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InfoTrack is committed to protecting your privacy. This privacy policy covers InfoTrack's treatment of the personal information we collect from and about you. This policy also describes the choices available to you regarding our use of your personal information and how you can access, update, or delete this data.

### **1. Personal information we collect about you and how we use it**

The table in Annex 1 sets out the categories of personal information we have collected about you over the past 12 months. The sources of this information and the purposes for collecting it are set forth further below.

**1.1. Information you give to us:** We collect personal information about you when you voluntarily submit information directly to us by filling in forms on our website or by corresponding with us by phone, email, or otherwise. Personal information is data that identifies or is associated with you and includes information you provide when you register to use our website, use the InfoTrack platform, enter a competition, promotion, or survey, report a problem with our website, or use some other feature of the InfoTrack service.

**1.2. Information we receive from other sources:** We work with third parties (including, for example, subcontractors in technical, payment, and delivery services, advertising networks, analytics providers, search information providers, and credit reference agencies) and may receive information about you from them, subject to your agreements with them.

**1.3.** We automatically collect personal information about you indirectly about how you access and use the InfoTrack service and information about the device you use to access the InfoTrack service. This information includes device ID or unique identifier, device type, geolocation info, and computer and connection information. We also collect personal information using cookies, web beacons, and similar technologies, which provide information about the pages you view, the links you click, and other actions you take on our services within our advertising or e-mail content. The table in Annex 2 sets out the categories of personal information we collect automatically.

**1.4.** We may supplement the personal information we collect with information from third parties and add it to your account information. For example, we may collect and use demographic information that is publicly available, additional contact information, credit check information, and information from credit bureaus, as allowed by applicable national laws.



**1.5.** We may link or combine the personal information we collect and/or receive about you and the information we collect automatically. This allows us to provide you with a personalized experience regardless of how you interact with us.

**1.6.** We may anonymize and aggregate any of the personal information we collect (so that you are not personally identified). We may use anonymized information for purposes that include testing our IT systems, research, data analysis, improving the InfoTrack service, and developing new products and features. We may also share such anonymized information with others.

## **2. Disclosure of your personal information**

**2.1.** We do not sell your personal information. We share your personal information with third parties only as follows:

**2.1.1.** If you request it or to complete a transaction initiated by you (See annex 1 for details);

**2.1.2.** If we are required or allowed by the law, such as to respond to a subpoena or to investigate fraudulent activity; or

**2.1.3** In connection with sale or merger. We may share your personal information while negotiating or in relation to a change of corporate control, such as a restructuring, merger, or sale of our assets.

**2.2.** Over the past 12 months we have not sold your personal information. We have disclosed your information for a business purpose as set forth in Annex 1.

**2.3.** If, in the future, we need to share your personal information for any other purpose, you will be informed in advance and have the opportunity to opt-out.

**2.4. Publicly accessible blogs.** Our website includes publicly accessible blogs or community forums. Any information you provide in these areas may be read, collected, and used by others who access them. This includes information posted on our public social media accounts. To request removal of your personal information from our blog or community forum, contact us at [privacy@infotrack.com](mailto:privacy@infotrack.com).

**2.5. Testimonials.** We may display personal testimonials of satisfied customers on our site, along with other endorsements. We ask for specific consent before posting these testimonials. If you wish to update or delete your testimonial, you can contact us at [privacy@infotrack.com](mailto:privacy@infotrack.com).

## **3. Your rights regarding your personal information**

**3.1.** Under applicable data and privacy protection laws and our policies, you have several basic rights regarding the personal information that we process about you. Here are your specific rights:

**3.1.1. Right to Access.** The right to access the personal information we process about you.

**3.1.2. Right to Transfer.** The right to receive the personal information we process about you in a commonly used format and to have it transferred to another data controller based on your consent.

**3.1.3. Right to Correct.** The right to correct your personal information without undue delay where that personal information is inaccurate or incomplete.

**3.1.4. Right to Deletion.** The right to request that your personal information be deleted without undue delay in certain circumstances.



**3.1.5. Right to Restriction.** The right to restrict our processing of some or all of your personal information in certain circumstances.

**3.1.6. Right to Opt-Out.** You have the right to opt-out of our processing of your personal information.

**3.1.7. Right to close your account.** The right to request that we close your account.

**3.1.8. Right to Non-Discriminatory Treatment.** You have the right not to be discriminated against for exercising any of the rights listed above.

**3.1.9. Right to Know.** You have the right to know the categories and specific pieces of information we collect about you, the sources of the personal information collected, the purpose of collection, and third-parties with whom we share personal information.

**3.1.10. Right to Opt-Out of Sale of Personal Information.** You have the right to opt-out of sale of your personal information.

**3.2.** If you wish to exercise any of these rights, please contact us by using our privacy request webform at [www.infotrack.com/privacy-requests](http://www.infotrack.com/privacy-requests) or by calling us at 1-800-938-8815. We will honor the requests you make related to your rights as the law allows, which means, in some cases, there may be legal or other legitimate reasons that we may not be able to address the specific request you make. You do not have to pay any fees to exercise your rights. We will acknowledge your request within 10 days and will substantively respond to your request within 45-90 days.

Prior to responding to your request, we will need to verify that you are the person that is the subject of the request (the "Verification Process.") The Verification Process consists of matching identifying information provided by you with the information we have about you in our records. You will be asked to provide us with two or three pieces of information that will help us to verify your identification. We will verify your request using the information associated with your account or other information that is held by us, including your email address. We will retain correspondence, documents and information related to any Request to Know, Request to Delete, or Request to Opt-Out for 24 months as required by law.

**3.3 Authorized agent information.** . In order to allow an authorized agent to make a request on your behalf, please email us at [privacy@infotrack.com](mailto:privacy@infotrack.com) to provide your written request and consent to an authorized agent. When your authorized agent makes a request related to your personal information, we will require the agent to provide the above written permission. We may also require that you verify your own identity directly with us at the time such a request is made.

**3.4.** If you reside in the European Union (EU), InfoTrack is the controller of your personal information for purposes of European data protection legislation. You also have the right to lodge a complaint to your local data protection authority. Information about how to contact your local data protection authority is available at [ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

## **4. Marketing and advertising**

**4.1.** From time to time, we may contact you with information about the InfoTrack service and our other products and services. Most messages will be sent electronically. For some messages, we may use the personal information we collect about you to help us determine the most relevant information to share with you.

**4.2.** If you do not want to receive such messages from us, you will be able to opt-out by selecting certain boxes on forms we use when we first collect your contact details. You can also change your marketing preferences at any time by following the email preferences link at the bottom of our emails.



## 5. Storing and transferring your personal information

**5.1. Security.** All information you provide to us is stored on secure servers in a controlled environment with limited access. Any payment transactions will be encrypted in transit using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our service, you are responsible for keeping this password confidential. You should not share your password with anyone.

**5.2.** While no transmission of information via the internet is completely secure, we take reasonable measures to protect your personal information. We cannot guarantee the security of your personal information transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## 6. Retaining your information

**6.1.** We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of our legitimate business interests and satisfying any legal or reporting requirements. In addition, we may retain personal information from closed accounts to comply with national laws, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Terms of Service and take other actions permitted or required by applicable national laws. After it is no longer necessary for us to retain your personal information, we dispose of it in a secure manner according to our data retention and deletion policies.

**6.2.** To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information, and the applicable legal requirements.

## 7. Cookies and similar technologies

**7.1.** Our Service uses cookies and similar technologies (collectively referred to as cookies) to distinguish you from other users of our service. This helps us enhance and personalize your user experience, to monitor and improve our website and services, and for other internal purposes. As is true of most websites, we gather certain personal information automatically.

**7.2.** We use the following types of cookies:

**7.2.1. Strictly necessary cookies.** These cookies are required for the essential operation of our Service, such as to authenticate you and prevent fraudulent use.

**7.2.2. Analytical/performance cookies.** These cookies allow us to recognize and count the number of visitors and to see how visitors move around our Service when they are using it. This helps us to improve the way our Service works, for example, by ensuring that you can find information easily.

**7.2.3. Functionality cookies.** These cookies are used to recognize you when you return to our Service. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**7.2.4. Targeting/marketing cookies.** These cookies record your visit to our Service, the pages you have visited and the links you have followed. We will use this information to make our Service and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

**7.3.** Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. Analytics and targeting cookies are used to monitor performance and improve our website, understand how you use our products and services, serve ads, and remarket products and services to you. For example, we use Google Analytics to understand how our website, services, and products



perform and how you use them. To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy>. To opt out of Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout>.

**7.4.** We partner with third parties to either display advertising on our website or to manage our advertising on other sites. Our third-party partners may use technologies such as cookies to gather information about your activities on this website and other sites to provide you advertising based upon your browsing activities and interests. If you wish not to have this information used to serve you interest-based ads, you may opt-out at any time by clearing your browser cookies. For more information regarding targeted advertising and to learn about your own choices in connection with it, please visit <https://www.aboutads.info/choices>. Please note this does not opt you out of being served ads. You will continue to receive generic ads.

**7.5.** Although most web browsers automatically accept cookies, some browsers' settings can be modified to decline cookies or alert you when a website is attempting to place a cookie on your computer. However, if you use your browser settings to block all cookies (including strictly necessary cookies), you may not be able to access all or parts of our site.

**7.6. Social Media.** Our website includes social media features, such as Facebook Like button and widgets such as the Share button. These features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the feature to function properly. Social media features and widgets are hosted on our site or by a third party, and your interactions with these features are governed by the privacy policy of the company providing it.

## **8. Links to third-party websites**

**8.1.** The InfoTrack service may, from time to time, contain links to and from third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

**8.2.** Some of the pages on our website may utilize framing techniques to serve content to/from our partners while preserving the look and feel of our website. Please be aware that you are providing your personal information to these third parties and not to InfoTrack.

## **9. Our policy towards children**

**9.1.** The InfoTrack service is not directed at persons under 18, and we do not intend to collect personal information from children under 18; nor do we sell the personal information of minors. If you become aware that a child has provided us with personal information without appropriate consent, then please contact us using the details in 13.1 so that we can take the appropriate steps in accordance with our legal obligations and this privacy policy.

## **10. Changes to this policy**

**10.1.** We may update this privacy policy from time to time, and so you should review this page periodically. When we change this privacy policy in a material way, we will update the "last modified" date at the end of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.

## **11. Notice to you**

**11.1.** If we need to provide you with information about something, whether for legal, marketing or other business-related purposes, we will select what we believe is the best way to get in contact with you. We will usually do this through email or by placing a notice on our website. The fact that we may send notices to you will not stop you from being able to opt-out of certain types of contact, as described in this privacy policy.



## 12. Contacting us

12.1. Regardless of your location, any questions, comments, and requests regarding this privacy policy are welcome and should be addressed to our Data Protection Officer at [privacy@infotrack.com](mailto:privacy@infotrack.com).