

**Contact Info, Inc.**  
**PRIVACY POLICY**

*This Privacy Policy was last updated on July 26, 2017.*

**Key Highlights**

- We will never sell or rent contact information to third-parties
- User data is processed accessed by computer algorithms, not people
- We will only update contact information for third-parties that have demonstrated an existing relationship with you or where you have expressly authorized the sharing
- We are committed to maintaining strong, multi-layered security processes designed specifically to ensure that personal data never ends up in the wrong hands

**Overview**

Contact Info, Inc. (“Contact Info”, “Company,” “we,” “us,” “our”) provides solutions to collect information, update proprietary databases, and manage contact information. We are committed to making sure your information is up-to-date and unified across your databases and devices. With our contact solutions, you will always have everything you need to maintain and strengthen your relationships right at your fingertips. We maintain the accuracy of your databases through the collective inputs of millions of people and billions of data points managed by powerful systems running artificial intelligence algorithms. Each end user of our apps and services contribute contact data to our proprietary “ContactCloud” database. Our systems use this crowdsourced and primary data, source anonymized, along with other proprietary sources and millions of public records to determine the most accurate contact information for each individual. The Contact Info family of products includes websites, web-based and mobile apps, APIs, and developer systems, which include [UpdateBot](#), [Contact Info](#), and related mobile applications and services (collectively, the “Products” or “Services”).

Contact Info is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the Personal Data (as defined below) we collect from users of our Services. This Privacy Policy provides information on how Contact Info collects, uses, shares, and secures your information, including Personal Data. When you visit our website or use our Services, you agree to this Privacy Policy and to our [Terms of Use](#). Capitalized terms not defined in this Privacy Policy have the meanings given in our Terms of Use.

**Data Collection**

We collect Personal Data, Anonymous Data, and Public Data and use systems and methods to create Enhanced User Data and Data Associations as described below:

- “Personal Data” means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data.
- “Anonymous Data” means data that is not associated with or linked to your Personal Data; Anonymous Data does not, by itself, permit the identification of individual persons.
- “Public Data” is data from publicly available sources<sup>00</sup>, such as via the Internet and social networks, including through public or licensed APIs.

- “Enhanced User Data” is data created from combining multiple sources of Personal Data and Public Data to create more complete or “Enhanced User Data” records.
- “Data Associations” are the links we make between different data elements to assign multiple separately sourced data elements to the same person.

### How We Collect Information

We collect “End User Data” directly from primary sources through account creation, survey forms, contact forms, emails, voice calls. We also receive End User Data from secondary source partners via bulk uploads or API feeds. To make our Services more useful and secure we may also automatically collect network and device information. We may also use third-party services (such as Google Analytics) to collect information about how you use and interact with our Services. When you interact with our Services, we may also use various technologies such as cookies and web beacons to passively collect information that cannot presently be used to specifically identify you. If you use our mobile or web apps with contact sync activated, we may collect information from your standard address book fields (but will not aggregate notes or custom fields). If you use our messaging services and provide a dedicated email address for use by the service, all information from that address will be retrieved and reproduced in the application. If you activate our email search feature and provide access credentials, we will access your account, scan your emails for header and signature fields, and retrieve contact information.

### What Information We Collect

We collect information such as name, gender, age, birthday, e-mail addresses, mailing addresses, social media handles, job title, company name, website URLs, photos, school affiliation, graduation year, degrees, majors, and interests. for our ContactCloud database. We may also collect information such as browser type, operating system, IP address, domain name, referring URL, phone manufacturer, phone model, screen size information, device ID, mobile network, application version, activity time stamps, and system issues or crashes. If you use our location-enabled services, we may also collect GPS or Wi-fi coordinates during app use and for periodic updates. We may also collect other custom fields that are part of our partner’s surveys. If you create an account with the Company or make a purchase through one of our partner’s we may also collect a password and information necessary to complete a transaction, including your name, credit card information, billing information and shipping information. The Company may store such information itself or in databases owned and maintained by affiliates, agents or service providers.

### Use of Data

We may use Personal Data provided to us for a variety of purposes as governed by current laws and the policies below:

### Service Delivery

We may use your Personal Data for Service delivery:

- for registration
- to help serve you relevant and meaningful content
- to provide, maintain and improve our Services
- to contact you as described below
- to charge your payment card if you have opted into certain paid Services

- to populate our ContactCloud database
- to determine, promote and enhance the accuracy, completeness and freshness of the contact information in our users' address books
- for our own business purposes

We may share your Personal Data with service providers:

- To help distribute our Services
- To communicate with you
- To remove repetitive or duplicate information from our systems
- To process payments, or provide other operational services
- To correlate, match, or verify information held by our service providers and trusted partners
- As part of a poll, quiz, survey, contest, reward program, or other activity
- To verify or enforce our Terms of Services or other applicable policies and guidelines

#### User Communication

We may use your Personal Data to contact you:

- regarding the Services
- in response to your inquiries and requests
- with alerts or newsletters
- with updates about your address book
- with opportunities to participate in polls, quizzes, and surveys or contest and reward programs

#### Referrals

If you elect to use our referral service to inform others about our site or Products, we may use the provided name, phone number, and e-mail address for you and for the person referred. Contact Info will automatically send the referred person an e-mail, text, and/or phone call inviting them to adopt the Services. Contact Info stores referral information for the sole purpose of sending these outreach notifications. The referred person may opt out to request removal of this information from our database using links provided in emails, by replying stop to texts, or by following touch-tone directions during phone calls.

#### Partner Updates

Contact Info is not in the business of selling or renting your Personal Data. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share information from our ContactCloud database with partners that have demonstrated a prior relationship with the contacts they are accessing. Partners must have an adequate amount of information to "demonstrate" a relationship with you. They must provide information that matches our previous entries before they will receive any new contact information for you. Users cannot simply enter your name and fake contact information then request an update. All partners must also have a publically posted privacy policy and provide an industry standard opt out mechanism. In these cases, we may share Personal Data without further notice to you, as set forth below:

- We may provide contact information updates to partners to ensure their address books are current

- We may make contact information available to partners for data hygiene process to ensure their address books are accurate

#### Aggregated and/or Anonymous Data

In an ongoing effort to better understand and serve the users of the Service, Contact Info may conduct research on its customer demographics, interests, and behaviors based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate and/or anonymous basis and the Company may share this aggregate and/or anonymous data with its affiliates, agents, and partners. The Company may also disclose aggregated user statistics and/or anonymous user data in order to describe our users and Services to current and prospective business partners and to other third parties for other lawful purposes. This aggregate and/or anonymous information does not identify you personally.

#### Public Data Associations

We may use your End User Data to make associations between data elements (provided the data elements constitute Public Data) and disclose these data elements as Enhanced Contact Data even if the data association was previously undisclosed. For example, if a person has a twitter handle, an email address and a facebook page, all of which constitute Public Data, and you provide End User Data that includes the data association to tie those three elements of Public Data together, we can disclose that connection. Further, nothing shall restrict our right to use, access, process, collect, disclose, share or distribute any Public Data, even if such Public Data is duplicative of your End User Data.

#### Business Transfers

As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.

#### Related Companies

We may also share your Personal Data with our related companies for purposes consistent with this Privacy Policy.

#### Agents, Consultants and Related Third Parties

The Company, like many businesses, sometimes hires other firms to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases and processing payments. When we employ another firm to perform a function of this nature, we only provide them with the information that they need to perform their specific function.

#### Legal Requirements

The Company may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary. Examples of legally required disclosure include to (i) comply with a legal obligation, (ii) protect and defend the rights or property of the Company, (iii) act in urgent circumstances to protect the personal safety of users of the Service or the public, or (iv) to protect against legal liability.

### Data Retention

We keep data for as long as necessary to fulfill the business purposes outlined in this Privacy Policy and our Terms of Use and discard data when it is no longer useful. We may retain data for a longer period for legal and accounting purposes and where required by law.

### User Options

You have the ability to control and update your Personal Data is used as outlined below:

#### User Consent

By submitting or uploading Personal Data through our Services you agree to the terms of this Privacy Policy, you expressly consent to the collection, use and disclosure of your or end-user Personal Data in accordance with this Privacy Policy, and you represent and warrant that you have all rights necessary to submit such Personal Data. You also represent that the Personal Data you provide is true, accurate, current, and complete. If you provide Personal Data to us, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of the Company and the authorized third parties.

#### User Updates

You may update your Personal Data by downloading our app, verifying your identity, and providing correct information. Keeping this information current will help ensure data quality and accuracy for your contacts that participate in our Services. You can download the [app here](#).

#### Unsubscribe

You also may unsubscribe or delete your account through the account settings page. You also may stop using our Services by removing our applications from your device. You can prevent collection of Personal Data from third-party email and social networking services (such as Facebook, LinkedIn, or Google) by not linking your email or social networking accounts with your Contact Info account. Please note that we may retain certain information associated with your account in our archives prior to you unsubscribing.

#### Opt Out

We encourage you to try the apps and other Services yourself before requesting that any data be removed from Contact Info. Contact Info exists to help people stay in contact, and by opting out you will likely cause people to lose track of you. Within our app you can control broadly who received your information using the settings and specifically who receives your contact information using permission functions. If you still want to opt out of our Services, you can do so at any time using the [opt out form](#). Please allow 30 days for us to remove your information. Please note, opting out of our services will prevent future updates to third-parties, but we do not control how third-parties use the data they already possess.

### **How We Protect Information:**

We maintain commercially reasonable security measures to protect the security of your information against unauthorized access and disclosure both online and offline. These measures include the implementation of reasonable technical, physical and administrative data security safeguards that are consistent with our business operations and industry standards. For example, we use secure

socket layer (“SSL”) or other encryption technology when transmitting your Personal Data between your system and ours.

We also employ firewalls and intrusion detection systems to help prevent unauthorized persons from gaining access to your information. Access to Personal Data is restricted so that only certain of our employees are granted access to information as appropriate to perform specific jobs and tasks. Some information is also stored in an encrypted form within our own databases. We use appropriate security measures to store payment card information.

While we take reasonable precautions against possible security breaches of our systems, no applications, website or Internet transmission is completely secure, and we cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur. We urge you to take steps to keep your Personal Data safe (including your username and password), and to log out of your account after each use.

### **Social Media**

Through the Service, you can choose to link your Contact Info account to your accounts with certain social media websites and services that are owned and/or controlled by third parties (including, without limitation, Facebook and LinkedIn) (such websites and services, collectively, the “Social Media Services”). When you elect to access and use the Social Media Services, you will be sharing your information (which will include personal information if you elect to share such information) with those Social Media Services. As with other third party sites, the information that you share with the Social Media Services will be governed by the privacy policies and terms of service of the providers of such Social Media Services and not by the policies and procedures we describe here. You may also be able to modify your privacy settings with these Social Media Services to, for example, control what information the Social Media Services disclose to other entities, including Contact Info. When you link your Contact Info account to a Social Media Service account, we will collect relevant information necessary to enable the Service to access that Social Media Service; however, you will provide your login information, like your password, directly to such Social Media Service (and not to Contact Info). As part of such integration, the Social Media Service will provide Contact Info with access to certain information that you have provided to such Social Media Service, and we will use, store and disclose such information in accordance with this Privacy Policy and, if and to the extent applicable, the policies of such Social Media Services. However, please remember that the manner in which Social Media Services use, store and disclose your information is governed by the policies of the applicable Social Media Services provider, and, as a result, Contact Info shall not have any liability or responsibility for the privacy practices or other actions of Social Media Services that may be enabled within and/or otherwise accessible through the Service.

### **Links to Other Web Sites**

This Privacy Policy applies only to the Service. This Service may contain links to other web sites not operated or controlled by Contact Info (the “Third Party Sites”). For instance, we may redirect to a partner website upon the completion of a contact form. The policies and procedures we described here do not apply to the Third Party Sites. The links from this Service do not imply that the Company endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

### **Regarding Children**

Our Services are not intended for or directed to children. Children under 13 are not eligible to use our Services. By using the Services, you represent that you are at least 18 years old, an emancipated minor, or possess legal parental or guardian consent to use the Services. You also understand that you must be at least 18 years old in order to purchase the Services advertised through our websites and applications. We do not knowingly collect or maintain Personal Data from children under the age of 13. If we learn that we have inadvertently gathered Personal Data from children younger than the age of 13, we will take reasonable measures to delete or destroy such information from our records.

### **International Users and Onward Transfer**

If you are a user, member or visitor who resides outside the United States, you understand that your Personal Data may be transferred to and processed in countries (including the United States) where laws regarding processing of Personal Data may be different than the laws in your country. We may store, process and/or transfer Personal Data to countries outside of the country or region of origin, including outside the EU and EEA, and especially to servers in the United States. By using our Services, or providing us with any information, you fully understand and unambiguously consent to this onward transfer, processing, and storage of your information in the United States for our legitimate business purposes as outlined in this Privacy Policy. If you do not agree to our transfer, processing, and storage of your information in the United States, you should not use our Services, or provide us with any information.

### **California Privacy Rights**

California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please [contact us](#) through our website. Please allow 30 days for us to respond to any such request.

We do not collect Personal Data about a consumer's online activities over time across third-party websites or online services as a Third-Party Ad Server. Therefore, "do not track" signals transmitted from web browsers do not apply to the sites, and we do not alter any of our data collection and use practices upon receipt of such a signal. Where a user or web browser transmits a "do not track" signal, third parties that place cookies and collect information on the Sites will be able to see that such a signal has been transmitted.

### **Changes to Privacy Policy**

We may update this Privacy Policy from time to time and any changes will become effective upon posting. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices. We will notify you about material changes in the way we treat your Personal Data either by email, if you have provided your email address to us, or by prominently posting the revised policy on our websites and/or apps.

### **Contact Us**

If you have questions or concerns regarding this Privacy Policy, you should [contact us](#).