

Privacy Policy

Sharetown Inc. (“Sharetown”) collects data to operate effectively and provide its services. Sharetown is committed to respecting your privacy and has created this Privacy Policy to transparently explain how Sharetown handles your personal information.

FOR EMPLOYEES AND APPLICANTS

Description of Product, Service, or Process	Employment and Human Resources
Categories of Personal Data	- Personal Identifiers
Category of Data Subjects	Sharetown gathers this information from its Employees and job Applicants.
Purpose of Processing	Sharetown uses this information to enter and facilitate a prospective or concurrent employment relationship with its employees.
Business Purpose(s) for Using Personal Information	Performing services on behalf of the business or service provider including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing; providing advertising or marketing services; providing analytic services; or providing similar services on behalf of the business or service provider.
Commercial Purpose for Using Personal Information	Not applicable.
Legal Basis for Processing	- Personal information is handled under contract. - There is a legal obligation to handle the personal information.
Sources from Which Sharetown Collected Information	Sharetown gathers this information directly from Employees and Applicants.
Categories of third Parties to Whom Sharetown Sold Personal Information	Sharetown does not sell this information.
Categories of third Parties with Whom Sharetown Disclosed Personal Information for a Business Purpose	Sharetown provides this information to government entities, payroll processors, and companies who perform background checks.

Automated Processing or Profiling	Automated systems are not used.
Where is this Information Processed?	The United States of America.
Retention Period	Sharetown retains this information throughout the duration of the employment relationship.

WEB USERS

Description of Product, Service, or Process	Website
Categories of Personal Data	- Internet Data
Category of Data Subjects	Sharetown gathers this information from people who use its website.
Purpose of Processing	Sharetown collects this information so it can log who has visited the website.
Business Purpose(s) for Using Personal Information	- Performing services on behalf of the business or service provider including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing; providing advertising or marketing services; providing analytic services; or providing similar services on behalf of the business or service provider.
Commercial Purpose for Using Personal Information	Sharetown collects this information directly from its website's users.
Legal Basis for Processing	- There is a legitimate business interest in handling the information.
Sources from Which Sharetown Collected Information	The website collects this information from Web Users.
Categories of third Parties to Whom Sharetown Sold Personal Information	Sharetown does not sell this information.
Categories of third Parties with Whom Sharetown Disclosed Personal Information for a Business Purpose	Sharetown does not share this information.

Automated Processing or Profiling	Automated systems are used.
If Automated Processing is Used what Function does the Automated Processing Serve?	The system automatically tracks users' IP addresses and web browsers.
Decisions with a Legal Effect that Use Automated Processing	The system does not make decisions based on the automated processing.
Where is this Information Processed?	The United States of America.
Retention Period	24 hours.

REPRESENTATIVE APPLICANTS

Description of Product, Service, or Process	Contractor Application Intake and Background Checks
Categories of Personal Data	- Personal Identifiers - Professional Employment Information
Category of Data Subjects	Sharetown gathers this information from applicants.
Purpose of Processing	Sharetown gathers this information to hire independent contractor representatives, perform background checks, and comply with government requirements for hiring.
Business Purpose(s) for Using Personal Information	- Performing services on behalf of the business or service provider including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing; providing advertising or marketing services; providing analytic services; or providing similar services on behalf of the business or service provider.
Commercial Purpose for Using Personal Information	Not applicable.
Legal Basis for Processing	- Personal information is handled under contract.
Sources from Which Sharetown Collected Information	Sharetown gathers this information directly from applicants.

Categories of third Parties to Whom Sharetown Sold Personal Information	Sharetown does not sell this information.
Categories of third Parties with Whom Sharetown Disclosed Personal Information for a Business Purpose	Sharetown provides this information to companies who perform background checks. If an applicant becomes an independent contractor representative, that information will be provided to government agencies as required by law.
Automated Processing or Profiling	Automated systems are not used.
Where is this Information Processed?	The United States of America.
Retention Period	7 years.

REPRESENTATIVES

Description of Product, Service, or Process	Contracting with Representatives
Categories of Personal Data	<ul style="list-style-type: none"> - Personal Identifiers - Internet Data - Geolocation Data - Professional Employment Information
Category of Data Subjects	Sharetown collects this information from independent-contractor representatives (“Representatives”).
Purpose of Processing	Sharetown collects Personal Identifiers and Professional Employment Information to contract services from representatives and facilitate payment for their services. Sharetown also uses this information to dispatch pickup or delivery services orders. Sharetown collects Internet Data and Geolocation Data to track application usage and location data while representatives are dispatched for pickup or delivery services. Sharetown uses some geolocation data to track mileage for insurance purposes.
Business Purpose(s) for Using Personal Information	<ul style="list-style-type: none"> - Performing services on behalf of the business or service provider including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing; providing advertising or marketing services; providing analytic services; or providing similar services on behalf of the business or service provider. - Undertaking internal research for technological development and demonstration.

Commercial Purpose for Using Personal Information	Not applicable.
Legal Basis for Processing	- Personal information is handled under contract. - There is a legitimate business interest in handling the information.
Sources from Which Sharetown Collected Information	Sharetown gathers Personal information, Professional Employment Information, and Internet Data directly from contractor Representatives. Sharetown gathers Geolocation Data from third-party telematics companies.
Categories of third Parties to Whom Sharetown Sold Personal Information	Sharetown does not sell this information.
Categories of third Parties with Whom Sharetown Disclosed Personal Information for a Business Purpose	Sharetown discloses mileage information from the Geolocation Data to insurance carriers.
Automated Processing or Profiling	Automated systems are used.
If Automated Processing is Used, how does the Automated Processing Gather Data?	An application tracks Geolocation Data automatically.
Decisions with a Legal Effect that Use Automated Processing	Sharetown uses Geolocation Data to track mileage and a Representative's driving behavior while dispatched for delivery or pickup. Sharetown does not make automated decisions from the Geolocation Data it gathers.
Where is this Information Processed?	The United States of America.
Retention Period	Sharetown retains Personal Identifiers and Professional Employment Information for the duration of the contract plus 7 years. Internet Data and Geolocation Data is retained for 7 years.

NON-REPRESENTATIVE CONTRACTORS

Description of Product, Service, or Process	Contracting with Non-Representative Contractors
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Categories of Personal Data	- Personal Identifiers
Category of Data Subjects	Sharetown gathers this information from Non-Representative Contractors.
Purpose of Processing	Sharetown gathers this information to enter into contracts with Non-Representative Contractors who will provide services for Sharetown.
Business Purpose(s) for Using Personal Information	- Performing services on behalf of the business or service provider including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing; providing advertising or marketing services; providing analytic services; or providing similar services on behalf of the business or service provider.
Commercial Purpose for Using Personal Information	Not applicable.
Legal Basis for Processing	- Personal information is handled under contract.
Sources from Which Sharetown Collected Information	Sharetown gathers this information directly from the Non-Representative contractors
Categories of third Parties to Whom Sharetown Sold Personal Information	Sharetown does not sell this information.
Categories of third Parties with Whom Sharetown Disclosed Personal Information for a Business Purpose	Sharetown provides this information, as required by law, to government agencies.
Automated Processing or Profiling	Automated systems are not used.
Where is this Information Processed?	The United States of America.
Retention Period	7 years.

PARTNERSHIPS

Description of Product, Service, or Process	Entering into Partnerships
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Categories of Personal Data	- Personal Identifiers - Internet Data
Category of Data Subjects	Sharetown gathers Personal Identifiers from its Partners who help Sharetown provide Services for its customers.
Purpose of Processing	Sharetown gathers this information to enter into commercial contracts. Sharetown also works with Partners to dispatch Representatives to process and service order requests.
Business Purpose(s) for Using Personal Information	- Performing services on behalf of the business or service provider including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing; providing advertising or marketing services; providing analytic services; or providing similar services on behalf of the business or service provider.
Commercial Purpose for Using Personal Information	Not applicable.
Legal Basis for Processing	- Personal information is handled under contract. - There is a legitimate business interest in handling the information.
Sources from Which Sharetown Collected Information	Sharetown gathers this information directly from its Partners.
Categories of third Parties to Whom Sharetown Sold Personal Information	Sharetown does not sell this information.
Categories of third Parties with Whom Sharetown Disclosed Personal Information for a Business Purpose	Sharetown provides some commercial information to government agencies when required to do so by law.
Automated Processing or Profiling	Automated systems are not used.
Where is this Information Processed?	The United States of America.
Retention Period	Personal Identifiers pertaining to a company is held indefinitely; all other information is held for 7 years.

Your rights with regard to the data we collect:

You may ask Sharetown to access, rectify, erase, and restrict how we process your Personal Data. You may review the Personal Data we have in our Information and Communications systems concerning you and make corrections to that Personal Data. In certain circumstances, you may even ask that we delete some of the Personal Data we may have collected about you or restrict how we process that information.

We will endeavor to respond to your requests within 30 days. Should we be unable to comply within 30 days, we will contact you and let you know of any delay.

Exercising Your Rights:

If you want to exercise your rights, you may contact us or our data protection office at:

Organization	Privacy Point of Contact
Sharetown Inc. Address: PO Box 197 Lehi, UT 84043 Phone: 801-319-6879	Address: PO Box 197 Lehi, UT 84043 Phone: 801-319-6879 Email: info@sharetown.com

Sharetown will not discriminate against you because you have made a request to exercise your privacy rights.

Children's Privacy

Sharetown does not knowingly direct its services to children. If you use our website or our services, you represent that you are at least the age of majority under the laws of the jurisdiction of your place of residence. If we learn that we have collected personal information from a minor, we will promptly take steps to delete such information.

Changes to our privacy statement:

We keep this privacy statement under regular review and will place any updates on our website. Paper copies of the privacy statement may also be obtained by contacting the Privacy Point of Contact at the information above and requesting a paper copy.

This privacy statement was last updated on 04-17-2020.