

# Political Data Inc. (PDI) Privacy Policy

*(effective 12/3/2017)*

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 about you is collected, used, and disclosed by PDI.

By visiting [www.politicaldata.com](http://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 disclosure of your Personal Data in accordance with this Privacy Policy.

If you have any questions or comments regarding our privacy policy, please contact us at [privacy@politicaldata.com](mailto:privacy@politicaldata.com)

## The Types of Data We Collect and Store

PDI is a company that provides voter data to political organizations, operates the PDI Online Software System (aka, PDI National, MOE, and RED), and maintains the website [www.politicaldata.com](http://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 personal data that is 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 provide personal data required 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.

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

- c. PDI Connections / Friend to Friend Contact Tools Users (Personal Contact Data) – The PDI Online Software Application has a module known as PDI Connections or Friend to Friend Phone Bank. This tool allows people associated with an organization to upload their personal contacts and other information and then communicate on behalf of the organization with their friends who were matched to the voter file within the organization’s account geography.

The PDI connections module maintains this information separately from the organization’s proprietary database and can only be accessed by the owner of the contact list. Only after the owner of the list enters information for a contacted individual will the identity of the voter and complete survey results will be exposed to the organization’s account. The organization owner the PDI Online System Application does not ever have access to a PDI Connections user’s contact list nor will the user’s contact list ever be sold or shared in any form to third party entities.

- d. 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.
- e. 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 and will only disclose Personal Data as described below and as described elsewhere in this Privacy Policy.

- a. Third Party Service Providers - We may also share Personal Data with third-party service entities to provide you with services; 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 required NOT to use your Personal Data other than to provide the Services requested by us. We will remain responsible to you for your Personal Data and will work with third-party services providers to ensure their use of your Personal Data is consistent with 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](mailto: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 Personal Data - You may change any of your Personal Data in your account by editing your profile within your account or by sending an e-mail to us at [privacy@politicaldata.com](mailto:privacy@politicaldata.com). You may request deletion of your Personal 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.

- 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](http://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 in some cases, 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.