

## DOUBLEPOSITIVE MARKETING GROUP

### PRIVACY POLICY

Effective January 20, 2014

This website is operated by DoublePositive Marketing Group, Inc. This Privacy Policy describes the overall privacy practices of DoublePositive Marketing Group, Inc., across its websites, mobile sites, digital ads, (collectively, "Websites") and used in Services we provide. This Privacy Policy describes some of the privacy practices of our vendors and business partners that provide or use technology on the Websites ("Service Providers"), but DoublePositive does not own, operate, or control, the privacy practices of such Service Providers.

If we collect information from or about you, we will use it according to the Privacy Policy in effect at the time the information is gathered. Please be aware that our Privacy Policy may be changed by updating this page. You should review this Privacy Policy periodically to ensure you are in agreement with any updates or changes. Your continued use of our website following any changes will mean you accept such changes.

### CONTACT US:

If you have questions or concerns regarding our Privacy Policy or practices, please contact us at **Privacy Compliance**, Double Positive Marketing Group, Inc., 1111 Light St Suite 350 Baltimore MD 21230 or [privacy@doublepositive.com](mailto:privacy@doublepositive.com)

### ABOUT OUR SERVICES:

We provide online advertising and marketing services across multiple channels and media, including to visitors to our Websites looking for deals on third party goods and services, and advertising and marketing professionals who access the Websites to use DoublePositive's services including but not limited to live hot transfers, mobile pay-per-call, display advertising, leads, search engine marketing, and other online marketing services (collectively "Services").

### INFORMATION WE COLLECT

The information we collect about you includes:

#### Non-Personally Identifiable Information:

The Websites and our third party Service Providers may collect or request anonymous or non-personally identifiable information ("Non-PII") from visitors. Non-PII cannot identify a specific individual unless combined with Personally Identifiable Information.

#### Survey Information

Examples of Non-PII that may be requested in registering or completing surveys on the Websites or Services may include age, gender, marital status, income, education, college enrollment, military service, type of automobile, type of housing, mortgage information, ZIP code, and consumer interests.

#### Web Browsing Data

Websites and our Service Providers, collect anonymous information known as "Web Browsing Data." Web Browsing Data alone cannot personally identify you. When you visit one of our Websites we collect the Internet Protocol (IP) address of your computer or Internet Service Provider, domain, web pages viewed while visiting our Websites, date, time of day, browser type, and responses to an advertisement delivered by us or our Service Providers. Google Analytics and Pardot collect Web Browsing Data to analyze the web traffic on our Websites.

To collect Web Browsing Data, we use small computer files which ask permission to be stored on your computer, including cookies, web beacons, tags, flash cookies, and log files (collectively, "Cookies"). Once you consent, the Cookie attaches to your computer and collects the Web Browsing Data to personalize your visit and provide Services.

#### Tracking Across Multiple Websites and Overriding Web Browser Settings

We and our Service Provider tag the computers of users who (a) visit our corporate Website [doublepositive.com](http://doublepositive.com) (the other Websites do not track users across multiple websites); and (b) interact with our display ads online with a Cookie so we can retarget those users with another ad later. We do this to continue to market our Services to prospective clients after they leave our site, and serve additional ad impressions to interested users as a Service to our clients.

We respect your privacy decisions and do not employ technology to override the privacy settings in your web browser. Some of our Service Providers, including Google, provide a global privacy setting that may affect your web browser privacy settings. Learn how to opt out of Google Adwords [here](#).

#### Personally Identifiable Information:

Our Websites and our Service Providers only collect personally identifiable information ("PII") with consent. This collection may occur when you submit PII in registering on a Website, speaking w a call center agent, subscribing to a newsletter, emailing us, requesting Services, participating in activities, or using other features and resources on the Websites. You may visit our Site anonymously. You may also refuse to supply PII but that may prevent you from engaging in certain Website features or Services. Such PII may include:

#### PII You Provide

Examples of PII include: first and last name, physical address, email address, and telephone numbers.

## Sensitive Personal Information

Some Services request personal information to determine credit worthiness, eligibility for insurance, or identify appropriate Services. Sensitive Personal Information includes, depending on the Website: citizenship and credit eligibility.

The Websites do not collect or retain Sensitive Personal Information without your consent. We do not set cookies to enable ad targeting based on Sensitive Personal Information.

Our third-party advertising technology Service Providers may, with your consent, collect, process, use, and retain Sensitive Personal Information to provide Services offered on some Websites. Learn how such Service Providers use Sensitive Personal Information by reviewing their own privacy policies. You may elect not to provide Sensitive Personal Information but will then be unable to access some Services. You may email [privacy@doublepositive.com](mailto:privacy@doublepositive.com) for more information.

## Business Users

We collect PII from individuals and companies who visit our Websites to access or provide Services, learn about our Services, or enter into business relationships with us ("business information"). We maintain business information that may include PII provided by individuals, for purposes of administering our business, such as maintaining account contact information, sending invoices, etc. We may share such business information with third parties who provide administrative services (and they are required to maintain the confidentiality of the information), as well as pursuant to a court order or to law enforcement or government officials as we deem necessary or appropriate.

## Children

We do not intend to collect PII from children under 13. If you are under the age of 13, do not provide us with PII, use our Services, or the Websites. If we learn that we collected PII from a child under 13, we will promptly delete that information. If you believe that we collected information from a child under 13, contact us at [privacy@doublepositive.com](mailto:privacy@doublepositive.com).

## Information about You from Other Sources:

We and our Service Providers may collect personal information about you on the Websites and from other sources, including commercially available sources. All the information we collect about you may be combined to personalize your experience, provide you and our clients with Services, to improve our Websites and Services, to provide relevant advertising to users, and for other marketing efforts.

## USE AND SHARING OF INFORMATION

Non-PII collected by DoublePositive and/or its Service Providers is used for marketing and sales efforts, to better target content to individuals to create a personally relevant experience for each user, to predict responses to ads, to help determine which ads perform best, and which content is most appropriate for different users. If a consumer elects to provide DoublePositive with PII, we may utilize such data for marketing purposes for our clients and Service Providers.

## Sharing PII with Service Providers and Clients

PII that we or our Service Providers collect is maintained in confidence by DoublePositive or a Service Provider. There are instances, however, in which PII and Non-PII is shared with other third parties who enter into business relationships with us. These clients may include financial service providers (including lenders, credit bureaus, and insurance companies); non-financial companies; online and offline advertisers, direct marketers; vendors; educational organizations; marketing service companies, and others such as non-profit organizations.

## Visitors who Request Services via the Websites

Visitors who volunteer PII on our Websites may, depending on the Website, consent to be contacted by DoublePositive, our client, or a call center Service Provider. The Service Provider may contact the user by through the use of an automatic telephone dialing system and may, among other things, verify the user's self-reported PII and interest in speaking with the client. The client or call center may contact the user by telephone even if the user has opted into the National Do Not Call list, or any State Do Not Call list.

## IF YOU DO NOT CONSENT TO BEING CALLED BY DOUBLEPOSITIVE, A CALL CENTER, OR BY ONE OR MORE OF OUR CLIENTS, DO NOT ENTER YOUR PII INTO FORMS ON OUR WEBSITES.

If the user does not wish to be contacted again by a call center Service Provider with respect to the user's inquiry, the user should specifically request that the Service Provider not contact the user again. Please note that a Service Provider may maintain the PII the user provided whether the user elects to use the Services. This prospect may take up to 30 days to complete.

## Mobile Visitors and Click-to-Call Services

Mobile users who initiate calls by clicking on a telephone number on a mobile Website consent to contacting a call center Service Provider through a call center using an automatic telephone system to verify users' interests and connect users with appropriate Service Providers.

### Aggregate or Anonymous Information

We may share Non-PII with third parties.

## HOW we protect and RETAIN your information

We take security measures to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data. These include firewalls and encryption, internal reviews of our data collection, storage and processing practices, and security measures, as well as physical security measures to guard against unauthorized access to systems.

If we retain PII on our systems, we restrict access to PII to employees, contractors, and agents who need to know that information in order to operate, develop, or improve our Websites and Services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination, if they fail to meet these obligations.

However, the internet and mobile web are inherently insecure and so we are unable guarantee that the security measures we take will not be penetrated or compromised or that your information will remain secure under all circumstances.

We retain individual records of PII and all Non-PII indefinitely.

## How to control and correct your INFORMATION

We or our Service Providers retarget users who view DoublePositive.com or our display advertising. You may elect not to provide Web Browsing Data to DoublePositive or its Service Providers by following the opt-out procedures set forth below, but some of our Websites and Services may not work properly.

Learn More about Cookies, Web Beacons, and other Technologies

You can accept or decline cookies. Most browsers automatically accept cookies. To learn more about cookies, including how to refuse cookies on your computer by adjusting web browser settings, follow these links:

- All About Cookies: [www.allaboutcookies.org/cookies/](http://www.allaboutcookies.org/cookies/)
- Microsoft Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Options+window+-+Privacy+panel>
- Google Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en-GB>
- Apple Safari: <http://www.apple.com/safari/>
- Flash: [www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html)
- Google: [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html)

### Opting Out of our Cookies

To opt-out from collection and use of your Web Browsing Data by the Websites, [click here](#) to access opt out and other privacy tools provided by the National Advertising Initiative.

Some of our Service Providers' cookies do not have an "opt-out" option, but you always have the option of blocking the use of cookies by changing a setting in your Internet browser.

### How to Control Collection of Your PII Online?

#### Social Media

We may engage with you on third party social media sites like LinkedIn, Twitter, Google+, Instagram, Pinterest and Facebook, if you engage with us. By doing so, you "opt in" to sharing your content with us. Be aware that such content (PII, images, captions, and comments, etc.) that you submit (upload, post, comment, share, "like", etc.) to third party social media sites (including any of our message boards or tweets) is publicly visible, not private and cannot be considered private PII. To manage social media notifications you receive, correct or delete your PII, or adjust your privacy settings, access the profile section of your social media accounts and follow the directions there. To learn more about social media privacy settings, follow these links:

- Facebook: <https://www.facebook.com/about/privacy/your-info-on-fb#!/about/privacy/>
- Twitter: <https://twitter.com/DoublePositive>
- Google+: <https://mail.google.com/mail/?hl=en&shva=1#settings/general>

#### Correcting your Personal Information:

Business Users may access and correct their personal information in their user accounts on the corporate website, DoublePositive.com. If you are not a business user and have any questions about accessing or updating information we have on file about you, please contact us at [privacy@doublepositive.com](mailto:privacy@doublepositive.com).

#### Your California Privacy Rights:

Under California Civil Code Section 1798.83, California residents who have an established business relationship with us have the right to request that we provide certain information regarding the disclosure of their personal information to third parties for their direct marketing purposes during the immediately preceding calendar year. You may send your request for such information to [privacy@doublepositive.com](mailto:privacy@doublepositive.com).

*Requests shall only be accepted via this email address. We shall not be responsible for requests made over the telephone or by any other means.*

#### TERMS OF USE

By using our Websites, you signify your consent to the data practices described in this Privacy Policy and agree that your visit and any dispute over privacy is subject to the [Terms of Use](#) for the applicable DoublePositive websites, including without limitation, the terms regarding limitations on DoublePositive's liabilities and application of the laws of the State of Maryland.