

Privacy and Personal Information Policy

Last Updated: Dec. 3, 2018

This policy (the “Privacy Policy”) describes the types of Personal Information (detailed below) collected by the Regional Greenhouse Gas Initiative, Inc. (“RGGI, Inc.”), how RGGI, Inc. processes Personal Information, and RGGI, Inc.’s relevant privacy practices.

By using RGGI, Inc.’s services, by using the www.rggi.org website, or by providing any Personal Information to RGGI Inc., users accept this Privacy Policy and the collection, use, and disclosure of their Personal Information as described below.

Information Collected

In the normal course of operations, RGGI, Inc. may collect (or users may provide) personally identifiable information such as contact information, names, titles, addresses, e-mail addresses, phone numbers, countries of residence, financial information, and other personal information (“Personal Information”), as well as business information and website browsing information.

The sources and uses of this information are described in more detail below.

Use of Information

RGGI, Inc. may use such Personal Information for the following purposes:

- Conducting auctions of CO₂ allowances.
- Tracking data, including the holdings and transactions of allowances, via the RGGI CO₂ Allowance Tracking System.
- Administering the www.rggi.org website and improving users’ experience on the website.
- Processing requests for information and answering inquiries, for example through email communications.
- Administering and organizing stakeholder meetings and webinars.
- Allowing for an independent market monitor to evaluate the conduct of participants in the auctions of CO₂ allowances.
- Other legitimate interests and lawful purposes.

Sharing of Information

RGGI, Inc. does not share Personal Information with third parties, except for those which are our contractors and/or subcontractors, and/or which we use to provide our services as described below.

RGGI, Inc. is under contract with the RGGI Participating States to provide services related to the implementation of the Participating States’ CO₂ budget trading programs, and may also be obligated by contract to share information with the Participating States. Such information is then governed by individual state laws regarding the management of Personal Information. As such, treatment of your



Personal Information may be subject to the privacy laws and the public records laws of the participating RGGI states.

RGGI, Inc. does not sell, trade, or share Personal Information, other than as described in this Privacy Policy.

Website

The www.rggi.org website uses Google Analytics to collect standard information on user behavior, including the number of visitors to the site and their navigation through the site's pages. This helps monitor and improve the effectiveness and usability of the website. Google Analytics uses "cookies," small text files placed on a user's computer, to distinguish unique users. Google Analytics reports do not show the personal identity of any user. The website does not use Google Analytics to gather Personal Information that personally identifies individual users.

You may prevent your data from being collected by Google Analytics by opting out through the use of the Google Analytics Opt-out Browser Add-on. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies.

Mailing List

The RGGI mailing list provides important updates, including notices of the availability of new auction documents, dates and materials for upcoming stakeholder meetings, quarterly releases of auction results, and other news and announcements relevant to the RGGI program and allowance market.

When signing up for the RGGI mailing list, users are asked to enter information including their name, email, and organization. Mailing list subscribers' Personal Information is not publicly disclosed or used for any purpose other than distributing RGGI mailing list emails.

Users who sign up for a RGGI COATS account (defined below), register for an in-person or webinar stakeholder meeting, and/or register as Primary or Secondary Auction Account Representatives are also added to the mailing list. This is based on a legitimate interest in ensuring that these users have access to information relevant to their participation in the RGGI CO₂ allowance market.

Any user may unsubscribe using the link at the bottom of any email or by emailing info@rggi.org. Users who unsubscribe will not be re-subscribed even if they participate in future stakeholder meetings, COATS accounts, or auction processes. Users may re-subscribe themselves using the sign-up form available via the www.rggi.org website.

RGGI mailing list emails are sent via a third-party provider, MailChimp, which collects analytics including email opens and clicks. For more information, see MailChimp's [privacy policies](#).

Stakeholder Meetings

When needed, the RGGI Participating States convene stakeholder meetings to gather input on topics related to program design and implementation. RGGI, Inc. administers these meetings on behalf of the RGGI Participating States.

Stakeholders are asked to register in advance of these meetings. When signing up, users are asked to provide information, including their name, email, and organization. These details are imported into the RGGI mailing list so that meeting attendees may receive updates about the meetings (see “Mailing List” above).

For in-person meetings, registrants’ details are typically collected via a web form. This information is used to plan the meeting and ensure the venue has adequate capacity.

Webinar meetings are typically held via the provider ReadyTalk, which collects additional meeting analytics such as the number of users which attended the webinar meeting and the duration of attendance. For more information, please see ReadyTalk’s [privacy policy](#) and [privacy statement](#).

CO₂ Allowance Tracking System (COATS)

COATS is the electronic platform by which participants in the RGGI CO₂ allowance market may receive, hold, and transfer CO₂ allowances. All parties interested in holding CO₂ allowances must register for a COATS login and open a RGGI COATS account.

Users who register for a COATS login and open a RGGI COATS account are asked for information including their name, contact information, and organization. Information related to COATS participation and activity is accessible by the independent market monitor (see “Market Monitoring” below), but is not publicly disclosed except for certain details available through COATS Public Reports, and aggregated statistics available in the Market Monitor Reports.

COATS Account Representatives’ emails are added to the mailing list so that they may receive important information relevant to their participation in the RGGI CO₂ allowance market (see “Mailing List” above). These users may unsubscribe at any time using the link at the bottom of any email or by emailing info@rggi.org.

The COATS system is operated by CSRA Inc. as a contractor of RGGI, Inc.

Auction Platform

The RGGI Participating States hold quarterly auctions, at which any qualified entity may bid on and purchase RGGI CO₂ allowances. To participate, entities must have a RGGI COATS account (see “COATS” above) and must also complete auction application materials which include Personal Information.

Information related to auction participation is provided to the independent market monitor, but is not publicly disclosed except as specified in the Auction Notice, in the form of aggregate auction results and a list of potential bidders in the Market Monitor Reports (see “Market Monitoring” below).

Auction account representatives’ emails are added to the mailing list so that they may receive important information relevant to their participation in the RGGI CO₂ allowance market (see “Mailing List” above). These users may unsubscribe at any time using the link at the bottom of any email or by emailing info@rggi.org.



The auction platform is operated by EnerNOC as a contractor of RGGI, Inc. For more information see EnerNOC's [privacy policy](#).

Market Monitoring

The conduct of participants in the RGGI auctions and secondary markets is evaluated by an independent market monitor. This evaluation is important to identify potential anti-competitive conduct or significant barriers to market participation, including the potential for market manipulation, collusion, and the exercise of market power.

Information related to auction and secondary market participation is provided to the independent market monitor in order to conduct this evaluation. This information is not publicly disclosed except as shown in the Market Monitor Reports, which include aggregated auction results, lists of potential bidders at each auction, aggregated secondary market statistics, and the overall conclusions of the market monitor.

Independent market monitoring of the RGGI CO₂ allowance market is performed by Potomac Economics as a contractor of RGGI, Inc.

Accessing, Modifying and Deleting Personal Information

Individuals may request to view, amend, or delete their Personal Information held by RGGI, Inc. Please email any requests regarding Personal Information to info@rggi.org.

Security

RGGI, Inc. takes security seriously and uses reasonable precautions to protect users' information. Only RGGI, Inc. employees, Participating States, and RGGI, Inc. contractors and/or subcontractors who need the information to perform a specific job are granted access to Personal Information. The computers/servers in which RGGI, Inc. stores Personal Information are kept in a secure environment, and RGGI, Inc. also works with our contractors and/or subcontractors to achieve their use of best practices in security.

Links

The www.rggi.org website may contain links to other sites. RGGI, Inc. is not responsible for the content or privacy practices of such other sites, which may have their own privacy policies or statements.

Children's Privacy

The www.rggi.org website is not directed at children under the age of 13, and RGGI, Inc. does not knowingly collect Personal Information from children under 13. If we discover that a child under 13 has provided us with Personal Information, we will delete such information from our servers. If you are a parent or guardian and you are aware that your child has provided us with Personal Information, please contact us at info@rggi.org.



Changes to This Privacy Policy

We may update this Privacy Policy from time to time, and advise users to review this page on the www.rggi.org website for any revisions to the Privacy Policy. If revised, the updated Privacy Policy will be posted on this page with a new “Last Updated” date, and will be effective when posted.

Contact Us

If you have any questions, suggestions, requests, or need further information about this Privacy Policy, please contact us at info@rggi.org.