

PRIVACY POLICY

1. Our Commitment to Privacy

This notice describes our Privacy Policy. Our privacy policy explains how FishWise collects, uses, and protects the personal information obtained through the use of our RISE website https://www.riseseafood.org ("Site"). By accessing or using the Site you are accepting the practices described in this Privacy Policy. Your use of our Site and any dispute over privacy, is subject to this Privacy Policy and our Terms of Use https://www.riseseafood.org/RISE_terms.pdf, including its applicable limitations on damages and the resolution of disputes. The Terms of Use are incorporated by reference into this Privacy Policy.

2. What Information Is Collected

Under the EU General Data Protection Regulation (GDPR), FishWise is a Data Controller.

We collect information directly from you, information from third parties, and information through your use of our Site.

(a) Information We Collect Directly From You

Some functions of the Site may require you or your client to provide us with your contact name, company name, and email address. However, no user accounts will be created on the Site.

We also collect information that you provide to us when you participate in surveys, questionnaires, or other data collection services on our Site or when you send email or other communications to us.

(b) Information We Collect Automatically

In addition to information you provide to us while using our Site, we may collect certain information automatically. We may collect:

- Device information (such as web browser, operating system, IP address)
- Use information (web pages you view, links you click, the date and length of time for each Site visit)
- Location information (through IP address, web beacons, or your mobile device's GPS, Bluetooth, or Wi-fi signal)

Please see the section "Our Use of Cookies and Other Tracking Mechanisms" below for more information.



(c) We Do Not Collect Sensitive Data

We do not collect any types of Sensitive Data from our users. Sensitive Data includes any personally identifiable information pertaining to: race or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, genetic or biometric data, health or mortality, and sex life or sexual orientation. Please immediately notify us if you have accidentally submitted any Sensitive Data and we shall promptly remove such information.

3. How and When the Information is Used

The information we collect is used for administering our business activities. No personally identifiable information is sold, gathered or used for any other purpose. We may additionally use the information to notify you about changes to our Site, new services, or special offers.

(a) Communications

We may use your personal information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions in any email we send.

(b) Aggregated Data

- Users can submit a detailed questionnaire about their company. This may include some personally identifiable information that will not be made public. We may publish this data as an aggregated and anonymized report.
- Users can sign up for educational modules, in which we will track details about your progress and results. We may publish this data as an aggregated and anonymized report.

4. How We Share Your Information

We may share your information, including personal information, as follows:

(a) Business Transfers

If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company.



(b) In Response to Legal Process

We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.

(c) To Protect Us and Others

We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Privacy Policy, or as evidence in litigation in which we are involved.

5. Release of Information

We will not sell, trade, or rent your personally identifiable information to others. However, we do provide some of our services through contractual arrangements made with affiliates, service providers, partners and other third parties ("Service Partners"). Our Service Partners include Google, Amazon Web Services, Tableau, and Zoho. We use Google to monitor our web analytics. They will not be receiving any personal information. We use Amazon Web Services, Tableau and Zoho to store your data. We and our Service Partners may need to use some personal information in order to perform tasks between our respective sites, or to deliver services to you.

6. How We Protect Your Information

All of your personally identifiable information will be stored on Amazon Web Services, Zoho, and Tableau. We have in place commercially reasonable security measures to protect the information we collect from loss, misuse, unauthorized access, and destruction. This includes encrypting data while in transit and at rest, using two-factor authentication, and restricting access to data to only FishWise employees. However, please be aware that despite our best efforts, no data security measures can guarantee 100% security. All information we collect may be stored in perpetuity, unless we receive a request by you to remove such information.

Although we describe much of the following processes throughout this Privacy Policy, please do not hesitate to email us at RISE@FishWise.org to receive the following information:

- What personal information pertaining to you is being processed
- Why this information is being processed
- Who has access to this personal information about you
- How this personal information is being used in automated decisions
- What processes are using this information



7. Our Use of Cookies and other Tracking Mechanisms

Fishwise uses cookies and other tracking mechanisms to track information about your use of our Site. We may combine this information with other Personal Information we collect from you. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site or to allow us to track your activities on our Site. Please visit the following link to view how Google Analytics uses cookies: https://support.google.com/analytics/answer/6004245.

WHAT ARE THE DIFFERENT TYPES OF COOKIES AND HOW DO WE USE THEM?

a) <u>Essential</u>: These are cookies which are essential for the running of our Site. Without these cookies, parts of our Site may not function. These cookies do not track where you have been on the internet and do not gather information about you that could be used for marketing purposes.

Examples of how we may use essential Cookies include:

- Setting unique identifiers for each unique visitor, so that user numbers can be analyzed.
- b) <u>Functional</u>: These cookies may be used to remember certain Site preferences. The information collected by these cookies is usually anonymized, so we cannot identify you personally. Functional cookies do not track your internet usage or gather information which could be used for selling advertising.

Examples of how we may use functional Cookies include:

- Gathering data about visits to our Site, including numbers of visitors and visits, length of time spent on the Site, or where visitors have come from.
- c) <u>Third Party Cookies</u>: You may notice on some pages of our Site that cookies have been set that are not related to us. When you visit a page with content embedded from these third-party service providers, such as Google Analytics and Zoho, may set their own cookies on your device. We do not control the use of these third-party cookies and cannot access them due to the way that cookies work, as cookies can only be accessed by the party who originally set them. Please check the third-party websites for more information about these cookies.
- d) <u>Disabling Cookies:</u> Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to refuse, disable, or delete cookies, some of the functionality of our Site may no longer be available to you. Without this information, we are not able to provide you with all the requested services, and any differences in services are related to your information.



- Some browsers transmit "do-not-track" signals to websites. Because of differences in how browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.
- e) <u>Clear GIFs, pixel tags and other technologies</u>: Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our Site and Services to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about Site usage. We and our third party service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

8. International Data Transfer

FishWise is a United States company. If you are located outside the United States and choose to provide information to us, FishWise transfers and stores personal information to the United States for processing. The U.S. may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to the U.S., we will protect it as described in this Privacy Policy. By visiting the Site, or providing FishWise with any information, you fully understand and unambiguously consent to this transfer, processing and storage of your information in the United States.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features in an effort to prevent loss, theft and unauthorized access, use and disclosure.

9. Third Party Analytics

We use Google Analytics and Zoho to evaluate usage of our Site. We also may use other analytic means to evaluate our Site. We use these tools to help us improve our Site, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your personal information with Google Analytics, but Zoho will receive personal and business information you provide to us.

10. Third-Party Links

When you click on links on our Site, they may direct you away from our Site. We are not responsible for the privacy practices of other websites or mobile applications and encourage



you to read their individual privacy policies. If you visit a third-party website or mobile application link from our Site, you do so at your own risk.

11. CAN-SPAM Act and Opting Out of Emails

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations. We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions.
- We may also send you additional information related to your account or our Services.
- Market to our mailing list or continue to send emails to our users after an account has been created.

To be in accordance with CANSPAM we agree to the following:

- NOT use false, or misleading subjects or email addresses
- Identify the message as an advertisement in some reasonable way
- Include the physical address of our business or site headquarters
- Monitor third party email marketing services for compliance.
- Honor opt-out/unsubscribe requests quickly
- Allow users to unsubscribe by using the link at the bottom of each email

We may send periodic promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions contained in the email. Please note that it may take up to 10 business days for us to process opt-out requests. Even if you opt-out, we may still communicate with you about your account or any Services you receive from us.

12. Children

The Site is not intended for use by children under the age of 13. FishWise does not allow individuals under the age of 13 to sign up for the mailing list nor do we knowingly collect or use any personal information from such children. If you are under the age of 13, do not submit any information to our Site. If we learn that we collected personal information from children under the age of 13, we will take steps to delete that information as soon as possible.

13. Changes to Privacy Policy

If our Privacy Policy or procedures change, we will immediately post those changes on our



Site. You can access our most recent Privacy Policy < https://www.riseseafood.org/privacy.pdf>. Any such changes will be effective immediately upon being posted, unless otherwise stated in the change.

14. California Residents Privacy Rights

The California Consumer Privacy Act (CCPA) provides consumers who are residents of the State of California with specific rights related to their personal information, subject to certain exceptions. It also requires us to disclose the information we collect, the purposes for which we collect it, and what we share and disclose.

California Civil Code § 1798.83, also known as the "Shine the Light" law, provides California residents with the right to request, once per year, without charge, information from website operators and owners regarding the Personal Information that they collect online and offline, if any, and the third parties, including affiliates, with which they have shared this information during the preceding calendar year, for the direct marketing purposes of the third party. If such information is collected and shared with third parties for their direct marketing purposes, the website operator or owner is required, upon request, to provide the list of categories of Personal Information they collect, if any, and the names and addresses of all third parties with which it has shared such information for direct marketing purposes.

A website operator or owner may meet its obligations, and be exempt from such disclosures, under the Shine the Light law, if it provides California residents the right to optout of, and thereby prohibit, the website operator or owner from sharing such Personal Information with third parties including its affiliates, for the direct marketing purposes of the third party.

In accordance with California Civil Code section 1798.83(c)(2), Fishwise complies with California 's "Shine the Light" law by providing all of its users, including its California users, with a cost-free method to opt-out of the sharing of Personal Information with all third parties for the direct marketing of those third parties, by not disclosing to third parties, for their direct marketing purposes the Personal Information of any customer if the customer has exercised the option to prevent such disclosure, and by disclosing these policies in its Privacy Policy. Consequently, Fishwise is not obligated under Shine the Light to provide California users, who have requested such information, a list of the categories of the Personal Information disclosed by Fishwise to third parties for their direct marketing purposes or the names and addresses of the third parties to which Fishwise has shared such Personal Information for their direct marketing purposes during the preceding calendar year.

California residents may have further rights related to the handling of their Personal Information under the California Consumer Privacy Act. While Fishwise does not "sell" your Personal Information in the traditional sense, it may share your information with third parties. California residents may have certain rights related to this information, including the right to ask that we "Do Not Sell Your Personal Information," the right to ask that we Delete



your Personal Information, or the right to request access to the categories or specific pieces of Personal Information we have collected about you. California residents also have the right to not be treated differently by Fishwise in response to your decision to exercise any of these rights.

To learn more about these rights, to opt-out of our sharing of your Personal Information, and to exercise other rights that apply, please contact Fishwise by emailing us at RISE@fishwise.org. As part of your request, we may ask for certain information including your name and account information, or the manner in which you have previously interacted with Fishwise. We will use this information only to contact you about your request and to verify your request. You may also designate an authorized agent to submit a request on your behalf.

15. Effective Date

This Privacy Policy is effective as of May 5, 2021.