

Privacy Policy

Last Updated: April 25, 2018

This Privacy Policy applies to information collected by ADA Carbon Solutions, LLC and/or its subsidiaries and affiliates (collectively “**ADA-CS**”, “**we**”, or “**us**”) through our web sites www.ada-cs.com and <https://compliance.ada-cs.com> (collectively, our “**Site**”). Our Site is intended for use solely by residents of the United States.

Introduction

This policy describes the type of information we may collect from you or that you may provide when you visit the Site and our practices for collecting, using, maintaining, protecting and disclosing that information. This policy applies to information we collect:

- On the Site.
- In email, text, and other electronic messages between you and the Site.

This policy does not apply to information collected by:

- us offline or through any other means, including on any other website operated by us or any third party; or
- any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Site.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Site. By accessing or using the Site, you agree to our privacy policy. This policy may change from time to time. Your continued use of the Site after we make changes is deemed to be acceptance of these changes, so please check the policy periodically for updates.

Children Under the Age of 13

Our Site is not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on the Site or on or through any of its features, register on the Site, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at privacy@ada-cs.com.

Your Consent

BY USING THE SITE OR PROVIDING PERSONAL INFORMATION TO ADA-CS, YOU AGREE THAT YOU HAVE REVIEWED AND UNDERSTOOD ADA-CS’S [TERMS OF USE](#) AND THIS PRIVACY POLICY TO YOUR FULL SATISFACTION, THAT YOU ACCEPT AND ARE SUBJECT TO ADA-CS’S TERMS OF USE AND THIS PRIVACY POLICY, AND THAT ADA-CS IS PERMITTED TO USE THE INFORMATION IT COLLECTS THROUGH THE SITE AS SET FORTH BELOW. IF YOU ARE NOT IN AGREEMENT WITH THE TERMS AND CONDITIONS OF USE AND THIS PRIVACY POLICY, DO NOT USE THE SITE OR PROVIDE ANY INFORMATION TO ADA-CS.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Site, including information:

- by which you may be personally identified, such as name, e-mail address, telephone number, or any other information the Site collects that is defined as personal or personally identifiable information under an applicable law;
- that is about you but individually does not identify you, such as the name of the Company that you work for; and/or
- about your internet connection, the equipment you use to access our Site and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

Information You Provide to Us.

The information we collect on or through our Site may include:

- Information that you provide by filling in forms on our Site. This includes information provided at the time you subscribe to receive e-mail alerts, you register for access to premium content, such as the ADA Carbon Solutions Compliance Campus, or you request further information or services from us. We may also ask you for information when you report a problem with our Site.
- Records and copies of your correspondence (including e-mail addresses), if you contact us on or through the Site.
- Your responses to surveys that we might ask you to complete for research purposes.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Site, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Site.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Site and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Site according to your individual interests.
- Recognize you when you return to our Site.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of the Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site.
- **Flash Cookies.** Certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Site. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see the **Choices About How We Use and Disclose Your Information** section below.
- **Web Beacons.** Pages of the Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Site and its contents to you.
- To provide you with information, products, or services that you request from us.
- To improve the content of the Site, offer or furnish additional products and services, personalize the types of information you receive from us, assess trends in the use of the Site, develop content and functionality that helps serve customers' needs, and improve the products and services that we provide.
- To fulfill any other purpose for which you provide it. For example, if you provide your e-mail address when you sign up to receive e-mail alerts, we use your e-mail address to deliver the e-mail alerts you request.
- To notify you about changes to our Site or any products or services we offer or provide through it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, you can opt-out by sending us an e-mail stating your request to privacy@ada-cs.com.

We may also use certain statistical analysis services, such as Google Analytics, to generate statistics in the aggregate about visitors to the Site. Google Analytics is a web analytics service provided by Google, Inc. ("**Google**"). For more information, please see the Google website.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Site users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our [terms of use](#) or terms of sale and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property or safety of us, our customers, or others.

Choices About How We Use and Disclose Your Information.

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of the Site may then be inaccessible or not function properly. Also see the **California Do Not Track Disclosures** section later in this privacy policy.
- **Promotional Offers from Us.** If you do not wish to have your contact information used by us to promote our own or third parties' products or services, you can opt-out by sending us an e-mail stating your request to privacy@ada-cs.com.

- **E-Mail Alerts.** If you want to stop receiving e-mail alerts from us, you can opt-out by sending us an e-mail stating your request to privacy@ada-cs.com. You may also opt-out by clicking on the unsubscribe link that we include at the bottom of each e-mail alert and following the instructions to change your e-mail alert preferences or to opt-out of all e-mail alerts.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

California Do Not Track Disclosures

Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, we do not respond to Do Not Track browser setting or signals. In addition, we may use other technology that is commonly used on the internet, such as web beacons and other similar technologies, to track visitors to the Site. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this information confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Site. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

Links to Third Party Websites

Although the Site may provide links to third-party websites, such third party websites are not covered by this privacy policy. These links are provided for your convenience only, and we assume no responsibility for the privacy or security of information you provide to any third party through linked websites or any other means.

Changes to this Policy

We reserve the right to make changes to this privacy policy at any time. Please check the privacy policy when you use the Site to ensure that you are aware of any changes in our privacy practices. The privacy policy will indicate the date it was last updated. Your continued use of the Site, including use after the posting of any changes to the privacy policy, will be deemed acceptance by you of the then-current privacy policy.

To Contact Us. Please contact us at privacy@ada-cs.com to learn more about our privacy practices or to change your privacy choices.