

Afognak Native Corporation Website Privacy Policy

Effective Date: January 1, 2021

Introduction

Afognak Native Corporation (ANC), Alutiiq, LLC (AQ), Afognak Commercial Group, LLC and their individual subsidiary and affiliate entities (“us,” “we,” or “our”) are committed to protecting the privacy of those who visit the Afognak Native Corporation website. As such it is important for the ANC Team to let all our site visitors know that we do not directly collect Personal Information/Personally Identifiable Information (PI/PII) from those who visit the site with one exception. And that one exception has to do with individuals using the Afognak Land Use Permit page within the ANC website. As a part of the Permit Page and the related process we collect a wide variety of data to include Personal Information/Personally Identifiable Information (PI/PII). We collect this information as a part of granting access to ANC owned lands. We do not collect, hold, or use PI/PII for purposes other than granting access to ANC Lands. More importantly, neither ANC nor any of its affiliates sell or exchange for value any PI/PII you may provide as part of the access permitting process.

The access to data and information we provide to website visitors by way of <https://www.afognak.com/> is referred to as the “Service”.

Definitions

- Service: Service is defined above.
- Personal Data: Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- Usage Data: Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- Cookies: Cookies are small files stored on your device (computer or mobile device).

Types of Data Collected

As you are probably aware, we collect several different types of information for various purposes to provide and improve our Service to you. PI/PII is not one of those types.

- **Personal Data**
 - We will not ask for nor collect any PI/PII during your visit to our site unless you are requesting a permit to access ANC held lands.
 - In the event you are requesting access to ANC Lands, you will be required to complete the Afognak Land Use Permit that will request the following PI/PII
 - First and Last Name
 - Gender
 - Date of Birth
 - Hair Color, Height, and weight
 - Billing Address, City, State and Zip Code
 - Home and Secondary Phone
 - Email Address

- Hunting/Fishing Permit Information
 - Credit Card, Number, Type, CVV Number, and expiration date
- **Non-PI/PII Data**
 - We do collect non-PI/PII data when you visit the site. We use the non-PI/PII data to improve the Service. By using the Service, you agree to the collection and use of Non-PI/PII in accordance with this policy. Non-PI/PII categories include Statistical, Usage, and Tracking Cookies. Each are discussed below.
- **Statistical Data.** To monitor use of the Site and improve its quality, we may compile statistical information concerning the use of the Site through analytics services. Examples of this information may include:
 - The number of visitors to the Site, or to sections or pages within the Site
 - Patterns of traffic flowing through the Site
 - Length of time spent on the Site, or in sections or pages of the Site,
 - The other sites that refer visitors to the Site
 - The pages of the Site that visitors frequently use as entry and exit points
 - Utilization of the browser and operating systems and versions used by visitors to the Site.
 - The analytics services may transfer this information to Service Providers in case of a legal obligation or if a service provider processes data on behalf of that service.
- **Usage Data**
 - We may also collect information on how the Service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.
 - While this information can be associated with the IP address belonging to the computer you used to visit the Site, it will not be associated with you as an individual.
- **Tracking Cookies Data**
 - We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.
 - Cookies are files with a small amount of data which may include an anonymous unique identifier.
 - Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used, such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.
 - You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.
 - Examples of Cookies we use:
 - Session Cookies. We use Session Cookies to operate our Service.
 - Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
 - Security Cookies. We use Security Cookies for security purposes.

Use of Data

- **PI/PII Data:** We use the PI/PII information collected on the Afognak Land Use Permit site within the ANC Website to document information of individuals requesting access to ANC Lands and to manage the fees paid as a part of the permitting process.
- **Non-PI/PII Data:** We use the collected non-PI/PII data for various purposes:
 - To provide and maintain our Service
 - To notify you about changes to our Service
 - To allow you to participate in interactive features of our Service when you choose to
 - To provide customer support
 - To gather analysis or valuable information so that we can improve our Service
 - To monitor the usage of our Service
 - To detect, prevent and address technical issues

Transfer of Data

Data and Information collected from your visit may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all the steps reasonably necessary to ensure that your information and data are treated securely and in accordance with this Privacy Policy and no transfer the information or data collected during your visit will take place to an organization or a country unless there are adequate controls in place, including the security of your data and other personal information.

Disclosure of Data

It is our Corporate policy not to sell PI/PII collected from customers, clients, employees, shareholders, contractors, subcontracts, or consultants. Similarly, we do not exchange or trade personal information for any non-financial consideration. Other than the Land Use Permitting form, this website does not directly collect PI/PII in any way.

For the data collected as a part of the land use permitting process (and in the unlikely event that PI/PII is incidentally captured in the rest of the website, we will not disclose your personal data we collect through this Site except with your consent or as described in this Policy. We may disclose your data and non-PI/PII data collected from the site for the same reasons that we may use it as described in this Policy, which includes disclosing it to our affiliates and non-affiliated entities, as we deem necessary to carry out those purposes.

- **Service Providers.** We may need to use or disclose this information with our Service Providers:
 - As you direct for land permitting information and other PI/PII
 - To manage the Site
 - To provide you with products, services, or offers

- To enhance our services by, among other methods, obtaining assistance with providing more personalized services to you through analytics and other technologies
- To protect our interests and legal rights, such as through responding to subpoenas and defending litigation
- To protect against and prevent fraud, illegal activity (such as identifying and responding to incidents of hacking or misuse of our websites and mobile applications), and claims and other liabilities

We endeavor to choose affiliates and non-affiliates with similar standards to ours regarding the protection of data.

- **Legal Process, Security, Defense, Protection.** It is possible that we will need to use or disclose information about you if required by law, subpoena, or other legal process. Additionally, we may disclose information about you if we have a good faith belief that disclosure is reasonably necessary to:
 - Demonstrate our relationship with you
 - Investigate, prevent, or take action regarding suspected or actual illegal activities or to assist law enforcement agencies
 - Protect the security or integrity of the Site
 - Investigate and defend ourselves against any third-party allegations or claims
 - Protect the rights and safety of others
- **Change in Control or Sale.** We may share, sell, assign, or license your personally identifiable information in connection with certain business transactions, such as a sale, acquisition, merger, or change in control of the Company, or in preparation for any of these events. In such cases, we will take appropriate steps under the circumstances and to the extent possible to ensure that the recipient will apply privacy protections substantially similar to those established by this Policy. Any entity that acquires all or substantially all of the Company's assets will have the right to continue using your data consistent with this Policy or as otherwise agreed to by you.

In no case will we sell or license your personally identifiable information to third parties, except as set forth above or as required or permitted by law.

Social Media Plugins

This Site uses social media plugins (e.g. Facebook) to enable you to easily share information with others. When you visit our Site, the operator of the social plugin can place a cookie on your computer, enabling that operator to recognize individuals who have previously visited our Site. If you are logged into the social media website (e.g. Facebook) while browsing our Site, the social plugins allow that social media website to share data about your activities on our Site with other users of their social media website. For example, Facebook Social Plugins allow Facebook to show your Likes and comments on our pages to your Facebook friends. Facebook Social Plugins also allow you to see your friends' Facebook activity on our website. We do not control any of the content from the social media plugins. For more information

about social plugins from other media websites you should refer to those sites' privacy and data/information sharing statements/policies.

Security of Data

No system for safeguarding personal or other information is 100% secure and even though we have taken steps to protect your personally identifiable information from being intercepted, accessed, used or disclosed by unauthorized persons, we cannot fully eliminate security risks associated with personal information. However, we take a number of steps to safeguard the security of personally identifiable information obtained through the Site. For example, we maintain administrative, technical and physical controls to reasonably safeguard data from unlawful use, unauthorized access or disclosure. Additionally, we use Secure Socket Layer (SSL) data encryption when data is transmitted over the Internet to our Site. Individuals who have access to confidential and otherwise nonpublic data are required to maintain the confidentiality of such information.

Service Providers

We may employ other companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services, or assist us in analyzing how our Service is used.

These Service Providers have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use Service Providers to monitor and analyze the use of our Service.

- **Google Analytics**
 - Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.
 - You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.
 - Google Analytics Terms of Service prohibits the collection of personally identifiable data such as name, email address, or billing information. Additionally, no attempt is made by ANC to export or correlate information from Google Analytics back to existing customer/client data outside of Google Analytics.
 - For more information on the privacy practices of Google, please visit the Google Privacy Terms web page.
- **Facebook**
 - Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from Facebook by visiting this page.

- To opt-out from Facebook's interest-based ads, follow these instructions from Facebook. 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, the Digital Advertising Alliance of Canada in Canada or the European Interactive Digital Advertising Alliance in Europe, 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>.

Links to Other Sites

We may provide links to websites or resources outside of our Site for your informational purposes only. You acknowledge and agree we are not responsible for the availability of such sites or resources, and do not endorse and are not responsible or liable for any content, advertising, goods, services or other materials on, available through or provided by such sites or resources. We are not responsible for the privacy or other practices of such sites and cannot guarantee the security of any of your personal information that you provide or may be collected by such sites. We encourage you to review the privacy policies and terms and conditions on those linked sites.

Children's Privacy

The Site is not directed to children as the products and services on this Site are intended for persons 18 years of age and older. Alutiiq does not knowingly collect, use or disclose any personally identifiable information from children. If you are concerned about your child's use of the Site, you may use web-filtering technology to supervise or limit access to the Site.

If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers. If you are concerned about your child's use of the Site, you may use web-filtering technology to supervise or limit access to the Site.

Changes to This Privacy Policy

Changes to this Policy. We reserve the right to change this Policy at any time. In the event we make material change(s) to the Policy, they will be effective immediately upon posting to the Site and will apply after the effective date listed above. You understand and agree that your continued use of the Site after the effective date, means that the collection, use, and sharing of your information collected after the effective date is subject to the updated Policy.

In the event the policy regarding sale of PI/PII were to change, you would be afforded the opportunity to opt-out of the sale of your company data or PI/PII in advance of any such action.

Applicable law

This Policy is governed by the internal substantive laws of the State of Alaska, without regard to its conflict of laws principles. Jurisdiction for any claims arising under or out of this Privacy Policy shall lie exclusively with the state and federal courts within Alaska. If any provision of this Policy is found to be

invalid by a court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of this Policy, which shall remain in full force and effect.

California Residents

If you are a California resident, please read the following:

- **General.** This section of the Policy (CA Policy) supplements and amends the information contained in our Policy, with respect to California residents. This CA Policy applies solely to individuals, visitors, users, and others who are natural persons and residents of the State of California (“consumers” or “you”). The CA Policy is written to clearly state that we do not disclose, sell, or exchange for value PI/PII about you or relating to you. This CA Policy is adopted in part to comply with the California Consumer Privacy Act (“CCPA”). Any terms defined within the CCPA have the same meaning when utilizing within this CA Policy. The other provisions of the Policy continue to apply except as modified in this CA Policy.
- **Information We Collect.** We do not collect, use, or disclose personal information in any category identified in the CCPA from individuals visiting this site with the exception of those individuals requesting land use permits on ANC lands through the Permitting Site which is integral to the ANC website. In that case, we do collect PI/PII voluntarily provided by permit requestors who visit our permitting site. That information is collected under an assumption of authorization from the provider for the purposes of, and only the purposes of, obtaining access to ANC held lands. We do not disclose, sell, or exchange for value any personal information in any category identified in the CCPA from individuals visiting or using this site or voluntarily providing us PI/PII as part of the permitting process.
- **Consumer Rights.** Pursuant to the CCPA, and as detailed below, consumers have various rights with respect to their PI.
 - **Right to Request Deletion.** We only collect PI/PII voluntarily provided by visitors to our site and we do not disclose, sell, or exchange for value the PI/PII provided under an authorization assumption as part of the Land Use Permitting process. Therefore, it is not necessary for you to request the Company delete your PI from the Company’s records or direct any service providers to delete your PI/PII from their records to preclude either from disclosure, sale or exchange of your PI/PII. This in no way diminishes your rights under the CCPA.
 - **Right to Request Information.** As previously stated, we only collect PI/PII voluntarily provided by visitors to our site and we do not disclose, sell, or exchange for value the PI/PII provided as part of the Land Use Permitting process. And as the PI/PII was provided by you are already aware of the information collected, there is no need for you to request the Company disclose the types of collected PI/PII. This in no way diminishes your rights under the CCPA
 - **Right to Request Information as to Sale or Disclosure for Business Purpose.** As we do not collect, sell, nor otherwise disclose PI of persons visiting the site it is not necessary for you to request information as to Sale or Disclosure for Business Purpose of PI. This in no way diminishes your rights under the CCPA. As we do not disclose, sell, or exchange for value PI/PII of persons visiting or using the site to request land use permits, it is not necessary for you to request information as to Sale or Disclosure for Business Purpose of PI/PII. This in no way diminishes your rights under the CCPA.

- **Right to Opt-Out.** We do not sell, exchange, or otherwise disclose PI/PII of persons visiting or using the site for land use permitting. As such you have no need to request to “Opt Out” from sale of your PI/PII as we will not sell yours or anyone’s PI/PII. This in no way diminishes your rights under the CCPA.
- **Nondiscrimination.** As we do not disclose, sell, or exchange for value PI/PII from visitors and users of the Land Use Permitting site we experience no need for Opting Out of the sale of PI/PII. However, if a customer has concerns regarding the retention PI/PII within our system we will work with them to resolve their concerns. In so doing, we will ensure that we provide the same level and quality of services from our site as required by the CCPA for all visitors and users.
- **Submitting Consumer Rights Requests.** While we do not collect, sell, nor otherwise disclose PI/PII of individuals visiting the site, it does not diminish your rights under the CCPA. As such, you may submit Consumer Rights requests regarding the above by contacting us at 888-232-9574 or privacy@afognak.com. We reserve the right to only respond to verifiable consumer requests. A verifiable consumer request is one made by any individual who is:
 - the consumer who is the subject of the request,
 - a consumer on behalf of the consumer’s minor child, or
 - by a natural person or person registered with the Secretary of State authorized to act on behalf of a consumer.
- **Identify Verification.** If the Company requests, you must provide us with sufficient information to verify your identity and/or authority to act on behalf of a consumer. Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond. We will endeavor to respond to a verifiable consumer request within forty-five (45) days of receipt, but we may require an extension of up to forty-five (45) additional days to respond and we will notify you of the need for the extension.

How to Contact Us

At any time, you may contact **Afognak Native Corporation** with questions or concerns about this Privacy Policy at privacy@afognak.com. Written responses may also be submitted to:

Afognak Native Corporation (Attn: Privacy Officer)

3909 Arctic Boulevard, Suite 500

Anchorage, AK 99503

Phone: (907) 222-9500

Fax: (907) 222-9501