

# AccuData Integrated Marketing Privacy Policy

**Last amended: January 1, 2020**

AccuData Integrated Marketing (“AccuData”) provides a variety of data, marketing, hygiene, and analytics products (the “Services”) designed to help for-profit and not-for-profit organizations market their own products and services or to assist their end user customers in marketing their products and services. Our solutions, many of which are described on this website, are used via direct mail, email, online and other marketing channels.

We take very seriously the privacy interests of the individuals whose information we handle and maintain in our database. We provide this Privacy Policy (“Privacy Policy”) to explain how we use and manage information, and what rights consumers have to control how their information is used in marketing. We also operate corporate websites, designed for our own customers and prospective customers, and others who want to learn about our services.

## 1. Information That We Collect and Use in Our Services

In order to provide our Services, we receive data, including personal information, from a variety of sources, including national data compilers and our own customers. We refer to the information that we collect and process throughout this Privacy Policy as “Information” or “the Information.”

**Business Contact Information.** The following information pertaining to you and your business is collected including:

- Name
- Company Name
- Job Title
- Email Address
- Postal Address
- Phone Number
- The domain name and IP address of a user’s web browser, along with a time stamp and other information about a user’s browser or device.
- Information about what content and pages users access, utilize or visit on our website, or how they interact with our content – for instance, if they spent a certain amount of time reviewing a particular blog post or description of particular services.
- Contact information that you provide, which could include (for instance) survey information, sign-up information (e.g., if you sign up for events or newsletters), requests for information, mailing addresses and email addresses.

- If we collect Information from “offline” sources – such as if you provide us your business card at a trade show – we will maintain that information and use it for marketing and business purposes as well.

**Consumer Information.** Consumer Information we procure or that is provided to us by our customers includes various identifying and demographic information about individuals and households. It often includes personal attributes such as name, gender, age, and contact information. It may also include information such as:

- Personal interests and hobbies;
- Financial information such as household income range.
- Information about transactions, such as purchases, that consumers have engaged in.

AccuData also receives information through this website (and any other website we operate). We describe this information in Section 6.

## 2. How We Use the Information We Collect or Receive

AccuData uses the Information for various purposes, including the following.

### *As Part of Our Services*

- **Data Marketing Services.** Our Services include providing marketing information to our customers, generally regarding which customers or prospective customers are most likely to be interested (or disinterested) in certain offers. Similarly, we help our customers identify and understand their customers better by providing insights about them. Our customers include (but are not limited to) agencies, marketers, reseller partners, and colleges and universities.
- **Additional Marketing Services.** Other Services we may sometimes provide to our customers (or that they may provide to their own customers), which may overlap with or supplement the above, may involve (a) assistance in targeting and optimizing of direct mail and email campaigns, display, mobile and social media marketing; (b) 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; (c) analyzing and optimizing our customers’ (or their service providers’) proprietary databases; or (d) providing data “hygiene” services, which is how companies update and/or “clean” their databases by either verifying, removing or correcting old, incorrect or outdated information.

## ***To Operate Our Services***

We use your information as a prospect or as our customer to help us personalize and continually improve your query/count and order experience with us. We also use your information to notify you of other AccuData products and services that might interest you. We do not sell, rent or trade, or share your business contact information with other companies for their own marketing purposes.

### **3. How We Share Information with Third Parties**

AccuData may share the Information with marketing services, platforms and service providers that we retain, in order to provide the Services we have described above (or other services we may add) and as described below. This includes:

- **Customers:** As described above, we license the Information in various ways to our customers (and sometimes to partners and resellers, who license the Information to their customers), when we provide our Services.
- **Partners:** We also may share the Information, including personally identifiable information, with business and data partners for related services to provide more tailored targeted marketing, advertising, and communications. Likewise, we may do so for analytical purposes, including to help these other parties measure campaign performance, inform future campaigns, or to handle, analyze, or segregate this Information on our or our customers' behalf.
- **Service Providers:** We share the Information with a variety of service providers in order to operate, protect and advertise our Services and maintain our website(s). For instance, we may share the Information with tech and customer support providers, marketing and advertising providers, other data providers (such as to enhance, perform hygiene on or verify our Information), security vendors, payment vendors (as to our business to business information), and other companies that help us deliver or develop Services.
- **Corporate transfers:** If AccuData, its stock or its significant assets are acquired by or merged into another entity, our information will be transferred to that entity, and may be shared during due diligence in anticipation of any such transaction.
- **Affiliates, parent companies and subsidiaries:** AccuData may share some or all of the Information in our possession with any affiliated or subsidiary companies (if we ever have any).
- **As required by law or to protect any person or entity:** AccuData may disclose Information if we believe that such disclosure is necessary to (a) comply in good faith with relevant laws or to respond to subpoenas or warrants served on us; or (b) to

protect or otherwise defend the rights, property or safety of AccuData, our customers, or any other person or entity.

#### 4. Your Marketing and Data Management Choices

You may “opt out” of our marketing database by submitting an “opt out” request via our secure online [webform](#). You also may contact us directly at (800) 371-7080 or [privacy.compliance@accudata.com](mailto:privacy.compliance@accudata.com). When you choose to “opt out” through either of these methods, please provide your current address, your email address, and any prior home or email addresses along with your desired request for action. Or, if you prefer, you can contact us directly by mail at:

AccuData Integrated Marketing, Inc.  
Attn: Privacy  
5220 Summerlin Commons Blvd., Suite 200  
Fort Myers, FL 33907

We will process your request within 30 days from the time we received the request, or sooner where required by law.

- If you would like to opt out of direct mail advertising in general, we recommend that you visit the DMA Choice website, at [dmachoice.thedma.org](http://dmachoice.thedma.org). The DMA Choice service is managed by the ANA (Association of National Advertisers) and allows you to follow a few easy steps to ensure that your marketing preferences are honored. Many of our partners will only accept requests directly from you, and our [Consumer Name Removal Guide](#) contains the information that you will need.
- If you wish to opt out of online targeted ads (sometimes referred to as “interest-based” or “personalized” advertising), you can also visit the opt-out portals operated by the industry groups the [National Advertising Initiative \(NAI\)](#) or the [Digital Advertising Alliance \(DAA\)](#), and you can learn more about how those opt-outs work on those linked web pages. Please note that these online opt-outs are cookie-based. Thus, if you browse the web from multiple browsers or devices, you will need to opt out from each browser and/or device, and for the same reason, if you change browsers or clear your browser cookie cache, you will need to perform this opt-out function again. Opting out in this way will not prevent you from seeing all types of online ads; it generally will prevent targeted ads customized to what advertisers think may be most likely to be relevant and of interest to you.

- If we market to you by email, in our corporate capacity – such as if you are a customer or prospective customer of ours and we send information about our Services -- you may “unsubscribe” from our marketing emails through a link placed in the emails.

## **5. Cookies and Similar Technologies**

### ***Cookies and How We Use Them***

AccuData and its business partners use certain industry-standard technologies, including cookies and similarly functional technologies, which we describe below. (We use these technologies on our website, for instance, and our partners may use these technologies in their own marketing services.)

We may work with third parties to provide or enhance our services (e.g. for purposes of tailoring ads, or placing browser cookies), or to offer marketers ways to access or use our Information, often in de-identified form. These partners may set and access their own cookies, pixel tags and similar technologies on your device, which may have cookies with varying expiration periods. Those partners may, likewise, collect various types of information about your browser, device, or browsing activities through use of these cookies.

Cookies, in turn, are small data files that contain a string of characters, such as a unique browser identifier. Cookies are stored on your computer or other device and act as tags that identify your device. Our (or other companies’) servers send your device a cookie when you visit a website. A pixel tag (also commonly known as a web beacon or clear GIF) is an invisible 1 x 1 pixel that is placed on certain web pages. When you access web pages (such as the website of a marketer), pixel tags may generate a generic notice of the visit and permit our partners (or sometimes, us) to read the cookies that a respective company or server has deployed. Pixel tags are used in combination with cookies to track the activity on a site by a particular device. When you turn off cookies, pixel tags simply detect a given website visit.

We or our service providers, and other online marketing platforms that we or they work with, may use cookies to, among other things, “remember” you, determine visitor patterns and trends, collect information about your activities on our clients’ sites, or interact with the advertising you see. Cookies are used in this way to provide relevant content to you and replace non-relevant communications with ads that better match your interests.

### ***Disabling Cookies***

Most web browsers are set up to accept cookies. You may be able to set your browser to warn you before accepting certain cookies or to refuse certain cookies. However, if you disable the

use of cookies in your web browser, some features of our website and other services may be difficult to use or become inoperable.

## **6. Data Collected Through Our Corporate Website**

### ***Information Collected***

AccuData collects information from users of our website(s) (including any page on which this Privacy Policy is posted), including:

- The domain name and IP address of a user's web browser, along with a time stamp and other information about a user's browser or device.
- Information about what content and pages users access, utilize or visit on our website, or how they interact with our content – for instance, if they spent a certain amount of time reviewing a particular blog post or description of particular services.
- Information, including personally identifiable and contact information that you provide, which could include (for instance) survey information, sign-up information (e.g., if you sign up for events or newsletters), requests for information, mailing addresses and email addresses.

### ***How AccuData uses the Information We Collect Through Our Website***

We use the Information we collect through our website(s) to do the following:

- Create and manage your unique user account.
- Provide Services to you.
- Respond to and communicate with you (including news and updates about our services).
- Send you offers and ads for products and services of partner brands, or other offers we believe may be of interest to you, such as invitations to events and webinars.
- Perform data analysis (including market research).
- We may combine the Information with other information we obtain from third parties, publicly available sources, and any other product or service we provide in order to further improve the relevance and effectiveness of products targeted offers, and advertisements, including (but not limited to), those provided on or through our services.
- We may use IP addresses to help diagnose problems with our servers and to administer our website(s). We also may use IP addresses to help identify visitors to our website(s) for the duration of a session and to gather demographic information about our visitors. We may use clickstream data to determine how much time visitors spend on each web page of our website(s), how visitors navigate through the website(s), and how we may tailor our

website(s) to better meet the needs of our visitors. We also use this Information for compliance with our legal obligations, policies and procedures, including the enforcement of our Terms and Conditions.

- If we collect Information from “offline” sources – such as if you provide us your business card at a trade show – we will maintain that information and use it for marketing and business purposes, as well.

### ***How AccuData Shares the Information We Collect Through Our Websites***

We may sometimes share or otherwise disclose the Information we collect about you, as described in this Privacy Policy or otherwise disclosed to you when you provide us with the information, as follows:

- We may share the Information with service providers who help us deliver the services you request or we provide. For instance, we share the Information with tech and customer support providers, marketing and advertising providers, other data providers (such as to enhance or verify our Information), security vendors, payment vendors (as to our business to business information), and other companies that help us deliver or develop Services.
- We may share the Information to communicate with you and market to you, including through email, direct mail or display media.
- We will disclose your PII (or other Information) if we believe in good faith that we are required to do so by law, regulation or other government authority or to protect the rights, safety or property of ourselves or any person or entity. We may also cooperate with law enforcement agencies in any official investigation and we may disclose any Information to the requesting agency in doing so.
- If we or all or substantially all of our assets are purchased by another company (such as in a merger, consolidation, restructuring, the sale of stock and/or assets, or other corporate change or financing transaction), the Information in our possession will likely be transferred to the successor entity. We also may share the Information during the course of any due diligence process.

Our website(s) uses cookies and similar technologies, both for its internal and operational purposes and to market to you (such as to retarget ads to you when you visit other sites across the Internet).

## **7. Links**

This website may provide links to other websites that AccuData thinks users will find interesting or useful. AccuData is not responsible for the privacy practices of these other sites or companies.

## **8. Security and Data Integrity**

AccuData takes steps to help ensure that the data we possess is housed and transmitted securely. This may include various types of physical and electronic security, including firewall protections, encryption, hashing or truncation of data, and access controls to personal information. While neither we nor any platform can guarantee 100 percent safety from hacks or illegal intrusion, we employ efforts that are designed to ensure that this does not occur.

## **8. Changes to this Privacy Policy**

From time to time, we may update this Privacy Policy. Any changes to it will become effective when it is posted to our website. Please check back to learn of any changes to this Privacy Policy.

## **10. Storage of Information in the United States**

If you are accessing our website from a location outside of the United States, your connection will be through and to servers located in the United States and all Information you provide will likely be processed and securely maintained in our web servers and internal systems located within the United States. (We likewise generally store the Information used in our Services in the United States.) Thus, you should be aware that in accessing this website or otherwise communicating with us, the information we collect or receive from you may be subject to laws with lesser or different privacy standards than those in your own country (such as if you are in a country located in the European Union).

## **11. Contact Us**

AccuData has a designated privacy contact. If you have questions related to this Privacy Policy, or regarding our products or services, please contact us:

Privacy Officer  
AccuData Integrated Marketing, Inc.  
5220 Summerlin Commons Blvd., Suite 200  
Fort Myers, FL 33907  
Email: [privacy.compliance@accudata.com](mailto:privacy.compliance@accudata.com)



## ADDENDUM FOR CALIFORNIA RESIDENTS

# California Privacy Rights

Last amended: January 1, 2020

### NOTICE TO CALIFORNIA RESIDENTS [CONSUMERS] - CALIFORNIA CONSUMER PRIVACY PROTECTION ACT

The California Consumer Privacy Act of 2018 (“CCPA”) provides certain rights to residents of California. This section of the Privacy Policy applies if you are a natural person who is a resident of California (“California Consumer”) and uses our Services. This Addendum supplements the information in the [Privacy Policy](#). However, this Addendum is intended solely for, and is applicable only as to, California Consumers: if you are not a California Consumer (or a resident of California), this does not apply to you and you should not rely on it.

In the below tables and sections, we describe (as required by the CCPA):

1. **Our Collection of Personal Information** – the types of Personal Information (which the CCPA defines broadly) that we collect, the types of sources we collect it from,
2. **Our Disclosure and Sale of Personal Information** – the types of recipients to whom we disclose or sell Personal Information.
3. **Our Business Purposes** – our business purposes for (a) collecting and (b) sharing Personal Information, which are generally the same.
4. **Your California Privacy Rights and Choices** – what rights you have under the CCPA, for instance, to request that we “opt out” your information from our marketing database (also called “do not sell” rights), or to request categories and personal information that we may have collected about you.

The following sets forth the categories of information we collect and purposes for which we may use California Consumers’ personal information:

#### 1. **OUR COLLECTION OF PERSONAL INFORMATION**

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

Category	Categories of Sources
<i>Identifiers, e.g.,</i> name; alias; postal address; telephone number; email address.	<ul style="list-style-type: none"> <li>• Data compilers and consumer data resellers. Consumer goods retailers, informational and retail websites, public records and other publicly available sources, content publishers, non-profit organizations, business-to-</li> </ul>

	<p>business companies, consumer surveys and survey companies, affiliate networks. (Note that above categories may be overlapping in nature.)</p> <ul style="list-style-type: none"> <li>• Advertising networks, data analytics providers, operating systems and platforms and social networks.</li> <li>• Corporate affiliates.</li> </ul> <p>(Collectively, “<b>Commercial Data Sources.</b>”)</p> <ul style="list-style-type: none"> <li>• Government sources such as U.S. Census Bureau.</li> </ul>
<p><b>Characteristics of protected classifications under California or US law</b></p> <p><i>E.g.</i>, race; color; religion; sex/gender; marital status; medical condition; military or veteran status; national origin; ancestry; self-reported health information.</p>	Commercial Data Sources.
<p><b>Commercial or transactions information</b></p> <p><i>E.g.</i>, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	Commercial Data Sources.
<p><b>Internet or other electronic network activity information</b></p> <p><i>E.g.</i>, browsing history; search history; online interests, such as information about categories of consumer interests derived from online usage; and information on a consumer's interaction with a website, application, or advertisement.</p>	Commercial Data Sources, Digital Marketing Service Providers
<p><b>Geolocation data</b></p>	Commercial Data Sources, US Postal Service.
<p><b>Professional or employment-related information</b></p> <p><i>E.g.</i>, current or past job history or performance evaluations.</p>	Commercial Data Sources
<p><b>Inferred Categories</b></p> <p><i>E.g.</i>, Inferred consumer interests</p>	Commercial Data Sources

## 2. 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 describes 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
<b>Identifiers, e.g.,</b> name; alias; postal address; telephone number; email address	<p>Data compilers and consumer data resellers, consumer goods and other consumer retailers, informational and retail websites, content publishers, non-profit organizations, food vendors, apparel vendors, business-to-business services and organizations, consumer surveys and survey companies, affiliate networks and government entities, including military services.</p> <p>In addition, advertising networks, internet service providers, data analytics providers, operating systems and platforms and social networks.</p> <p>(Collectively, “<b>Commercial Data Recipients</b>”)</p>	Yes
<b>Characteristics of protected classifications under California or US law, e.g.,</b> race; color; religion; sex/gender; marital status; medical condition; military or veteran status; national origin; ancestry; self-reported health information. (Data may be inferred.)	Commercial Data Recipients.	Yes.
<b>Commercial or transactions information, e.g.,</b> records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. (Data may be inferred.)	Commercial Data Recipients.	Yes.
<b>Internet or other electronic network activity information, e.g.,</b> browsing history; search	Service Providers (see below).	Yes.

history; online interests, such as information about categories of consumer interests derived from online usage; and information on a consumer's interaction with a website, application, or advertisement.		
<b>Geolocation data</b>	Service Providers, Commercial Data Recipients.	Yes
<b>Professional or employment-related information.</b> <i>E.g.</i> , current or past job history or performance evaluations.	Commercial Data Recipients.	Yes.
<b>Inferred Categories</b> <i>E.g.</i> , Inferred consumer interests	Commercial Data Recipients.	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.

**Aggregate and Deidentified 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, in our discretion.

Please also refer to Section 3 below, which further describes our business purposes for collecting and sharing personal information.

### **3. 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.

<b>Our Purposes for collecting, using and sharing Personal Information</b>
<p><b>Data marketing services, for example:</b></p> <ul style="list-style-type: none"> <li>• 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).</li> <li>• 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.</li> <li>• 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.</li> </ul>
<p><b>Online targeting, for example:</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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).</li> </ul>
<p><b>Additional marketing services, for example (which may overlap with “data marketing services” above):</b></p> <ul style="list-style-type: none"> <li>• Assisting in targeting and optimizing of direct mail and email campaigns, display, mobile and social media marketing, including by providing customer insights.</li> <li>• 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.</li> <li>• Analyzing and optimizing our Clients’ (or their service providers’) proprietary databases, or helping Clients to identify and mitigate potential fraud.</li> <li>• 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.</li> </ul>
<p><b>Operating our Services, for example:</b></p> <ul style="list-style-type: none"> <li>• improving, testing, updating and verifying our own database.</li> <li>• developing new products.</li> </ul>

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

#### 4. YOUR CALIFORNIA RIGHTS AND CHOICES

Without being discriminated against for exercising these rights, 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. 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.) Please note that sometimes we act as a “service provider” for our clients, in which case we receive and act on instructions from the client(s) as to the client data provided: any requests to exercise rights with respect to data we handle on behalf of a client should be directed to the particular client.

##### a. Right to request access to your personal information

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.

##### b. Right to request deletion of your personal information

California residents may also request that we delete any personal information that we collected from you, such as if you have been a customer of ours. (Note that this is different from your right to “opt out” of us selling your personal information, which is described below; also note that we do not generally collect personal information directly from consumers.) However, we may retain personal information for certain important purposes, such as (a) to protect our business, systems, and users from fraudulent activity, (b) to address technical issues that impair existing functionality (such as de-bugging purposes), (c) as necessary for us, or others, to exercise their free speech or other rights, (d) to comply with law enforcement requests pursuant to lawful process, (e) for scientific or historical research, (f) for our own internal purposes reasonably related to your relationship with us, or to comply with legal obligations. Additionally, we need certain types of information so that we can provide our Services to you. If you ask us to delete it, you may no longer be able to access or use our Services.

##### c. Right to “opt-out” of the sale of your personal information.

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

Depending what information we have about you, and whether we have included any of it in our marketing products and services, we may have sold (as defined by California law) certain categories of information about you in the last 12 months, as described in the above table in Section 2 of this Addendum.

If you would like to opt out, you may do so as outlined on the following page: [Do Not Sell My Personal Information](#)

**d. How to exercise your access and (if applicable) deletion rights**

California residents may exercise their California privacy rights by sending an email to [privacy.compliance@accudata.com](mailto:privacy.compliance@accudata.com), submitting your request to [optout.accudata.com/request/opt-out](https://optout.accudata.com/request/opt-out), or by contacting us at (800) 371-7080.

For security purposes (and as required under California law), we will verify your identity when you request categories or specific pieces of personal information we may have received about you. You will need to confirm your identity by answering a series of questions that confirm 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.
- Where you have requested that we delete personal information that we may have collected from you, we will seek to confirm whether your request is for an “opt out” or a “deletion”: because “opt out” or “do not sell” rights enable us to maintain your information for “suppression” purposes – i.e., to prevent us from selling information about you in the future (which is what many consumers requesting “deletion” actually desire to occur) -- we try to explain this in order to ensure we are meeting consumers’ preferences. (In addition, “deletion” rights only apply to information that we have collected “from” consumers – which does not apply to much of the information in our databases.)
- Upon completion of the above process, we will send you a notice that explains the categories of personal information or specific pieces of information we were able to locate about you, whether we (1) deleted, (2) deidentified, or (3) retained the information we collected from you in our suppression file. 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.

**e. 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.

**f. Information about persons under 16 years of age**



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).

**g. Authorized agents**

You may also designate an agent to make requests to exercise your rights under the 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 power of attorney.

[Consumer Access Request](#)