**The Home Grown Collective**

**Privacy Policy**

**Effective Date: December 5, 2023**

HOMEGROWNCOLLECTIVE Inc. (“**Home Grown**” or “**we**,” “**us**” or “**our**”) respects your privacy. This Privacy Policy (“**Policy**”) describes how we collect, use, protect and disclose your Personal Information when you access or use our website available at <https://homegrowncollective.org/> (the “**Website**”) and mobile application (the “**App**”). We refer to the Website and App together are the “**Platform**”.

**We reserve the right to modify this Policy at any time. All changes will be effective immediately upon posting to our Platform.**

If you have any questions about this Policy or how we handle your Personal Information, please contact us by email at support@homegrowncollective.org.

1. **PERSONAL INFORMATION**

“**Personal Information**”is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household. Personal Information does not include publicly available information or aggregated information that does not include personal identifiers.

Please note, we may use and disclose aggregated, anonymized or de-identified information collected in connection with our Platform and services and other information that does not identify any individual for any lawful purposes (“**Anonymized Data**”). Except as otherwise required under applicable laws, our use and disclosure of such Anonymized Data is not subject to this Policy.

1. **WHAT PERSONAL INFORMATION DO WE COLLECT?**

Depending on how you use our Platform, we may collect the following categories of Personal Information about you:

* **Identifiers:** Information such as your real name, email address, telephone number, mailing address, birthdate, gender, online identifier, IP address and other similar information.
* **Consumer Information:** Information such as products you have sold or purchased through the Platform and the content of your related communications with us.
* **Business Information:** If applicable, we collect information related to your business, including tax information. If your business tax information includes your social security number, we may ask you for that information.
* **Internet Activity:** Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with our Platform.
* **Device information**: Information such as the IP address, operating system, browser type, language preferences, mobile phone number, device identifier and other similar information associated with a device used to access, use, or interact with our Platform.
* **Geolocation Data:** Imprecise location information, like the city, state and ZIP code associated with your IP address.
* Other information you provide to us.
1. **HOW DO WE COLLECT PERSONAL INFORMATION?**

*Directly from You*

We collect your Personal Information directly from you when you access, use or otherwise interact with our Platform, or otherwise engage with us in connection with our services such as requesting more information about us.

*From You Automatically*

We may collect certain information about you automatically when you use our Platform such as your IP address, mobile carrier, and other device identifiers that are automatically assigned to your computer or device when you access the Internet. For more information, see the “Cookies and Other Tracking Technologies” section below.

*From Third Parties*

We, or third parties acting on our behalf, may collect Personal Information about you from other third parties including, without limitation, online and offline sources, our service providers, third party services, social media platforms, advertising networks, and other public or commercial sources (collectively, “**Third Party Sources**”). The collection of Personal Information from these Third Party Sources can occur in a variety of ways, including:

* We may receive Personal Information about you from third parties that provide services to us through or in connection with our Platform, including our web hosting providers and payment providers.
* We may receive Personal Information related to your use of our Platform from third party analytics providers. For more information, see the “Cookies and Other Tracking Technologies” section below.
* We may also receive Personal Information about you from other users of our Platform, such as those who refer you to us or members from whom you have bought or sold goods.
1. **HOW DO WE USE PERSONAL INFORMATION?**

The primary purposes for which we use Personal Information are:

* *Member Service and Communications.* We may use Personal Information to(1) facilitate purchases; (2) send you emails, calls, and text messages to provide you with alerts and updates about your engagement with the Platform; (3) request feedback, and (4) for those purposes in which you authorize or instruct us to use your Personal Information.
* *Business Purposes.* We may use Personal Information for business purposes including but not limited to: (1) carrying out our obligations and enforcing our rights arising from any contracts we have entered into, including, any contracts between you and us; (2) preventing fraud; (3) assessing the success of our marketing and advertising campaigns; (4) registering accounts; and (5) other business purposes permitted under applicable law.
* *Operational and Purposes*. We may use your Personal Information to help us: (1) operate and improve our Platform; (2) conducting statistical or demographic analysis; and (3) customizing your experience with our Platform.
* *Marketing Purposes.* We may use your Personal Information to advertise and market to you including notifying you of special promotions, opportunities, offers and events via e-mail and other means.
* *Enable user-to-user communications*. We may process your information if you choose to use any of our offerings that allow for communication with another member.
* *Law Enforcement/Legal Purposes.* We may use Personal Information to cooperate with law enforcement or other legal purposes, including: (1) complying with legal and regulatory requirements; (2) satisfying contractual obligations; (3) cooperating with law enforcement or other governmental agencies for purposes of investigations, public safety or matters of public importance when we are legally required to do so or believe that disclosure of Personal Information is necessary or appropriate to protect the public interest; and (4) protecting and defending against legal actions or claims.
1. **DISCLOSING PERSONAL INFORMATION TO THIRD PARTIES**

To operate our Platform and provide our services, we may share certain Personal Information that we, or third parties acting on our behalf, have collected, with certain other third parties including:

* **Service Providers.** We may share Personal Information with service providers. For example, we may share Personal Information with vendors to help us host and manage our Platform; improve the content and functionality of the Platform; perform data analysis and statistical analysis; troubleshoot problems with the Platform; provide email services; provide data processing; and support or provide the security of the Platform.
* **Payment and Billing Processors.** In addition to the service providers above, we share Personal Information with payment processing and billing service providers. We currently use Stripe for payment processing. For additional information about how Stripe uses your information, please visit [Privacy Policy (stripe.com)](https://stripe.com/privacy).
* **Other Users of The Platform.** Depending on how you use the Platform and with your consent, we may share your Personal Information with other users of the Platform to facilitate communications with member businesses or other members, such as for purchasing, shipping, or transactions. For more information about sharing with other members and users, please visit our [URL for Terms and Conditions].
* **Parties to Business Transactions.** In the event of an anticipated or actual merger or acquisition, bankruptcy or other sale of all or a portion of our assets, we may transfer or allow third parties to use information owned or controlled by us, including Personal Information. We reserve the right, in connection with these types of transactions, to transfer, share, assign, or sell your Personal Information and other information we have collected to third parties or to authorize such third parties to use any such information including for due diligence as part of any of the transactions described in this paragraph. Any Personal Information you submit or that is collected after this type of transfer may be subject to a new privacy policy adopted by the successor entity.
* **Government and Law Enforcement.** We may share your Personal Information with individuals or private parties where necessary to enforce and comply with the law, to protect our property or legal rights, for the safety of the public or any person, to prevent harm, to protect the security and integrity of the Platform and any equipment used to make the Platform available.
* **Professional Advisors**. We may share Personal Information with our professional advisors, such as our attorneys, accountants, financial advisors, and business advisors, in their capacity as advisors to Home Grown Collective.
* **Other.** We may share Personal Information with third parties and/or service providers when explicitly requested by or consented to by you, or for the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure).
1. **THE TOOLS WE USE AND YOUR PRIVACY CHOICES**

**Cookies and Other Tracking Technologies**

We use cookies and other similar technologies to operate our Platform, assess Platform performance, improve Platform functionality, and obtain valuable data and statistics about the usage and effectiveness of our Platform. We also use these tools to learn whether you are a repeat visitor, personalize our advertising, and provide you with an enjoyable, customized and innovative online experience.

A cookie is a small text file that a website saves on your computer or mobile device when you visit a website. Cookies enable a website to remember your actions and preferences (such as login, language, font size and other display preferences) and recognize you and/or your browser, along with some information you have provided in the past. Web beacons/pixel tags are small graphics on a webpage or email that monitor your activity when viewing a webpage or email. We may combine information gathered from cookies with other Personal Information.

Generally, the type of information we collect through cookies and other tracking technologies is specific to your computer or other device and includes the IP address, date and time the device accessed our Platform, what parts of our Platform were visited, your internet services provider, the device ID number, approximate geographic location, browser type, the websites you visit before and after coming to our Platform, and whether the web pages requested were delivered successfully.

**Analytics Tools**

We use third-party analytics tools, including:

* *Google Analytics.* Google Analytics is a web analytics tool that assists us in understanding how our Platform is used. Google Analytics will place cookies on your device that will generate information we select about your use of the Platform, including your device’s IP address. That information will be transmitted directly to and stored by Google. The information will be used for the purposes of evaluating use of the Platform, compiling reports on activity on the Platform for our use and providing other services relating to activity on, and usage of, the Platform. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google’s practices with respect to the Personal Information collected through Google Analytics are covered by Google’s privacy policy, available at <https://policies.google.com/privacy>. You may opt-out of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout>.

**Your Choices – How To Manage Your Personal Information**

The Options/Settings section of most internet browsers will tell you how to manage cookies and other technologies that may be uploaded to your device, including how to disable such technologies. You can disable our cookies, or all cookies, through your browser settings, but please note, disabling cookies may impact some of the features of our Platform and prevent them from operating as intended. You can learn more about cookies, including how to see what cookies have been uploaded to your device and how to manage and delete them, by visiting <https://www.allaboutcookies.org/>.

Further, we offer you several choices with respect to how we use your Personal Information.

* You may update or correct any Personal Information you have provided us by editing your account information on our Platform or by contacting us at support@homegrowncollective.org.
* For marketing and other promotional email communications you receive from us, you can opt-out of receiving such communications by following the unsubscribe instructions contained in most email messages from us. Your unsubscribe request or email preference changes will be processed promptly, though this process may take several days. During that processing period, you may receive additional marketing and other promotional emails from us. Please note, opting out of these communications will only apply to marketing and other promotional emails and will not apply to any email or other communications we send to you for non-marketing purposes, including, but not limited to, emails and other communications about your interactions with our Platform.
1. **LINKS TO THIRD PARTY WEBSITES**

Please be aware that our Website and email communications may contain links to other websites on the Internet that are owned and operated by third parties. The inclusion of any link does not imply our endorsement of any other company or its sites, products, or services. This Policy does not apply to the privacy practices of those websites, and we are not responsible for the content or privacy policies of websites to which our Website links. We encourage you to review the privacy policies of other websites to understand their privacy practices.

1. **SOCIAL MEDIA**

We are active on social media, including Facebook and Instagram (“**Social Media**”). Anything you post on Social Media is public information and will not be treated confidentially. We may post (or re-post) on the Platform and our Social Media pages any comments or content that you post on our Social Media pages. Your use of Social Media is governed by the privacy policies and terms of the applicable Social Media providers.

Our Platform may include social media features such as the Facebook “Like” button. These websites may automatically record information about your browsing behavior every time you visit a website that has a social media button, regardless of whether you click on the button. Your use of these features is governed by the privacy policy of the company providing the social media feature, not by this Policy. We recommend that you review your privacy settings on the Social Media sites that you use.

1. **SECURITY OF INFORMATION; RETENTION**

We are committed to protecting the security of your Personal Information. We use commercially reasonable safeguards to maintain the security and privacy of Personal Information we collect and use in connection with our Platform. Nevertheless, when disclosing Personal Information, you should remain mindful that there is an inherent risk in the transmission of information via the internet and mobile platforms.

We reserve the right to retain any Personal Information as long as it is needed to: (1) fulfill the purposes for which we collected the Personal Information; and (2) comply with applicable law.

1. **CHILDREN’S PRIVACY**

We do not direct or target any piece of our Platform to children under the age of 13. If we learn that we have collected the Personal Information of anyone under the age of 13, we will take appropriate steps to delete this information. If you are a parent or guardian of someone under the age of 13 and discover that your child has submitted Personal Information to us, please contact us at support@homegrowncollective.org. We will make reasonable efforts to remove such information from our databases.

1. **CONTACT US**

We welcome your questions, comments, and concerns about privacy and this Policy. Please email us at support@homegrowncollective.org with any questions or feedback you have pertaining to our privacy practices.