

Privacy Policy

Last Updated: January 1, 2023

1. Keeping your information safe

GreenWaste is committed to respecting your privacy. We are committed to keeping your information safe and secure and handling it in accordance with our legal obligations. We want you to understand how we handle your data. We also want you to know your rights and choices.

This Privacy Policy (“**Policy**”) applies to information collected through our online domains, at our physical locations and anywhere else we gather information about you and refer to this Policy. For simplicity, we call these sources the “**Platform**” in this Policy.

How we handle your information depends on how you use the Platform. This Policy is grouped into these sections:

- » Who we are and how this Policy works;
- » the categories and specific types of Information we collect;
- » How we use information;
- » Our exchange of information with others;
- » How long we retain your information; and
- » Your rights and controls over information about you.

We encourage you to read this Policy carefully. If you have questions, please Contact Us.

2. Who we are and how this Policy works

(a) Who we are

Greenwaste Recovery LLC operates the Platform and is referred to in this Policy as “**GreenWaste**”, “**we**”, “**our**” or “**us**”. This Policy supplements and is governed by our Terms of Service and/or any separate contract through which we provide products or services to you and incorporate or reference this Policy (collectively, “**Terms**”). Capitalized terms that are used but not defined in this Policy are defined in our Terms. The Terms describe how the Platform works in general, including security measures we use to protect our systems and the information described in the Policy.

(b) When this Policy applies

This Policy applies to you when you use the Platform. By using or accessing the Platform, you signify that you have read, understand and agree to be bound by this Policy and the Terms.

- » If you are a current or former employee or contractor of ours, this Policy does not apply to you. You may contact us about your privacy practices and rights at hr@greenwaste.com.

- » If we receive your information in our role as a service provider to another business, please see [Our role](#) for more information.

This Policy is effective as of the *Last Updated* date above. Because the Platform changes often, this Policy may change over time. Anytime we modify this Policy, we will post a revised version and update the *Last Updated* date above. If you have given us your contact information, we will notify you before any material changes take effect so you have time to review them.

(c) [Location-specific sections](#)

The Platform operates from the United States and, as of the *Last Updated* date, may only be used by California residents. We have no international operations. Our practices generally do not differ based on your location, but your rights and choices depend in part on the law where you live. For example, you may have rights under:

- » the California Consumer Privacy Act, as amended (“**CCPA**”) or another U.S. jurisdiction that has enacted a data privacy law similar to CCPA, we extend to you the same rights that CCPA grants to California residents, except where we specify otherwise.

Residents of those states should consult the [Rights under California law](#) section. If that section applies to you, it overrides any contrary descriptions elsewhere in the Policy as they relate to you.

If you have questions about your rights under other data privacy laws, please [Contact Us](#).

(d) [Our role](#)

If you contract with us directly, we serve as the business controlling the personal information we collect about you.

However, if we receive your personal information in our role as a contractor or service provider to another business, we may serve in a different role under applicable law. If you access or interact with the Platform through another company, like your waste-management utility, that customer of ours may be the business controlling our processing of your information. In those circumstances:

- » Additional privacy notices or policies, provided by our customer to you, may govern or apply to the personal information you provide through the Platform.
- » We will direct any questions or rights requests you may send us as required under our customer agreements or applicable law.

3. [Information we collect](#)

(a) [Information you give us](#)

In general, you can visit GreenWaste without telling us who you are or revealing any personal information about yourself. However, to use some aspects of the Platform, we will need information about you, such as if you:

- » Pay for Services through the Platform or establish an account
- » Request that we provide recycling or waste-management services at your home or other address
- » Contact or communicate with us

- » Subscribe or opt-in to our newsletters, alerts, or other communications

When you submit information through the Platform you are consenting to its collection, use and disclosure in accordance with this Policy.

If you make payments through our Platform, your complete payment information is collected and processed our payment processing partner(s). We do not receive your full payment-account information.

(b) Information collected when you use the Platform

As you use the Platform, we generate technical data about which features you've used, how you've used them and the devices you use to access our services, including:

- » Device information related to the device you use to interact with the Platform, such as your IP address, its identifiers, its browser and operating system, its internet service provider, and its settings.
- » Usage data related to your use of the Platform, such as the pages you visit, the sites you use before or after visiting ours, your actions within the Platform, the content or advertisements you interact with, general location information, time stamps and performance logs and reports.

(c) Information collected when you visit our locations

If you visit our recycling centers or other in-person locations, we may collect additional personal information about your visit through onsite recording devices and other technology. This additional information may include license plate numbers of vehicles. We do not have a practice of associating this information with any individual, nor do we maintain this information in repositories linked to individuals.

(d) Information we don't collect

For clarity, we do not collect, sell or share:

- » Sensitive personal information (while we collect any address you provide in connection with our recycling and waste-management services, we do not collect your precise geolocation, nor do we use your address to infer characteristics about you).
- » Personal information about anyone under the age of 16 (see [Use by minors](#) for more details)

4. How we use information

The main reason we use your information is to deliver our recycling and waste-management services to you. If we process your information solely in our capacity as a service provider or contractor (as defined in CCPA) to another business, we only use your information for the business purposes permitted under our contract(s) with the business that controls the collection of your information. Here is a detailed explanation of the various ways we use your information, together with practical examples:

1. To provide our content, services and products to you
 - Create and manage your account
 - Provide you with customer support and respond to your requests

- Deliver our recycling and waste-management services to you
- Communicate with you about our services
- 2. To manage your account
 - Register you on the services to allow you to control your recycling and waste-management services
 - Administer your account
- 3. To improve our services and develop new ones
 - Administer focus groups, market studies and surveys
 - Review interactions with customer teams to improve our quality of service
 - Develop new content and services
- 4. To operate advertising and marketing campaigns
 - Administer discounts or other offers
 - Text you, after you have given your consent and only until you withdraw it.
 - Communicate with you about products or services that we believe may interest you
- 5. To prevent, detect and fight fraud and other illegal or unauthorized activities
 - Find and address ongoing, suspected or alleged violations of our Terms
 - Better understand and design countermeasures against violations of our Terms
 - Retain data related to violations of our Terms to prevent against recurrences
 - Enforce or exercise our rights; for example, those in our Terms
- 6. To ensure legal compliance
 - Verify copyright or IP claims
 - Comply with legal requirements
 - Assist law enforcement

(a) Purposes

We rely on the following purposes to collect and use your information as described in this Policy:

- » Commercial purposes: The reason we process your information for purpose 4 above is to advance your economic interests or our economic interests. These purposes include performing the contract that you have with us, as embodied by our Terms, which advances our economic interests and yours. For instance, if you order services from us, we use your information to complete your payment and provide your product to you.
- » Business purposes: We process your information for purposes 1-6 above for operational reasons, in a reasonably necessary and proportionate manner (i.e., for business purposes under CCPA). For instance, we

analyze users' behavior on our services to continuously improve our offerings, we suggest offers we think might interest you and promote our own services, we process information to help keep our members safe and we process data where necessary to enforce our rights, assist law enforcement and enable us to defend ourselves in the event of a legal action.

- » Comply with applicable laws and regulations: We process your information for purpose 6 above where it is necessary for us to comply with applicable laws and regulations and evidence our compliance with applicable laws and regulations. For example, we may retain usage data and payment data in line with our accounting, tax and other statutory data retention obligations and to be able to respond to valid access requests from law enforcement.
- » Consent: From time to time, we may ask for your consent to collect specific information or use your information for certain specific reasons, like providing your email address or phone number for direct marketing purposes. In general, you may withdraw your consent by changing your settings (such as browser or device settings) or following instructions provided with information we send you based on the consent you gave us (such as texting 'stop' to text messages from us). You may always withdraw your consent at any time – just Contact Us.

5. Our exchange of information with others

Since our goal is to deliver our recycling and waste-management services to you, the principal reason we exchange your information with third parties is to facilitate those services.

This section describes how and why we exchange personal information with third parties, like our contractors (as defined below). It also describes exchanges made for certain purposes, like legal reasons and consensual direct marketing. We may also exchange deidentified and/or anonymized data for these purposes.

(a) Among our Affiliates

We may share, link or pool user information among our affiliated business entities, but always in accordance with applicable law, applicable agreements and this Policy.

(b) Direct marketing

We only disclose, rent, sell or share any information about you to third parties for direct marketing purposes unless you opt in, and will only do so until you opt out.

We may share information about you with third party sponsors or partners who will use it for marketing purposes but only if you opt in to such sharing or do not opt out when prompted. We will never share information in this manner without giving you one of these two options.

(c) For personalized ads

We share information with select advertising partners to make the advertising presented to you more relevant to you.

In the past twelve months, we have shared these categories of personal information to personalize advertising:

- » Device Information (including Personal Identifiers)
- » Commercial Information

» Internet Activity

» Geolocation

In the past twelve months, this information has been disclosed to the following third parties:

» Google LLC

(d) Operational disclosures

We contract with companies or individuals to provide certain services related to the functionality and features of the Platform, including payment processing, email and hosting services, software development, ordering and fulfillment processing, data management and surveys and marketing administration. We call these third-party companies and individuals “**contractors.**”

We may disclose information about you, as well as usage data and device information, to contractors as necessary for them to perform their services. Our contractors are not permitted to use your information for any other purpose. In the past year, we have disclosed account information, usage data and device information to the following types of contractors:

- » Analytics providers, namely Google Analytics, to tell us how the Platform is doing, such as which parts interest visitors and how long they visit before leaving. Among other data, they may receive your IP address.
- » Various hosting services and data processors to provide the infrastructure of the Platform which ensures that traffic is from real people, not computers. Among other data, they may receive your IP address.
- » Payment providers to process payments between you and us, such as for ongoing Services or products. These providers receive information about your order in order to tie your payment to your order. We don't receive all of the information you may provide to them as part of that process (for instance, we don't receive full payment-account numbers).
- » Support providers to provide assistance to you when you request it. They are able to retrieve information about you that is relevant and necessary to your requests, such as account information and order details.

(e) For legal reasons

Finally, we may share your Information:

- » In response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us;
- » When we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of our company, our users, or others; and in connection with the enforcement of our Terms and other agreements; or
- » In connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

(f) With your consent or at your request

We may periodically ask for your consent to exchange your information with third parties. Whenever we ask your consent for this reason, we will summarize the purpose and scope of the exchange.

(g) Technical

Finally, we may use and exchange non-personal information (meaning information that, by itself, does not identify who you are, such as device information, general demographics, general behavioral data, location data in de-identified form), as well as personal information in hashed, non-human readable form, under any of the above circumstances.

6. How long we retain your information

We retain your information only as long as we need it for the purposes described under How we use information, except when longer retention is required by our compliance policies and efforts toward applicable legal, tax, accounting and regulatory requirements.

How long we need information for those purposes varies by category, and even within categories. These retention determinations always consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from its unauthorized use or disclosure, whether we can achieve those purposes without using the personal information.

For example, we delete some Usage Data as soon as you exit the Platform, whereas we may retain records of your orders for services and products for several years as required by law or contract, such as agreements with our payment processor(s) or under our accounting standards.

7. Your rights

(a) In General

We want you to be in control of your information, so we want to remind you of the following options and tools available to you:

» Opting Out of Communications

As described above, we may use the information we collect from you to send messages to you. If you do not want to receive such communications, you can opt out (as applicable) by using the unsubscribe link at the bottom of our communications, unchecking the applicable box to opt out when prompted, texting “STOP” in response to any text message we may send you, or by simply not opting in when prompted. You may also at any time opt out of receiving communications from us by sending an e-mail to customerservice@greenwaste.com with the subject line ‘Opt Out’.

Please note that even if you unsubscribe from our communications, we may still need to contact you with important information related to changes to the Platform, your account and your payments. For example, even if you have unsubscribed from our promotional emails, we will still send you confirmation of a purchase you have made on our Platform or to alert you to changes to our Terms or Privacy Policy.

» Opting Out of Personalized Advertising

You have a choice about participating in personalized advertising. If you wish to opt out, in addition to any Location-specific rights that may apply, you have a few options:

- » Your mobile device settings may allow you to limit the use of information from your device in personalized advertising through a “Limit Ad Tracking” setting (in an iOS device) or an “Opt Out of Personalized Ads” setting (on an Android device).
- » You can learn more about advertising networks and personalized advertising, and your ability to opt out, by visiting the Digital Advertising Alliance at www.aboutads.info/choices or the Network Advertising Initiative at www.networkadvertising.org/choices.

In providing you with transparency and access to choice regarding personalized advertising, we are acting in accordance with our commitment to the Digital Advertising Alliance’s Self-Regulatory Principles. You can learn more about these Principles [here](#).

(b) Rights under California law

This section applies to you only if you reside in California or another U.S. state where applicable law provides for some or all of these rights. Except as noted in this section, we extend these California rights to residents of those states regardless of whether applicable law in those states includes all of these rights.

(i) Rights under CCPA

The California Consumer Privacy Act (“**CCPA**”) provides California consumers with additional rights regarding their *personal information* (as defined in CCPA). When you see *italics* in this section, it denotes the first time we use terminology defined in CCPA in this section (b).

- » The categories of personal information we collect are generally described above, and depend on how you use the Platform.
- » The categories of third parties with whom we exchange personal information are in Section 5 above. The disclosures in Section 4(a) supplementally describe with *business purpose* or *commercial purpose* for those exchanges of information.

Under CCPA, California *consumers* have the following rights:

(1) Rights to Know, Access, Correct and Delete.

You have the right to request that we disclose, correct and delete personal information about you that we have collected. Your right to know includes the personal information we have sold or shared or disclosed for a *business purpose*.

(2) Rights to Limit and Opt-Out of Sharing/Sale

You also have the right to direct us (1) not to share or sell your personal information and (2) limit our disclosure and use of your sensitive personal information to purposes necessary to provide the Platform to you.

To opt out of the sharing of your personal information, please [Contact Us](#).

As of the *Last Updated* date, we have no knowledge of any use of personal information we collect from individuals under the age of 16 for ‘sale’ or ‘sharing’ purposes.

(3) Right of No Retaliation

CCPA prohibits us from discriminating against you if you exercise rights under CCPA, except when you opted in to a financial incentive involving certain of your personal information, and subsequently restrict our use of that personal information through a CCPA rights request.

- » For example, if we offer you a discount code for consenting to receive marketing emails, and you then require us to delete your email address, we may not honor that discount code.

Your right of no retaliation doesn't need to be exercised. We never retaliate against anyone exercising their rights under this Policy or CCPA.

(1) Preference signals

We are in the process of updating the Platform to honor any global *Opt-out preference signal* sent from California IP addresses to the Platform through browser or device-level settings, provided the signal complies with CCPA's requirements. Our goal is for the Platform to automatically respond to compliant signals by opting California residents out of any sharing or sale of their data in a frictionless manner.

Please [Contact Us](#) if you believe the Platform collected or processed your information in a manner inconsistent with your opt-out preference signal.

(2) Request process for CCPA rights

To submit a CCPA request relating to the foregoing rights, please contact us as described under [Requesting information](#). That section generally applies to requests to exercise CCPA rights. However, in addition:

- » We will confirm receipt of your CCPA request within 10 days, and will substantively respond within 45 days.
- » We may initially substantively respond by informing you that we will require up to 45 further days, along with an explanation of why our substantive response is delayed.
- » We provide responses in the manner we receive your request (i.e., with an email response to an email request).

Finally, we may deny deletion requests, in whole or in part, with respect to information we reasonably need to:

- » comply with a legal obligation
- » allow you, other consumers, or us to exercise free-speech rights or other legal rights
- » perform a contract with you (for instance, if a product you purchased carries a warranty or could reasonably be subject to recall under applicable law)
- » or if we use the information for solely internal purposes reasonably aligned with consumer expectations.

(ii) Other California law

Because we only give your information to third parties for direct marketing purposes with your consent, and always allow you to opt out of direct marketing communications after opting in, we believe we are not currently required to comply with California Civil Code Section 1798.83.

(c) Requesting information

(i) Submitting requests

To exercise any right under this Section 7, [Contact Us](#). Your request must:

- » provide sufficient information to identify you and the law that applies to you, such as your name, e-mail address, home or work address, or other information we maintain.
- » not include social security numbers, driver's license numbers, third-party account numbers, credit or debit card numbers, or health information.

(ii) Verifying requests

We verify requests by first confirming the source of the request and then by matching the information submitted to the information we maintain. If your request is unclear or we are unable to authenticate your identity, we will respond with direction on how to remedy the deficiencies, in accordance with law that applies to you.

If we cannot verify the identity of the individual making the request, we may deny it, in full or in part.

(iii) Responses to requests

We will respond to your request as quickly as we can, taking into account the nature of your request and the volume of pending requests. The content of our response will vary with the nature of your request, but will always respond in accordance with any deadlines or requirements specified by the laws that applies to you.

Under certain circumstances, we may be unable to provide responsive personal information, such as when disclosure would create a substantial, articulable and unreasonable risk to the security of the information, customers' account with us, or the security of our systems or networks. We do not disclose account passwords or any other non-personal information that enables access to an account.

Please understand, however, that we reserve the right to retain an archive of any information about you, to the extent permitted by law. We may also retain deidentified or aggregate data derived from information about you.

8. Use by minors

The Platform is intended for adult users. We do not knowingly collect information from anyone under the age of 16. If we learn that we have collected information from a child under age 16, we will delete that information as quickly as possible.

- » If you are under 16: sorry, but please leave the Platform. If you've already sent us information, please [Contact us](#) first so we can delete it.
- » If you are a parent or guardian of a child under 16 years of age and you believe your child has provided us with information, please [Contact Us](#).

9. Contact Us

If you have questions or comments about this Policy, please contact us at customerservice@greenwaste.com, with "Privacy" in the subject line or call us at (408) 283-4804.