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## **Privacy Policy**

OMI takes your privacy very seriously. Please read this privacy policy carefully as it contains important information about who we are, how and why we collect, store, use and share your personal information (any information relating to an identified or identifiable individual). It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

### **What Personal Information We Collect**

OMI collects, uses and is responsible for certain personal information about you. When we do so, we are subject to various foreign and United States federal and state laws. The information we collect includes from third parties and suppliers, and from public records such as business registrations, partner data aggregation and proprietary search engine technology.

Information we collect and use includes the following personal information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person or household:

- Identifiers (e.g., a real name, alias, title, unique personal identifier, postal address, phone number, online identifier, Internet Protocol address, and e-mail address)
- Professional or employment related information including company and business contact information, including corporate domain names, industry classifications and incorporation information
- Characteristics of protected classifications under California or federal law
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement)
- Audio, electronic, visual, or similar information
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, predispositions, behavior, and abilities.

Company profiles may include number of employees; ownership/persons of significant control, Company information including subsidiaries, affiliates, and lines of business; IP addresses, geolocation, company revenue, year business started and other similar data.



## How We Collect Your Personal Information

1. We collect most of this personal information:
  - From publicly accessible sources
  - Directly from a third party (e.g., partners and licensors)
  - Via our IT systems, including data manufacturing using domain patterns.

## How and Why We Use Your Personal Information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party (e.g., so that we can supply commercial data about businesses to other businesses. We license and sell business contact information for marketing and data administration purposes) or
- Otherwise, where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What we use your personal information for</b>	<b>Our reasons</b>
To provide products and/or services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Outward Media	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you



<p>Conducting checks to identify our customers and verify their identity</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under relevant laws, governmental regulation or rules</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Gathering and providing information required by or relating to audits, inquiries or investigations by regulatory bodies</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring business policies are adhered to, e.g. policies covering security and internet use</p>	<p>For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best products and services. We authenticate and build business contact emails using numerous verification methods and data elements</p>
<p>Operational reasons, such as improving efficiency, training and quality control</p>	<p>For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best products and services</p>
<p>Ensuring the confidentiality of commercially sensitive information</p>	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
<p>Statistical analysis to help us manage our business, e.g. in relation to our performance, customer base, product range or other efficiency measures</p>	<p>For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best products and services</p>
<p>Preventing unauthorized access and modifications to systems</p>	<p>For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>



<p>Updating and enhancing individual records</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
<p>Marketing our services and those of our third party customers to:</p> <ul style="list-style-type: none"> <li>— existing and former customers;</li> <li>— third parties who have previously expressed an interest in such services;</li> <li>— third parties with whom we have had no previous dealings.</li> </ul>	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers</p>
<p>External audits and quality checks, e.g. for ISO or other accreditation and the audit of our accounts</p>	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate operational standards</p> <p>To comply with our legal and regulatory obligations</p>

In addition to the above table, we specifically collect your personal information to license the information to businesses, approved resellers and other third parties for marketing and data-related products, services and administration purposes. OMI may also use your personal information to match with other public and private data sources for verification and improvement of our products and services. Anonymous segments of information which is non-personally identifying information, such as demographic and behavioral data that is accessed from the underlying data is used by OMI and/or third parties to provide advertising messages to you on third party sites and other services.

### Who we Share Your Personal Information With

We routinely share personal information with:

- Our affiliates, including companies within the OMI group;



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- Service providers we use to help deliver our products and/or services to you and our customers;
  - Our customers, who license such personal information from us;
  - Third parties we use to help us run our business, such as marketing agencies or website hosts;
  - Other third parties including social media sites

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g. in relation to ISO accreditation and the audit of our accounts.

In addition to the foregoing, OMI compiles online registration information for internal analyses and quality control.

OMI may disclose information in response to a court order, subpoena, law enforcement proceeding, regulatory bodies or otherwise to comply with our legal and regulatory obligations.

## **How We Use Personal Information With Our Services**

We use and make available Personal Information for various purposes such as:

- We have (including in the preceding 12 months) sold and/or disclosed for a business purpose to one or more third parties the above listed categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household;
- We assist marketers by targeting, delivering, and optimizing email and display ad campaigns.;
- We assist marketers in measuring the effectiveness of online advertising campaigns such as by evaluating which messages are most likely noticed or opened by which types of business contacts, or which kind of ads are most likely to lead to conversion
- We provide other data services, such as (but not limited to) email contact verification, IP address resolution and other analytics and database tools
- We may provide IP addresses to third Parties, with whom we partner for display advertising
- We may use your personal information to send you updates (by email, text message, telephone or post) about our (or our customers') products and/or services, including exclusive offers, promotions or new products and/or services



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You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at 310 274-5312 ext.100; or
- Sending an email to [privacy@outwardmedia.com](mailto:privacy@outwardmedia.com); or
- Using the “unsubscribe” link in emails or “STOP” number in texts; or

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

Regarding web-based online marketing applications, we may de-identify Personal Information (such as by creating a “hashed” version of an email address, or another related identifier) in order to reach business contacts through online display advertising. For these marketing applications we use IP addresses and similar technologies. When we interact with business contacts online, through online advertising or email, we may use IP addresses and similar technologies, which also may contain unique online identifiers.

### **Third Party Advertisers**

We use third party advertising companies to serve our Internet ad banners on our website and other websites on which we advertise. The use of third party cookies and other tracking technologies is not covered by our privacy policy. We do not have access to or services

Third party advertising networks also track visitors' online usage and behavior patterns. These companies may use information about your visits to our websites in order to provide advertisements on sites about products and services that may be of interest to you. The result of these efforts is the creation of an online profile that attempts to predict individual user interests, preferences and purchasing habits. The third party advertising networks then accordingly customize the advertising content served to users when visiting other websites.

## **Managing Personal Information**

### **OMI Email Marketing**

To opt out of receiving OMI promotional e-mails, newsletters, and updates on products and services:



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You may follow the unsubscribe instructions in any of our promotional emails. You can also call us at 310 274-5312 ext.100 or send an email to [privacy@outwardmedia.com](mailto:privacy@outwardmedia.com).

You may change your preferences at any time.

### **Third Party Marketing**

Individuals whose contact information is in our contacts database may request to be excluded from the professional contacts database by emailing [privacy@outwardmedia.com](mailto:privacy@outwardmedia.com).

### **Data Correction, and Deletion**

OMI provides access to your business information in order to help in maintaining accuracy. Businesses and business professionals may have access to their business information within the OMI databases in order to review such information, correct any inaccuracies, or delete any personal information within such business information if required by law. Authorized business representatives may request a copy of their company's business record.

To obtain a copy of your company's business record or, to submit corrections or update your information send an email to [privacy@outwardmedia.com](mailto:privacy@outwardmedia.com) or call 310 274-5312 ext. 101.

OMI will investigate any potential errors and correct any verified inaccuracies when a business owner or principal contacts OMI about a potential data error. We will delete any personal information within the business record if required by law, and respond to the inquiry. There may be some third parties that may continue to display inaccurate Data until their databases and display of data are updated according to their update schedules.

### **Data Security**

Information may be held at OMI's offices and those of OMI's affiliated entities, third party agencies, service providers, resellers, distribution partners and other representatives and agents. OMI maintains appropriate security measures to protect personal information against accidental loss, unauthorized access and disclosure. These measures include the implementation of technical, physical and administrative security safeguards. OMI employees are required to complete privacy and security training. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We continually test our systems and are ISO IEC 27001:2013, 27017:2015, 27018:2019, and ISO/IEC 9001:2015. Abd SO 27001 Certification, ISO/IEC 17021-1:2015 and ISO/IEC 27006:2015, certified, which means we follow top industry



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standards for information security. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Our policies and procedures for securely managing information and protecting Data against unauthorized access include:

Establishing policies and procedures for securely managing information and as may be further addressed in our contractual relationship with a customer

Limiting employee access to sensitive information

Protecting against unauthorized access to customer data by using data encryption, authentication and virus detection technology, as required;

Requiring service providers with whom we do business to comply with relevant data privacy legal and regulatory requirements

Conducting background checks on employees and providing Data Privacy training to our team members;

## **Data Retention**

OMI will retain your personal information for as long as we are utilizing it in connection with our products and services. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

If you wish to be removed or request that we no longer use your information contact OMI at 310 274-5312 ext.100 or [privacy@outwardmediac.com](mailto:privacy@outwardmediac.com). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Children**

In complying with the Children's Online Privacy Protection Act, we will not knowingly collect any personally identifiable information from or provide any products or services to individuals under the age of 13.





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We cannot always determine the age of a sender of an email. Should we learn that a user is under 13 years of age and we can identify personal information relating to such a user, we will delete such information promptly.

## **Data Privacy Practices Updates**

This privacy policy was published on July 9, 2020. We may change this privacy policy from time-to-time and when we do, we will inform you via our website. We do this to keep you informed of how we collect, use, manage, disclose, and protect information.

## **California Residents**

### **What is the CCPA?**

Beginning January 1, 2020, under the California Consumer Privacy Act of 2018 (CCPA) residents of the state of California have the following rights, to be exercised, free of charge:

You have the “**Right to Know**” or the “**Right to Access Information About Collection, Disclosure and Sale of your Personal Information**” over the past 12 months. Refer to the additional details below. [Fill out the form to complete your Right to Information about Collection, Disclosure and Sale of your Personal Information request.](#) The information you provide will only be used to fulfill your CCPA request.

### **Know Your Rights**

You have the **Right to Deletion** of information subject to certain exceptions. Refer to the additional details on these exceptions below. \_ The information you provide will only be used to fulfill your CCPA request. Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.
- Please note that we may not delete your personal information if it is necessary to:
- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law,
- provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;



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- Debug to identify and repair errors that impair existing intended functionality;
  - Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
  - Comply with the California Electronic Communications Privacy Act;
  - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
  - Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
  - Comply with an existing legal obligation; or
  - Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

You have the **Right to Opt Out of the Sale of Your Personal Information**, unless such personal information was collected from a government source. Call OMI at 310 274-5312 ext.100 or email [privacy@outwardmedia.com](mailto:privacy@outwardmedia.com)

- If you have opted out of the sale of your personal information but would like to Opt Back in, please [fill out the CCPA Opt-In form](#). The information you provide will only be used to fulfill your CCPA request.

You also have a **Right Not to be Discriminated Against** for exercising your CCPA rights. We reserve the right to use a third party to verify your identity and this third party may require additional information for verification purposes. The data you provide will only be used to fulfill your CCPA request. This means we cannot, among other things:

- Deny goods or services to you;
- Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Provide a different level or quality of goods or services to you; or
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. Please see below for the categories of personal information about California consumers that we have collected, sold and disclosed for a business purpose over the past 12 months.



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## Additional CCPA Disclosures

Under the CCPA, we are required to provide you with specific disclosures about the categories of personal information we collect, categories of sources from whom we collect such information, our commercial purpose for collecting licensing and selling such information, and the categories of third-parties with whom we share such information. We have described how we collect data and the use of your information above, and provide a summary below. You have the right under the CCPA and certain other privacy and data protection laws, as applicable, to opt-out of the sale or disclosure of your personal information. If you exercise your right to opt-out of the sale or disclosure of your personal information, we will refrain from selling your personal information, unless you subsequently provide express authorization for the sale of your personal information. To opt-out of the sale or disclosure of your personal information, [fill out the form to complete your Right to Information about Collection, Disclosure and Sale of your Personal Information request](#), email [privacy@outwardmedia.com](mailto:privacy@outwardmedia.com) or call 310 274-5312 ext. 100..

### How to Exercise Data Subject Rights

If you wish to exercise any of these rights please email [privacy@outwardmedia.com](mailto:privacy@outwardmedia.com) with the phrase “California Data Subject Rights” in the subject line. You may also call us at 1-310-274-5312 ext.100. We will review and respond to all requests accordingly. The rights described herein are not absolute and we reserve all of our rights available to us at law in this regard. Additionally, if we retain your Personal Information only in de-identified form, we will not attempt to re-identify your data in response to a Data Subject Rights request. Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly by email/phone or in writing], you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and other information relevant to your inquiry);
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected or possess information, or is someone authorized to act on such person’s behalf.



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Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

If you make a Data Subject Rights request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf.

We will process your request within the time provided by applicable law.

### Categories of Personal Information

1. Identifiers: Examples include –
  - A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, employment, employment history.
  - This information may have been collected for some of these data elements on California Residents.
  
2. Geolocation Data: Examples include –
  - Physical location
  - This information may have been collected for some of these data elements on California Residents.
  
3. Professional or Employment Related Information: Examples include –
  - Current or past job history



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## Categories of Personal Information

Category	Examples	Collected, sold and disclosed
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address	We may have collected some of these data elements on California Residents.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	employment, employment history,	We may have collected some of these data elements on California Residents.
C. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	We may have collected some of these data elements on California Residents.
D. Geolocation data.	Physical location or movements.	We may have collected some of these data elements on
E. Professional or employment-related information.	Current or past job history	We may have collected some of these data elements on California Residents.



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## **EEA Residents and GDPR**

OMI does not knowingly collect, maintain or otherwise process or use personal information of individuals who are residents of the European Economic Area (EEA) or who are otherwise subject to the “General Data Protection Regulation” (GDPR). As such, OMI does not take steps to restrict (either itself or with respect to its service providers, customers or other third parties) transfer of information in or out of the EEA. In the event that you are a resident of the EEA or are otherwise subject to GDPR, please contact OMI to ensure that your personal information is promptly deleted.

## **How to Contact Us About Privacy Matters**

If you would like to contact us for any reason concerning our privacy practices, please email us at [privacy@outwardmedia.com](mailto:privacy@outwardmedia.com).

**Do You Need Extra Help?** If you would like this notice in another format (for example: audio, large print, braille) please contact us (see “How to contact Us” above).