



California Consumer Privacy Act of 2018

High-level Implications - Process for Compliance - Client and Partner Considerations

Consumer Privacy Legislation An overview for our Partners

VisitIQ™ considers consumer privacy protection and ensuring the security the information we present and share with our clients, a cornerstone of how we do business. In that spirit, VisitIQ™ embraces the need to comply with any and all legislation related to promoting consumer privacy and ensuring data security.

In June, 2018, California passed the California Consumer Privacy Act of 2018, designed to enable consumers to request and receive the types of personal information businesses' may have on them, and to opt themselves out of a business's database. The law went into effect January 1, 2020.

What was Done to Comply

As a strong proponent of giving consumers control over managing their privacy, VisitIQ™ uses an established cross-functional team to assess and make recommendations on the path forward regarding ensuring our compliance. We anticipate that that the California Attorney General, legislature (and our industry) will be engaged in clarification and refinement efforts over the next year-and-a-half on provisions in the law, including but not necessarily limited to the CCPA's disclosures regarding:

- Categories of sources of the information collected
- Business purposes for information collected
- Categories of 3rd parties with which the information is shared
- Processes for validating that who is requesting information or opting is verified to do so

VisitIQ™ and its partners will continue to actively monitor adjustments to the law and its provisions over the next few years.

Collection of Personal Information

Depending on how you interact with us or our partners, we may collect about you the categories of information summarized below. The following section also describes how we collect and use such categories of information.

Category	Categories of Sources
Identifiers <i>E.g., name; alias; postal address; mobile ad identifiers; IP address; telephone number; email address; social network handles</i>	<ul style="list-style-type: none">• Data compilers and consumer data resellers, informational and retail websites, as well as non-profit organizations ("Commercial Source Categories")• Public records and other publicly available sources• Government entities• Social networks
Characteristics of protected classifications under California or US law (inferred or actual, including self-reported) <i>E.g., race; color; religion; sex/gender; pregnancy, marital status; military or veteran status; national origin; ancestry; age (over 40) (may be inferred, actual or self-reported)</i>	<ul style="list-style-type: none">• Commercial Source Categories• Public records and other publicly available sources• Government entities• Social networks
Commercial or transactions information <i>E.g., products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</i>	<ul style="list-style-type: none">• Commercial Source Categories• Public records and other publicly available sources
Internet or other electronic network activity information <i>E.g., browsing history; online interests.</i>	<ul style="list-style-type: none">• Commercial Source Categories
Geolocation data	<ul style="list-style-type: none">• Commercial Source Categories
Professional or employment-related information <i>E.g., current or past job history or job title.</i>	<ul style="list-style-type: none">• Commercial Source Categories• Public records and other publicly available sources
Inference Data <i>E.g., consumer information or preferences.</i>	<ul style="list-style-type: none">• Commercial Source Categories

Our Disclosure and Sale of Personal Information

We will share the information collected from and about you as discussed above for various business purposes, with service providers and with third parties including our customers. The chart below shows how and with whom we share or disclose personal information, and whether (based on the CCPA's definition of "sell") we believe we have "sold" a particular category of information in the prior 12 months.

Category	Categories of Third Parties We Share With	Whether We "Sold" This Category of Personal Information in the Last 12 Months
Identifiers <i>E.g., name; alias; postal address; mobile ad identifiers; IP address; telephone number; email address; social network handles</i>	<ul style="list-style-type: none"> Data compilers and consumer data resellers, consumer goods retailers, informational and retail websites, content publishers, non-profit organizations, business-to-business services and organizations, consumer surveys and survey companies, affiliate networks ("Commercial Recipient Categories") Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers Social networks 	Yes
Characteristics of protected classifications under California or US law (inferred or actual, including self-reported) <i>E.g., race; color; religion; sex/gender; pregnancy, marital status; military or veteran status; national origin; ancestry; age (over 40) (may be inferred, actual or self-reported)</i>	<ul style="list-style-type: none"> Commercial Recipient Categories Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers Social networks 	Yes
Commercial or transactions information <i>E.g., products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</i>	<ul style="list-style-type: none"> Commercial Recipient Categories Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers Social networks 	Yes
Internet or other electronic network activity information	<ul style="list-style-type: none"> Commercial Recipient Categories 	Yes
<i>E.g., browsing history; online interests.</i>	<ul style="list-style-type: none"> Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers, and social networks 	
Professional or employment-related information <i>E.g., current or past job history or job title.</i>	<ul style="list-style-type: none"> Commercial Recipient Categories Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers Social networks 	Yes
Inference Data <i>E.g., consumer information or preferences.</i>	<ul style="list-style-type: none"> Commercial Recipient Categories Advertising networks and media platforms, political campaigns, internet service providers, data analytics providers Social networks 	Yes

We also may share any of the personal information we collect as follows:

Sharing for Legal Purposes:

In addition, we may share personal information with third parties in order to: (a) comply with legal process or a regulatory investigation (e.g. a subpoena or court order); (b) enforce our Terms of Service, this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; and/or (d) protect the rights, property or personal safety of us, our platform, our customers, our agents and affiliates, its users and/or the public. We likewise may provide information to other companies and organizations (including law enforcement) for fraud protection, and spam/malware prevention, and similar purposes.

Sharing In Event of a Corporate Transaction:

We may also share personal information in the event of a major corporate transaction, including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction.

Sharing With Service Providers:

We share any personal information we collect with our service providers, which may include (for instance) providers involved in tech or customer support, operations, web or data hosting, billing, accounting, security, marketing, data management, validation, enhancement or hygiene, or otherwise assisting us to provide, develop, maintain and improve our services.

Sharing of Aggregate Information:

We may aggregate and/or de-identify any information collected so that such information can no longer be linked to you or your device ("Aggregate/De-Identified Information"). We may use Aggregate/De-Identified Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors, at our discretion.

Our Business Purposes for Collecting and Sharing Personal Information

Generally speaking, we collect and share the Personal Information that we collect for the following purposes, as we also have described in our Privacy Policy and/or our website. Our Purposes for collecting, using and sharing Personal Information:

Data marketing services, for example:

- Generally, creating data marketing tools and products for our marketer clients, as more fully described in our Privacy Policy (and on our websites). This includes our provision of datasets, data "appends" (connecting data across datasets), data "scoring" (providing inferences about potential consumer behavior), data hygiene services (helping customers to evaluate, validate and correct personal information they hold), and security and anti-fraud services (helping customers to identify potentially fraudulent activity).
- Helping our Clients identify and understand their consumers better, by providing insights about them and managing loyalty programs, as well as providing financial and other scoring products.
- Assisting our Clients through our Services to provide their current and prospective customers with better service, improved offerings, and special promotions, for instance, advising on which current or prospective customers are most likely to be interested (or disinterested) in certain offers.

Online targeting, for example:

- Creating or helping to create defined audience segments based on common demographics and/or shared (actual or inferred) interests or preferences (e.g., households with prospective students). When we do this, we work with a data partner that "matches" our or other Information through de-identification techniques (such as through coded data "hashing") with online cookies and other identifiers, in order to target and measure ad campaigns online across various display, mobile and other media channels.
- Assisting Clients in creating "identity" graphs, to help locate users across various channels, such as based on common personal, device-based, or network-based identifiers (e.g., IP address, email address).

Additional marketing services, for example (which may overlap with “data marketing services” above):

Assisting in targeting and optimizing direct mail and email campaigns, display, mobile and social media marketing.

- Measuring the effectiveness of online or offline ad campaigns by determining which messages are most likely to be seen or opened by which types of consumers, or which types of ads are most likely to lead to purchases.
- Analyzing and optimizing our Clients’ (or their service providers’) proprietary databases, or helping Clients to identify and mitigate potential fraud.
- Providing “verification” or data “hygiene” services, which is how companies update and/or “clean” their databases by either verifying or removing or correcting old, incorrect or outdated information.

Operating our Services, for example:

- Improving, testing, updating and verifying our own database.
- Developing new products.
- Operating, analyzing, improving, and securing our Services.

Other internal purposes, for example:

- For internal research, internal operations, auditing, detecting security incidents, debugging, short-term and transient use, quality control, and legal compliance.

We sometimes use the information collected from our own website, from social networks, from other “business to business” interactions (such as at trade shows) or from data compilers for the above, as well as for our own marketing purposes.

Your California Rights and Choices

California residents have the right to request that we disclose what personal information we collect from you, to delete that information, and to opt-out of the sale of your personal information, subject to certain restrictions and without being discriminated against for exercising these rights. You also have the right to designate an agent to exercise these rights on your behalf. This section describes how to exercise those rights and our process for handling those requests. (To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.)

A. Your right to “opt out” of the sale of your personal information

California residents have the right to opt-out of the “sale” of their personal information. California law broadly defines what constitutes a “sale” – including in the definition making available a wide variety of information in exchange for “valuable consideration.”

If you would like to opt out, you may follow the link at the bottom of our website or click here: “Do Not Sell My Personal Information”. You may also call our toll-free number at 1-866-207-1399, but we highly recommend using the website link for the most straightforward and efficient processing. The “opt-out” action effectively removes all information from our files, and places your information on a “suppression” list. We will only retain enough to ensure your information is not reintroduced.

B. Right to request access to your personal information (Right to Know)

California residents have the right to request that we disclose what categories of your personal information that we collect, use, or sell. You may also request the specific pieces of personal information that we have collected from you. However, we may withhold some personal information where the risk to you or our business is too great to disclose the information. Sometimes, we act only as a “service provider” to our clients (for instance, if they provide information to us for analytics, processing or other data management services), in which case any consumer requests for opt-out, deletion or access to data must be made through that client: we therefore will forward any such requests to a named client, as feasible.

California residents may exercise their California access rights by going to our Privacy Portal within the “Do Not Sell My Personal Information” page. You may also submit a request by calling our toll-free number at 1-866-207-1399, but we highly recommend accessing our website for the most straightforward and efficient processing. For security purposes (and as required under California law), we will verify your identity – in part by requesting certain information from you — when you request to exercise your California access rights. For instance, you may need to confirm your possession of an identifier, identifying information, or to provide a piece of identification that confirms you are the person you claim to be.

Once we have verified your identity, we will respond to your request as appropriate:

- Where you have requested the categories of personal information that we have collected about you, we will provide a list of those categories.
- Where you have requested specific pieces of personal information, we will provide the information you have requested, to the extent required under the CCPA and provided we do not believe there is an overriding privacy or security concern to doing so.
- Upon completion of the above process, we will send you a notice that explains the categories of personal information we were able to locate about you, whether we (1) deleted, (2) de-identified, or (3) retained the information we collected from you. Certain information may be exempt from such requests under applicable law.

If we are unable to complete your requests fully for any of the reasons above, we will provide you additional information about the reasons that we could not comply with your request.

C. Right to request deletion of your personal information

You may also request that we “delete” any personal information that we collected directly from you, such as if you are a customer of ours, or interacted with us at a trade show.

However, “deletion” is different from “opting out” of sale (or exercising your “do not sell” rights), as it only pertains to information we collected “from” you – not the data in our commercial database. Thus, if you want to avoid being placed in our database in the future, and avoid having your data “sold” to marketers, then you should exercise your “opt out” rights, described in section A above and on our “Do Not Sell My Personal Information” page: we will then maintain your information on a suppression list, to “suppress” your data if we later acquire it.

Also note that when we “delete” your information (e.g., if you are a former customer of ours), we may (and are permitted to) retain personal information for certain important purposes, such as (a) to ensure your deleted information is not reintroduced to our systems, (b) to protect our business, systems, and users from fraudulent activity, (c) to address technical issues that impair existing functionality (such as debugging purposes), (d) as necessary for us, or others, to exercise their free speech or other rights, (e) to comply with law enforcement requests pursuant to lawful process, (f) for scientific or historical research, (g) for our own internal purposes reasonably related to your relationship with us, or to comply with legal obligations.

D. Right to Nondiscrimination

We will not deny, charge different prices for, or provide a different level of quality of goods or services if you choose to exercise these rights.

E. Information about persons under the age of 16

We do not knowingly collect personal information from minors under 16 years of age in California unless we have received legal consent to do so. If we learn that personal information from such California residents has been collected, we will take reasonable steps to remove their information from our database (or to obtain legally required consent).

F. Authorized agents

You may also designate an agent to make requests to exercise your rights under CCPA as described above. We will take steps both to verify the identity of the person seeking to exercise their rights as listed above, and to verify that your agent has been authorized to make a request on your behalf through providing us with a signed written authorization or a copy of a legally sufficient power of attorney. We likewise may require that you verify your own identity, depending on the type of request you make.

G. Consumer Inquiries

Licensee shall respond to all consumer inquiries about Licensee’s use of VisitIQ™ Data. Licensee shall not make marketing solicitations using Driven IQ Data to individuals who have requested not to receive such solicitations from Licensee. Licensee may communicate consumer inquiries that involve the accuracy of the VisitIQ™ Data to VisitIQ™. VisitIQ™ shall cooperate with Licensee to address any consumer issues that Licensee has made reasonable efforts to resolve.