# Political Data Inc. (PDI) Privacy Policy

*(effective 12/31/2019)*

Political Data, Inc. ("PDI", "us", "we", or "our") is committed to protecting your privacy. This privacy policy is intended to clearly explain what we consider to be "personal data", what we consider to be "anonymous data", and how this information is collected, used, and disclosed by PDI.

By visiting www.politicaldata.com, accessing the PDI Online Software Application, or doing business with PDI, you are accepting the practices described in this privacy policy and expressly consent to the use and potential disclosure of your Personal Data in accordance with this Privacy Policy. If you disagree, disapprove, or do not wish to comply with this Privacy Policy, please immediately discontinue visiting our website and using our products.

If you have any questions or comments regarding our privacy policy, please contact us at privacy@politicaldata.com

## The Types of Data We Collect and Store

PDI is a privately owned company that provides voter data products to political organizations, operates the PDI Online Software System (aka, PDI National, MOE, BlueVote, and RED), and maintains the website www.politicaldata.com. The Site and Software shall hereinafter be collectively referred to as "Services".

In the process of doing business, PDI collects and maintains information classified as both "Personal Data" and "Anonymous Data" using the following definitions:

a. Personal Data - "Personal Data" means data that allows someone to identify or contact you, including, for example, your name, delivery address, telephone number, e-mail address, voter registration information we provide you through use of the Service, as well as any other non-public information about you that is associated with or linked to any of the foregoing data

b. Anonymous 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.

It is important to understand PDI stores and maintains personal data that has been collected or acquired through different methods, with different levels of detail and different ownership rights. These methods include the following:

a. PDI Client, System User, or Website Visitor Information (Client Data) – Individuals working with PDI by using the PDI Online Software Application or purchasing data or services directly through a PDI account representative may be required to provide personal data for direct communication, processing a payment transaction, or creating a unique PDI Online Software user account. This information may range from billing information to the user's IP address. We collect and store this information to support PDI's client /marketing communications, enhancement of client's online experience, and ability to maintain a high level of online security and system performance. PDI does NOT sell or share in any form System User or Client information with any third-party entities.

b. Information Submitted to the PDI Online Software (Submitted Data) – Users of the PDI Online Software Application will frequently add personal data through data entry and bulk import functionality. The purpose of Submitted Data is to enhance the individual information for a voter or proprietary contact data. All information created and added to the PDI Online Software Application is exclusively owned by the contracted entity that provided payment for the data or software purchase. PDI does not sell or share in any form Submitted Data with any third-party entities.

   Some organizations may desire to share data in their PDI Online Software Application with another PDI account owned by trusted organization. The software has data sharing functionality that utilizes a specific protocol requiring active consent from the organization sharing and receiving the data.

   PDI sales or support team members are not authorized to provide any account information that could assist in the configuration of data sharing between two or more client organizations.

   Submitted Data acquired by an organization can be exported at any time by an account administrator. PDI will provide technical assistance at no charge to organizations not able to extract their Client Added Data.

c. Donation / Purchase Processing (Financial Transaction Data) – The PDI Online Software Application supports custom webforms designed to process financial data, PDI uses third party components activated by the account owner to manage the financial transactions. To be clear, PDI does not store credit card information.

d. Voter Information (Voter File Data) – PDI provides voter data derived from government agencies to organizations permitted to use voter data under state or local law. Access to voter data is limited in how it may be used as well as the duration under the applicable purpose. Under no condition is access to voter data ever granted in perpetuity.

   While the exact voter data fields vary from state to state, they commonly include Name, Address, Birth Date, Gender, Party, Phone Number, and Email Address as provided by individuals on their voter registration forms.

   PDI has no authority to provide voter data or permit the use of voter data beyond the scope of applicable state or local law. PDI does not make any changes to voter data that could possibly impact a voter's eligibility or status. We do not have the authority to add or remove voters on behalf of any government elections agency. It is the responsibility of individuals using PDI voter data to determine whether their use of the data is legally permissible. Voter data may never be used for personal or commercial use.

   Traditional political campaign methods often require the exporting of paper or electronic lists from the PDI online Software Application. The entity purchasing the list or software subscription

is responsible for protecting the privacy of individuals contained on such lists or files.

All lists and electronic files should be stored with personal privacy in mind and destroyed immediately after using. We ask that all PDI Online System users maintain and store these lists and files with a respectful consideration of the personal privacy of the individuals contain on the list. Treat the lists and files as if your information is included.

## Disclosure of Personal Data

We do NOT sell your Personal Data for commercial use and will only disclose Personal Data as described below and as described elsewhere in this Privacy Policy.

a. Third Party Service Providers – PDI may also share Personal Data with third-party service entities under the following conditions: to conduct quality assurance testing; to facilitate creation of accounts; to provide technical support; and for benchmarking and research purposes associated with the performance of Services. These third-party service providers are contractually prohibited from using Personal Data for any purpose other than providing the previously stated services. We will remain responsible to you for Personal Data and require third-party services providers adopt strict adherence to the terms of this Privacy Policy.

b. Other Disclosures - Regardless of any choices you make regarding your Personal Data (as described below), we may disclose Personal Data if we believe in good faith that such disclosure is necessary (i) in connection with any legal investigation; (ii) to comply with relevant laws or to respond to subpoenas or warrants served on us, our Partners or third-party services providers; (iii) to protect or defend our rights, property and/or other users of Services; and/or (iv) to investigate or assist in preventing any violation or potential violation of the law or breach of our agreement with you.

## Automatically Collected Information

When you access or use Services, we may automatically collect information about you, including:

a. Log Information - We log information about your use of Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to Services.

b. Device Information - We collect information about the computer or mobile device you use to access Services including the hardware model, operating system and version, unique device identifiers and mobile network information.

c. Information Collected by Cookies and Other Tracking Technologies - We use various technologies to collect information, and this may include sending cookies to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory that helps us to improve Services and your experience, see which areas and features of Services are popular and visit counts. We may also collect information using web beacons (also known as “gifs,” “pixel tags” and “tracking pixels”). Web beacons are electronic images that may be used in connection with Services or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. For more information about cookies, and how to disable them, please see “Your Choices” below.

## Email Communications

We may periodically send you e-mails that directly promote the use of Services. When you receive communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to this Privacy Policy.

## Data Security

PDI uses standard industry security measures to help protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction of Personal Data. Unfortunately, it is impossible to guarantee that Personal Data is 100% secure**.** Please store passwords in a safe place and sign out when you are not in close proximity to your device. You are solely responsible for all activity done through your account and will immediately notify us at security@politicaldata.com if you have reason to believe that your account has been compromised. We reserve the right, in our sole discretion, to terminate or suspend your account.

## Third Party links

Services include links to third-party websites. Some third-party websites may collect data or solicit personal information from you. We neither own nor control such third-party websites and are not responsible for their content or actions. Please read the terms and conditions and privacy policies of any third-party website that may be linked to Services.

## Your Choices

a. Account Information - You may update, correct or delete information about you at any time by logging in to your account. If you would like to cancel your account entirely, please contact us, and enter your request for cancellation, but please note that we may retain certain information as required by law or for legitimate business purposes.

b. Changing or Deleting your Customer Personal Data - You may change any of your Customer Data in your account by editing your profile within your account or by sending an e-mail to us at privacy@politicaldata.com or calling (800) 638-4649. You may request deletion of your Customer Data by us, and we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We may also retain your information for fraud or similar purposes. Please note that the policies described in the section may not apply to Personal Data associated with registered voter records.

c. Cookies - Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Removing or rejecting browser cookies does not necessarily affect third-party flash cookies used in connection with Services.

Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Site. To delete or disable flash cookies please visit the following website for more information: www.adobe.com/products/flashplayer/security.

## Changes to this Privacy Policy

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this Privacy Policy, and when possible, we may provide you with additional notice (such as adding a statement to the homepage of our Services or sending you an email notification).

Any changes will be effective immediately upon posting of the revised Privacy Policy and your continued use of the Service indicates your consent to the then current Privacy Policy. If you do not agree, you may discontinue use of the Services. We encourage you to review the Privacy Policy whenever you interact with us to stay informed about our information practices and the ways you can help protect your privacy.

To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

## Children's Privacy

We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your Children 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.

## California Consumer Privacy Act - CCPA *(Effective January 1st, 2020)*

The CCPA, was passed by the California State Legislature in AB375 in 2018 and signed by the Governor that year. Subsequent legislation AB25, AB874, AB1146, AB1355 and AB1564 made modifications to the law. The total of these legislative protections take effect on January 1, 2020.

The CCPA places important protections on commercial use of personal data collected by entities doing business in California. It allows consumers to view any data collected on them, restrict use of that data and even have their data deleted under most circumstances.

PDI is required to comply with the CCPA for data that is acquired from our public website (politicaldata.com) and sales process. PDI is not required to comply with the CCPA for Personal Data associated with registered voters. Any adherence to the CCPA would be strictly voluntary and conditional. Please continue reading this section for more specific details.

The law creates two important exemptions for those working within areas of political free speech, governmental, and legitimate research. These can be found in two key sections of the new law:

1798.105 (d) (4) A business or a service provider shall not be required to comply with a consumer's request to delete the consumer's personal information if it is necessary for the business or service provider to maintain the consumer's personal information in order to *exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or*

*exercise another right provided for by law.*

1798.140 (f) For purposes of this title: "Commercial purposes" means to advance a person's commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction. *"Commercial purposes" do not include for the purpose of engaging in speech that state or federal courts have recognized as noncommercial speech, including political speech and journalism.*

Amendments to the law in 2019 went further in three areas that provide additional protections for PDI Clients and how our data is utilized by excluding data legally made available from federal, state or local governments from the provisions which apply to "personal information." (Civil Code Section 1798.140 (O) (2)). This further clarified that data such as voter files, political donor data, and other data commonly used by PDI is not subject to the provisions.

These amendments also provided greater clarity by defining "personal information" in a way that exempts de-identified or aggregate consumer data. (Civil Code Section 1798.145 (a) (5)) This is the kind of data utilized by PDI in modeling and other voter targeting, and the amendment expressly excludes this data from the consumer protections under this law.