



This Privacy Notice (“Notice”) provides information about how VisitorsList Inc. (“we,” “us,” “our”) handles personal details about you and describes the rights you may have regarding your personal information.

The Notice applies to the online and offline collection, use, sale, sharing, and disclosure of personal information in Our Contact Data Solutions. In other words, it applies to our customers, who are businesses trying to reach business professionals for their own business-to-business sales, marketing, and recruiting activities.

The use of our online and offline services constitutes your agreement to the terms of this Notice. If you do not agree with the terms of this Notice, please do not use our online or offline services.

Notice at Collection: We collect personal information as detailed in this Notice. The categories of personal information that we collect are listed below under “Personal information we collect,” and the purposes for which we collect and use personal information are listed below under “Purpose for the collection of personal information.” To learn more about your privacy rights, including your right to opt out of the sale or sharing of your personal information, please navigate to the “Consumer privacy rights” section below. Our retention practices are outlined below under “Retaining personal information.”

Introduction

Through VisitorsLists Data Intelligence and Marketing Solutions services, we enable our business partners to provide marketing solutions. To provide relevant products and services to consumers, these businesses use our data and technology to create, deploy, and measure targeted advertising programs across marketing and digital advertising technology ecosystems. In addition, we may aggregate and depersonalize data for analytical purposes, to provide reporting to our business partners, and for measuring advertising performance. As a part of enabling Data Intelligence and Marketing Solutions services, we may use service providers.

The information we collect and maintain (“Marketing Data”) for our Data Intelligence and Marketing Solutions marketing Data includes information about consumers such as demographics, life events, household composition, public records, or firmographics. Demographic data includes information such as age, gender, income, occupation, education, and marital status. Life events data includes information such as a recent move or home purchase. Household composition data includes information such as number of people in a household. Public records data includes information such as summarized U.S. Census data, geographic data, and property data from local tax assessors and recorded deed information. Firmographic data includes information such as type of business, years in business, size of business, and job titles.

Personal Information Usage Notice

This notice in email form is sent to all contacts notifying them of VisitorsList's usage of their professional and business profile information.

Email Subject: Personal Information Notice

This Personal Information Notice is to inform you of the collection, processing, and sale of certain personal information or personal data about you ("Personal Information"). VisitorsList collects business contact and similar information related to individuals when they are working in their professional or employment capacity and uses this information to create professional profiles of individuals ("Professional Profiles" / "Contacts") and profiles of businesses ("Business Profiles"/"Companies"). We provide this information to our customers, who are businesses trying to reach business professionals for their own business-to-business sales, marketing, and recruiting activities.

If you do not wish to have your information being used for the above-mentioned reason you can opt out by sending an email with your details to us at support@VisitorsList.com. Here's how it works:

- Verify your identity via email confirmation.
- Submit a request to remove the profile.
- Receive confirmation that your request is being processed.

Personal Information Processed

In connection with our creation of Professional Profiles, we may collect and process any or all of the following types of Personal Information about you:

- Name
- Profile picture associated with your profession
- Telephone number (general or direct business numbers, faxes, and/or mobile numbers)
- Email address, including business and/or other email addresses (including "freemails" such as Gmail, Yahoo, Hotmail, etc.)
- Job title and department
- Office address
- Company name
- Work history
- Education history
- Professional affiliations
- Links to social media profiles

- Links to articles by, about, or quoting you (“web references”)
- Inferences drawn from personal data in these categories

1. Personal information we collect

We collect the following categories of personal information: identifiers, personal information categories listed in the California Customer Records Act, characteristics of protected classifications under state or federal law, commercial information, internet or other similar electronic network activity, geolocation data, professional or employment-related information, and inferences drawn from other personal information. We do not collect biometric information, sensory data, or non-public education information (per the Family Educational Rights and Privacy Act), nor do we collect information directly from consumers.

Category of Personal Information	Personal Information we collect, by source category
<p>Identifiers and personal Information categories listed in the California Customer Records statute</p> <p><i>Including, but not limited to, real name, alias, postal address, unique personal identifier, online or mobile identifier, Internet Protocol (IP) address, and email address, as well as Categories of Sensitive Personal Information such as account name, Social Security Number, driver’s license number, passport number, or other similar identifiers</i></p> <p>Note that personal information in this category may overlap with other categories</p>	<p>This Personal Information is collected from the following sources:</p> <ul style="list-style-type: none"> • Advertising networks • Banks/credit unions • Collection agencies • Credit reporting agencies • Data brokers, including data aggregators, data compilers, and data originators • Financial technology (fintech) companies • Government (information not in public records) • Insurance carriers • Marketing companies • Public records made lawfully available from government agencies • Operating systems and platforms
<p>Characteristics of protected classifications under state or federal law</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</i></p>	<p>This personal information is collected from the following sources:</p> <ul style="list-style-type: none"> • Banks/credit unions • Collection agencies • Credit reporting agencies • Data brokers, including data aggregators, data compilers, and data originators • Financial technology (fintech) companies

<p><i>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"> Insurance carriers
<p>Commercial information</p> <p><i>Including, but not limited to, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</i></p>	<p>This personal information is collected from the following sources:</p> <ul style="list-style-type: none"> Banks/credit unions Collection agencies Credit reporting agencies Data brokers, including data aggregators, data compilers, and data originators Financial technology (fintech) companies Insurance carriers
<p>Biometric information</p> <p><i>Including, but not limited to, information pertaining to bodily characteristics, facial information, fingerprints, or eye scans</i></p>	<ul style="list-style-type: none"> We do NOT collect this category of information
<p>Internet or other similar electronic network activity</p> <p><i>Including, but not limited to, internet browsing and search history and information regarding a consumer's interaction with an internet website, application, or advertisement while using an internet connected device</i></p>	<p>This personal information is collected from the following sources:</p> <ul style="list-style-type: none"> Advertising networks Data brokers, including data aggregators, data compilers, and data originators Marketing companies Operating systems and platforms
<p>Geolocation data</p> <p><i>Various technologies to determine your location, including, but not limited to, IP address, Wi-Fi access points, and cell towers.</i></p>	<p>This personal information is collected from the following sources:</p> <ul style="list-style-type: none"> Data brokers, including data aggregators, data compilers, and data originators

<p>Sensory data</p> <p><i>Audio, electronic, visual, thermal, olfactory, or similar information.</i></p>	<ul style="list-style-type: none"> • We do NOT collect this category of information
<p>Professional or employment-related information</p> <p><i>Including, but not limited to, professional licenses, employment dates, employer name, employer information</i></p>	<p>This Personal Information is collected from the following sources:</p> <ul style="list-style-type: none"> • Banks/credit unions • Collection agencies • Credit reporting agencies • Data brokers, including data aggregators, data compilers, and data originators • Financial technology (fintech) companies • Insurance carriers
<p>Non-public education information (per the Family Educational Rights and Privacy Act)</p> <p><i>Education records directly related to a student and maintained by an educational institution or party acting on its behalf</i></p>	<ul style="list-style-type: none"> • We do NOT collect this category of information
<p>Inferences drawn from other personal information</p> <p><i>Inferences drawn from any of the Personal Information identified in this category to create a profile about a consumer reflecting the consumer's site preferences, characteristics, behavior, personal preferences</i></p>	<p>This personal information is collected from the following sources:</p> <ul style="list-style-type: none"> • Advertising networks • Banks/credit unions • Collection agencies • Credit reporting agencies • Data brokers, including data aggregators, data compilers, and data originators • Financial technology (fintech) companies • Government (information not in public records) • Insurance carriers • Marketing companies • Public records made lawfully available from government agencies • Operating systems and platforms

2. Purpose for the collection of personal information

Through VisitorsList's Data Intelligence and Marketing Solutions, we enable our business partners to communicate with consumers across marketing and digital advertising technology ecosystems. To provide relevant products and services to consumers, these businesses may use our data and technology to create, deploy, and measure targeted advertising programs.

We collect information as outlined below and use it for permitted marketing uses. We may also use the information we collect for analytical purposes, to provide reporting to our business partners, and to measure marketing performance.

We describe the purpose for collecting personal information, listed by category of personal information in the chart below. Please note that a specific piece of personal information may fall into one or more categories of personal information.

Category of Personal Information	Purpose of Collection
Identifiers and personal Information categories listed in the California Customer Records Act	<p>The purposes for collecting, disclosing and/or selling/sharing this personal information include:</p> <ul style="list-style-type: none">• To operate and administer Data Intelligence and Marketing Solutions, we enable our business partners to communicate with consumers across marketing and digital advertising technology ecosystems; to provide relevant products and services to consumers, these businesses may use our data and technology to create, deploy, and measure targeted advertising programs• To deliver relevant content• For the development and sale of Data Intelligence and Marketing Solutions
Characteristics of protected classifications under state or federal law	<p>The purposes for collecting, disclosing and/or selling/sharing this personal information include:</p> <ul style="list-style-type: none">• To operate and administer Data Intelligence and Marketing Solutions, we enable our business partners to communicate with consumers across marketing and digital advertising technology ecosystems; to provide relevant products and services to consumers, these businesses may use our data and technology to create, deploy, and measure targeted advertising programs

	<ul style="list-style-type: none">• To deliver relevant content• For the development and sale of Data Intelligence Marketing Solutions
Commercial information	<p>The purposes for collecting, disclosing and/or selling/sharing this personal information include:</p> <ul style="list-style-type: none">• To operate and administer Data Intelligence Marketing Solutions, we enable our business partners to communicate with consumers across marketing and digital advertising technology ecosystems; to provide relevant products and services to consumers, these businesses may use our data and technology to create, deploy, and measure targeted advertising programs• To deliver relevant content• For the development and sale of Data Intelligence Marketing Solutions
Biometric information	We do NOT collect this category of information
Internet or other similar electronic network activity	<p>The purposes for collecting, disclosing and/or selling/sharing this personal information include:</p> <ul style="list-style-type: none">• To operate and administer Data Intelligence and Marketing Solutions, we enable our business partners to communicate with consumers across marketing and digital advertising technology ecosystems; to provide relevant products and services to consumers, these businesses use our data and technology to create, deploy, and measure targeted advertising programs• To deliver relevant content• For the development and sale of Data Intelligence and Marketing Solutions
Geolocation data	<p>The purposes for collecting, disclosing and/or selling/sharing this personal information include:</p> <ul style="list-style-type: none">• For the development of Data Intelligence and Marketing Solutions
Sensory data	<ul style="list-style-type: none">• We do NOT collect this category of information

Professional or employment-related information	<p>The purposes for collecting, disclosing and/or selling/sharing this personal information include:</p> <ul style="list-style-type: none">• To operate and administer Data Intelligence and Marketing Solutions, we enable our business partners to communicate with consumers across marketing and digital advertising technology ecosystems; to provide relevant products and services to consumers, these businesses may use our data and technology to create, deploy, and measure targeted advertising programs• To deliver relevant content• For the development and sale of Data Intelligence and Marketing Solutions
Non-public education information (per the Family Educational Rights and Privacy Act)	<ul style="list-style-type: none">• We do NOT collect this category of information
Inferences drawn from other personal information	<p>The purposes for collecting, disclosing and/or selling/sharing this personal information include:</p> <ul style="list-style-type: none">• To operate and administer Data Intelligence and Marketing Solutions, we enable our business partners to communicate with consumers across marketing and digital advertising technology ecosystems; to provide relevant products and services to consumers, these businesses may use our data and technology to create, deploy, and measure targeted advertising programs• To deliver relevant content• For the development and sale of Data Intelligence and Marketing Solutions

3. Purpose of Processing

VisitorsList processes this information for purposes including organizing and making available Professional Profiles and Business Profiles to our customers for their direct marketing, sales, and/or recruiting activities via our products and services, or to customers who sublicense such data to their customers for any of the same purposes; testing, developing, improving, and enhancing our products and services; and for our own direct marketing, sales and recruiting purposes. Profile information is provided to our customers or partners subject to restrictive license agreements that limit the use to those specified purposes and prohibit the unauthorized use or transfer of the information.

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

We sell/share Marketing Data, including personal information, with our customers and business partners, such as marketing and digital advertising technology companies like platform providers, content publishers, and other entities that provide marketing solutions, to facilitate the creation and deployment of digital advertising. For example, when we segment our data

into groups of consumers (“Audiences”), we share them using unique identifiers (“Unique IDs”). We may also share aggregated and depersonalized data with our customers and business partners for analytical purposes, including measuring advertising performance and reporting.

Many of our customers and business partners follow the guidelines provided by the Network Advertising Initiative (“NAI”) members and/or the Digital Advertising Alliance (“DAA”).

In order to enable our business partners to communicate with consumers across marketing and digital advertising technology ecosystems and to provide relevant products and services to consumers, during 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. Please note that we may share your personal information for a targeted advertising purpose.

Category of Personal Information	Sold or shared, by third-party category	Disclosed for a business purpose, by a third-party category
Identifiers and personal Information categories listed in the California Customer Records Act	<ul style="list-style-type: none">• Advertising networks• Marketing companies• Operating systems and platforms• Social networks	<ul style="list-style-type: none">• Marketing companies• Operating systems and platforms• Parties to litigation• Service providers Social networks
Characteristics of protected classifications under state or federal law	<ul style="list-style-type: none">• Marketing companies• Operating systems and platforms	<ul style="list-style-type: none">• Marketing companies• Operating systems and platforms• Parties to litigation• Service providers
Commercial information	<ul style="list-style-type: none">• Marketing companies• Operating systems and platforms	<ul style="list-style-type: none">• Marketing companies• Operating systems and platforms• Parties to litigation• Service providers

Biometric information	We do NOT sell/share this category of information	We do NOT disclose this category of information
Internet or other similar electronic network activity	<ul style="list-style-type: none"> • Advertising networks • Marketing companies • Operating systems and platforms 	<ul style="list-style-type: none"> • Marketing companies • Operating systems and platforms • Parties to litigation • Service providers
Geolocation data	<ul style="list-style-type: none"> • We do NOT sell/share this category of information 	<ul style="list-style-type: none"> • We do NOT disclose this category of information
Sensory data	<ul style="list-style-type: none"> • We do NOT sell/share this category of information 	<ul style="list-style-type: none"> • We do NOT disclose this category of information
Professional or employment-related information	<ul style="list-style-type: none"> • Marketing companies • Operating systems and platforms 	<ul style="list-style-type: none"> • Marketing companies • Operating systems and platforms • Parties to litigation • Service providers
Non-public education information (per the Family Educational Rights and Privacy Act)	<ul style="list-style-type: none"> • We do not sell/share this category of information 	<ul style="list-style-type: none"> • We do not disclose this category of information
Inferences drawn from other personal information	<ul style="list-style-type: none"> • Advertising networks • Marketing companies • Operating systems and platforms 	<ul style="list-style-type: none"> • Marketing companies • Operating systems and platforms • Parties to litigation • Service providers

5. Corporate reorganization

In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, acquisition, sale, joint venture, assignment, consolidation, transfer, change of control, or other disposition of all or any portion of our business, we may share your personal information. We may also share your personal information if we undergo bankruptcy or liquidation, in the course of such proceedings.

6. Links to other sites or services

This Notice does not apply to other third-party sites or services. If you click on a link or browse to a third-party site from our site/service, your activity and interaction is subject to that third party's rules and policies. We recommend that you review the online privacy statements on these other sites to understand their privacy practices and treatment of personal information so that you can make an informed decision regarding your use or interaction with their site/service.

7. Securing personal information

We maintain a comprehensive Information Security Program with administrative (policies, standards, and processes), physical, and technical controls designed to protect the confidentiality, integrity, and accessibility of your personal information.

8. Retaining personal information

We retain your personal information for as long as reasonably necessary to fulfil the purposes for which it was collected or processed, as described in this Notice. For instance, we retain your personal information, collected through our services and websites, for as long as your account is active or as needed to provide services to you and our customers. Furthermore, Profile information provided to our customers or partners is subject to restrictive license agreements that limit the use to those specified purposes and prohibit the unauthorized use or transfer of the information.

When determining retention periods, we consider our relationship with you and your information, the nature and sensitivity of the information, and what is reasonably necessary and proportionate to provide and improve our services. We also adjust retention periods to comply with our legal, reporting, or accounting obligations, to resolve disputes, and to enforce our agreements. We regularly review our retention periods and assess our data minimization practices, retaining the least amount of information for the shortest retention period, while still upholding all our obligations.

9. Consumer privacy rights

In some instances VisitorsList offers its services to customers as a service provider/processor



or subject to other exceptions under the applicable state privacy laws. Where VisitorsList is acting as a service provider/processor, we are processing data on behalf of others who will provide you applicable privacy rights.

If you are a resident of California, Colorado, Connecticut, Utah, or Virginia, you may take advantage of certain privacy rights, such as to request access, correction, or deletion of your personal information. You also have the right to appeal a denial of your privacy rights.

Because we may “sell” or “share” personal information or engage in “profiling,” “targeted advertising,” “cross-context behavioral advertising,” or use sensitive personal information, consistent with the defined terms in applicable state laws, you may also exercise your right to opt out of such sales, sharing, profiling/automated decision making, targeted advertising, or cross-context behavioral advertising, and limit our use of your sensitive personal information.

10. Lawful Basis

VisitorsList's processing of your Personal Information is normally based on the legitimate interest of itself and its customers and partners to engage in direct marketing, sales, and recruiting activities, and VisitorsList's legitimate interests in organizing and making available Professional and Business Profiles, given the limited impact that this use of this business contact and similar information presents to an individual's private life. We may also rely on other legal bases in certain situations, including for performance of a contract with you, as necessary for compliance with a legal obligation, or consent, as applicable.

11. Your Rights

You have the right to request that VisitorsList (1) provide you with access to your Personal Information, (2) rectify or correct your Personal Information, (3) erase your Personal Information, or (4) restrict the processing of your Personal Information, including refraining from selling it or otherwise providing it to any third parties. You also have the right to object to processing, to data portability, and to lodge a complaint with the appropriate supervisory authority in your country, if any. If we are processing your biometric information in connection with your use of our products or services, you have the right to withdraw your consent at any time. The foregoing rights may be subject to certain limitations pursuant to applicable law. Look at the rights briefed below for your benefit.

Right to know

You have the right to request a disclosure of the personal information collected, sold, and shared about you and the purpose for doing so unless such request proves impossible or would involve disproportionate effort. Upon submission of a verifiable consumer request, we will provide you with the following information.

- The categories of personal information we collected about you;
- The categories of sources from which we collected your personal information;
- Our business or commercial purpose for collecting or selling/sharing the personal information;
- The categories of third parties to whom we sold or disclosed personal information; and
- The specific pieces of personal information we collected about you.

To make a verifiable consumer request, you may email us at support@spokesly.com. 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 provide you with the information in a readily usable format that you can easily transfer to another entity.

Right to correct

You have the right to correct inaccurate personal information that we collect or maintain about you, subject to verification. To make a verifiable consumer request to correct, you can email us at support@spokesly.com.

Right to delete

If we have collected or are currently maintaining personal information about you, you have the right to request the deletion of this personal information, unless an exception applies under applicable law. To make a verifiable consumer request to delete, you can email us at support@spokesly.com.

Right to be free from discrimination

You have the right to be free from discrimination for exercising any of your consumer privacy rights. If you choose to exercise any of your rights, we will not:

- Deny you goods or services;
- Charge you a different price or rate for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you with a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.



Right to opt-out of the sale/sharing of personal information

You have the right to opt out of the sale/sharing of your personal information to third parties. To exercise your right to opt out of the sale or sharing of your personal information, you can email us at support@spokesly.com.

Right to appeal

If you believe we have denied any of your consumer privacy rights in error, you have the right to appeal by replying to our denial message or any communication from us.

12. Authorized agent

Using an authorized agent (*with or without power of attorney*) to submit an opt-out request or a request to limit the use of a consumer's sensitive personal information: In order to submit an opt-out request or a request to limit on behalf of another consumer, please provide written permission, signed by the applicable consumer, authorizing the agent to submit the opt-out request. The name of the agent submitting the request must match the name on the authorization.

For us to locate the consumer's record, please also include the consumer's first and last name (middle name optional) and their address (including unit number, city, state, and zip code). You may also provide the consumer's Social Security number and date of birth. While those fields are optional, this information makes it easier for VisitorsList to locate the consumer's information and complete the request.

Documentation may be sent to the addresses listed below.

Using an authorized agent *without* power of attorney to submit a verifiable privacy request for access, correction, or deletion of a consumer's personal information: To submit a verifiable request for access, correction, or deletion on behalf of another consumer, an authorized agent without power of attorney must provide one item from **each** of the two sections below.

1. Signed permission from the applicable consumer authorizing the agent to submit the verifiable privacy request on their behalf, including a description of the type of privacy request(s). The name of the agent submitting the request must match the name of the authorization.
2. The applicable consumer must verify their own identity directly with the business by submitting information or documentation that provides sufficient proof of identification, such as:
 - a. a Social Security number or a copy of a Social Security card issued by the Social Security Administration,



- b. a certified or official copy of a birth certificate issued by the entity authorized to issue the birth certificate, or
- c. a copy of a driver's license or an identification card issued by the motor vehicle administration or any other government issued identification.

This secondary identification must include or reference the same name as stated in the signed permission form. The submission must also include sufficient information for VisitorsList to locate the consumer's file.

Documentation may be sent to the addresses listed below.

Using an authorized agent *with* power of attorney to submit a verifiable privacy request for access, correction, or deletion of a consumer's personal information: In order to submit a verifiable request for access, correction, or deletion on behalf of another consumer, an authorized agent with power of attorney must provide the valid power of attorney executed under applicable law.

Documentation may be sent to:

VisitorsList Inc.
P. O Box 242, 35640 Fremont Blvd, Fremont, CA 94536

You can also email the information to support@spokesly.com

To protect the confidentiality of your data, you and/or your authorized agent may choose to submit your data using confidentiality features offered by your email provider.

All personal information provided as part of this process will be deleted after verification has been completed.

13. Personal information of children

Our services are not intended for use by individuals under the age of eighteen (18). If we learn that we have collected or received personal information from individuals under the age of eighteen (18), we will delete the personal information. We do not knowingly sell personal information of children under the age of eighteen (18) years.

Parent or Guardian Privacy Opt-Out Request (child under 18 years)

If you believe we have collected personal information from individuals under the age of eighteen (18), a parent or guardian may make a data privacy opt-out request or limit our use of sensitive personal information (subject to limitations and exceptions under applicable law) by emailing us at support@spokesly.com.



14. Contact information

If you have questions or concerns regarding this Notice or the protection of your Personal Information and privacy rights, you may contact us in the following ways:

Email	support@visitorslist.com
Phone	1-(800) 523-1387
Postal Mail	VisitorsList Data Privacy Request P. O Box 242, 35640 Fremont Blvd, Fremont, CA 94536