

**1. Introduction**

A. TargetSmart Communications, LLC ("TargetSmart" or "we") respects the privacy of every individual about whom we provide information. We offer our clients both information management services and information products to help with targeted communications and opinion research. When TargetSmart provides information products to our clients, we adhere to the information practices described in this Privacy Policy.

**2. Personal Information that we collect and hold about you**

- A. TargetSmart's information products help our clients, a wide variety of general public facing organizations, membership organizations, researchers, data compilers, and suppliers manage, use, and optimize customer data and assist them in identifying and reaching relevant audiences.
- B. TargetSmart brings information products and services to market through Analytics Data Installs, ListBuilder, Digital Voter Files, SmartVAN, Polling services, Communications services, Data Enhancement services, and Strategic Consulting, each containing only the information needed for their intended use. Each of TargetSmart's information products is designed for specific use by our clients with a legitimate need for the product.
- C. To fulfill our client's needs, we collect and hold personal information about you from different sources. The outline below defines the categories of personal information we may have collected in the past twelve (12) months, listed by category of services.

Category of Personal Information	Personal information we collect and from whom we collect it
Identifiers	<p><b>What we collect:</b> Including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Name (first, last, and/or maiden name; home address or other physical address; e-mail address(es); telephone number(s).</li> <li>• Device identification information used to access websites; we may devices with a mobile telephone number.</li> <li>• Information collected passively via cookies and similar technology.</li> <li>• IP addresses, device identifiers, and application identifiers.</li> <li>• Categories of Sensitive Personal Information: Date of birth, other consumer-based information.</li> </ul> <p><b>From whom we collect it (by category of sources):</b></p> <ul style="list-style-type: none"> <li>• Government sources</li> <li>• Courthouses records</li> <li>• Campaign compliance disclosures</li> <li>• Telephone directories</li> <li>• Website directories and listings</li> <li>• Census data</li> <li>• Election administration officials</li> <li>• Court records</li> <li>• County clerk records</li> <li>• Property records</li> <li>• Legal records</li> </ul>

	<ul style="list-style-type: none"> <li>• Voter information, such as election districts, political party registrations, voter registration, and election participation by voters</li> <li>• Information you provide</li> <li>• Information collected passively via cookies and similar technology.</li> <li>• Advertising Partners.</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Publicly available information</li> <li>• Marketing companies</li> </ul>
<p><b>Personal information categories listed in the California Customer Records statute</b></p> <p><i>Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, an individual's name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</i></p> <p><b>Note that personal information in this category may overlap with other categories.</b></p>	<p><b>What we collect:</b> Including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Name (first, last, and/or maiden name; home address other physical address; e-mail address(es); telephone number(s).</li> <li>• Device identification information used to access websites; we may devices with a mobile telephone number.</li> <li>• Information collected passively via cookies and similar technology.</li> <li>• IP addresses, device identifiers, and application identifiers.</li> <li>• Categories of Sensitive Personal Information: Date of birth other consumer-based information.</li> </ul> <p><b>From whom we collect it (by category of sources):</b></p> <ul style="list-style-type: none"> <li>• Government licensing</li> <li>• Courthouses records</li> <li>• Campaign compliance disclosures</li> <li>• Telephone directories</li> <li>• Website directories and listings</li> <li>• Census data</li> <li>• Election administration officials</li> <li>• Court records</li> <li>• County clerk records</li> <li>• Property records</li> <li>• Legal records</li> <li>• Voter information, such as election districts, political party registrations, voter registration, and election participation by voters</li> <li>• Information you provide</li> <li>• Information collected passively via cookies and similar technology.</li> <li>• Advertising Partners.</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Publicly available information</li> <li>• Marketing companies</li> </ul>
<p><b>Characteristics of protected classifications under California or federal law</b></p>	<p><b>What we collect:</b> Including, but not limited to the following:</p>

<p><i>An individual's age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</i></p>	<ul style="list-style-type: none"> <li>• Categories of Sensitive Personal Information: Age, race, ethnicity, religion, marital status, political party affiliation, country of origin, spoken language, and gender.</li> </ul> <p><b>From whom we collect it (by category of sources)</b></p> <ul style="list-style-type: none"> <li>• Information you provide.</li> <li>• Advertising partners.</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (Fintech) companies</li> <li>• Public records made lawfully available from Government agencies</li> <li>• Government (information not in public records)</li> <li>• Marketing companies</li> </ul>
<p><b>Commercial information</b></p>	<p><b>What we collect:</b> Including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Records of online services you purchased, obtained, or considered purchasing from us.</li> <li>• Property records</li> <li>• Small/personally owned business data</li> <li>• Business data that identifies, describes, or could reasonably be linked/associated to you</li> </ul> <p><b>From whom we collect it (by category of sources)</b></p> <ul style="list-style-type: none"> <li>• Information you provide.</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (Fintech) companies</li> <li>• Public records made lawfully available from Government agencies</li> <li>• Government (information not in public records)</li> <li>• Marketing companies</li> </ul>
<p><b>Biometric information</b></p>	<ul style="list-style-type: none"> <li>• We do not collect this category of information</li> </ul>
<p><b>Internet or other similar electronic network activity</b></p>	<p><b>What we collect:</b> Including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Information about your interactions with our website, for example, when you view or search content, we receive and track that information; web session; log file information; information such as the website(s) you visited, when you visited the website, how long you stayed, your behavior while you are on our website and from what device you accessed the website.</li> <li>• Information about your interactions with online forms; for example, the use of autofill, number of pauses, length of time to complete a field, number of errors, number of changed answers, typing fluency and number of repeat interactions.</li> </ul> <p><b>From whom we collect it (by category of sources)</b></p> <ul style="list-style-type: none"> <li>• Information directly collected from you</li> </ul>

	<ul style="list-style-type: none"> <li>• Information collected passively via cookies and similar technology</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Marketing companies</li> </ul>
<b>Geolocation data</b>	<p><b>What we collect:</b> Including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Information used to determine your location via IP address, Wi-Fi access points, and cell towers.</li> </ul> <p><b>From whom we collect it (by category of sources)</b></p> <ul style="list-style-type: none"> <li>• Information directly collected from you.</li> <li>• Information collected passively via cookies and similar technology.</li> <li>• Telecommunications providers.</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Marketing companies</li> </ul>
<b>Sensory data</b>	<ul style="list-style-type: none"> <li>• We do not collect this category of information</li> </ul>
<b>Professional or employment-related information</b>	<p><b>What we collect</b> Including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Professional Licenses</li> </ul> <p><b>From whom we collect it (by category of sources):</b></p> <ul style="list-style-type: none"> <li>• Information you provide.</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (Fintech) companies</li> <li>• Public records made lawfully available from Government agencies</li> <li>• Government (information not in public records)</li> <li>• Marketing companies</li> <li>• TransUnion companies</li> </ul>
<b>Non-public education information (per the Family Educational Rights and Privacy Act)</b>	<ul style="list-style-type: none"> <li>• We do not collect this category of information</li> </ul>
<b>Inferences drawn from other personal information</b>	<p><b>What we collect</b> Including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Site preferences, behavior, characteristics, personal preferences</li> </ul> <p><b>From whom we collect it (by category of sources)</b></p> <ul style="list-style-type: none"> <li>• Data from survey research.</li> <li>• Information directly collected from you.</li> <li>• Information collected passively via cookies and similar technology.</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (Fintech) companies</li> </ul>

	<ul style="list-style-type: none"> <li>• Public records made lawfully available from Government agencies</li> <li>• Government (information not in public records)</li> <li>• Marketing companies</li> </ul>
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### 3. Use of Your Information

A. The information that TargetSmart makes available to our clients is used for many differing purposes, including but not limited to the enhancement of customer and constituent files and providing lists for activities such as prospecting, voting, advocacy, marketing, and fundraising purposes. Examples of the ways your information is used for business purposes:

- Targeting, delivering, and optimizing direct outreach campaigns through the mail, phone, in-person, and e-mail; and media campaigns through digital, broadcast, print, earned and out-of-home channels
- Assisting clients in measuring the effectiveness of ad campaigns
- Creating data and identity linkages to match common identities across different data sources
- Creating inference models about people, households, postal addresses, or unique online identifiers
- Categorization of specific audiences based on shared interests or preferences
- Cross channel marketing
- Population research and analytics.

B. Below is a description of the purpose for our collection of personal information, by category of personal information. The information in the chart below may appear in one or more categories.

<b>Category of Personal Information</b>	<b>Purpose of Collection</b>
<b>Identifiers and personal information categories listed in the California Customer Records statute</b>	<ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To display, optimize, and provide personalized advertisement.</li> <li>• To communicate with you.</li> <li>• To conduct surveys used for research, analytics, and to enhance our product development and offerings.</li> <li>• For product development and research, and for any purpose subject to the limitations set forth in this Notice and applicable law.</li> <li>• Data from third parties, such as your telecommunications companies or providers.</li> </ul>
<b>Characteristics of protected classifications under California or federal law</b>	<ul style="list-style-type: none"> <li>• To verify your identity.</li> <li>• To display, optimize, and provide personalized advertisements.</li> <li>• To communicate with you.</li> <li>• For product development and research, and for any purpose subject to the limitations set forth in this Notice and applicable law.</li> </ul>
<b>Commercial information</b>	<ul style="list-style-type: none"> <li>• For product development and research, and for any purpose subject to the limitations set forth in this Notice and applicable law.</li> </ul>

	<ul style="list-style-type: none"> <li>To display, optimize, and provide personalized advertisements.</li> </ul>
<b>Internet or other similar electronic network activity</b>	<ul style="list-style-type: none"> <li>To display, optimize, and personalize advertisements.</li> <li>To measure advertising effectiveness.</li> <li>To perform website analysis.</li> </ul>
<b>Geolocation data</b>	<ul style="list-style-type: none"> <li>To verify your identity.</li> <li>To enhance and optimize an account for access to and use of the online services.</li> <li>To display, optimize, and provide personalized advertisements.</li> <li>To communicate with you.</li> <li>For product development and research, and for any purpose subject to the limitations set forth in this Notice and applicable law.</li> </ul>
<b>Professional or employment information</b>	<ul style="list-style-type: none"> <li>To display, optimize, and provide personalized advertisements.</li> <li>To communicate with you.</li> <li>For fulfillment of your requests and purchases, transactional and other communications about our websites and the online services.</li> </ul>
<b>Inferences drawn from other personal information</b>	<ul style="list-style-type: none"> <li>To verify your identity.</li> <li>To enhance and optimize an account for access to and use of the online services.</li> <li>To display, optimize, and provide personalized advertisements.</li> <li>To communicate with you.</li> </ul>

**4. Disclosing for a business purpose and selling/sharing personal information**

A. In the prior 12 months, we may have sold or shared for a commercial purpose or disclosed for a business purpose your personal information to different third parties, as detailed below.

<b>Category of Personal Information</b>	<b>Sold or shared by category of third parties</b>	<b>Disclosed for a business purpose, by category of third parties</b>
<b>Identifiers and personal information categories listed in the California Customer Records statute</b>	<ul style="list-style-type: none"> <li>Advertising networks</li> <li>Consumer data resellers</li> <li>Data analytics providers</li> <li>Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>Financial technology (Fintech) companies</li> </ul>	<ul style="list-style-type: none"> <li>Consumer data resellers</li> <li>Data analytics providers</li> <li>Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>Financial technology (Fintech) companies</li> <li>Government agencies</li> </ul>

	<ul style="list-style-type: none"> <li>• Identity verification companies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Retail merchants</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>	<ul style="list-style-type: none"> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Parties to litigation</li> <li>• Service providers</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>
<b>Characteristics of protected classifications under California or federal law</b>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>	<ul style="list-style-type: none"> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Parties to litigation</li> <li>• Service providers</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>
<b>Commercial information</b>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>	<ul style="list-style-type: none"> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Parties to litigation</li> <li>• Service providers</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>

<p><b>Internet or other similar electronic network activity</b></p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>	<ul style="list-style-type: none"> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Parties to litigation</li> <li>• Service providers</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>
<p><b>Geolocation data</b></p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>	<ul style="list-style-type: none"> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Parties to litigation</li> <li>• Retail merchants</li> <li>• Service providers</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>
<p><b>Professional or employment-related information</b></p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> </ul>	<ul style="list-style-type: none"> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> </ul>



	<ul style="list-style-type: none"> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>	<ul style="list-style-type: none"> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Parties to litigation</li> <li>• Service providers</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>
<b>Inferences drawn from other Personal Information</b>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>	<ul style="list-style-type: none"> <li>• Consumer data resellers</li> <li>• Data analytics providers</li> <li>• Data brokers, which include data aggregators, data compilers, and data compilers/originators</li> <li>• Financial technology (fintech) companies</li> <li>• Government agencies</li> <li>• Insurance carriers/agencies/partners</li> <li>• Internet service providers</li> <li>• Marketing companies</li> <li>• Parties to litigation</li> <li>• Service providers</li> <li>• Social networks</li> <li>• Survey providers</li> </ul>

**5. Sharing And Disclosure of Your Information**

- A. TargetSmart may disclose your information for use by qualified companies, non-profit organizations, and political organizations in their marketing, fundraising, customer service, and constituent service and outreach programs.
- B. Our client and supplier contracts require that any data sent to us has been legally obtained for the uses to which it will be put. Additionally, we require that our client's usage of any data received from us comply with applicable data protection laws and industry best practices. We also agree to comply with information providers' restrictions on the data we receive. Our clients' information is the sole property of our clients, and the rights we have concerning our clients' information are the rights they grant to us. We use and share personal information that our clients share with us in the manner requested or authorized by our clients and consistent with the restrictions placed on that information.
- C. We may share personal data we obtain with the following third parties:
  - i. Agents and Service Providers who help with our business activities or provide services requested by our clients. These companies are authorized to use your personal data only as necessary to provide these services to us. These services may include data storage, customer service, and business operations.

- ii. Business and Data Partners and Clients, to help provide more tailored advertising and for analytical purposes.
  - iii. Affiliates, Partners, and Subsidiaries: to provide necessary services.
- D. In certain situations, TargetSmart may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- E. We may also disclose your personal data as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, respond to a government request or where there has been a change in ownership, merger, or acquisition.

## 6. **Security, Retention, and Data Integrity**

- A. TargetSmart follows generally accepted standards and maintains physical, technical, and administrative safeguards to protect personal data. TargetSmart continually monitors access to its systems to detect unauthorized attempts to gain access to information. We may retain your information for as long as our client accounts are active or as needed to provide services, comply with our legal obligations, resolve disputes, and enforce our agreements.

## 7. **Access**

- A. TargetSmart has no direct relationship with the individuals whose personal data it processes. However, an individual who seeks access or correct, amend, or delete inaccurate data is welcome to contact us with questions regarding their data.
- B. In certain circumstances, we may be required by law to retain your personal data or may need to retain your personal data to continue providing a service.

## 8. **Children Under the Age of Eighteen**

- A. We do not collect personal information from any person we know to be under the age of 16, and we will delete any personal information collected that we later know to be from a person under the age of 16. Some election officials allow individuals under 18 to register to vote. We do retain these official voter records of people under 18. Our products and services are not targeted at people under 18 years of age.
- B. If you believe a child under the age of 16 has disclosed personal information to us, please contact us at [privacy@targetsmart.com](mailto:privacy@targetsmart.com) and specify the customer and information you believe to be from the child under 16.

## 9. **Privacy Policy Changes**

- A. From time to time, TargetSmart may update and revise our privacy policy based on changes in our business environment and changes to applicable law. We urge consumers and clients to periodically visit our webpage at <https://privacy.targetsmart.com/privacy-policy> to understand any changes that may have occurred. Our privacy policy contains an "effective date" reflecting the last changes. If there is a material change to our Policy, we will provide you with a notice on our website so that you can review and understand those changes.

## 10. **Additional Consumer Privacy Rights**

- A. If you are a California, Colorado, Connecticut, Utah, or Virginia resident, you have specific rights regarding your personal information. This section describes your state-provided rights and

explains how to exercise those rights. Please also consult the rest of our general privacy policy for complete details.

**i. Right to know**

1. You have the right to request that TargetSmart disclose certain information about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Disclosure, and Deletion Rights), we will disclose to you:
  - a. The categories of personal information we collected about you.
  - b. The categories of sources for the personal information we collected about you.
  - c. Our business or commercial purpose for collecting or selling that Personal Information.
  - d. The categories of third parties with whom we share that Personal Information.
2. If we provide this information to you electronically, the information will be in a portable format. To the extent that it is technically feasible, we will give you the information in a readily usable format that you can easily transfer to another entity.

**ii. The right to correct**

1. You have the right if you determine that TargetSmart has inaccurate personal information about you that we maintain, to request a correction to that information.
2. You must use our "Exercising Access, Data Disclosure, and Deletion Rights" system to verify your identity and provide us with any information you wish corrected.
3. Requests to correct information will only be made where the information provided, and the requester's identity is verifiable.

**iii. The right to delete**

1. You have the right to request that TargetSmart delete any of your personal information that we collected from you and retain, subject to certain exceptions.
2. Once we receive and confirm your verifiable consumer request for deletion (see "Exercising Access, Data Disclosure, and Deletion Rights"), we will delete (and direct our service providers to delete) your personal information from our records unless an exception applies.
3. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:
  - a. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
  - b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such actions.
  - c. Debug products to identify and repair errors that impair existing intended functionality.
  - d. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
  - e. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
  - f. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- g. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- h. Comply with a legal obligation.
- i. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

**iv. Right to Opt-Out of Personal Information Sales**

1. You have the right to direct TargetSmart not to sell your personal information at any time (the "Right to Opt-Out").
2. Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back into personal information sales at any time by contacting TargetSmart at the e-mail address or phone number provided in this notice.
3. Once we receive and confirm your verifiable consumer request for opt-out of the sale/sharing of personal information (see "Exercising Access, Data Disclosure, and Deletion Rights"), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

**v. The right to be free from discrimination**

1. You have the right not to receive discriminatory treatment from TargetSmart for exercising the privacy rights conferred by any state-specific privacy law.
2. Choosing to exercise any right that is part of this privacy policy will not cause:
  - a. Denial of any goods or services.
  - b. Charges of a different price or rate for goods and services, including the granting of discounts, benefits, or penalties.
  - c. Different levels of quality of goods or services that may be provided.
  - d. Suggestions that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**vi. The right to opt-out of cross-content behavioral advertising, automated decision-making/profiling, or targeted advertising.**

1. You have the right to direct TargetSmart not to use your personal information at any time for cross-content behavioral advertising, automated decision-making/profiling, or targeted advertising.
2. Submit your consumer request for opt-out of cross-content behavioral advertising, automated decision-making/profiling, or targeted advertising on the TargetSmart "Exercising Access, Data Disclosure, and Deletion Rights" section of our Privacy Policy.

**vii. The right to limit the use of sensitive personal information.**

1. You have the right to limit how TargetSmart may use your sensitive personal information.
2. For this section, sensitive personal information may include, but is not limited to:
  - a. Social Security Number
  - b. Driver's License Number
  - c. Biometric Information
  - d. Precise geolocation
  - e. Racial description
  - f. Ethnic origin

**11. Exercising Access, Data Disclosure, and Deletion Rights**

- A. To exercise the access, data disclosure, or deletion rights described above, please submit a verifiable consumer request to one of the below methods:

- i. Filling out the web form found on <https://privacy.targetsmart.com>.
  - ii. Phoning us at 888-678-6880.
- B. Questions unrelated to submitting a data disclosure or deletion request should be sent via e-mail at [privacy@targetsmart.com](mailto:privacy@targetsmart.com).

## 12. Verification Process and Required Information

- A. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request for your minor child.
- B. You may only make a verifiable consumer request for access or data portability twice within 12 months. The verifiable consumer request must:
  - i. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information; and,
  - ii. Describe your request with enough detail to understand, evaluate, and respond to it appropriately.
- C. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.
- D. Making a verifiable consumer request does not require creating an account with us.
- E. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## 13. Verifiable Consumer Request Response Timing and Format

- A. TargetSmart endeavors to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will provide our written response by mail or electronically at your option.
- B. Any disclosures we provide will only cover the 12 months preceding the verifiable consumer request's receipt.
- C. Our response will also explain why we cannot comply with a request, if applicable.
- D. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.
- E. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## 14. Authorized Agents

- A. State law allows consumers to use authorized agents to submit requests to TargetSmart on their behalf. If you have elected to use an Authorized Agent, or if you are an Authorized Agent who would like to submit requests on behalf of a consumer, the following minimum procedures will be required before acceptance of any requests by an Authorized Agent on behalf of a consumer.
- B. Authorized agents must use the TargetSmart Privacy web form(<https://privacy.targetsmart.com/>) or our toll-free number (1-888-678-6880) to submit any request on behalf of a consumer.
- C. Authorized agents are required to:
  - i. identify themselves as agents, and;

- ii. submit proof of their agency relationship in the form of a valid power of attorney in compliance with their agent's state law or reliable evidence of signed permission to act on behalf of a consumer.
- D. For the safety and security of the consumer's information, requests submitted to TargetSmart by an Authorized Agent will require TargetSmart to verify the consumer's identity by establishing a direct method of communication, either via a valid mailing address or e-mail address, with the consumer and the Authorized Agent.

**15. Contacts for More Information.**

- A. For questions or concerns about TargetSmart's privacy policy or practices, please contact us at:
  - i. Compliance Department  
TargetSmart Communications LLC  
Washington, DC 20005  
1-888-678-6880  
[privacy@targetsmart.com](mailto:privacy@targetsmart.com)