LEANPATH[®] PRIVACY POLICY

This policy was last modified November 7, 2013.

Overview

LeanPath is committed to maintaining your confidence and trust, and accordingly maintains the following Privacy Policy to protect the personal information you provide us online. This Privacy Policy applies only to our main site at http://www.leanpath.com and our food waste analytics platform http://online.leanpath.com accessible to customers only through your account (together, referred to as the "Site") and information collected for us or by us through our Site and through various features and online offerings on our Site. It does not apply to any third party site or service linked to our Site or recommended or referred by our Site or by our staff. Further, it does not apply to any other Site or online service operated by LeanPath, or to any of our offline activities. Questions regarding this policy should be directed to <u>info@leanpath.com</u> or (503) 620-6512.

What information do we collect?

We collect two types of information through the Site: personal information and anonymous information. Personal information consists of any information that identifies an individual user of the Site and for entities, Customer Descriptive Data and Account Data as those terms are defined in our <u>Terms of Use</u>. Anonymous information consists of information in the nature of de-identified personal information through aggregation or other means, and de-identified system and usage data of individuals collected from the Site and for entities, System Data and Waste Data as those terms are defined in our Terms of Use. For example, individuals may be asked for personal information when registering on our site, placing an order, subscribing to our newsletter, responding to a survey, filling out a form or subscribing to our services.

When ordering or registering on our site, as appropriate, you may be asked to enter your name, e-mail address, title, organizational affiliation, mailing address, phone number or credit card information. When visiting the public portion of our Site, you do not need to login or submit personal information but we may collect some anonymous usage information through cookies and similar analytical tools. See the information on cookies below.

What do we use your information for?

Any of the information we collect from you may be used in one of the following ways:

• To personalize your experience

(your information helps us to better respond to your individual needs)

• To improve our website and other products and services

(we continually strive to improve our website offerings based on the information and feedback we receive from you)

• To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs)

- To process transactions
- To administer a contest, promotion, survey or other site feature
- To send periodic emails
- To send marketing information about LeanPath services to Site visitors

The email address you provide for order processing, may be used to send you information and updates pertaining to your order, in addition to receiving company news, updates, related product or service information, etc. Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

How do we protect your personal information?

We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information.

We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential.

After a transaction, your personal information related to the transaction (such as credit card number, expiration date, CVV, etc.) may be kept on file for more than 60 days in order to manage automatic renewals. You may request that we process your renewals, if applicable, in a different manner that does not require us to retain this information.

Although LeanPath has implemented a number of security features throughout the Site and LeanPath's service infrastructure to prevent the unauthorized release of or access to personal information, we cannot guarantee absolute security. Please be advised that the confidentiality of any communication or material transmitted to or from LeanPath via the Site, e-mail or via our service infrastructure cannot be guaranteed. When disclosing any personal information, you should remain mindful of the fact that it is potentially accessible to unauthorized parties through illegal hacking, interception or criminal activities, and consequently, can be collected and used by others without your consent. LeanPath has no responsibility or liability for the security of information transmitted via the Internet.

Do we use cookies?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information

We use cookies to help us remember and process the items in your Order or service subscriptions through our Site and for online analytics, understand and save your preferences for future Site visits and compile aggregate data about Site traffic and Site interaction so that we can offer better Site experiences and tools in the future. We also may use cookies to deliver online food waste analytic tools

customized to you. We may contract with third-party service providers to assist us in better understanding our Site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies via your browser settings. Like most websites, if you turn your cookies off, some of our services may not function properly. However, you can still place Orders by contacting customer service.

Do we disclose any information to outside parties?

We do not sell, trade, or otherwise transfer to outside parties personal information except to support our business and assist us to promote and provide our services. In particular, we share personal information with trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our Site policies, or protect ours or others rights, property, or safety. However, we are free to share any and all anonymous information that we collect or de-identify with other parties for any reason, including without limitation marketing, advertising, Waste Data syndication or other uses.

Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our Site. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Site and welcome any feedback about these other sites.

California Online Privacy Protection Act Compliance

Because we value your privacy we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We therefore will not distribute your personal information to outside parties without your consent.

As part of the California Online Privacy Protection Act, all registered users of our Site may make any changes to their personal information at any time by contacting LeanPath support at support@leanpath.com.

Childrens Online Privacy Protection Act Compliance

We are in compliance with the requirements of COPPA (Childrens Online Privacy Protection Act), we do not knowingly collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

Your Consent and Notification of Changes

By using our Site, you consent to the collection and use of this information by LeanPath. LeanPath may modify this Privacy Policy from time to time. If we decide to make a material change in our Privacy Policy, we will post that change on this page and on any other pages or locations we deem important to

alert you about the change in our privacy and information collection practices. Your continued use of this Site following the posting of changes to these terms will mean you accept these changes. In some cases, we may attempt to contact you through an email or other address you have provided to give you information and choices about our using your personal information in a manner different from that stated at the time of collection. In addition, if we make any material changes in our privacy practices that affect your personal information already stored in our database, we apply those changes to the personal information in our possession only with your consent or as otherwise permitted by applicable law.

Changes to LeanPath's Business

In the event LeanPath goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, our customers' personal information may be part of the assets transferred. The information transferred or shared remains subject to the promises made in this Privacy Policy, unless you agree to new terms.

Changing Your Information and Opting Out

You may have the right to access the personal information which LeanPath has collected about you. You may also have the right to modify any errors contained in that information. Please contact us for more details. Our Site provides visitors and customers the opportunity to opt-out of receiving certain specific types of communications from us and our partners at the point where we request information about the visitor or customer. In addition, you may unsubscribe or opt out of all future electronic communications from us that do not relate to the products and services you have ordered by (1) calling the number listed below or (2) clicking the unsubscribe link on any email marketing communication you receive.

Further Information about LeanPath Privacy Policy and Practices

This Privacy Policy applies to all visitors and customers of our Site. If you become an inactive customer, or if we close or suspend your account, we will continue to adhere to the Privacy Policy in place when we collected your personal information so long as we retain it in our databases. We may delete any or all of your information at any time without notice to you for any reason or no reason unless otherwise required by law to retain it. You may have other privacy protections under state laws and we will comply with any applicable state laws when we disclose information about you. This Privacy Policy replaces our previous policy on this topic and any statements or disclosures to you about our information practices.

Contacting Us

If there are any questions regarding this privacy policy you may contact us using the information below.

LeanPath, Inc. 10180 SW Nimbus Ave Portland, OR 97223 USA <u>info@leanpath.com</u> www.leanpath.com (503) 620-6512