#### **Privacy Policy**

Little Free Library is committed to protecting your privacy and works to give you a safe online experience. This Privacy Policy describes Little Free Library's policies and procedures for the collection, use, and disclosure of Your personal information when You use our website or mobile application.

Little Free Library complies with the EU-US Data Privacy Framework (EU-US DPF), the UK Extension to the EU-US DPF, and the Swiss-US Data Privacy Framework (Swiss-US DPF) (collectively the "Principles") as set forth by the US Department of Commerce. Little Free Library has self-certified to the US Department of Commerce that it adheres to the EU-US Data Privacy Framework Principles (EU-US DPF Principles) with regard to the processing of personal data received from the European Economic Area (EEA) in reliance on the EU-US DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-US DPF. Little Free Library has certified to the US Department of Commerce that it adheres to the Swiss-US Data Privacy Framework Principles (Swiss-US DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-US DPF. If there is any conflict between the terms in this privacy policy and the EU-US DPF Principles or the Swiss-US DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program and to view our certification, please visit https://www.dataprivacyframework.gov/. The Federal Trade Commission has jurisdiction over Little Free Library's compliance with the EU-US Data Privacy Framework (EU-US DPF) and the UK Extension to the EU-US DPF, and the Swiss-US Data Privacy Framework (Swiss-US DPF).

This Privacy Policy ("Policy") describes how Little Free Library in the United States ("US") ("Company") collects, uses, and discloses certain personally identifiable information that we receive in the US from individuals in the US, the European Economic Area ("EEA"), the United Kingdom ("UK"), Gibraltar, and Switzerland ("Personal Data").

Little Free Library recognizes that the EEA, the UK, Gibraltar, and Switzerland have established strict protections regarding the handling of Personal Data, including requirements to provide adequate protection for Personal Data transferred outside of the EEA, the UK, Gibraltar, and Switzerland. To provide adequate protection for certain Personal Data about consumers, corporate customers, suppliers, and business partners received in the US from the EEA, the UK, Gibraltar, and Switzerland, Little Free Library has elected to self-certify to the EU-US Data Privacy Framework ("EU-US DPF"), UK Extension to the EU-US Data Privacy Framework, and Swiss-US Data Privacy Framework ("Swiss-US DPF") administered by the US Department of Commerce ("DPF Program"). Little Free Library adheres to the DPF Program Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability and the Supplementary Principles. For purposes of enforcing compliance with the DPF Program, Little Free Library is subject to the investigatory and enforcement authority of the US Federal Trade Commission. For more information about the DPF Program, see the US Department of Commerce's DPF website: https://www.dataprivacyframework.gov/. To review Little Free Library's representation on the **DPF** which the self-certification list, located https://www.dataprivacyframework.gov/list.

The Swiss-US DPF will only be relied upon for transferred data from the US to Switzerland from September 15, 2024. This is the date of entry into force of Switzerland's adequacy decision by the Swiss Federal Administration.

# **Your Rights**

Under the DPF, you have rights in relation to your Personal Data. These include:

- Information on the types of Personal Data collected.
- Information on the purposes of collection and use.
- Information on the type or identity of third parties to which your personal data is disclosed.
- Choices for limiting use and disclosure of your Personal Data.
- Access to your personal data.
- Notification of the organization's liability if it transfers your Personal Data.
- Notification of the requirement to disclose your Personal Data in response to lawful requests by public authorities.
- Reasonable and appropriate security for your Personal Data.
- A response to your complaint within 45 days.
- Cost-free independent dispute resolution to address your data protection concerns.
- The ability to invoke binding arbitration to address any complaint that the organization has violated its obligations under the DPF Principles to you and that has not been resolved by other means.

You can also verify our self-certification to the DPF and check the information we have provided by viewing our details on the DPF list.

# **Personal Data Collection and Use**

We may collect the following categories of Personal Data: name, address, e-mail address, phone numbers, IP address, and geolocation data. Little Free Library will only process Personal Data in ways that are compatible with the purpose that Little Free Library collected it for, or for purposes the individual later authorizes. Before we use your Personal Data for a purpose that is materially different than the purpose we collected it for or that you later authorized, we will provide you with the opportunity to opt out. Little Free Library maintains reasonable procedures to help ensure that Personal Data is reliable for its intended use, accurate, complete, and current.

Little Free Library may use Personal Data for the following purposes:

- 1. To provide and maintain our Service, including to monitor the usage of our Service.
- **2. To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **3. For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **4. To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

- **5. To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **6.** To manage Your requests: To attend and manage Your requests to Us.
- 7. To deliver targeted advertising to You: We may use Your Personal Data to develop and display content and advertising (and work with third-party vendors who do so) tailored to Your interests and/or location and to measure its effectiveness.
- **8. For business transfers:** We may use Your Personal 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 Data held by Us about our Service users is among the assets transferred.
- **9. For other purposes**: We may use Your Personal Data for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

## **Children Under the Age of 16**

Our mobile application and website are not intended for children under 16 years of age. No one under age 16 may provide any information from children under 16. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this App, create an account on the App, or otherwise provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at info@littlefreelibrary.org.

## **Data Transfers to Third Parties**

<u>Third-Party Agents or Service Providers</u>. We may transfer Personal Data to our third-party agents or service providers who perform functions on our behalf including:

- 1. With Service Providers: We may share Your Personal Data with Service Providers to monitor and analyze the use of our Service, to advertise on third party websites to You after You visited our Service, to contact You.
- 2. With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **3. With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **4. With other users:** when You share Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **5. With Your consent**: We may disclose Your Personal Data for any other purpose with Your consent.

We currently use the following third-party service providers, which may change from time-to-time:

## 1. Google Ads (AdWords)

Google Ads (AdWords) remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: http://www.google.com/settings/ads. Google also recommends installing the Google Analytics Opt-out Browser Add-on - https://tools.google.com/dlpage/gaoptout - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: https://policies.google.com/privacy.

#### 2. X

X remarketing service is provided by X Corp. You can opt-out from X's interest-based ads by following their instructions: https://help.x.com/en/safety-and-security/privacy-controls-fortailored-ads. You can learn more about the privacy practices and policies of X by visiting their Privacy Policy page: https://privacy.x.com/en.

#### 3. Facebook

Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this page: https://www.facebook.com/help/516147308587266. To opt-out from Facebook's interestbased ads. follow these instructions from Facebook: https://www.facebook.com/help/568137493302217. Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA http://www.aboutads.info/choices/, the Digital Advertising Alliance of Canada in Canada http://youradchoices.ca/ or the European Interactive Digital Advertising Alliance in Europe http://www.youronlinechoices.eu/, or opt-out using your mobile device settings. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: https://www.facebook.com/privacy/explanation.

#### 4. Classy

Classy provides our payment processing service and is provided by Classy, Inc., a GoFundMe Company. Classy's privacy policy can be found by clicking <u>HERE</u>.

#### 5. Pinterest

Pinterest remarketing service is provided by Pinterest Inc. You can opt-out from Pinterest's interest-based ads by enabling the "Do Not Track" functionality of your web browser or by following Pinterest instructions: http://help.pinterest.com/en/articles/personalization-and-data. You can learn more about the privacy practices and policies of Pinterest by visiting their Privacy Policy page: https://about.pinterest.com/en/privacy-policy.

Where required by the DPF, we enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection the DPF requires and

limiting their use of the data to the specified services provided on our behalf. We take reasonable and appropriate steps to ensure that third-party agents and service providers process Personal Data in accordance with our DPF obligations and to stop and remediate any unauthorized processing. Under certain circumstances, we may remain liable for the acts of our third-party agents or service providers who perform services on our behalf for their handling of Personal Data that we transfer to them.

<u>Third-Party Data Controllers</u>. In some cases, we may transfer Personal Data to unaffiliated third-party data controllers. These third parties do not act as agents or service providers and are not performing functions on our behalf. We may transfer your Personal Data to third-party data controllers for the following purposes:

1. For business transfers: We may transfer Your Personal Data as part 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 Data held by Us about our Service users is among the assets transferred.

We will only provide your Personal Data to third-party data controllers where you have not optedout of such disclosures. We enter into written contracts with any unaffiliated third-party data controllers requiring them to provide the same level of protection for Personal Data the DPF requires. We also limit their use of your Personal Data so that it is consistent with any consent you have provided and with the notices you have received.

## Joint Data Controllers

For the purposes of applicable data protection laws, We and Facebook, TikTok, and Google (collectively the "Joint Controllers") act as joint data controllers for the processing of your Personal Data in relation to processing analytics data. As joint data controllers, We and the following organizations:

- **Jointly determine** the purposes and means of processing your Personal Data.
- Collaborate to ensure your Personal Data is handled lawfully, transparently, and securely.
- **Define responsibilities** for responding to data subject requests, such as access, correction, deletion, and portability.

While both controllers oversee your Personal Data, you can exercise your rights by contacting Us or the responsible organization below:

- Facebook https://www.facebook.com/help
- TikTok https://support.tiktok.com/en/
- Google https://support.google.com/

<u>Disclosures for National Security or Law Enforcement</u>. Under certain circumstances, we may be required to disclose your Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements. We will only do so in accordance with the DPF Principles.

#### Security

Little Free Library maintains reasonable and appropriate security measures to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with the DPF.

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 mobile application or website, 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 Data, we cannot guarantee the security of your Personal Data transmitted through our mobile application or website. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures included through the mobile application or website.

### **Access Rights**

You can review and change your personal information by logging into the mobile application or website and visiting your account profile page. You may also delete your account by visiting your account profile page. However, deleting your account will not delete any purchase or donation data we collected about you. To request the permanent deletion of purchase or donation data, you can send us an email at info@littlefreelibrary.org.

Instead of correcting, amending, or deleting your account through your account profile page, you can also email us to request that we correct, amend, or delete your Personal Data. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights of someone other than the individual requesting access. We may request specific information from you to confirm your identity. In some circumstances, we may charge a reasonable fee for access to your information.

## **US Citizen State Privacy Rights**

State consumer privacy laws may provide their residents with additional rights regarding our use of their Personal Data. Many states, including California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) provide their state residents with rights to:

- Confirm whether we process their Personal Data.
- Access and delete certain Personal Data.
- Correct inaccuracies in their Personal Data, taking into account the information's nature processing purpose (excluding Iowa and Utah).
- Data portability.
- Opt-out of personal data processing for:
  - targeted advertising (excluding Iowa);

- sales; or
- profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data or process personal data of minors under 18, 17, or 16 years old.

The exact scope of these rights may vary by state. To exercise any of these rights please send an email to info@littlefreelibrary.org or write us at: 2327 Wycliff St., Suite 220, St. Paul, Minnesota 55114.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: info@littlefreelibrary.org. However, please know we do not currently sell data triggering that statute's opt-out requirements.

### **Complaints from EU or Swiss Citizens**

In compliance with the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF, Little Free Library commits to resolve DPF Principles-related complaints about our collection and use of your Personal Data. EEA, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF should first contact Little Free Library at: info@littlefreelibrary.org

Little Free Library commits to refer unresolved complaints concerning our handling of Personal Data received in reliance on the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF to Better Business Bureau, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit https://bbbprograms.org/programs/privacy/dpf/disputes for more information or to file a complaint. The services of the Better Business Bureau are provided at no cost to you.

If you remain dissatisfied with the resolution of your complaint by the Better Business Bureau, Little Free Library commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA), and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of Personal Data received in reliance on the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF.

<u>Binding Arbitration</u>. You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with Little Free Library and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you. For more information on binding arbitration, see <a href="https://www.dataprivacyframework.gov/framework-article/D-Binding-Nature-of-Decisions">https://www.dataprivacyframework.gov/framework-article/D-Binding-Nature-of-Decisions</a>.

## Complaints from Citizens other than EU or Swiss Citizens

Little Free Library commits to resolve complaints about our collection and use of your Personal Data. Non-EEA, UK, and Swiss individuals with inquiries or complaints regarding our handling of Personal Data should first contact Little Free Library at: info@littlefreelibrary.org.

If You are dissatisfied with Little Free Library's resolution of Your complaint, You may formally initiate the appeals process by providing written notice to info@littlefreelibrary.org. Your email should be labeled "Notice of Appeal" as applicable and fully describe your concerns or disagreement and include any documentation necessary to validate the claims you are making.

# **Acknowledgement of the Appeal**

We will acknowledge receipt of your appeal within ten (10) business days of receiving your written notice of appeal. This acknowledgement may contain requests for additional information to help us properly investigate or adjudicate the appeal. Your failure to provide substantive responses to our requests may materially impact our ability to investigate or adjudicate the relevant issue.

# **Investigation and Determination**

We will reasonably investigate the appeal based on the information and documentation you have provided. Following the investigation, we will reach a determination of your appeal, which may include modifying or upholding the original decision. We will notify you of our determination in writing within 60 days of receipt of your written notice of appeal, and we will include the explanation for our determination of your appeal. If we deny your appeal, you may file an appeal with the relevant regulator.

### Scope of the Appeal

The appeal will review whether the decision made by the privacy team that you have appealed was fair and consistent with applicable privacy law. You may only appeal a decision that applies to you personally unless you are otherwise authorized to act on another person's behalf, in which case you must provide evidence that you are authorized by the person on whose behalf you have submitted an appeal. The appeal will focus exclusively on the decision being appealed. Broader issues related to our company policies, management style, or any other issues will not be considered as part of the appeal.

# Remedy

The remedy that you seek is an important part of the appeal. Your initial written appeal must address what you seek as an outcome (for example, access to data, correction of data, deletion of data, etc.).

#### Withdrawal of the Appeal

You may withdraw or end your appeal at any time by providing us with written notice.

#### **Appeal Records**

We will maintain a record of the appeal, including the final determination, in accordance with our record retention policies and procedures.

# **Contact Us**

If you have any questions about this Policy or would like to request access to your Personal Data, please contact us as follows: info@littlefreelibrary.org.

# **Changes to This Policy**

We may update our Policy from time to time. If we make material changes to how we treat our users' Personal Data, it is our policy to notify you by email at the primary email address specified in your account. The date the Policy was last revised is identified at the bottom of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you and for periodically visiting this Policy to check for any changes.

Effective Date: September 15, 2025 Last modified: September 15, 2025