



# Privacy Policy

Version: 1.0

Adopted and Updated: 04.21.2021

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## **1 PURPOSE AND SCOPE**

- 1.1 GAP Connections, Inc., is committed to protecting your personal information. Your privacy is important to us, and maintaining your trust and confidence is one of our highest priorities. We therefore adhere to ethical standards in the collection, use, and protection of any information you provide. We believe that you should know how information is used and collected, and we appreciate that you trust us to do so carefully and sensibly.
- 1.2 This Privacy Policy sets forth our current privacy practices and explains the information we collect. The Privacy Policy applies to the services and programs that we provide, as well as your use of our websites, mobile apps, other online services and anything else that links to or refers to the Privacy Policy (our “Services”). We hope that by taking a few minutes to read this Privacy Policy, you will have a better understanding of what we do with the information you provide to us and how we keep it private and secure. You acknowledge that by continuing to communicate with the Company that you understand and accept this Privacy Policy and that you freely consent to the privacy practices described in this Privacy Policy.

## **2 PRIVACY POLICY CHANGES**

- 2.1 Due to the rapidly evolving nature of electronic communication, and due to the fact that laws frequently change, we may change this Privacy Policy from time to time as needed. We reserve the right, in our sole discretion and with reasonable notice, to revise, update, or otherwise modify this Privacy Policy. We will post the most current version of this Privacy Policy on the Website. This will enable you to always be aware of what personally identifiable information we may collect and how we may use that information. We encourage you to review this Privacy Policy regularly for any changes. Your continued communication with the Company from time to time will constitute your acceptance of any changes to this Privacy Policy.

## **3 COLLECTED AND USER-PROVIDED INFORMATION; USE OF INFORMATION**

- 3.1 Registration; Participation in Programs. Membership in the Company and certain areas of the Website require that you register for access. In order to register as a Member of the Company or for access to the Website, we require that you provide certain information. That information may include, without limitation, your name, address, telephone number, e-mail address, and date of birth.

Participation in the Company's Services may involve the provision to the Company of other information, including information concerning your operations and your workers. Except as otherwise noted herein, we will not collect or use that information for purposes other than to administer the Company's Services, keep records concerning the use of our Services, and communicate with you regarding such Services and your membership in the Company. Your participation in any of our Services may require that the Company share your personal information with one or more third-party contractors that are retained to administer part or all of the programs on the Company's behalf; however, such information will be provided to such contractor(s) only after they have signed an appropriate nondisclosure agreement promising to keep your information confidential and to use it for no purpose other than to provide the services that the Company has engaged it to provide. The information you provide to us and that we collect through our Services will also be provided to other members of the Company, but only if and to the extent that you authorize us to provide such information to specific members. We may aggregate the information collected on all of our Members through the monitoring and education programs and provide that information to other Members, third parties, and the general public in statistic or other aggregate form; however, none of that information will be traceable to any individual Member, nor will it include the personal identifying or contact information of any Member. Information collected through the Worker Concern Helpline ("WCH") may be shared with agencies that may assist in our resolution of concerns or questions reported to the WCH (for example, the Mexican Consulate or federal or state Departments of Labor), but only with the permission of the person reporting such concerns or questions.

3.2 Accuracy of Collected Information. We review our data collection, storage, and processing practices to ensure that we only collect, store, and process the information needed to provide or improve the Services. We take all reasonable measures to ensure that the information we process is accurate, complete, and current; however, we depend on you to update or correct your information whenever necessary. If you fail to provide or update certain information, you may lose some functionality related to the Company's Services.

3.3 Collected Information.

3.3.1 We may use cookies to personalize or enhance your user experience on the Website. A cookie is a small text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies

is to provide a convenience feature to save you time. For example, if you personalize a web page, a cookie helps the website to recall your specific information on subsequent visits. Therefore, this simplifies the process of delivering relevant content and eases Website navigation by providing and saving your preferences and login information. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser preferences to decline cookies. If you reject cookies, you may disable some of the functionality of the Website. Please check with your browser provider for more information on removing cookies.

3.3.2 Log File Format Information. When you access the Website, we collect site-visitation data automatically and store it in log files. This information includes Internet protocol (IP) addresses, internet service provider (ISP), referring/exit pages, operating system, browser type, date/time stamp, and clickstream data. We will not link this automatically-collected data to personally identifiable information without first obtaining your permission. Each computer that connects to the Internet is assigned a unique IP address for identification purposes. The Website uses an extended log file format to capture that IP address, along with the date and time of your visit, any referral address, and the Internet browser you are using. We do not collect your email address or other personal or financial information when you use the Website, unless you provide that information. Our log files, which do not identify individual users, are used to analyze trends, to administer the Website, to track users' movements through the Website, and to gather demographic information about our user base as a whole. We will merge Website visitation data with anonymous demographic information for research purposes, and we may use this information in the aggregate to help us provide more relevant content and improve our programs.

3.4 User ID and Passwords: Use of the Website or other technology employed by the Company may require a user ID and password. You agree to maintain the confidentiality of your password and are solely responsible for all activities associated with its use, whether authorized or unauthorized. You shall not share or otherwise make available your password with or to other persons. We will never ask you for your password in an unsolicited correspondence. You should always sign out of your account and close all browser windows when you have finished using the Website or other Company technology. This is to ensure that others cannot access your account.

3.5 Notifications: The Company may occasionally send notices to you via mail or e-mail. You will not be able to choose to unsubscribe to these mailings, as they are considered an essential part of the Company's Services. These notifications may include, without limitation, confirmation of education or monitoring event and/or registration, date or time changes for events for which you have registered, and similar notifications or announcements.

3.6 Security: The security of your personal information is of paramount importance to us. When you enter proprietary or sensitive information (such as your credit card number and/or social security number) on our registration forms, your information is sent over an authenticated and encrypted connection using the Secure Socket Layer (SSL).

3.7 Scanned Data: Devices used to scan Grower ID cards are managed by a cloud-based server. This allows for remote management of the device's use of the scanning application and the ability to kill the application or wipe stored data. Offline data from scanning will be stored on the local device's hard disk. Hard encryption (128-bit AES) will be used to encrypt the folder that contains the data to be transmitted. All data transmissions will be handled using secure socket layer (SSL) 128-bit encryption.

3.8 Data Storage: We store your personal information only on servers with restricted access that are located in controlled facilities; and we use a variety of safeguards, technology, and procedures to protect your personal information from unauthorized access, use, or disclosure.

3.9 Data Destruction: We will take reasonable steps to destroy personal information that is no longer needed. We may shred, erase, or otherwise modify such personal information to make it undecipherable.

## **4 DISCLOSURE REQUIRED BY LAW**

4.1 We may disclose, or give access to, your information to an appropriate third-party when we believe in good faith that third-party access is necessary to ensure that we comply with applicable law.

## **5 DISCLAIMER REGARDING THIRD PARTY WEBSITES**

5.1 The Website may contain links to other websites. Merchants and other third parties linked to the Website may have separate privacy and data collection practices. We accept no responsibility and have no liability for such independent

policies. References on the Website to any names, marks, products, or services of third parties or links to third-party websites are provided solely as a convenience to you and do not in any way constitute or imply that we endorse, sponsor, or recommend the third-party and its information, product, or service. We are not responsible for the content or accuracy of material on third-party websites, and therefore we disclaim all responsibility for the content of such third-party websites. If you decide to link to any such third-party website, you do so entirely at your own risk. It is your responsibility to determine when you have left our Website.

## **6 LIMITATION OF WARRANTIES AND LIABILITIES**

6.1 We cannot ensure or warrant the full security of any information mentioned in this Privacy Policy.

6.2 We will disclose any breach of the security of our system to those who require such disclosure under consumer protection laws. Any disclosure shall be made in the most expedient time possible and without unreasonable delay, consistent with the legitimate needs of law enforcement. We may delay a notice if a law enforcement agency determines that the notice would impede a criminal investigation.