

DeleteMe Privacy Policy

Effective as of 08/21/2022

This Privacy Policy describes how DeleteMe and our corporate subsidiaries and affiliates (collectively, “DeleteMe”, “we”, “us”, or “our”) collects, uses and shares your personal information if you visit joindeleteme.com or our other websites or services that link to this Privacy Policy (collectively, the “Services”), contact us, receive our communications or attend our events.

If you are looking for information on our use of cookies, please review our [Cookie Policy](#) below.

We also provide important information for visitors located in [Europe and the United Kingdom](#) below.

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Personal Information We Collect

Information you provide to us. Personal information you provide to us through the Services may include:

- **Contact information**, such as your first and last name, email address, phone number, professional title and organization name.
- **Profile information**, such as your username and password and any account preferences for the Services.
- **Datasheet information.** When enrolling in the service, you will be asked to fill out a datasheet with personal data fields that you can choose to complete so that we can find instances of data brokers holding that data about you and have it deleted. The kinds of categories that you can provide and thus have us search against include first name, middle name, last name or surname/family name, date of birth, gender, email addresses, phone numbers, street addresses, relatives' names, employers, political affiliation, and ethnicity. This information is used to provide the Company's DeleteMe service, specifically to search for listings containing your personal information on data broker websites and to have them removed. Providing this information to us is entirely optional. The more information you provide, the more data points we can search against and the more listings we can potentially find and have deleted.
- **Feedback or correspondence**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us.
- **Usage information**, such as information about how you use the Services and interact with us, including information you provide when you use any interactive features of the Services.
- **Marketing information**, such as your preferences for receiving communications about our products, activities, and publications, and details about how you engage with our communications.
- **Other information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Information we obtain from social media platforms. We may maintain pages for DeleteMe on social media platforms, such as Facebook, Twitter, and LinkedIn. When you visit or interact with our pages on those platforms, the platform provider's privacy policy will apply to your interactions and their collection, use, and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

Information we obtain from other third parties. We may receive personal information about you from third-party sources, such as marketing partners, publicly-available sources, and data providers.

Cookies and Other Information Collected by Automated Means. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity occurring on or through the Services. The information that may be collected automatically includes your computer or mobile device operating system type and

version number, manufacturer and model; device identifier; browser type; screen resolution; IP address; the website you visited before browsing to our website; general location information such as city, state or geographic area; and information about your use of and actions on the Services, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

See our [Cookie Policy](#) for more information.

How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

To operate the Services. We use your personal information to:

- provide, operate, and improve the Services;
- establish and maintain your user profile on the Services;
- facilitate social features of the Services, such as our blog;
- communicate with you about the Services, including by sending you announcements, updates, security alerts, and support and administrative messages;
- understand your interests and personalize your experience with the Services;
- provide support and maintenance for the Services; and
- respond to your requests, questions and feedback.

For research and development. We analyze use of the Services to improve the Services and to develop new products and services.

To send you marketing and promotional communications. We may send you marketing communications as permitted by law. You can opt out of our marketing and promotional communications as described below.

To comply with law. We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

For compliance, fraud prevention, and safety. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Services; and (c) protect, investigate, and deter against fraudulent, harmful, unauthorized, unethical, or illegal activity.

With your consent. In some cases we may specifically ask for your consent to collect, use, or share your personal information, such as when required by law.

To create anonymous data. We may create aggregated and other anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.

How We Share Your Personal Information

We do not share your personal information with third parties without your consent, except in the following circumstances or as otherwise described in this Privacy Policy:

Affiliates. We may share your personal information with our corporate subsidiaries and affiliates for purposes consistent with this Privacy Policy.

Service providers. We may share your personal information with third-party companies and individuals that provide services on our behalf or help us operate the Services (such as customer support, hosting, analytics, email delivery, marketing, communications and database management services). These third parties may use your personal information only as authorized by their contracts with us.

Partners. We may sometimes share your personal information with business partners or enable them to collect information directly via our Services. See our [Cookie Policy](#) for more information about third parties that collect information through our Services with cookies and similar technologies.

Third-party platforms and social media networks. If you have enabled features or functionality that connect the Services to a third-party platform or social media network (such as by connecting your account with a third party to the Services or sharing content via a third-party platform), we may disclose the personal information that you authorized us to share. We do not control the third party's use of your personal information.

Professional advisors. We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.

For compliance, fraud prevention and safety. We may share your personal information for the compliance, fraud prevention and safety purposes described [above](#).

Government Requests. Notwithstanding anything to the contrary in this policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, or legal request or to protect the safety, property, or rights of DeleteMe or

others. However, nothing in this policy is intended to limit any legal defenses or objections that you may have to a third party or government request to disclose your information.

Business transfers. We may sell, transfer, or otherwise share some or all of our business or assets, including your personal information, in connection with a (potential) business transaction such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

Your Choices

In this section, we describe the rights and choices available to all users. Users who are located within Europe can find additional information about their rights [below](#).

Access or update your information. If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into your account.

Opt out of marketing communications. You may opt out of marketing emails by following the unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails.

Cookies & browser web storage. For information on how to disable cookies and similar technologies used in the Services, see our [Cookie Policy](#).

Do Not Track and Global Privacy Control. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit www.allaboutdnt.com.

Choosing not to share your personal information. Where we are required by law to collect your personal information, or where we need your personal information to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the Services. We will tell you what information you must provide to receive the Services by designating it as required at the time of collection or through other appropriate means. As described above, while you do not need to fill out your datasheet, we search for your personal data held by data brokers based on what you provide in the datasheet. The more information you provide in your datasheet, the more data points we can search against and the more listings we can potentially find and have deleted.

Third-party platforms or social media networks. If you choose to connect to the Services via a third-party platform or social media network, you may have the ability to limit the information that we may obtain from the third party at the time you connect your third-party account to the Services. Subsequently, you may be able to control your settings through the third-party platform. If you withdraw our ability to access certain information from a third-party platform or

social media network, that choice will not apply to information that we have already received from that third party.

Other Sites, Mobile Applications, and Services

The Services may contain links to, or content or features from, other websites and online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third-party websites, mobile applications, or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use, and sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

Security Practices

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. We try our best by providing you with leading security practices, like encrypting all requests via a secure connection (HTTPS) and other best practices. We recommend that you take care to manage access to the computers and devices where you are logged in to our application.

International Data Transfers

We are headquartered in the United States and have service providers in other countries, and your personal information may be transferred outside of your state, province, or country to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children

The Services are not directed to, and we do not knowingly collect personal information from, anyone under the age of 16. If we learn that we have collected personal information of a child without the consent of the child's parent or guardian, we will delete it. DeleteMe does not provide services directly to anyone under the age of 18. We encourage parents or guardians with concerns to [contact us](#).

Changes to this Privacy Policy

We may amend this Privacy Policy at any time by posting the amended version on the Services and indicating the effective date of the amended version. We may announce any material changes to this Privacy Policy through the Service and/or via email if we have your email address. In all cases, your continued use of the Services after the posting of any modified Privacy Policy indicates your assent to the amended Privacy Policy.

How to Contact Us

If you have any questions or comments about this Policy or DeleteMe's privacy practices, email us at support@joindeleteme.com. You may also write to us via postal mail at:

DeleteMe
Attn: Legal – Privacy
18 Bow Street, #55
Somerville, MA 02143

Your California Privacy Rights

Under California law, California residents are entitled to ask us for a notice identifying the categories of personal customer information that we share with certain third parties for marketing purposes, and providing contact information for such third parties. If you are a California resident and would like a copy of this notice, please submit a written request to us via email at support@joindeleteme.com. You must put the statement "Your California Privacy Rights" in your request and include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

California has passed a law called the California Consumer Privacy Act (CCPA). If the CCPA is applicable to you, you have the right to:

1. know the categories of personal information collected about you in the prior 12 months and its sources and business purpose;
2. know whether your personal information is sold or disclosed, and to whom, in prior 12 months;
3. if "sale" of info, right to opt out of the sale of your personal information;
4. access and then delete your personal information (subject to exceptions); and
5. equal service and price (non-discrimination) if you exercise your privacy rights.

"Personal Information" is defined to include information that identifies, relates to, describes, or is capable of being associated with a particular consumer or household. This includes (among other types of personal information) IP addresses, geolocation data, biometric information, and "unique identifiers" such as device and cookie IDs, Internet activity information like browsing history, commercial information such as products or services purchased or consuming histories or tendencies, and characteristics concerning an individual's race, color, sex (including

pregnancy, childbirth, and related medical conditions), age (40 or older), religion, genetic information, sexual orientation, political affiliation, national origin, disability or citizenship status. Inferences drawn from personal information “to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes” are also considered “personal information.”

Contact us at support@joindeleteme.com to exercise your CCPA rights.

Request for Erasure . For identity verification purposes, DeleteMe requires anyone submitting an erasure request to submit the subject’s full name, email address, and home address related to the subject’s DeleteMe account or DeleteMe communications. DeleteMe will submit a verification email to the requestor who will be required to re-authenticate the request for erasure. DeleteMe relies upon this information to ensure the information on the correct individual is removed.

DeleteMe Subscribers Removal of Personal Information . Current members are able to log into their DeleteMe accounts to request personal data deletions on their user dashboards, which will also cancel their DeleteMe service subscriptions because, given the nature of the services we provide, we cannot provide the service without any personal data.

Do Not Sell My Information . We take your privacy seriously. We do not sell our members information. We are not a data broker.

If you are a California resident, you can request information regarding the disclosure, if any, of your personal information by DeleteMe to third parties for the third parties’ direct marketing purposes. To make such a request, please send an email to support@joindeleteme.com, subject line: CCPA Request.

Your Nevada Rights

You may review and request changes to your information or opt-out of the sale of your personal information at support@joindeleteme.com.

Notice to European Users

The information provided in this section applies only to individuals in the [European Economic Area](#) and the United Kingdom (collectively, “**Europe**”).

Personal information . References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

Controller and Representative . DeleteMe is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

Legal bases for processing . The legal bases of our processing of your personal information as described in this Privacy Policy will depend on the type of personal information and the specific context in which we process it. However, the legal bases we typically rely on are set out in the table below. We rely on our legitimate interests as our legal basis only where those interests are not overridden by the impact on you (unless we have your consent or our processing is otherwise required or permitted by law). If you have questions about the legal basis of how we process your personal information, contact us at support@joindeleteme.com.

Processing purpose (click link for details)	Legal basis
Details regarding each processing purpose listed below are provided in the section above titled “How We Use Your Personal Information”.	
<u>To operate the Services</u>	Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the Services you access and request.
<u>For research and development</u>	These activities constitute our legitimate interests.
<u>To send you marketing communications</u>	
<u>For compliance, fraud prevention and safety</u>	
<u>To create anonymous data</u>	
<u>To comply with law</u>	Processing is necessary to comply with our legal obligations.
<u>With your consent</u>	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it at any time in the manner indicated when you consent or in the Services.

Use for new purposes . We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Sensitive personal information . We ask that you not provide us with any unnecessary sensitive personal information (e.g., social security number, government-issued identification, payment card information, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) outside of what is required to provide the Services. All fields where sensitive data is requested in our product or service are optional for completion.

Retention

We retain personal information where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested; to comply with applicable legal, tax or accounting requirements; to establish or defend legal claims; or for fraud prevention). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Data is stored in line with our internal retention policy. Identifying data provided by an active DeleteMe member will be retained for as long as the individual has a membership, plus 6 months. The 6 month buffer provides time for: any legal obligations, as well as a reasonable time-frame whereby the customer may reactivate their membership. Payment data will be stored for at least 7 years in line with the Generally Accepted Accounting Principles (GAAP) of the United States.

Your rights

European data protection laws give you certain rights regarding your personal information. If you are located within Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about how we process your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

Please contact our [EU Representative](#) to submit these requests. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact our EU Representative or submit a complaint to the data protection regulator in your jurisdiction. [You can find your data protection regulator here.](#)

EU Representative

Our EU representative is our point of contact for EU data subjects and data protection supervisory authorities. To get in touch with our representative, please contact:

Postal Address: Pridatect, Pridatect, S.L., C/ del Marqués de Campo, nº 13, 46007, Valencia, Spain.

Phone number: +34 936 403 472

Email: eurepresentation@pridatect.com

Cross-Border Data Transfer

As a US-based organization, DeleteMe uses US-based providers to deliver the service. There is no functional international data transfer to processors or subprocessors and your data will remain in the US. However, you – as the data subject – should be aware that any data you provide is being sent directly to a US company that operates and provides our service in the US. Therefore, you are directly exporting your personal data to a third country. Please contact our [EU Representative](#) if you have any related questions.

Notification of changes and acceptance of policy

We keep our Privacy Policy under review and will place any updates on this webpage. By using DeleteMe, or any of our related services, you accept our collection and use of data by us as set out in this Privacy Policy in order for us to fulfill obligations in the delivery of our services. Continued access or use of DeleteMe services will constitute your express acceptance of any modifications to this Privacy Policy. If we are obliged to inform you of drastic changes, you will receive an email detailing these changes.