

Effective October __, 2021

Overview

This Privacy Policy describes how and why Forage Technology Corporation (“Forage”, “We”, “Us” and “Our”) collects, stores, uses, and shares Personal Data when you (the “User”, “You”, “Your”) visit Our Website or use Our services, including services related to Your EBT Transactions (the “Services”).

“EBT Transaction” means a transaction subject to the requirements set by the US Department of Agriculture Food and Nutrition Services (“FNS”) and any state or local requirements governing online purchases of households benefiting from the Electronic Benefits Transfer (“EBT”) system under the Supplemental Nutrition Assistance Program or any other similar program adopted by the FNS, including without limitation any requirements applicable to payments using EBT benefits and store eligibility requirements, as such requirements may be updated from time to time.

“Personal Data” in this policy means protected information about You, including without limitation Your identity, finances, and online behavior as detailed in Section 1 below.

“Website” means <https://www.joinforage.com/> and any successor website.

Please note that We also act on behalf of and under the instructions of financial institutions, merchants and other partners which act as data controllers, including for processing payment transactions. Please refer to their respective privacy policies for more information regarding the processing of Your Personal Data in these contexts.

For information on how we use cookies, please refer to our Cookie Policy.

1. The Personal Data We collect

Depending on how You interact with Our Website and Services We may collect the following categories of Personal Data:

- Transaction information, such as type of purchase, personal account number, the merchant’s information, the date and the total amount of the transaction, and other information provided by financial institutions or merchants needed to process EBT Transactions.
- Website, device and mobile app usage, the browser You use, Your network connection, Your IP address, and details and similar information collected via automated means, such as cookies and similar technologies directly from Your device.
- Information You provide about Yourself like Your name, billing address, email address, phone number, and payment information.

2. How We May Use Your Personal Data

We May Use Your Personal Data to:

- Process Your EBT transactions
- Operate, evaluate, support and improve Our Services, through the use of aggregated and anonymized Personal Data and usage data
- Detect security breaches, protect against fraud and malicious activity and take action against wrongdoers (e.g. fraudsters and hackers)
- Perform other business purposes

3. How We protect Your Personal Data

We have implemented appropriate technical and organizational security measures designed to protect the security of any Personal Data We process, including compliance with the security standards set by the Payment Card Industry (aka PCIDSS).

4. How We store Your Personal Data

We use the Amazon's distributed cloud storage resources to store Your Personal Data. Accordingly, Your Personal Data may be stored on servers inside or outside the United States.

5. How Long Do We Keep Your Information?

We will only keep Your Personal Data for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

6. Your rights over Your Personal Data

Depending on how You use the Forage Services, You may have the right to request access to, correct, amend, delete, port to another service provider, restrict, or object to certain uses of Your personal data.

If You complete an EBT Transaction and wish to exercise these rights over information about Your purchase, You need to directly contact the merchant You interacted with. We are only a processor on their behalf, and cannot decide how to process their information. If We have a direct contractual relationship with You, please submit Your data subject request to contact@joinforage.com.

Finally, because there is no common understanding about what a "Do Not Track" signal is supposed to mean, We don't respond to those signals in any particular way.

7. Your specific rights under the California Consumer Privacy Act ("CCPA")

a. CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

(1) every individual who is in the State of California for other than a temporary or transitory purpose and

(2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to You, We must adhere to certain rights and obligations regarding Your Personal Data.

The payment transaction information that Forage collects is regulated by existing federal financial privacy laws. The CCPA recognizes that such financial information is already protected by federal privacy law, so the CCPA does not apply to this information.

Beyond financial information, Forage may collect certain information that is subject to the CCPA. This supplemental privacy notice explains our practices for this CCPA-covered information.

b. What categories of Personal Data do We collect?

We have collected the categories of Personal Data listed in Section 1 in the past twelve (12) months.

We may also collect other Personal Data outside of these categories instances where You interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through Our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of Our Services and to respond to Your inquiries.

c. How do We use and share Your Personal Data?

You may contact us by email at support.contact@joinforage.com, or by referring to the contact details at the bottom of this document.

If You are using an authorized agent to exercise Your right to opt-out We may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on Your behalf.

d. Will Your information be shared with anyone else?

We may disclose Your Personal Data with Our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on Our behalf.

We may use Your Personal Data for Our own internal business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of Your personal data.

Other than to provide the Services, Company has not disclosed and Company has not sold any Personal Data to third parties for a business or commercial purpose. Company will not sell Personal Data in the future belonging to Website visitors, users and other consumers.

e. Your rights with respect to Your Personal Data

i. Right to request deletion of the data - Request to delete

You can ask for the deletion of Your Personal Data. If You ask us to delete Your Personal Data, We will respect Your request and delete Your Personal Data, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, Our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

ii. Right to be informed - Request to know

Depending on the circumstances, You have a right to know:

- whether We collect and use Your Personal Data;
- the categories of Personal Data that We collect;
- the purposes for which the collected Personal Data is used;
- whether We sell Your Personal Data to third parties;
- the categories of Personal Data that We sold or disclosed for a business purpose;
- the categories of third parties to whom the Personal Data was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling Personal Data.

In accordance with applicable law, We are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

iii. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against You if You exercise Your privacy rights.

iv. Verification process

Upon receiving Your request, We will need to verify Your identity to determine You are the same person about whom We have the information in Our system. These

verification efforts require us to ask You to provide information so that We can match it with information You have previously provided us. For instance, depending on the type of request You submit, We may ask You to provide certain information so that We can match the information You provide with the information We already have on file, or We may contact You through a communication method (e.g. phone or email) that You have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use Personal Data provided in Your request to verify Your identity or authority to make the request. To the extent possible, We will avoid requesting additional information from You for the purposes of verification. If, however, We cannot verify Your identity from the information already maintained by us, We may request that You provide additional information for the purposes of verifying Your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as We finish verifying You.

v. Other privacy rights

- You may object to the processing of Your Personal Data
- You may request correction of Your Personal Data if it is incorrect or no longer relevant, or ask to restrict the processing of the data
- You can designate an authorized agent to make a request under the CCPA on Your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on Your behalf in accordance with the CCPA.
- You may request to opt-out from future selling of Your Personal Data to third parties. Upon receiving a request to opt-out, We will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, You can contact us by email at contact@joinforage.com. If You have a complaint about how We handle Your data, We would like to hear from You.

8. Will We change this Privacy Policy?

We may update this Privacy Policy from time to time. We will post an alert online if the changes are material. If the changes will materially affect the way We use Personal Data that We have already collected, We will notify You.

Cookie Policy

Effective October __, 2021

Forage Technology Corporation (“**Forage**”, “**We**”, “**Our**” or “**Us**”) values individual privacy. This Cookie Policy (“**Policy**”) explains what cookies are, the types of cookies placed on Your device when you use Our Website (as defined below) and Services and how we use cookies. This Policy applies when you visit Our website <https://www.joinforage.com/> (“**Website**”) and/or otherwise use Our Services.

Except as otherwise stated in this policy, the Privacy Policy will apply to Our collection and disclosure of Your Personal Data.

Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Privacy Policy.

What are Cookies?

Cookies are small pieces of text used to store information on web browsers. A cookie also may store unique identifiers, such as information about Your computer, user settings and preferences, and other information.

Why we use Cookies

Cookies enable us understand the information we receive about you, including information that allows us to improve Our Website and Services and Your experience thereon.

Types of Cookies

Session and persistent cookies

Session cookies and Persistent cookies are different types of cookies.

- Session cookies only stay while the user is browsing the website. Once the user closes the browser window, the session cookies are deleted. We use session cookies primarily to help you use Our Website and Services more efficiently and to learn more about Your use of our Website and Services.
- Persistent cookies are not automatically deleted when you close Your web browser. These cookies stay in Your browser until they expire or you delete them. We use these cookies primarily for analytical purposes.

How we use Cookies

We use cookies to provide, secure and improve Our Website and Services, including by personalizing Your experience and recognizing You when you visit Our Website or use Our Services.

For these purposes, we also may link information from cookies with other personal data we hold about You. When You visit the Website or use Our Services, some or all of the following cookies may be set on Your device. Cookies, like all technologies, can be swiftly replaced by more secure and performant cookies.

Your choices regarding cookies

You may determine which cookies You accept via Your cookies preferences in a few different ways. Please note that changes You make to Your cookie preferences may prevent all or part of Our Website or Services from functioning as intended.

Browser and devices controls

Some web browsers provide settings that allow users to control or reject cookies or to alert users when a cookie is placed on their computer. The process for managing cookies is slightly different for each internet browser. The “*Help*” function of Your web browser should explain how to control cookies.

You also may be able to reject device identifiers by activating the appropriate setting on Your mobile device, as available. The procedure for managing device identifiers is slightly different for each device. You can check the specific steps in the help or settings menu of the device You use.

Updates to this Policy

We may update this Cookie Policy from time to time. We will post an alert online if the changes are material. If the changes will materially affect the way We use Personal Data that We have already collected, We will notify You.

Contact Us

If You have any questions about Forage’s cookies practices and this Policy, please contact us at contact@joinforage.com.