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them separately. Also, tools from commercial browsers may not be effective with regard to Flash cookies (also known as locally shared objects), HTML5 cookies, or other tracking technologies. For information on disabling Flash cookies, go to Adobe's website. Please be aware that if you disable or remove these technologies, some parts of The Partnership's services and software may not work and that when you revisit The Partnership's services and software, your ability to limit browser-based tracking technologies is subject to your browser settings and limitations.

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. Note, however, there is no consensus among industry participants as to what "Do Not Track" means in this context. Like many online services, The Recycling Partnership currently does not alter The Recycling Partnership's practices when The Recycling Partnership receives a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you can visit <http://www.allaboutdnt.com>, but The Recycling

Partnership is not responsible for the completeness or accuracy of this third-party information. Some third parties, however, may offer you choices regarding their Tracking Technologies. One way to potentially identify cookies on our web site is to add the free Ghostery plug-in to your browser (<http://www.ghostery.com/>) which according to Ghostery will display for you traditional, browser-based cookies associated with the web sites you visit and privacy and opt-out policies and options of the parties operating those cookies. The Recycling Partnership is not responsible for the completeness or accuracy of this tool or third-party choice notices or mechanisms. For specific information on some of the choice options offered by third party analytics and advertising providers, see the next section.

Analytics and Advertising tracking technologies. You may exercise choices regarding the use of cookies from Google Analytics by going [here](#).

In addition, we may serve ads on third-party services that are targeted to reach people on those services that are also identified on one of more of our data bases ("**Matched List Ads**"). This is done by using Tracking Technologies or by matching common factors between our data bases and the data bases of the third-party services. For instance, we may use such ad services offered by Facebook or Twitter and other Third-Party Services. We are not responsible for these Third-Party Services, including without limitation their security of the data. If we use Facebook to serve Matched List Ads on Facebook services, you should be able to hover over the box in the right corner of such a Facebook ad and find out how to opt-out with us from such list. If you opt-out from our Facebook Matched List Ads, we will remove the matching Personal Information from that list, however, this will not take effect immediately and if you have multiple e-mails or other accounts you may have to opt-out separately for each one. If we use Twitter Matched Use Ads, you should be able to opt-out through your account settings on Twitter. If you opt-out from our Twitter Matched Use Ads, you will be removed from that list, however, this will not take effect immediately and if you have multiple e-mails or other accounts you may have to opt-out separately for each one. We are not responsible for such third parties' failure to comply with your or our opt-out instructions or to provide us notice of your opt-out elections, and they may change their options without notice to us or you.

Communications

You can opt out of receiving certain promotional communications (emails or text messaging) from The Recycling Partnership at any time by (i) for promotional e-mails, following the instructions provided in emails to click on the unsubscribe link, or if available by changing your communication preferences by logging onto your account. Please note that your opt-out is limited to the e-mail address or phone number used and will not affect subsequent subscriptions. If you opt-out of only certain communications, other subscription communications may continue. Even if you opt out of receiving promotional communications, The Recycling Partnership may, subject to applicable law, continue to send you non-promotional communications, such as those about your account, transactions, servicing, or The Recycling Partnership's ongoing business relations. Except in connection with Corporate Transactions, to prospectively opt-out of our sharing of your Company-Collected PI for third party direct marketing purposes, contact us [here](#).

Your California Privacy Rights

We do not share personal information as defined by California Civil Code Section 1798.83 ("**Shine The Light law**") with third parties for their direct marketing purposes without your consent. If you are a California

resident, you may request information about our compliance with the Shine the Light law by contacting us [here](#) or by sending a letter to The Recycling Partnership, 125 Rowell Ct., Falls Church, VA 22046 (Attention: Legal Counsel). Any such request must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, **and we are not required to respond to requests made by means other than through this e-mail address or mail address**

Changes to This Privacy Policy

We reserve the right to change this Privacy Policy prospectively effective upon the posting of the revised Privacy Policy and your use of our The Partnership's services and software indicates your consent to the privacy policy posted at the time of use. However, we will not treat your previously collected Company-Collected PI, to the extent it is not collected under the new privacy policy, in a manner materially different than represented at the time it was collected without your consent. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

Contact The Recycling Partnership

If you have any questions about this Privacy Policy, please contact The Recycling Partnership [here](#) or at The Recycling Partnership, 125 Rowell Ct., Falls Church, VA 22046 (Attention: Legal Counsel.)

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