



Updated January 18, 2023

## PRIVACY STATEMENT – VIRGINIA RESIDENTS ONLY

This PRIVACY NOTICE FOR VIRGINIA RESIDENTS supplements the information contained in the Privacy Statement of Martin Data LLC and its subsidiaries (collectively, “we,” “us,” or “our”) and applies solely to visitors, users, and others who reside in the State of Virginia (“consumers” or “you”). We adopt this notice to comply with the Virginia Consumer Data protection Act (VCDPA) and other Virginia privacy laws. Any terms defined in the VCDPA have the same meaning when used in this notice.

### Information We Collect and Disclose

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In the preceding twelve (12) months, we have collected and disclosed the following categories of personal information from consumers:

<u>Category</u>	<u>Collected</u>	<u>Source</u>
A. Identifiers (such as a real name, alias, postal address, unique personal identifier, online identifier and email address).	Yes	From third party data providers.
B. Personal information categories (such as a name, address, telephone number, education and employment).	Yes	From third party data providers.
C. Protected classification characteristics under Virginia or federal law (such as age and gender).	Yes	From third party data providers.
D. Commercial information (such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies).	Yes	From third party data providers.
E. Biometric information (such as genetic, physiological and biological characteristics, or identifying information, such as, fingerprints, faceprints, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns and sleep data. Please Note: we do collect some general health and exercise data categories).	No	
F. Internet or other similar network activity (such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement).	Yes	From third party data providers.
G. Geolocation data (such as physical location).	Yes	

H. Sensory data (such as audio, electronic, visual, thermal, olfactory, or similar information).	No	
I. Professional or employment-related information (such as current job history).	Yes	From third party data providers.
J. Non-public education information per the Family Educational Rights and Privacy Act – 20 U.S.C. Section 1232g, 34 C.F.R. Part 99 (such as education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records).	No	
K. Inferences drawn from other personal information (such as a profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior and attitudes).	Yes	From third party data providers.
Please Note: Some personal information included above may overlap with other categories.		

### **Use of Personal Information**

We use and disclose the personal information we collect for our commercial and business purposes, as further described in this Privacy Policy. These commercial and business purposes include, without limitation:

- Our commercial purposes include marketing, helping businesses find new customers, developing insights as to consumer interests and behaviors, keeping contact information up to date and relevant, enabling relevant and personalized marketing messages.
- Our business purposes as identified in the VCDPA include:
  - Improving our services

### **Sharing of Personal Information**

Martin Data may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We may share your personal information with the following categories of third parties:

- Subsidiaries and affiliates.
- Contractors and service providers.

### **Disclosures of Personal Information for a Business Purpose**

In the preceding 12 months, Martin Data has disclosed the following categories of personal information for a business purpose to the parties identified above:

Category A: Identifiers.

Category B: Virginia Customer Records personal information categories.

Category C: Protected classification characteristics under Virginia or federal law.

Category D: Commercial information.  
Category I: Professional or employment-related information.  
Category K: Inferences drawn from other personal information.

### **Sales of Personal Information**

In the preceding (12) twelve months, we have sold personal information from all the following categories:

- Category A: Identifiers.
- Category B: Virginia Customer Records personal information categories.
- Category C: Protected classification characteristics under Virginia or federal law.
- Category D: Commercial information.
- Category G: Geolocation data.
- Category I: Professional or employment-related information.
- Category K: Inferences drawn from other personal information.

In the preceding twelve (12) months, we may have sold your personal information to the following categories of third parties:

- Business Services/Agency
- Consumer Services Companies
- Insurance Companies
- Manufacturing Companies
- Marketing and Research Companies
- Media and Publishing Companies
- Technology/Computer Software Companies
- Telecommunications Companies
- Other Companies not Categorized.

Martin Data aims to provide consumers with control over the collection and use of their personal information. Consistent with this goal, we will honor requests from consumers to “opt-out” of the collection and disclosure of their personal information. Your Rights and Choices section below provides instructions on how to opt-out of our collection and disclosure of personal information.

### **Your Rights and Choices**

The VCDPA provides consumers (Virginia residents) with specific rights regarding their personal information.

You have the right and choice to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.

You also have the right to request that we opt-out the sale or sharing of your personal information and delete all the personal information that we have collected and retained about you. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless a specific VCDPA exception applies. You also have the right to correct inaccuracies in your personal data.

## **Exercising Access, Data Portability, Opt-Out, Correction and Deletion Rights**

To exercise the access, data portability, opt-out, correction, and deletion rights described above, please submit a verifiable consumer request to us by either:

Visiting: <https://martindataoptout.com/VA.html> or calling us at 866-365-1955

Only you or a person that you have designated as an authorized agent to act on your behalf may make a verifiable consumer request related to your personal information. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such requests (which we may ask to review) or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent's request. As a parent or legal guardian, you may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide all required information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with clear and precise detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## **Response Timing and Format**

We will respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response to you electronically (via email). Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **Non-Discrimination**

We will not discriminate against you for exercising any of your VCDPA rights and choices. Unless permitted by the VCDPA, we will not:

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

## **Financial Incentives**

Martin Data does NOT offer any financial incentives or payments to consumers as compensation, for the collection of personal information, the sale of personal information, or the deletion of personal information.

## **Minors**

We do not knowingly collect, maintain or disclose identifiable information on anyone younger than 18 to third parties for use in marketing solicitations. Limited information related to minors younger than 18 is used in creating additional insights solely related to the adult parent in the household of the minor individual, however, we do not disclose any identifiable information about the minor as part of the insights created and included within the adult record (For example, we only create a flag that denotes “presence of children” and “child age ranges”).

We do not knowingly collect, maintain or sell personal information about consumers younger than 18 for the purpose of marketing or advertising directly to the minor. If we become aware that we have collected personal information from a child under the age of 18, we will delete that information from our records.

## **Changes to Our Privacy Notice**

Martin Data reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Site and update the notice’s effective date. Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.

## **Right to Appeal**

If you feel that we have not processed your request to your satisfaction, you may appeal our decision. Please provide any additional information concerning your request and email it to [privacy@martindataoptout.com](mailto:privacy@martindataoptout.com). Once we have received your appeal, we have 60 days to review it and respond. In the event the appeal is denied, you may contact the Virginia Attorney General to file a compliant against us at:

Office of the Attorney General  
202 North Ninth Street  
Richmond, Virginia 23219  
804 786-2071

## **Contact Us**

Should you have any questions about this privacy policy, please contact:

Martin Data LLC  
Attn: Privacy Officer  
735 Taylor Rd. STE 220  
Columbus, OH  
[privacy@martindataoptout.com](mailto:privacy@martindataoptout.com)