

PRIVACY POLICY

Environmental Resource Trust (ERT), doing business as American Carbon Registry (ACR), located at 204 E 4th Street, North Little Rock, AR 72114 USA, (the “**Organization**,” “**we**,” or “**us**”) wants you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect through:

- Websites operated by us from which you are accessing this Privacy Policy, including [the ACR Registry](#) (the “**Websites**”);
- Our social media pages located at [Twitter](#) and [LinkedIn](#) (collectively, our “**Social Media Pages**”);
- HTML-formatted email messages that we send to you that link to this Privacy Policy or other communications with you; and
- Offline interactions you have with us.

Collectively, we refer to the Websites, Social Media Pages, emails, and offline interactions as the “**Services**.”

PERSONAL INFORMATION

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual. The Services collect Personal Information, including:

- Name, job title, postal address, email, telephone and fax number;
- Login name, password, security question and answer;
- IP address;
- Profile picture;
- Social media account ID; and
- Other information provided by you through your registry account or otherwise through the Services.

Collection of Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Services.**
 - *We collect Personal Information through the Services, for example, when you open a registry account, sign up for a newsletter, attend one of our events or contact us for support.*
- **From Other Sources.**
 - *We receive your Personal Information from other sources, for example from publicly available databases, offset credit exchange or settlement platforms, industry groups, or identity verification providers.*

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

Use of Personal Information

We and our service providers use Personal Information for the following purposes:

- **Providing our registry services.**
 - *To provide the carbon offset registry and registry related services, or with information you have requested, including publishing public reports, verification documents and other publicly accessible information regarding the listing, transfer, cancellation and retirement of offsets.*
 - *To process invoices and payments.*
- **Providing the functionality of the Services and fulfilling your requests.**
 - *To provide the Services’ functionality to you, such as arranging access to your registered account, producing Account Holder reports, and providing you with related benefits, or service.*

- *To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions, suggestions, compliments or complaints, or when you request information about our Services.*
- *To send administrative information to you, such as changes to our terms, conditions, and policies.*
- **Providing you with our newsletter and/or other marketing related materials.**
 - *To send you marketing related emails, with information about our Services and other news about our organization.*
- **Aggregating and/or anonymizing Personal Information.**
 - *We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose, as it no longer identifies you or any other individual.*
- **Accomplishing our organizational purposes.**
 - *For data analysis, for example, to improve the efficiency of our Services;*
 - *For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements;*
 - *For fraud prevention and fraud security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;*
 - *For developing new services;*
 - *For enhancing, improving, maintaining, or modifying our current services, as well as undertaking quality and safety assurance measures;*
 - *For identifying usage trends, for example, understanding which parts of our Services are of most interest to users.*

Disclosure of Personal Information

We disclose Personal Information:

- **Through our public reports.**
 - *You can choose whether and at what time in the project registration process certain information is displayed in our public reports through your registry account.*
- **To our affiliates for the purposes described in this Privacy Policy.**
- **To our service providers, to facilitate services they provide to us.**
 - *These can include providers of services such as website hosting, data analysis, payment processing, fraud prevention, information technology and related infrastructure provision, support service, email delivery, auditing, and other services.*
- **By using the Services, you may elect to disclose Personal Information.**
 - *You can share information on message boards, chat, profile pages, blogs, and other services to which you are able to post information and content (including, without limitation, our Social Media Pages). Please note that any information you post or disclose through these Services will become public and may be available to other users and the general public.*

Other Uses and Disclosures

We also use and disclose your Personal Information as necessary or appropriate, in particular when we have a legal obligation or legitimate interest to do so:

- **To comply with applicable law and regulations.**
 - *This may include laws outside your country of residence.*
- **To cooperate with public and government authorities.**
 - *To respond to a request or to provide information we believe is necessary or appropriate.*
 - *These can include authorities outside your country of residence.*
- **To cooperate with law enforcement.**
 - *For example, when we respond to law enforcement requests and orders or provide information we believe is important.*
- **For other legal reasons.**
 - *To enforce our terms and conditions; and*

- To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- **In connection with a sale or transaction.**
 - We may disclose or transfer your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our organization or assets (including in connection with any bankruptcy or similar proceedings).

OTHER INFORMATION

“Other Information” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. The Services may collect Other Information such as:

- Browser and device information;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you that does not reveal your specific identity; or
- Information that has been aggregated in a manner such that it no longer reveals your specific identity.

Collection of Other Information

We and our service providers may collect Other Information in a variety of ways, including:

- **Your browser or device.**
 - Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services you are using. We use this information to ensure that the Services function properly.
- **Cookies.**
 - Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used, and assist us with resolving questions regarding them. We do not currently respond to browser do-not-track signals. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services.
- **Pixel tags and other similar technologies.**
 - **Pixel tags.** Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our campaigns, and compile statistics about usage of the Services and response rates.
 - **Analytics.** We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to <http://www.google.com/policies/privacy/partners>, and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.
 - **Invisible reCAPTCHA.** We use invisible reCAPTCHA application on our Services in order to protect against spam and other automated abuse. The reCAPTCHA tool may make use of cookies, as well as other information like IP address, date, time, language, screen size and resolution, and mouse movements. The use of the reCAPTCHA tool and any information collected through the tool are subject to the provider’s privacy policy, available on their website.

- **Adobe Flash technology (including Flash Local Shared Objects (“Flash LSOs”)) and other similar technologies.**
 - *We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the [Website Storage Settings Panel](#). You can also go to the [Global Storage Settings Panel](#) and follow the instructions (which may explain, for example, how to delete existing Flash LSOs (referred to as “information”), how to prevent Flash LSOs from being placed on your computer without your being asked, and how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.*

Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Policy. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “*Contacting Us*” section below.

CHOICES AND ACCESS

Your choices regarding our use and disclosure of your Personal Information

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt out from receiving marketing-related emails from us, such as our newsletter. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out via the unsubscribe link at the bottom of the email.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing related emails from us, we may still send you important administrative messages, from which you cannot opt out.

How you can access, change, or delete your Personal Information

If you would like to request to access, correct, update, suppress, restrict, or delete Personal Information, object to or opt out of the processing of Personal Information, or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another organization (to the extent these rights are provided to you by applicable law), you may contact us in accordance with the “*Contacting Us*” section below. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed or whether you would like to have your Personal Information suppressed from our database. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes.

RETENTION PERIOD

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- *The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);*
- *Whether there is a legal obligation or other regulatory requirements to which we are subject (for example, certain laws require us to keep records of your offset project and offset credit data for a certain period of time before we can delete them; or*
- *Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).*

THIRD PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with our Services, including our Social Media Pages.

JURISDICTION AND CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

SENSITIVE INFORMATION

Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through the Services or otherwise to us.

THIRD PARTY PAYMENT SERVICE

The Services may provide functionality allowing you to make payments to the Organization using third-party payment services with which you have created your own account. When you use such a service to make a payment to us, your Personal Information will be collected by such third party and not by us, and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party's collection, use, and disclosure of your Personal Information.

UPDATES TO THIS PRIVACY POLICY

The "LAST UPDATED" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services.

CONTACTING US

Environmental Resources Trust, doing business as American Carbon Registry, located at 204 E 4th Street, North Little Rock, AR 72114 is the organization responsible for collection, use, and disclosure of your Personal Information under this Privacy Policy.

If you have any questions about this Privacy Policy, please contact us at acr@winrock.org.

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.