



## Acxiom's U.S. Products Privacy Policy





## Scope

Acxiom respects the privacy of every individual about whom we either process information or maintain information within Acxiom's information products. We offer traditional offline and digital information management services and information products to our clients. When we provide information management services, we process our clients and partners information according to the terms and conditions of the contract and in accordance the functionality of the Acxiom Operating System. When Acxiom provides information products to our clients and partners, we adhere to the information practices described in this privacy policy and our Digital Advertising Policy. To view this policy, please visit <http://acxiom.com/about-acxiom/privacy/us-online-advertising-privacy-policy/>.

## Personal information collection and use

Acxiom brings to market three types of traditional offline and digital information products, each containing only the information needed for the intended use. Each of Acxiom's information products is designed for specific use by our clients with a legitimate need for the product.

**Marketing and advertising products** — These products contain information on households in the U.S. and are developed from many sources, including:

- **Public Record and Publicly Available Information:** Telephone directories, website directories and listings, real property recorder and assessor information.
- **Data from Other Information Providers:** Demographic information, surveys and questionnaires with appropriate notice, and summarized or aggregated purchase information.

Acxiom's marketing and advertising products do not include specific details about a purchase, detailed financial information, credit information, medical information, or Social Security Numbers. We will not knowingly collect, use or disclose data for marketing purposes on anyone under the age of 18. We do use information related to children to



identify and remove minor records from ours and our client's marketing files. Acxiom also uses the U.S. Direct Marketing Association's (DMA) Mail Preference and Email Preference suppression files, as well as state and federal Do Not Call lists in the development of its marketing and advertising products.

Acxiom's marketing products are used by qualified companies, non-profit organizations, and political organizations in their marketing, fund-raising, customer service, and constituent service and outreach programs. The information can be used to enhance customer and constituent files and provide lists for prospecting and fund-raising purposes. Acxiom's clients use our marketing and advertising products to provide customers and prospects with better service, improved offerings and special promotions.

Acxiom enables our clients and digital advertising clients and partners access to a subset of the Acxiom marketing data to deliver content that is relevant and meaningful to their users while protecting the privacy of consumers and offering them a choice about participating in such activities. To learn more about our digital advertising products privacy policy please visit <http://acxiom.com/about-acxiom/privacy/us-online-advertising-privacy-policy/>.

**Directory products** — These products contain contact information such as name, address and telephone number for most of the households and businesses in the United States. These databases are developed from the white and yellow pages of published U.S. telephone directories and information available through directory assistance.

Acxiom's directory products are used by companies, non-profit organizations, government agencies, political organizations and consumers through Internet sites to search the entire United States to locate names, addresses and telephone numbers. For example, we license some of our directory products to companies as an automated and inexpensive form of directory assistance. We also license the directories to search engines on the Internet that provide free nationwide directory searches to consumers.

**Fraud detection and prevention products** — These products contain information about individuals and households in the United States for risk mitigation including identity verification, information verification, fraud detection and fraud prevention and provide online links to services offered by other information providers. We will not knowingly collect, use or disclose data for these purposes on anyone under the age of 13. These products include information from many different sources, such as:

- Directories, real property recorder and assessor information, current drivers license information, where allowed by law, current motor vehicle information, where allowed by law, deceased information, and other suppression information.
- Data from Other Information Providers: Telephone companies, surveys and questionnaires with appropriate notice, consumer- provided contact information and identifying information from credit bureaus where permitted by law.

These products and access to other information provider services may include, where permitted by law, financial information, Social Security Numbers and other information typically considered sensitive.

Acxiom's fraud detection and prevention products are used by qualified companies (primarily in the finance, insurance, mortgage and retail industries), non-profit organizations, and government agencies to verify the identity of consumers and to investigate suspicious transactions for fraud prevention. The basic verification service tells our client whether identifying information provided by a consumer is valid, current and correlates to that individual. To protect the use of this information, Acxiom does not provide our fraud detection and prevention products to individuals.

**Additional terms and conditions** — For a company to use Acxiom's products and services, they are required to enter into a contract with Acxiom. The terms of these contracts may further govern the use of personal information collected and maintained by Acxiom.

**Contracted services** — Where permitted by law, third parties under contract to Acxiom may have access to the information in Acxiom's information products for the purpose of assisting in processing the data. Some of these third-party contractors may reside outside of the United States.



## Your choices and how to contact us

**Opt-out from Acxiom's marketing products** — Acxiom gives consumers the opportunity to opt-out of our digital advertising products and marketing and directory products at no cost. Acxiom utilizes the Direct Marketing Association's Mail and Email Preference files as well as the various state registries and the Federal Trade Commission's Do-Not-Call Registry in developing our marketing and directory products. Consumers registered with any of these organizations, do not need to also opt-out with Acxiom to prevent use of information related to them for prospecting purposes. Consumers who wish to opt-out from all Acxiom marketing information products, may complete and submit an opt-out request form online at [www.acxiom.com/optout](http://www.acxiom.com/optout) or by calling 1-877-774-2094. To opt out of just our digital advertising products please visit <http://acxiom.com/about-acxiom/privacy/online-advertising-products-optout/>. To learn about, view and edit, the information that determines the Acxiom-data-enabled ads you see or the digital offers you receive please visit Acxiom's [AboutTheData.com](http://AboutTheData.com) consumer website where we describe how data fuels marketing and helps you get the right offers at the right times.

Acxiom will also accept opt-outs from qualified third-parties. To obtain a copy of Acxiom's third party qualification criteria, please send an email to [privacy@acxiom.com](mailto:privacy@acxiom.com).

**Access and correction to Acxiom's directory and fraud detection and prevention products** — Acxiom offers access to and correction of information in our directory products and our fraud detection and prevention products.

Access to information about you in our directory and our fraud detection and prevention products will be provided in the form of a U.S. Reference Information Report which is available for a processing fee of \$5.00. You may complete and submit a request form for your U.S. Reference Information Report online at [www.acxiom.com/usreference](http://www.acxiom.com/usreference) or by calling 1-877-774-2094. After you receive your U.S. Reference Information Report, you may contact us online, by phone or in writing about correcting any inaccurate information with Acxiom and with the original source of the information.

**Complaint process** — Acxiom provides consumers a formal method for filing a complaint about our practices or procedures. This method specifies what information must be included in the complaint and where it should be directed. To learn how to file a complaint, email us at [privacy@acxiom.com](mailto:privacy@acxiom.com) or call 1-877-774-2094.

**Other questions** — If you have any other questions about any of Acxiom's information practices or products, email us at [privacy@acxiom.com](mailto:privacy@acxiom.com) or call 1-877-774-2094.

## Other Important Information

**European Union Safe Harbor** — As a global company, Acxiom Corporation abides by privacy laws of many countries. Acxiom maintains an industry-recognized leadership role in consumer privacy and was one of the first U.S. companies to register with the U.S. Department of Commerce for EU Safe Harbor. More information about these guidelines can be found in Acxiom's EU Safe Harbor Policy, available at <http://acxiom.com/about-acxiom/privacy/eu-safe-harbor> /or by calling 1-877-774-2094.

**Accuracy** — Acxiom maintains quality control procedures to ensure the information we compile and process is as accurate and complete as possible. Acxiom responds promptly to questions from clients and consumers about the accuracy of information.

**Security** — Acxiom maintains security procedures designed to keep information we own, license and process from being accessed by any unauthorized person or business. We use a variety of multi-level security systems to control access to our services and information products. All users at client locations, as well as all Acxiom associates, must have the appropriate access codes and be authorized to access certain data and applications.

Acxiom conducts risk assessments and regular audits on our internal and external information systems in order to assess our ability to maintain the integrity of client and Acxiom data. Our enterprise security operations center maintains real-time monitoring for information system vulnerabilities and unauthorized access attempts into our internal systems. We also maintain physical security for our facilities and limit access to certain critical areas of our business.



We take reasonable precautions to ensure that our security procedures are adequate for the protection of our computer systems and data, but this does not eliminate the possibility that our security will be breached. If a security breach causes Acxiom leadership to believe individual consumers are at actual risk for identity theft or other fraudulent activities that may cause substantial harm or inconvenience to consumers or if such breach otherwise requires public notification, Acxiom will post a Security Alert notice on our website ([www.acxiom.com](http://www.acxiom.com)) that will provide relevant information for consumers and Acxiom clients to consider to protect against fraudulent and other harmful actions that may result from the unauthorized access.

**Compliance** — Acxiom participates in industry efforts to establish fair and workable guidelines above and beyond current laws and regulations and believes such actions are an effective way to protect privacy of the environment. We also support legislation and regulatory efforts to introduce fair and workable guidelines that protect privacy of consumers. We actively work to ensure that such guidelines are consistent with and complement established self-regulatory measures, and that they enable the consumer to continue receiving the benefits that appropriate information use, sophisticated marketing techniques and transaction-processing services provide.

When Acxiom provides information management services to our clients, we process our clients' information in strict accordance with the terms and conditions of the contract. Some of the services we provide to companies such as financial institutions and healthcare organizations are governed by laws such as the Fair Credit Reporting Act, Gramm-Leach-Bliley, the USA PATRIOT Act and the Health Insurance Portability and Accountability Act.

In these and similar situations, Acxiom works closely with our clients to ensure that the processing we perform is in accordance with all the laws governing those activities.

**Awareness** — Acxiom is committed to privacy education. We provide education to our clients, our associates and the industry about the issues, guidelines and laws surrounding individual consumer privacy issues, corresponding responsibilities and Acxiom's privacy policies



and practices. Acxiom provides education and consultation to clients about privacy compliance and about the laws and industry guidelines that protect consumers. Acxiom advocates speak at various events and emphasize the importance of responsible data collection and use.

Privacy education is part of the culture at Acxiom. We provide information to all U.S. associates — beginning with an educational session during the orientation of new associates — about the importance of privacy. We provide ongoing education about the laws and accepted practices in which Acxiom conducts business. As changes in legislation or industry practices occur, special education may be provided to update our associates on the new practices.

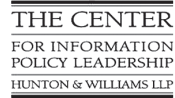
At the time of initial employment and annually thereafter, we require all Acxiom associates to complete privacy education and pass a certification test. When appropriate, Acxiom disciplines associates who violate our privacy policies.

**Privacy policy changes** — From time to time Acxiom may update and revise our privacy policy based on changes in our business environment and changes to applicable laws. We urge consumers and clients to periodically visit our website ([www.acxiom.com/privacy](http://www.acxiom.com/privacy)) to understand any changes that may have occurred.

Our privacy policy contains an “effective date” reflecting when the last changes occurred.

Effective Date: September 2013







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