

Privacy Policy

Introduction

WildTrack, Inc. ("**WildTrack**", "**we**" or "**our**") respects your privacy and is committed to protecting it through our compliance with this Privacy Policy. This Privacy Policy describes:

- The types of information we may collect or that you may provide when you access or use our website, mobile applications, and other business tools and consulting services, including our footprint identification technology and associated image database (collectively or individually, the "**Service**").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy DOES NOT apply to information that:

- We collect offline or on any websites you may access through the Service.
- You provide to or is collected by any third party (see Third Party Information Collection).

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not access or use the Service. By accessing or using the Service you agree to this Privacy Policy. This Privacy Policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of the Service after we revise this Privacy Policy means you accept those changes, so please check the Privacy Policy periodically for updates.

Information We Collect and How We Collect It

We collect several types of personal information from and about users of our Services, which may include the following:

- **Identifiers**, such as name, postal address, email address, affiliation and/or telephone number.
- **Protected characteristics**, such as age and gender.
- **Sensory information**, such as audio, electronic, visual, thermal, olfactory, or other similar information.
- **Commercial information**, such as any billing and transaction information and records of products or services purchased, obtained, or considered.
- **Internet or network activity information**, such as information generated from interactions with our online services, such as data collected through server logs and cookies and similar technologies.
- **Geolocation**, such as physical location or movements.
- **Professional or employment-related information**, such as current or prior organizational, job title, information about your role, and work-related contact details.
- **Inferences** that we derive from the preceding or other information we collect.

We collect personal information:

- Directly from you when you provide any information to us.
- Automatically when you use the Service. Information collected automatically may include usage details, IP addresses, referring URL, and information collected through cookies, pixel tags, web beacons, and other tracking technologies.
- From third parties, for example, our business partners and service providers.

The personal information we collect on or through the Service may include:

- Information that you provide at the time of registering to use the Service.
- Information you provide when you report a problem with the Service.
- Details of transactions you carry out through the Service. You may be required to provide financial information before placing an order through the Service.
- Information you provide while using the Service.
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.
- Your search queries on the Service.

You may also provide information for publication or display ("**Posted**") on public areas of the Service (collectively, "**User Contributions**"). Your User Contributions are Posted and transmitted to others at your own risk. Additionally, we cannot control the actions of third parties with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

When you access and use the Service, we may use technology to automatically collect:

- **Usage Details.** When you access and use the Service, we may automatically collect certain details of your access to and use of the Service, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the Service.
- **Device Information.** We may collect information about your mobile device or computer device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- **Stored Information and Files.** The Service also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
- **Location Information.** This Service collects real-time and/or historic information about the location of your device in coordination with the Service.

Information Collection Technologies

The technologies we may use for automatic information collection may include:

- **Cookies.** A cookie is a small file placed on your mobile device or computer device. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your device. However, if you select this setting you may be unable to access certain parts of our Service.
- **[OTHER TECHNOLOGIES IF APPLICABLE].**

Third-Party Information Collection

When you use the Service or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include certain application providers, content providers, [analytic companies, and advertisement companies].

These third parties may use tracking technologies to collect information about you when you use this Service. The information they collect may be associated with your personal information or they may

collect information, including personal information, about your online activities over time and across different websites and services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the Service and its contents, and any other information or services that you request from us.
- Maintain and improve the Service.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when Service updates are available, and of changes to any products or services we offer or provide through it.
- For research purposes (as it relates to images, data, and metadata about animals).
- To allow you to participate in interactive features on our Service.
- To gather data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our products and services, marketing and your experience and create anonymous, aggregated data.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our products and services is among the assets transferred.
- Fulfill any other purpose for which you provide it.
- For any other purpose with your consent.

The usage information we collect helps us to improve our Service and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Service according to your individual interests.
- Speed up your searches.
- Recognize you when you use the Service.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual without restriction.

In addition, we may disclose personal information that we collect, or you provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held us about our users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including the Terms of Service and Data License Agreement, and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of WildTrack.

Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Service may then be inaccessible or not function properly.
- **Location Information.** You can choose whether or not to allow the Service to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some parts of the Service may become inaccessible or not function properly.

Data Protection Rights

WildTrack would like to make sure you are fully aware of all of your data protection rights. You are entitled to the following:

- You have the right to request copies of your personal information.
- You have the right to request that WildTrack correct any information, including personal information, that you believe is inaccurate. You also have the right to request WildTrack to complete information, including personal information, you believe is incomplete.
- You have the right to request that WildTrack erase your personal information.
- You have the right to request that WildTrack restrict the processing of your personal information.
- You have the right to request that WildTrack transfer the data that we have collected directly to you.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at: info@wildtrack.org.

“Do Not Track” Disclosure

We do not collect or respond to Do Not Track signals and our websites do not function differently based on any Do Not Track preferences that may be received. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Service, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Service. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

Retention of Your Information

- We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy unless otherwise required by law. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.
- We will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service or we are legally obligated to retain this data for longer time periods.

Where Your Information is Held

Your personal information may be held in our possession in the United States. Depending on where you are located and the information provided to us, the personal information may be transferred to and maintained by us on servers located in the United States, which may not have the same data protection laws. However, we take all necessary measures to protect your personal information in accordance with this Privacy Policy and applicable law. By providing such information through the Service, you hereby expressly consent to such transfer and processing of your data personal information into the United States.

To our European Union residents, it is sometimes necessary for us to share your personal information outside of the European Economic Area (“EEA”), as our offices are outside the EEA. The following circumstances may apply when these transfers are subject to special rules under European and UK data protection law:

- With your and our service providers located outside the EEA;
- If you are based outside the EEA; or

- Where there is an international dimension to the services we are providing to you.

We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. If you would like further information, please contact us at info@wildtrack.org.

Information about Minors

The Service is not intended for children under 16 years of age, and we do not knowingly collect any personal and/or identifiable information from children under 16. If we learn we have collected or received any personal and/or identifiable information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any personal and/or identifiable information from or about a child under 16 please contact us at info@wildtrack.org.

Your California Privacy Rights

This section of the Privacy Policy applies solely to visitors, users, and others who are residents of the State of California (“**consumers**”). If a term used in this section of the Privacy Policy is defined in either the California Consumer Privacy Act of 2018, as amended (“**CCPA**”) and/or the California Consumer Privacy Act Regulations promulgated by the California Attorney General (the “**Regulations**”), then that term shall have the same meaning as the definition in the CCPA and/or its Regulations when used in this section of the Privacy Policy only.

For example, when used in this section of the Privacy Policy only, “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include information exempted from scope of the CCPA (such as information covered by certain sector-specific privacy laws) or information exempted from the CCPA’s definition of personal information (such as publicly available information or consumer information that is deidentified or aggregated).

Sale or Sharing of Personal Information

We do not, and will not, sell Personal Information to any third-party. We also do not, and will not, share any Personal Information with third-parties for the third-parties’ marketing purposes.

Our Personal Information Collection and Use Practice

We collect Personal Information when a California consumer uses, visits or participates in the Service. The categories of Personal Information we may collect are described below with reference to the statutory categories of Personal Information specified in the CCPA (California Civil Code section 1798.140):

- **Identifiers**, such as name, postal address, email address, affiliation and/or telephone number.
- **Protected characteristics**, such as age and gender.
- **Sensory information**, such as audio, electronic, visual, thermal, olfactory, or other similar information.
- **California customer records** (as defined in California Civil Code § 1798.80), such as contact details and communications we collect through our support channels, webpages, social media, at our events, and connected with our other marketing activities.

- **Commercial information**, such as any billing and transaction information and records of products or services purchased, obtained, or considered.
- **Internet or network activity information**, such as information generated from interactions with our online services, such as data collected through server logs and cookies and similar technologies.
- **Geolocation**, such as physical location or movements.
- **Professional or employment-related information**, such as current or prior organizational, job title, information about your role, and work-related contact details.
- **Inferences** that we derive from the preceding or other information we collect.

We describe the categories of third parties to whom we disclose Personal Information and the business and commercial purposes for which we use the Personal Information above.

Privacy Rights

Consumers may request the following information about how we have collected and used your Personal Information during the past 12 months:

- The categories of Personal Information we collected.
- The categories of sources from which we collected the Personal Information.
- The business or commercial purpose for collecting and/or selling Personal Information.
- The categories of third parties with whom we shared Personal Information.
- The categories of Personal Information that we sold or disclosed for a business purpose.
- You may request a copy of the Personal Information of the Personal Information that we have collected about you during the past 12 months.
- You can ask us to delete the Personal Information that we have collected from you.

How to Exercise Your Rights

To submit requests to exercise your privacy rights as described herein, please email us at info@wildtrack.org. When submitting such request, you must provide your full name, address, phone number, email address, and affiliation, if any. We will use such information to attempt to verify your identity by comparing the information provided to the information collected and/or maintained by us.

California consumers have the right to designate an authorized agent to exercise the privacy rights conferred by the California Consumer Privacy Act and listed herein on their behalf. Your authorized agent may make a request on your behalf upon our verification of the agent's identity and our receipt of a copy of the valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity and provide us with written confirmation that you have given the authorized agent permission to submit the request.

Right to Not Be Discriminated Against

California consumers have the right not to receive discriminatory treatment from us for the exercise of the privacy rights conferred by the California Consumer Privacy Act and listed herein. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Individuals with Disabilities

If you have a disability and need access to this Privacy Policy in a different format, please contact us at info@wildtrack.org.

California Shine the Light Law

In addition to these rights, pursuant to California's "Shine the Light" law, California consumers who share Personal Information with us have the right to request and obtain from us once per year, free of charge, a list of the third parties to whom we have disclosed their Personal Information (if any) for direct marketing purposes in the prior calendar year, as well as the type of Personal Information disclosed to those parties. If you would like to exercise this right, please contact us at info@wildtrack.org.

Your Privacy Rights under other State-Specific Laws

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to info@wildtrack.org. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Virginia residents may have additional personal information rights and choices. In accordance with the Virginia Consumer Data Protection Act, as amended from time to time ("VCDPA"), you may: (1) confirm whether we are processing your personal information, and access that personal information; (2) receive your personal information in a portable and readily useable format; (3) correct inaccuracies in your personal information; (4) delete your personal information; and (5) opt-out of the processing of your personal information for targeted advertising, sale to third parties, or profiling where there is a legal or similarly significant effect on you. To exercise your rights, you may submit a request to info@wildtrack.org.

Without limiting the foregoing, we further comply with all other state-specific data privacy laws, as applicable. You may have certain additional rights available to you under these state-specific data privacy laws.

Legal Basis for Processing Personal Data under General Data Protection Regulation (GDPR)

We may process Personal Data under the following conditions. For the purposes of this section, “**Personal Data**” shall mean any personal information that may relate to an identified or identifiable natural person.

- **Consent:** You have given your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which we are subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in us.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by us.

In any case, we will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Rights under the GDPR

We undertake to respect the confidentiality of your Personal Data and to guarantee you can exercise your rights.

You have the right under this Privacy Policy, and by law if you are within the EEA, to:

- **Request access to your Personal Data.** The right to be provided with a copy of your Personal Data.
- **Request rectification of the Personal Data.** You have the right to correct any mistakes in your Personal Data.
- **Object to processing of your Personal Data.** The right to require us to restrict processing of your Personal Data.
- **Request restriction of your Personal Data.** The right to require us to delete your Personal Data.
- **Request the transfer of your Personal Data.** The right to receive the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party – in certain situations.
- **Withdraw your consent.** You have the right to withdraw your consent on using your Personal Data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of the Services that we provide.

Exercising Your GDPR Data Protection Rights

You may exercise your rights of access, rectification, cancellation and opposition by contacting us. Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will try our best to respond to you as soon as possible.

You have the right to lodge a complaint with a supervisory authority in the EEA where you work, normally live, or where any alleged infringement of data protection laws occurred. For more information, please contact your local data protection authority in the EEA.

Changes to Our Privacy Policy

We may update our Privacy Policy from time to time. If we make material changes to how we treat your personal information, we will post the new privacy policy via the Service with a notice indicating that this Privacy Policy has been updated.

Contact Information

To ask questions or comment about this Privacy Policy and our privacy practices, please contact us at: info@wildtrack.org.

Last modified: February 14, 2023