

CHOOSE DATA PROTECTION POLICY

1. INTRODUCTION. This Data Protection Policy (the “Policy”) sets out how Choose (“we” and/or as defined in the GTCs) handle personal data in the Choose services (as defined in the GTCs) and on associated websites and applications for desktops, tablets and mobile handsets (hereinafter referred to as the “Service”). By using the Service, you indicate your acceptance of this Policy. If you do not agree to this Policy, you are not permitted to access the Service and you should not do so. By personal data we mean information that can be used to uniquely identify a single person. If you have questions about this Policy please feel free to contact us by following the instructions on our website: <http://choose.today> or by sending an e-mail to privacy@choose.today

2. CHILDREN AND PRIVACY. We do not knowingly collect information from children under age 13. If you are under age 13, you are not permitted to use the Service. If you are 13 - 17 years of age, you may visit, browse and use the information on the Service but you may not register an account or submit any personal information. If you are 13 - 17 years old, by browsing, using or accessing the Service you confirm that you have the permission of a parent or guardian to do so. If you are a parent or guardian and believe that we may have inadvertently collected personal information from your child, please notify us immediately by following the instructions on our website: <http://choose.today> or by sending an e-mail to privacy@choose.today

3. COLLECTION AND USE OF PERSONAL DATA. When you register as a user for the Service, you may provide us with certain information that we store. When you use the Service, we may store information generated by your use of the Service, such as virtual emissions statistics for your user, activity in the Service, time of log-in, location of sessions if allowed by the device, what version of the Service you use, technical data such as your IP address, location information, and other similar information. If the Service is accessed via a handheld device we also store a number that uniquely identifies the device. Information that you add to your profile like your age may also be stored. If you reply to surveys that we have provided, or otherwise provide us with your personal data in response to our communications to you, the information you provide will be made anonymous unless otherwise specified. This information is used to provide the Service to you, to calculate settlement when acquiring actual emission quotas, to improve the Service, and, if provided by you in response to our communications, to provide you with special offers and promotions from Choose or its partners. Your participation in any such special offer is completely voluntary.

4. SHARING INFORMATION WITH THIRD PARTIES. We will not share your personal data with third parties except in the following situations:

- a) when you have given us consent to share such personal data. This can for instance be in relation Facebook, Twitter or similar social media (as further described in section 7 below) or other;
- b) when necessary for billing purposes or other services/functions performed on our behalf, we share information with the billing provider or other vendor to facilitate billing or other services/functions, respectively. The payment information is stored by the billing provider and not by Choose;
- c) when we engage third parties to perform services on behalf of us in relation to the Choose service, either companies that are affiliated with us or third parties. In such cases we will remain responsible for your personal data and ensure that all handling of the data will be in accordance with this policy and applicable laws; and

d) in response to legal process, such as a request by law enforcement, a court order or similar, or to protect the integrity of the Service if we believe that a user has committed unlawful or otherwise harmful acts.

We will never sell your personal data to third parties or allow third parties to have access to your data for their own purposes unless you otherwise provide your consent. If all or part of Choose is sold, merged or is otherwise transferred to another entity, the information you have provided on or through the Service may be transferred to such entity as part of that transaction.

5. COMMUNICATIONS. If you have provided us with your email address or your phone number we will only use this information to communicate with you in matters relevant to the Service. Such information includes receipts for payment, information about changes in the Service, changes in the GTCs and this Policy. We will not use this information to send you information about third party services unless you otherwise provide your consent. Providing us with this information in response to our communications to you shall be considered consent from you to use this information to send you information about third party services. If the legal statutory requirements are met or if you have opted in, we will send you our newsletter and similar information. You can at any time give us notice that you no longer want to receive such communication.

6. SERVER LOG FILES. Usage of the Service may be logged in the server log files. These log files include the IP address of the device that accessed the Service together with the time of the use and which resource that was requested, as well as user identification information. The log file of the Service is used to create anonymous usage statistics that are used to settle with the owners of the content, to analyze the usage of the Service, and for the purposes of system administration.

7. COOKIES AND SIMILAR TECHNOLOGIES. A cookie is a small file that is placed on your device that allows Choose and our partners to recognize your device when you return to the web page. We use cookies to offer log-in functionality, to remember user preferences and to understand how our web pages are used. We may use both temporary (“session”) and persistent cookies. You can delete cookies in your browser anytime and you can also block cookies from being placed. This may however impact the functionality of the service. Choose may also use third party vendor remarketing tracking cookies, including the Google AdWords tracking cookie. This means we will continue to show ads to you across the internet, utilizing the existing ad-networks that facilitate this type of advertising. As always we respect your privacy and are not collecting any identifiable information through the use of Google’s or any other third party remarketing system. We do not, however, control these cookies, and they are not subject to this Policy. Third party vendors do not have access to the Service’s cookies. The use of cookies sent by third party vendors is standard. In addition to our own, cookies are also placed by Google Analytics as described below.

8. INTEGRATION WITH THIRD PARTY SERVICES. Google Analytics: We may use Google Analytics from Google (Google Inc, US) on our web pages to create anonymous usage statistics. If you have concerns relating to the usage of Google Analytics, be informed that it is possible to block Google Analytics by installing a plug-in to your browser. A plug-in for the most common browsers can be found here: <http://tools.google.com/dlpage/gaoptout>

Facebook: If you enable the function “Connect to Facebook” in the settings of your Service client we will share your favorites with Facebook (Facebook Ireland Limited, Ireland) enabling your Facebook friends to see your virtual emission cuts and enabling you to see your Facebook friends’ similar activity. Further if you use the function “share” you can post to your Facebook account directly from the Service client. Please refer to Facebook’s privacy policy to understand how Facebook deals with your data.

Twitter: If you use the function “share” you can post to your Twitter account (provided by Twitter Inc, US) directly from the Service client. Such posting might involve sharing personal data. Please refer to Twitter’s privacy policy to understand how Twitter deals with your data.

9. INTEGRATION WITH THIRD PARTY WEBSITES. We may link to third party websites. Choose cannot control or be held liable for third parties’ privacy policies and content. Please refer to the site’s privacy policy to understand how the site deals with your data. For the avoidance of doubt, this Policy applies solely to information collected by the Service.

10. SAFEGUARDING OF PERSONAL DATA. We store your data in a secure manner on restricted and protected equipment. Only a limited number of personnel have access to this equipment and only persons with a legitimate reason have access to your personal data. While we take reasonable precautions for protection of personal data, no security measures are completely secure, and we do not guarantee the security of personal data.

11. RETENTION OF PERSONAL DATA. We will retain your personal information only for the period necessary to fulfill the purposes outlined in this policy. When it is no longer necessary to store the data it will be deleted or made anonymous in a safe and permanent manner or the access to it will be blocked to the extent that statutory data retention requirements apply.

12. YOUR RIGHTS. The General Data Protection Regulation (GDPR) gives you the right to access certain information held about you. Your right of access can be exercised in accordance with the Act.

Our site allows you to connect with third party sites, such as Facebook and Twitter to share contents and pages. If you use any of these sites, please note that they will have their own privacy policies, which are entirely outside of our control. We do not accept any responsibility or liability for such policies. Please check these policies carefully before you submit any personal data to such sites.

13. DETECTION OF MISUSE OF THE SERVICE. If there is suspicion of misuse of the Service, we might combine data collected in accordance with this Policy with other information in order to investigate the extent of the misuse and who is responsible.

14. COMPLIANCE. We will at all times treat personal data as set out in this Policy and at all times comply with applicable data protection legislation and regulations.

15. NOTICES, CONSENTS & CONTACT. If you have questions regarding your data stored with us, its rectification or deletion, or would like to revoke any consent provided to us, object against certain uses or similar, please feel free to contact us at privacy@choose.today.

16. AMENDMENTS TO POLICY. The Service is subject to constant improvement and future changes may influence what data we store and how we process it. This Policy might be updated to reflect such changes, changes in legal framework or improvements in how we handle personal data. Such changes or updates are effective immediately after we give notice of the change or update, which we may do by revising the “Date of Last Revision” date of this Policy or by otherwise posting on the Service, or by email or conventional mail, and/or by any other means which provides reasonable notice. Your use of the Service after such notice is posted means that you accept these changes or updates. You agree that Choose shall not be liable to you for any damages that might result from any changes to this Policy, if any. The current version of this Policy can be found at our website: <http://choose.today>

17. INTERNATIONAL USERS. Choose may process information about its users on computers and servers located in a number of countries, any of which may be located outside of your state, province, country, or other governmental jurisdiction and where the privacy laws may not be as protective as those in your jurisdiction. If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your personal data to/from the EEA, EU and/or United States. By providing your personal data, you consent to any transfer and processing in accordance with this policy. YOU ACKNOWLEDGE THAT THE LAWS OF THE UNITED STATES, THE EU AND/OR THE COUNTRY YOU RESIDE IN TREAT YOUR INFORMATION IN A MANNER THAT MAY BE SUBSTANTIALLY DIFFERENT FROM, AND LESS PROTECTIVE THAN, THE TREATMENT REQUIRED UNDER THE LAWS OF OTHER COUNTRIES AND JURISDICTIONS. IF YOU DO NOT WANT YOUR INFORMATION TRANSFERRED TO THE UNITED STATES, THE EU, OR THE EEA, YOU SHOULD NOT SHARE YOUR INFORMATION WITH US, OR MAKE USE OF THE SERVICE. TO THE EXTENT ALLOWED BY THE LAW OF THE COUNTRY IN WHICH YOU ARE LOCATED, YOU EXPRESSLY WAIVE ANY RIGHT YOU MAY HAVE TO REQUIRE US TO TREAT YOUR IDENTIFYING INFORMATION IN ACCORDANCE WITH THE LAWS OF ANY COUNTRY OR JURISDICTION OTHER THAN THE UNITED STATES. HOWEVER, THE FOREGOING WAIVER MAY NOT BE LEGALLY BINDING IN SOME COUNTRIES, SUCH AS THE MEMBER STATES OF THE EUROPEAN UNION. TO THE EXTENT IT IS NOT LEGALLY BINDING IN THE COUNTRY IN WHICH YOU ARE LOCATED, THIS FOREGOING WAIVER DOES NOT APPLY TO YOU.

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