

Introducing the Privacy Policy

This privacy policy ("Privacy Policy") explains how CO2 Neutral Inc. ("Neutrl" or "we") collects and processes information from members and users of the website, software applications, and other online services we provide (collectively "Neutrl's products"). , and the website located at www.neutrl.com (the "Website").

If we ever need additional personal information for a specific reason, we will tell you and ask for your permission. Also, to the extent that Neutrl has links to other websites (like retailers), please note that we do not own, operate, or control them, and they have their own controlling privacy policies that you should review.

What data we collect and why

In order to provide our products, Neutrl collects information that you share directly with us when you use our website or extension. Though you don't have to, you can choose to provide your email to set up an account with us, which lets you earn EcoPoints, see a personalized recommendation feed, and more. You can also set up your profile with your name and other info for a more personalized experience.

Neutrl also collects technical information about your device and use of Neutrl to make sure that our products are working correctly. The information we collect is geared to providing Neutrl members with a better way to shop online and to help us develop, improve, and market our services.

Account and Profile Information

When you become a member of Neutrl, you share a limited amount of information during the registration process, optionally including your name, email address, member password and other registration information to personalize your profile. You can also sign up using your existing Google or Facebook account, which lets Neutrl see basic profile information you provided to Google or Facebook, like your name and email address.

If you choose to link a social media profile (like Facebook) at sign-in, Neutrl will store this information for login purposes. Linking your social media profile grants Neutrl access to the profile, but only as allowed by your permission settings, that platform's terms of service, and this Privacy Policy. We will NOT track any of your social media activity, and we cannot post anything on your behalf.

If you choose to sign in with Google, you'll have the option of importing your contacts so that you can refer your friends to Neutrl. Referral addresses are masked, so we never see or store them, nor can we contact anyone without your permission.

As you continue to use Neutrl's products, you might also provide information when you:

- refer friends from your contacts to Neutrl
- click "follow" on stores you like
- communicate with Neutrl through email or other means

Neutrl cannot see and does not store your payment card data, except in tokenized format (a random algorithmically-generated string) that can only be interpreted by the payment processor.

Technical Information

Neutrl automatically collects information to ensure that our products work correctly on different devices and browsers. This includes data like:

- the type of device you're using
- the device's unique ID (where available)
- operating system
- browser type
- IP address
- event stamp
- error logs

This data allows us to make sure Neutrl products are working correctly, to make your experience better, and to detect and prevent fraud. Also, to help us coordinate our communications and marketing campaigns, and to understand how our users engage with our products, we use common digital tools that allow us to see if you opened an email we sent, visited a link in those emails, or generally interacted with Neutrl as a result of our marketing efforts.

Shopping and Usage Data

On retail sites, Neutrl collects the name of the retailer, page views, and in some cases, product information that allows us to track price changes and update our product catalog. The information you share, and we collect, enables us to improve our products and gives us insights about deals, pricing, and availability of retail items, which we can share with the rest of the Neutrl community. We may also use this information to provide you with a more tailored, relevant experience or show sponsored product offers that may interest you.

Aggregate and Anonymized Data

We may also use the information we collect in aggregate or otherwise anonymized form. This lets us look at interactions with our site and products generally and does not identify you or any specific person. We use this general data for research, development, marketing, analytics, and to enhance the shopping experience for the Neutrl community.

What data we do not collect

We collect information that we believe can help us save our users time and money. This does not include, and we do not collect, any information from your search engine history, emails, or from websites that are not retail sites.

We also do not collect bank or credit card information.

How we share your data

We know how important your personal data is to you, so we will never sell it. We'll only share it with your consent or in ways you'd expect (as we explain here). That means we will share your data if needed to complete your purchase, with businesses who help us operate Neutrl, or if we are legally required to do so.

We may share information with our service providers (businesses that work for and with us) for the purpose of running Neutrl and fulfilling our commitments to you. These include businesses that perform services on our behalf, including to help us maintain our products, to provide support for legal, banking, security protection, payment processing, our own marketing, and customer service. Please know that when we share information with our service providers, it's for the purposes outlined in this Privacy Policy and not for their independent use. For example, we use Google's fraud prevention tool ReCaptcha on parts of our website, but it is only used to fight spam and abuse.

We may also share information in the following cases:

- with your express consent;
- in an aggregate or anonymized format that does not identify any specific person;
- as required by law, or to comply or respond to a valid government request;
- when we believe in good faith that it's necessary to protect our rights, protect your safety or the safety of others, or investigate fraud; and
- with a buyer or successor if Neutrl is involved in a merger, acquisition, or similar corporate transaction. If that happens, you will be notified via email and/or a prominent notice on the Website of any change in ownership, as well as any choices you will have as a result.

How we protect your data

The security of your information is important to us. Our team is dedicated to protecting your information and have put in place physical, electronic, and procedural safeguards.

These measures include limiting access, using encryption, testing for vulnerabilities, advanced malware detection, employing pseudonymization and anonymization techniques, and more.

Though we hate to say it, despite our efforts, we can't guarantee that user information will not be accessed, viewed, disclosed, altered, or destroyed as a result of a breach of any of our safeguards. You provide us with information at your own risk.

Neutrl only retains information about you as long as you keep using Neutrl. We'll also keep information if we need it to meet our legal obligations and to defend against legal claims.

How we use cookies and similar technologies

Like most other online services, Neutrl uses cookies, pixel tags, web beacons, and other markers (we'll just call them "cookies") to collect some of the data discussed in this Privacy Policy. These help us operate our products, analyze engagement and usage, and provide a relevant and personalized shopping experience. See below to learn how you can manage your cookie preferences.

Some cookies can be temporary (“session cookies” like those used for navigating your browser) and disappear once you close it. Others last longer (“persistent cookies,” like when you ask a site to remember your login) and are saved to your computer until you delete them.

Our cookies serve several important functions:

- Operations: These are cookies that we need to make the Neutrl services work, and include remembering your login credentials and entries into a form, adding items to a shopping cart, navigation, and standard tech checks like load balancing or javascript checks.
- Analytics: These types of cookies help Neutrl monitor the traffic and activity on our site, and to coordinate our own marketing campaigns. While they do not identify you specifically, they may be indirectly linked to your unique user ID. We aggregate and anonymize this data to help us detect fraud, understand trends, broad demographic data, and the general operation of our site.
- Attribution: We use third-party pixels on our landing page to tell our advertising partners that someone found Neutrl through one of their ads. In addition, third-party affiliates may use cookies on our behalf, so that Neutrl can get a commission from a merchant when you make a purchase (which we pass on to you as EcoPoints). In both these cases, Neutrl does not reveal any information that can be used to identify you.

If you want to disable cookies entirely, your browser or mobile device might have an option to do that. For more information, including instructions on disabling cookies, please visit: <http://www.allaboutcookies.org/>

Your choices for managing your data

If you would like to delete your profile or personal information, you can always ask us by emailing support@neutrl.com. We will delete any personal information we have, though we may still store some data in an aggregated and anonymized format that doesn't identify you and can't be attributed to you (or if we're legally required).

Additional rights regarding your data

Depending on where you live, you may have additional rights as to the personal information that you share and Neutrl collects. Residents of the EU, UK, Canada, Australia, New Zealand, and California can click below to learn more.

EU, UK, Canada, Australia, and New Zealand residents

Controller: Neutrl is a private company, established in the United States of America. Our address is 1240 Barton Hills Drive, 201, Austin, TX 78704. Our contact email address is support@neutrl.com. For the purposes of the General Data Protection Regulation, we are the data controller.

Legal Bases: The personal information that you share and we collect, as well as its purposes, are described in this Privacy Policy. Neutrl will only collect or process your personal information if we have a legal basis to do so. These are:

- When you consent to our use of your data for a specific purpose.
- When we need that data to enact a transaction or to provide you with services and products that you request. This includes personalizing features and protecting the security of Neutrl and its users.
- When Neutrl has a legitimate interest in using that data in the normal ways you'd expect, like ensuring Neutrl's products run properly, improving and creating new products, historical analytics research, promoting Neutrl, and protecting our legal rights.
- When we need to process your data to comply with a legal or regulatory obligation.

Your rights: You have the following rights with regard to your personal data. To exercise any of these rights, please contact us at support@neutrl.com. Please note that these rights are limited, like for example, where fulfilling your request would adversely affect other individuals or our legal obligations.

- Right to Access: You have the right to request information about your personal data that we hold, how we use it, and who we share it with.
- Right to Portability: Where you have provided your personal data to us on the basis of your consent, you have the right to ask us for a copy of this data in a

structured, machine-readable format and to ask us to send this data to another data controller.

- Right to Rectification: You have the right to ask us to correct your personal data where it is inaccurate or incomplete.
- Right to Erasure: In certain circumstances, you have the right to ask us to delete the personal data we hold about you.
- Right to Withdraw Consent: In situations where we are processing your personal data based on your consent, you may withdraw this consent at any time.
- Right to Object to Processing: In situations where we are processing your personal data based on our legitimate interest, you can object that the interest is no longer legitimate. Neutrl will stop processing that data, unless we can demonstrate an overriding legitimate ground. You can also request to opt out of direct marketing.
- Right to Restrict Processing: You have the right to ask us to stop any active processing of your personal data while we seek to verify data you claim is inaccurate, while we verify our legitimate interests, or while we cannot erase that data due to legal obligations.

Neutrl will try to respond to these requests within 30 days, but some might take longer. You will typically not be charged any fee for effecting these rights, but Neutrl reserves the right to charge a reasonable fee (or refuse to comply) if the request is unfounded, repetitive, or excessive.

Complaints: In the event that you wish to make a complaint about how we process your personal data, please contact us at support@neutrl.com and we will do our best to resolve it. You can also choose to file a complaint with the relevant data protection authority.

California residents.

If you live in California and use Neutrl, you have some additional rights when it comes to your data.

- Right to Delete: You can ask us to delete the personal information we have about you.

- Right to Know: You can ask us for a list of the categories of personal information we have about you, the categories of sources from which we get personal information, the business purposes for which we collect personal information, and the categories of third parties with whom it is shared (you can also see that in this Privacy Policy). You also can ask us for a copy of the pieces of personal information we have about you.

California law gives you the right to opt out of the sale of your personal information. But Neutrl does not and will not sell (or rent, or disclose for value) any of your personal information in the first place. So you're good.

To exercise any of these rights, you (or your authorized agent) can contact us by email at support@neutrl.com. We will confirm receipt of your request within 10 days, and will provide a response to you within 45 days of your request, though in some exceptional cases it might take longer (if that happens, we'll let you know). We will need your name and email address to verify your request, and may also ask for additional information if necessary to verify the identity of the person making the request. We reserve the right to deny your request if we cannot verify your identity, or if an exemption applies (for example, where fulfilling your request would adversely affect other individuals, or where we have a conflicting legal obligation). That said, we will not discriminate against you for exercising any of your privacy rights.

To learn about the categories of personal information that Neutrl uses, please see the section of this policy called "What data we collect and why." The personal information that we have collected in the past 12 months falls into the following categories as set out under California law:

- The contact information you provide – California law refers to these as identifiers.
- We don't track your location, but your IP address gives us a general idea of the city, state, and country – what California law calls geolocation.
- Shopping and Neutrl usage data – California law calls this internet activity.
- Purchases on retail sites when using Neutrl – this is commercial information under California law.

To learn about the limited ways in which we disclose data for our business purposes — that is, to a service provider — and the categories of those service providers, please see the section of this policy called “How we share your data.”

Please note that, while Neutrl provides tools to manage your privacy as described in this policy, we do not support “Do Not Track” browser settings at this time.

Lastly, California residents also have the right to request this information in an accessible alternative format. If you have a disability and would like to access this privacy policy in an alternative format, please contact us by email or mail as detailed below.

Data Transfers and the EU-US Privacy Shield

If we transfer your data outside of the European Economic Area, we will do so within the safeguards of Model Contract Clauses and the EU-US Privacy Shield framework.

As we are located in the United States and Neutrl’s products are operated in the United States, if you are located outside of the United States, please be aware that information you share and we collect will be transferred to, and processed, stored, and used in the United States in order to provide Neutrl’s products to you. The United States does not have an adequacy decision regarding data protection from the European Commission.

CO2 Neutral Inc. (“Neutrl”) complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Neutrl has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov>.

Neutrl is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. With regard to personal data that Neutrl may transfer from the European Union to the United States, in some circumstances, including liability for cases of onward transfers to third parties, you may invoke binding arbitration

We will respond to complaints in a timely fashion, and further commit to refer unresolved Privacy Shield complaints to the American Arbitration Association (AAA), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your

complaint to your satisfaction, please visit <http://go.adr.org/privacyshield> for more information or to file a complaint. The services of the AAA are provided at no cost to you.

Minors

We created Neutrl for the exclusive use of adults (18 and older). We don't knowingly collect or solicit personal information from children. If you are a child under 18, please do not attempt to register for Neutrl's products or send any personal information to us.

If we learn we have collected personal information from someone under 18, we will delete that information as quickly as possible. If you are a parent or guardian of a child who you think may have given us some personal information or posted information on any public portion of Neutrl's products, please let us know at support@neutrl.com. We'll help you remove it.

Changes to this policy

We will continue to update our policies and practices as needed. We will notify you of any changes to our Privacy Policy by posting any changes here. If we do, you'll see that the date at the top of this Privacy Policy has changed.