

## PRIVACY POLICY

### New Yorkers for Affordable Groceries

New Yorkers for Affordable Groceries (“**our**,” “**us**,” or “**we**”), respects your privacy. We created this Privacy Policy to let you know what information we collect when you access and use our Website, or create an account via the Website, and how we use it, as well as our information sharing and protection practices.

This Privacy Policy applies to:

- The website [www.groceryaffordability.nyc](http://www.groceryaffordability.nyc) (the “**Website**”); and
- Any email, text and other electronic communications you send to us through the Website.

This Privacy Policy does not apply to:

- Information we collect offline or by any other means (such as through other websites, products or services we may offer); and
- Information collected by third parties, which may have their own privacy policies.

Please read this Privacy Policy carefully and save it. If you do not agree with it, you should not access the Website. **By using the Website or by submitting electronic communications to us through the Website, you consent to the practices prescribed in this Privacy Policy.**

### Important Information and Who We Are

New Yorkers for Affordable Groceries is the controller and responsible for your personal information and data. We have appointed a data privacy manager (“**DPM**”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPM using the contact information set out below.

### What Information Does New Yorkers for Affordable Groceries Collect?

- **Personal Information.** When we refer to “**Personal Information**” in this Privacy Policy, we mean any information by which you may be personally identified or contacted, whether online or offline. When you fill out any forms located on the Website, we may collect certain Personal Information from you, such as your first and last name, employment information, home or other physical address, email address, phone number, or other contact information, whether at work or at home, credit card or other payment information. It is always your choice whether or not to provide Personal Information. If you choose not to provide requested Personal Information, you may not be able to use certain features of the Website.
- **Technical Information.** We may also automatically collect and use technical data and related information, such as information about your device, system and application

software, peripherals and other data related to your interactions with the Website (“**Technical Information**”). We may automatically collect Technical Information through cookies, flash cookies, web beacons and log files. The information we collect from these technologies may include your IP address, device ID, browser information and the page you request. We do not consider this information to be Personal Information.

- **Geo-Location Information.** We may also collect information about your geographic location from you or your device, including your country, region, city, zip code, street address, time zone, latitude, longitude, velocity, bearing, altitude and horizontal position representation information (“**Geo-Location Information**”).

We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **Information You Voluntarily Disclose**

Please keep in mind that whenever you voluntarily disclose Information through any public-facing features of the Website, that Information can be collected and used by others. You submit this Information at your own risk. We are not responsible for the security or privacy of any Information you choose to submit in connection with these public features.

### **How does we use Information?**

We will only use your Information when the law allows. Except as described in this Privacy Policy, Personal Information, Technical Information and Geo-Location Information (collectively, “**Information**”) that you provide or that we collect will be kept confidential and used to support your relationship with us.

We may use your Information, including your Personal Information, as follows:

- To provide software updates, product support, product enhancements and other services to you related to the Website.
- To improve, market or promote our activities.
- To communicate with you.
- To alert you to updated information and other new activities offered by us.
- To respond to comments, questions or requests for customer service.
- For any other purpose we may describe when you provide the Information.

We may also use your Information for any other purpose with your consent. Generally, we do not rely on consent as a legal basis for processing your Information although we will get your consent before sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We will only use your Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Information We Share**

Except as described in this Privacy Policy, we do not share, rent or sell your Personal Information collected through the Website with third parties.

New Yorkers for Affordable Groceries, its agents, vendors or contractors may disclose, share, and use your Information, including your Personal Information, to third parties in the following circumstances:

- To our agents, vendors or contractors that we use to support the internal operations of our business who are required to keep the Information confidential and use it only for the purposes for which we disclose it to them.
- If required to do so by law, comply with legal process or to comply with a governmental or regulatory request.
- To protect and defend the rights or property of our agents or contractors.
- To act in urgent circumstances to protect the personal safety of the Website or the public.
- As part of a transaction or potential transaction where we merge with another organization, files for bankruptcy, or sells its assets or capital stock.

We require all third parties to respect the security of your Information and to treat it in accordance with the law. We do not allow our third-party service providers to use your Information for their own purposes and only permit them to process your Information for specified purposes and in accordance with our instructions.

### **Security of Your Information**

We have put in place appropriate security measures to prevent your Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. These security measures include storing your Information on our secure servers behind firewalls and using encryption technology. In addition, we limit access to your Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Information on our instructions, and they are subject to a duty of confidentiality.

Despite the actions and precautions we take, no data transmissions over the Internet can be guaranteed to be 100% secure, and we cannot ensure or warrant the security of the Information. You acknowledge and agree that you transmit it to us at your own risk. However, we have put in place procedures to deal with any suspected Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data Retention**

We will only retain your Information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Information, we consider the amount, nature and sensitivity of the Information, the potential risk of harm from unauthorized use or disclosure of your Information, the purposes for which we process your Information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

### **Third-Party Websites, Services and Technologies**

We may provide links to third-party websites on the Website or in other communications to you. These links may appear as a specific domain name or URL or may be activated by clicking on an advertisement or other icon or graphic. Please be aware that other websites and services, including the websites of third parties that you connect with through the Website, may collect personally identifiable information about you. We cannot control and are not responsible for the information collection practices of any third-party websites, services or applications. We encourage you to carefully review their terms of use, privacy policies, and any other legal notifications before using or providing information through such websites, services or applications.

Further, the Website may employ third party technologies that require you to accept such third party's terms. This Privacy Policy does not cover the information practices of those third-party technologies.

### **Children's Privacy**

The Website is not intended for children under the age of 13. We do not knowingly collect Information from children under 13. If we learn we have collected or received information from a child under 13, we will delete that information. If you believe that we may have collected Information from a child under the age of 13, please contact us.

### **Your Legal Rights**

Under certain circumstances, you have rights under data protection laws in relation to your Information:

- **Request access** to your Information.
- **Request correction** of the Information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your Information. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your Information.
- **Request restriction of processing** of your Information.
- **Request the transfer** of your Information to you or to a third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your Information.

You will not have to pay a fee to access your Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Information (or to exercise any of your other rights). This is a security measure to ensure that Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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

This is our entire Privacy Policy, and it replaces any earlier version. We may change this Privacy Policy by posting a new version on the Website. If we make material changes to our practices regarding the collection, use and sharing of your Personal Information, we will notify you via e-mail to the email address you provide to us and/or through a notice on the Website home page.

When we do change the Privacy Policy, we will also revise the “revised” date. Your continued use of the Website after such date constitutes your agreement to this Privacy Policy and any updates.