

PRIVACY AND COOKIES POLICY

Little Free Library, Ltd. (“LFL” or “We”) are committed to protecting and respecting your (“you” or “your”) privacy.

This policy sets out the basis on which any Personal Data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your Personal Data and how we treat it.

1. Definitions

In this policy the following words have the following meanings:

"Data Protection Laws" means any Applicable Law relating to the processing, privacy, and use of Personal Data, including (a) in the United Kingdom, (i) the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, SI 2003/2426, and any laws or regulations implementing Directive 95/46/EC (Data Protection Directive) or Directive 2002/58/EC (ePrivacy Directive); and/or (ii) the General Data Protection Regulation (EU) 2016/679 (GDPR), and/or any corresponding or equivalent national laws or regulations (Revised UK DP Law) (b) in member states of the European Union, the Data Protection Directive or the GDPR, once applicable, and the ePrivacy Directive, and all relevant member state laws or regulations giving effect to or corresponding with any of them; and (c) any judicial or administrative interpretation of any of the above, any guidance, guidelines, codes of practice, approved codes of conduct or approved certification mechanisms issued by any relevant Supervisory Authority;

"Personal Data" means any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and where referred to in this policy includes special categories of Personal Data.

- 2. Information we collect from you.** This is information about you that you give us by contacting us via our website www.littlefreelibrary.org (“our site”) or by corresponding with us by phone, SMS, e-mail or otherwise. The information you give us may include your name, address, e-mail address and phone numbers.
- 3. Information we receive from other sources.** We are working closely with third parties (including, for example, analytics providers). Please see our cookies policy for further details.
- 4. Children’s Privacy.** Our site is not directed to children under the age of 13 and we do not knowingly solicit or collect information from children under the age of 13 without prior parental consent. If we learn that a child under the age of 13 has submitted Personal Data to us without parental consent, we will take all reasonable measures to delete such information from our databases and/or to not use such information for any purpose (except as necessary to protect the

safety of the child or others as required or allowed by law). If you become aware of any Personal Data we have collected from a child under 13, please contact us as indicated in the Contact section of this Policy.

5. Cookies

Through Google Analytics, our website uses cookies. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

6. Uses made of the information

- 6.1. We will only use your Personal Data to the extent that the law allows us to do so. Under the GDPR we rely on the following legal bases for processing your Personal Data:
 - 6.1.1. where you have given us your consent;
 - 6.1.2. where it is necessary to perform a contract we have entered into or are about to enter into with you; or
 - 6.1.3. where it is necessary for the purposes of our legitimate interests (or those of a third party) and your interests or fundamental rights and freedoms do not override those interests.
- 6.2. We use information held about you in the following ways:
 - 6.2.1. processing of an enquiry received from you; or
 - 6.2.2. processing a request for further information or in response to you expressing an interest in one or more of our products or services.
- 6.3. **Information you give to us.** We will use this information:
 - 6.3.1. to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - 6.3.2. to contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - 6.3.3. to contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication to provide you with information about goods or services related to your enquiry;
 - 6.3.4. to notify you about changes to the service we provide; and
 - 6.3.5. to ensure that content from our site is presented in the most effective manner for you and for your computer.
- 6.4. **Information we collect about you.** We will use this information:
 - 6.4.1. to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - 6.4.2. to improve our site to ensure that content is presented in the most effective manner;

6.4.3 as part of our efforts to keep our site safe and secure.

6.5. **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

7. Disclosure of your information

7.1. You agree that we have the right to share your Personal Data with:

7.1.1. Selected third parties including business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;

7.1.2. analytics and search engine providers that assist us in the improvement and optimization of our site;

7.2. We will not disclose your personal information to third parties except:

7.2.1. In the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets.

7.2.2. If LFL or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.

7.2.3. If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce other agreements; or to protect the rights, property, or safety of LFL., our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

8. Where we store your Personal Data

8.1. All information you provide to us is stored on our secure servers.

8.2. 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 to try to prevent unauthorised access.

9. Retention of Personal Data

9.1. We will only retain your Personal Data for as long as necessary to fulfil the purposes for which we collected your Personal Data.

9.2. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of that Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

10. Your rights under GDPR

Under certain circumstances, you have the right to:

10.1 Request access to your Personal Data (commonly known as a 'subject access request'). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

10.2 Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

10.3 Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data in certain circumstances.

10.4 Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

10.5 Request the restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.

10.6 Request the transfer of your Personal Data to another party.

10.6.1 If you want to review, verify, correct or request erasure of your Personal Data, object to the processing of your Personal Data, or request that we transfer a copy of your Personal Data to another party, please contact us as indicated in the Contact section of this Policy.

10.6.2 Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

10.7 To exercise any of the above rights, you can contact LFL using the information in Section 14 below. You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

11. Privacy Shield Frameworks fore EU and Swiss Citizens

LFL complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries (including Iceland, Liechtenstein, and Norway) and Switzerland transferred to the United States pursuant to Privacy Shield. LFL has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, LFL is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

- 11.1. Pursuant to the Privacy Shield Frameworks, EU and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also may correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to customerservice@littlefreelibrary.org. If requested to remove data, we will respond within a reasonable timeframe
- 11.2. We will provide an individual opt-out or opt-in choice before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to customerservice@littlefreelibrary.org.
- 11.3. LFL's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, LFL remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless LFL proves that it is not responsible for the event giving rise to the damage.
- 11.4. In compliance with the Privacy Shield Principles, LFL commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact us by email at customerservice@littlefreelibrary.org or using the mailing address listed below.
- 11.5. LFL has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers for more information and to file a complaint. This service is provided free of charge to you.
- 11.6. If your complaint involves human resources data transferred to the United States from the EU and/or Switzerland in the context of the employment relationship, and LFL does not address it satisfactorily, LFL commits to cooperate with the panel established by the EU data protection authorities (DPA Panel) and/or the Swiss Federal Data Protection and Information Commissioner, as applicable and to comply with the advice given by the DPA panel and/or Commissioner, as applicable with regard to such human resources data. To pursue an unresolved human resources complaint, you should contact the state or national data protection or labor authority in the appropriate jurisdiction. Complaints related to human resources data should not be addressed to the BBB EU PRIVACY SHIELD.
- 11.7. Contact details for the EU data protection authorities can be found at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm if your Privacy Shield complaint cannot be resolved through the above channels, under certain

conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

11.8. For this Privacy Policy and its content, LFL is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) and the Department of Transportation. If LFL becomes subject to an FTC or court order based on non-compliance with this policy or Privacy Shield, LFL shall make public any relevant Privacy Shield related sections of any compliance or assessment report submitted to the FTC, to the extent consistent with confidentiality requirements.

12. Non-EU/Non-Switzerland Citizens

LFL commits to resolve complaints about your privacy and our collection or use of your personal information. Non-EU/Non-Switzerland citizens with inquiries or complaints regarding this privacy policy should contact LFL at:

Little Free Library
Attn: Customer Service
2327 Wycliff St.
Suite 220
Saint Paul, MN 55114
customerservice@littlefreelibrary.org

Agreement to Arbitrate. In the event of a dispute between you and LFL arising under or relating to the Privacy Policy, either party may choose to resolve the dispute by binding arbitration, as described below, instead of in court (the "Arbitration Agreement"). Under certain conditions, more fully described on the Privacy Shield website, you may invoke binding arbitration when other dispute resolution procedures have been exhausted. Any claim (except for a claim challenging the validity or enforceability of this arbitration agreement, including the Class Action Waiver) may be resolved by binding arbitration if either side requests it. THIS MEANS IF EITHER YOU OR LFL CHOOSE ARBITRATION, NEITHER PARTY SHALL HAVE THE RIGHT TO LITIGATE SUCH CLAIM IN COURT OR TO HAVE A JURY TRIAL. ALSO DISCOVERY AND APPEAL RIGHTS ARE LIMITED IN ARBITRATION.

Class Action Waiver. ARBITRATION MUST BE ON AN INDIVIDUAL BASIS. THIS MEANS NEITHER YOU NOR LFL MAY JOIN OR CONSOLIDATE CLAIMS IN ARBITRATION BY OR AGAINST OTHER INTERESTED PARTIES, OR LITIGATE IN COURT OR ARBITRATE ANY CLAIMS AS A REPRESENTATIVE OR MEMBER OF A CLASS OR IN A PRIVATE ATTORNEY GENERAL CAPACITY.

Governing Law and Rules for Arbitration. The Arbitration Agreement is governed by the Federal Arbitration Act (FAA). Arbitration must proceed only with the American Arbitration Association (AAA) or Judicial Arbitration and Mediation Services (JAMS). The rules for the arbitration will be the procedures of the chosen arbitration organization. If the organization's procedures change after the claim is filed, the procedures in effect when the claim was filed will apply. Arbitration hearings will take place in Minnesota. A single arbitrator will be appointed. The arbitrator must:

- Follow all applicable substantive law, except when contradicted by the FAA;
- Follow applicable statutes of limitations;
- Honor valid claims of privilege; and
- Issue a written decision including the reasons for the award.

The arbitrator's decision will be final and binding except for any review allowed by the FAA. However, if more than \$100,000 was genuinely in dispute, then either you or LFL may choose to appeal to a new panel of three arbitrators. The appellate panel is completely free to accept or reject the entire original award or any part of it. The appeal must be filed with the arbitration organization not later than 30 days after the original award issues. The appealing party pays all appellate costs unless the appellate panel determines otherwise as part of its award. Any arbitration award may be enforced (such as through a judgment) in any court with jurisdiction.

13. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy. Changes to our privacy policy are effective seven (7) days after notice of the change is sent to you.

14. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to us at:

Little Free Library
Attn: Customer Service
2327 Wycliff St.
Suite 220
Saint Paul, MN 55114
customerservice@littlefreelibrary.org

COOKIES POLICY

1. Information about our use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Everyone has the option to deactivate the storage of cookies by configuring their browser so that it does not permit the sending of cookies or notifies you in the event that cookies are sent before they are accepted.

Except for essential cookies, all cookies will expire after 26 months.

2. Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies," which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. 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 will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this, you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

You can find more information about cookies at: www.aboutcookies.org. You can find more information about Google Analytics and how to reject or delete these cookies at: www.google.com/intl/en/privacypolicy.html.

3. Third parties

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.