

## PRIVACY POLICY

Last updated: 1/31/17

We believe in managing the privacy of individuals and making safe and ethical use of personal information that is provided to us via electronic channels.

We respect your privacy and are committed to managing it through our compliance with this privacy policy (this “Privacy Policy”). For purposes of this Privacy Policy, each of the terms “we,” “us,” or “our” means CTL Solutions, LLC, and the term this “Site,” means, collectively, this website, portions of other Web pages and Web content through which you have accessed this Privacy Policy.

CTL Solutions, LLC offers various services that are accessible to users through this Site, such as, for example, information about products, e.g. Compost Connect (“Products”), and resources relating to the same (collectively “Services”). Some Services are only available to users who have an account with Compost Crusader, such as placing and/tracking orders; providing feedback, etc. Other Services are available to anyone on the Site, such as learning more about the Products and viewing resources relating to the same.

This Privacy Policy (together with our Terms of Use [\[\[INSERT HYPERLINK\]\]](#) and any other documents referred to in this Privacy Policy and the Terms of Use) describe information that we collect from both Registered Users and users on this Site, by use of and through the Services, and how that information may be used and disclosed by us.

Please read this Privacy Policy and the Terms of Use <https://www.compost-connect.com/legal/tos.pdf> carefully to understand our policies and practices regarding your personal information and how we will treat it. By accessing, using or submitting information to this Site and/or Services, you agree to this Privacy Policy and our Terms of Use <https://www.compost-connect.com/legal/tos.pdf>. This Privacy Policy may change from time to time and your continued use of this Site and/or Services is deemed to be acceptance of such changes, so please check periodically for updates.

### **Children’s Information**

This Site is not intended for anyone under the age of 18. If you are under the age of 18 and have reached this Site, please leave the Site. We do not knowingly collect personal information from children under 18, unless we have received consent from a parent or guardian.

If you believe that we might have any information from or about a child, please contact us at [contactus@compost-connect.com](mailto:contactus@compost-connect.com). In the event that we learn that we have collected personal information from a child under the age of 13, without consent, we will delete that information and otherwise comply with the requirements of the Children’s Online Privacy Protection Act and other applicable laws such as the California Online Privacy Protection Act.

### **Information We Collect About You**

We collect several types of information from and about users and Registered Users of this Site and Services, including the information described below.

#### Personally Identifiable Information

In this Privacy Policy, “personally identifiable information” means information that identifies a

particular individual, including but not limited to an individual's name, postal address, e-mail address, and phone number.

Although we collect the IP address and information relating to the browsing behavior, through the use of cookies, such as number of visits, pages viewed, time on site, etc., of everyone that visits our Site or uses our Services, we do not collect any other personally identifiable information from users visiting the Site. We do not link IP addresses with any personally identifiable information of users in a manner that identifies a particular individual, unless otherwise stated below and which is treated as personally identifiable information. Therefore, we treat such information for users as non-personally identifiable information as described further below.

As for Registered Users, most of the personally identifiable information we collect from Registered Users is voluntarily submitted by you, such as when you register(ed) for an account on the Site ("Account"), for example, first and last name, email and postal address, etc. We will also link some of the non-personally identifiable information described further below, with your personally identifiable information. This allows us to better understand the interests, needs, and objectives of our Registered Users such that we may better serve you and offer you better Services.

We may occasionally offer additional opportunities to users and Registered Users to communicate with us. If we offer such opportunities, please note that we may collect and link such voluntarily submitted information with your IP address and/or browsing behavior in a way that makes such information personally identifiable information. If you do not want us to collect and/or link such information, please do not participate in such opportunities. The below list identifies examples only and does not constitute the complete list of opportunities that we may provide.

- Online surveys;
- Marketing initiatives, including, contests, events, or promotions;
- Fillable forms or fields;
- Requesting information about us, this Site, and our Service, whether via email or other electronic means; and
- Forums, product reviews or User Generated Content (defined below) or submissions.

It is also possible that we may collect personally identifiable information about Registered Users from sources other than you, such as forums, instant messaging services, blogs, other users of our products and services and our business partners. Some of the information we collect is through the use of marketing and/or web analytic partners. You may be able to prevent such marketing partners from recognizing you on return visits to this Site by disabling cookies on your browser.

If you use any functionality on this Site and/or Services allowing you to send content to another user, including through the use of social media such as Facebook, twitter, Pinterest, etc., then please be aware that: (a) we may display your email address and/or social media handle (e.g. username) to the other user(s); (b) we may use information you provide about other user(s) to facilitate the communication and/or (c) we may collect the information about you and the other

user(s) as otherwise set forth in this Privacy Policy.

We may also collect management information on our email campaigns, such as whether you have read an email sent by us, when and how many times, etc. We will use this information to improve content and Services and to inform groups of users about relevant products and services.

#### Non-Personally Identifiable Information

Although we largely only collect personally identifiable information from Registered Users, we may collect non-personally identifiable information from everyone that accesses the Site and/or Services. We use this information to help make the Site and Services more useful and appealing to you and to better understand our users and Registered Users.

We may collect demographic information about you including but not limited to gender, IP address, zip code, and information regarding your preferences and usage. This type of information is not, by itself, personally identifiable information. However, as stated above, if we link such information with personally identifiable information in a manner that identifies a particular individual, then we will treat all such information as personally identifiable information for purposes of this Privacy Policy.

Some of the information we collect is through the use of marketing and/or web analytic partners. Such marketing partners collect information like how often users visit this Site and/or Services, what pages they visit when they do so, what other sites they used prior to coming to this Site and survey responses.

We may collect non-personally identifiable information about you through a variety of technical methods, including the following:

- *Collection of Usage Details and IP Address.* As you navigate through this Site and/or Services, we may collect details of your visits to this Site and/or Services, including, but not limited to, traffic data, location data, logs, the resources that you access, and information about your computer and internet connection, including your IP address, operating system and browser type. We may also collect the webpage from which you came immediately before reaching the Site and the webpage to which you went immediately after leaving the Site. We may use this information for system administration and to report aggregate information to our advertisers and business partners.
- *Collection with Cookies.* “Cookies” are pieces of information that a website sends to your computer while you are viewing a website. We may place and access cookies on your computer and/or mobile device to track and store preferential information about you. You consent to our placement of cookies on your computer and/or mobile device. Please note that most internet browsers will allow you to stop some cookies from being stored on your computer and/or mobile device and to delete some cookies stored on your computer and/or mobile device. If you choose to do so, however, your use of certain aspects of this Site and/or Services may be inaccessible, or not function as expected.
- *Collection with Web beacons.* “Web beacons” are electronic images, tags or scripts that allow a website to access cookies and help track general usage patterns of visitors to a website. Web beacons can recognize certain types of information, such as cookies, time

and date of a page view, and a description of the page where the Web beacon is placed. We may use Web beacons to compile information regarding use of this Site and/or Services.

- *Collection with Mobile Device GPS.* If you are using a mobile device application to access or use the Site or Services, we may use the GPS of the mobile device to identify your location. Any such identification is used only in connection with the functionality of the Site or Service and will not be otherwise used, except in the aggregate with the location information from other users.

The information collected through these technical methods, standing alone, cannot be used to determine your identity. If such information is combined in a way that makes it become personally identifiable information, we will treat the combined information as personally identifiable information as described above.

### **How We Use Your Information**

We may use your non-personally identifiable information to:

- Understand and anticipate your needs and preferences;
- Ensure this Site and/or the Services are of interest to you (including, customization of advertising and content) and help us better understand your use of this Site and/or the Services;
- Conduct internal reviews of this Site and/or the Services and administer this Site's systems;
- Develop, enhance, and market our products and services or the products and services of third parties;
- Provide you with promotional materials, offers, and personalized information; and
- Manage our business and operations.

In addition to the uses described above, we may use your personally identifiable information to:

- Confirm and complete transactions requested by you;
- Provide customer support (including, responding to your requests), troubleshoot and resolve problems and disputes;
- Contact you to verify the information you provide to us;
- Protect the security and integrity of this Site and Services;
- Comply with, monitor compliance with and enforce this Privacy Policy, our Terms of Use <https://www.compost-connect.com/legal/tos.pdf> and any other applicable agreements and policies;
- Meet legal and regulatory requirements;
- Provide administrative communications to you; and
- For other purposes as may be disclosed when you provide personally identifiable information or in this Privacy Policy.

## Sharing of Personally Identifiable Information

### Typical Sharing

We strive not to disclose more personally identifiable information than is necessary to complete a transaction, provide a requested service or to operate and improve the Site and/or Services so that they are useful to you. Therefore, we only share your personally identifiable information with third parties we trust, such as our maintenance providers and/or marketing partners. Some of the categories of third parties we may share your personally identifiable information include:

- A person who, in our reasonable judgment, is authorized to receive your personally identifiable information as your agent, including as a result of your business dealings with that person (for example, your attorney.)
- The holders of an Account from which your access was granted;
- Our third party vendors so that they may provide support for our internal and business operations, including for the handling of data processing, to process credit card transactions or other payment methods, data storage, surveys, research, internal marketing, delivery of promotional and transaction materials and this Site's and Services' maintenance and security;
- Third parties selected by you when you (i) engage in any activities on this Site and/or Services that are sponsored by them, such as purchasing products or services offered by a third party, electing to receive information or communications from a third party, or electing to participate in contests, sweepstakes, games or other programs sponsored in whole or in part by a third party, and/or (ii) respond to promotional materials from us or our marketing partners. You authorize such third parties to use your personally identifiable information to, for example, send you additional promotional materials, provide you a product or service, or enter you into a sweepstakes. When we disclose your personally identifiable information to these third parties, your personally identifiable information will become permanently subject to the information use and sharing practices of that third party, and the third party will not be restricted by this Privacy Policy with respect to its use and further sharing of your personally identifiable information;
- Other third parties,:
  - o As required by law or ordered by a court, regulatory, or administrative agency;
  - o As we deem necessary, in our sole discretion, if we believe that you are violating any applicable law, rule or regulation, or are otherwise interfering with another's rights or property, including, without limitation, our rights or property;
  - o If requested by authorities in the event of any act of terrorism or instance of local, regional or national emergency;
  - o To monitor compliance with and enforce our Terms of Use <https://www.compost-connect.com/legal/tos.pdf>, this Privacy Policy, and any other applicable agreements and policies;
  - o To enforce or protect our rights;

- o As part of a Business Transfer, (defined below); and
- o Our affiliated companies (i.e., companies under common control or management with us).

### Aggregation and De-Personalization

We may take your personally identifiable information and make it non-personally identifiable, either by combining it with information about other individuals (aggregating your information with information about other individuals), or by removing characteristics (such as your name) that make the information personally identifiable to you (de-personalizing your information). We may use and/or disclose to third parties such aggregate or de-personalized information in any manner and without notice or compensation to you.

### Circumvention of Security Measures

In addition, although we use commercially reasonable physical, managerial and technical security measures and safeguards designed to protect the integrity and security of the personally identifiable information we collect through this Site and Services, we cannot ensure that your personally identifiable information will only be disclosed as described in this Privacy Policy. By way of example (without limiting the foregoing), we may be forced to disclose personally identifiable information to the government or third parties under certain circumstances or third parties may unlawfully intercept or access transmissions or private communications. Therefore, notwithstanding anything to the contrary within this Privacy Policy, the Terms of Use <https://www.compost-connect.com/legal/tos.pdf> or any other applicable agreement or policy, your use of this Site and/or Services is at your own risk and we do not promise or guarantee, and you should not expect, that your personally identifiable information will always remain private. In the unlikely event that an unauthorized third party compromises our security measures, we will not be responsible for any damages directly or indirectly caused by an unauthorized third party's ability to view, use or disseminate such information.

### Business Transfers

We specifically and expressly reserve the right to disclose, lease, sell, assign or transfer your personally identifiable information collected through this Site and Services and any databases, to third parties in connection with a Business Transfer. A "Business Transfer" means a sale, acquisition, merger, consolidation, reorganization, bankruptcy or other corporate change involving us and/or our affiliates, even if the Business Transfer is only being contemplated and regardless of whether the Business Transfer relates to a part or the whole of our business. Nothing in this Privacy Policy is intended to interfere with our ability to transfer all or part of our business, equity, and/or assets (including this Site and/or Services) to an affiliate or independent third party at any time, for any purpose, without any limitation, without notice, and without any compensation to you, whatsoever.

### **Data Retention & Removal**

We typically keep personally identifiable and non-personally identifiable information for at least two years. Registered Users may close their Account by sending a request to [contactus@compost-connect.com](mailto:contactus@compost-connect.com). Upon request, we will work with the Registered User to terminate their Account and to remove select information we have collected about the Registered

User. However, please note that we may, at our sole discretion, disassociate posted content and information from the Registered User in lieu of removing the same. Further, not all information can be deleted such as information which has been aggregated or is archived. We may also retain select information to prevent, investigate or identify any wrongdoing in connection with the Site and/or Services or to satisfy other legal obligations.

### **Do Not Track Requests**

This Site does not respond to “do not track” requests. All traffic is treated as equal and processed the same in that we will track users and Registered Users use of the Site and/or Services as well as the webpage that the user or Registered User came from before reaching the Site and the webpage to which he or she went after leaving the Site. If you desire to have your browsing be private, we suggest that you use your web browser’s private, incognito or other similar options.

### **Network Advertising**

From time to time, we may participate in or use advertising networks, such as third party advertising servers, advertising agencies, technology vendors and research firms. We may use these third-party advertising networks for marketing, advertising and promotional purposes, as well as to serve advertisements to you. Advertising networks often gather data about consumers who view advertisements to make inferences about a consumer’s interests and preferences, which enables their computers to deliver advertisements directly targeted to the consumer’s specific interests. This practice is often referred to as “online behavioral advertising.” For example, a third-party advertising network might collect the type of internet browser you use, the type of computer operating system you use, the domain name of a website you visit, whether or not you visit specific pages of this Site and other websites, the location of your internet service provider’s presence, the date and time of a visit to a website and other interactions between you and websites. Please see the “*Online Behavioral Advertising*” subsection of “Choices About How We Use and Collect Your Information” below to read about how you can prevent certain third-party advertising networks from collecting information about you.

### **User Generated Content**

You are responsible for any content, including personal information, that you contribute on this Site or through the Services (“User Generated Content”). For example, for Registered Users of an Account, User Generated Content may include reviews, registration data and other activities. User Generated Content you post on this Site or through the Services is done at your own risk. We cannot control the actions of other users and Registered Users of this Site which may have access to your User Generated Content. We are also not responsible for circumvention of any privacy settings or security measures contained on this Site and/or Services. As a result, we cannot and do not guarantee that your User Generated Content will not be viewed by unauthorized persons. You understand and acknowledge that, even after removal or disassociation, copies of your User Generated Content may remain viewable in cached and archived pages, or might have been copied or stored by other users and/or Registered Users of the Site and/or Services. Proper access and use of information provided on this Site and/or Services, including User Generated Content, is governed by our Terms of Use <https://www.compost-connection.com/legal/tos.pdf>.

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. Below are some mechanisms that provide you with control over certain information:

- *Cookies.* If you do not wish us to collect cookies, you may set your browser to refuse some cookies, or to alert you when cookies are being sent. If you do so, please note that some parts of this Site and/or Services may then be inaccessible or may not function properly.
- *Email Offers from Us.* If you do not wish to receive email offers or newsletters from us, you can opt-out of receiving email information from us (other than emails related to the completion of your registration, correction of user data, change of password and other similar communications essential to your transactions on this Site and/or Services) by using the unsubscribe process at the bottom of the email or by emailing us at [contactus@compost-connect.com](mailto:contactus@compost-connect.com) with “unsubscribe” in the subject line.
- *Marketing Third-Parties.* If you do not wish to have your personally identifiable information shared with third parties solely for marketing purposes, emailing us at [contactus@compost-connect.com](mailto:contactus@compost-connect.com) with “do not share” in the subject line.
- *Accessing and Correcting Personal Information.* For Registered Users who wish to review and update their personal information, please log into this Site or Service and visit your account profile page and make any desired changes. For users who wish to review the information we have collected about you or someone for which you are the legal guardian, please email us at [contactus@compost-connect.com](mailto:contactus@compost-connect.com). Please note that we may need to solicit select personally identifiable information in order to locate the information you are requesting and authenticate that you are the user about which the information is requested or the legal guardian of the Registered User.
- *Online Behavioral Advertising.* Certain third-party advertising networks that deliver behavioral advertising may be members of the Self-Regulatory Program for Online Behavioral Advertising. You may be able to prevent member companies from collecting preference data about you by going to the website <http://www.aboutads.info/choices> and following the directions. *Note that if you opt out, you may still receive advertising. In addition, if you opt out and later delete your cookies, use a different browser or buy a new computer, you will need to renew your opt-out choice.*

You may be presented with an opportunity to receive information and/or marketing offers from third parties in connection with this Site and/or the Services. All information you disclose to such third parties will be subject to the privacy policy and practices of such third parties. We are not responsible for the privacy policies and practices of such third parties and, therefore, you should review the privacy policies and practices of such third parties prior to disclosing information to them. If you later decide that you no longer want to receive communications from a third party, you will need to contact that third party directly.

### **Links to Third-Party Websites**

This Site and the Services, as well as the e-mail messages sent with respect to this Site and the Services, may contain links to websites operated by third parties that are beyond our control. Links to third parties from this Site and the Services are not an endorsement by us of such third parties, their websites, their products, their services, or their practices. We are not responsible for

the privacy policy, terms and conditions, practices or the content of such third parties or third-party websites. These third-party websites may send their own cookies to you and independently collect data. If you visit a website that is linked from this Site, the Services or our emails, we encourage you to read any privacy statements and terms and conditions of that third party's website before providing any personally identifiable information. If you have a question about the terms and conditions, privacy policy, practices or contents of a third party or a third party website, please contact the third party directly.

### **Operation of this Site in the United States**

This Site is operated in the United States. If you are located in the European Union, Canada or elsewhere outside of the United States, please be aware that any information you provide to us will be transferred to the United States. By using this Site or providing us with your information, you consent to this transfer and to the applicable laws of the United States.

### **Changes to this Privacy Policy**

We may amend this Privacy Policy at any time in order to provide you with the most up-to-date and accurate information about our collection of data. Amendments will take effect immediately upon us posting the updated Privacy Policy on this Site. Your use of the Site and/or Services after the posting of an updated Privacy Policy constitutes your acceptance and agreement to be bound by the updated Privacy Policy. We may, but do not obligate ourselves, to notify Registered Users of any such changes or updates. However, we recommend that everyone, especially users, revisit this Privacy Policy from time to time in order to review any changes that have been made. The date on which this Privacy Policy was last updated will be noted immediately above this Privacy Policy.

### **Contacting Us**

If you have questions or concerns about our privacy practices or wish to make a request regarding your personally identifiable information or the personally identifiable information of someone for which you are the legal guardian, please contact us at any of the following:

- Via telephone: 502-693-9045
- Via fax:
- Via mail: Harini Aiyer  
CEO, CTL Solutions, LLC  
4455 N Oakland Ave, 106  
Shorewood, WI-53211
- Via email: [contactus@compost-connect.com](mailto:contactus@compost-connect.com)

### **SPECIAL NOTIFICATION FOR CALIFORNIA RESIDENTS - YOUR CALIFORNIA PRIVACY RIGHTS**

Individuals who are residents of California and have provided their personally identifiable information to us may request information regarding our disclosures, if any, of their personally identifiable information to third parties for direct marketing purposes. Such requests must be submitted to us at [contactus@compost-connect.com](mailto:contactus@compost-connect.com) or in writing at:

Attn:  
Harini Aiyer  
CEO, CTL Solutions, LLC  
4455 N Oakland Ave, 106  
Shorewood, WI-53211

California privacy rights requests must include the reference “Request for California Privacy Information” on the subject line and in the body of the message and must include the e-mail address or mailing address, as applicable, for us to send our response. This request may be made no more than once per calendar year. We reserve the right not to respond to requests submitted other than to the address specified in this paragraph.

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