

**Online and Offline Privacy Policy** 

## 1. Introduction to Make Marketing's Services

Make Marketing and its various affiliates and subsidiaries provide to clients a wide variety of marketing services, which help our clients and the platforms and partners they work with to provide more relevant marketing and communications, and to understand their consumers better. These clients may reach their customers and others, for instance, through direct mail, email, display, mobile and multi-media channels.

Many of these services are described in greater detail on our website, http://www.Makemkt.com. None of the information that we handle is collected on this website, but rather through relationships we have with other companies such as data suppliers, business partners (such as ad networks and other online partners), data services providers, agencies and our clients. We nonetheless provide this Privacy Policy as a service to consumers and others who want to learn more about the data we handle and how we use it. If you are interested particularly in the information we collect via our normal operations or this website, please go to the Section titled "**Data Collected On Our Website**".

Make Marketing is a member of the Direct Marketing Association ("DMA"), and we adhere to the principle that consumers should have choices regarding how marketers use their data and market to them. For information about how to opt out of our database, or out of certain services provided by our business partners, please go to our section titled "**Your Choices and Opt Out Rights**."

# 2. The Types of Data That We Obtain and Use

Make Marketing receives data from, and handles data on behalf of, a variety of consumer-facing companies, applications and services, business-facing companies, and suppliers. We also may obtain data through public sources, such as census data and other public records. Some of the data we receive, use and make available is Personal Information ("PI") or is linked to PI. PI includes, for instance, name, postal address, telephone number or email address. In addition, some of our services involve using and making available "business to business" data, which is obtained from a number of sources, including public directories, filings and publications, surveys and subscriptions.

We also collect certain information when you visit our website, http://www.Makemkt.com, as described in the below section titled "**Data Collected On Our Website**."

#### 3. Our Services, and How We Use Personal Information

We use and make available Personal Information for various purposes. For instance, We use personal Information to ensure event logistic transition, airport pickup and drop-offs.

#### 4. Data Collected On Our Website

This website itself is primarily directed to businesses that may wish to use our services, but we welcome consumers who want to know more about our services. When you access this website or engage with us by email, we may collect the following information:

 Personal Information. When you provide us with information through our website, such as to request or download information, sign up for a newsletter, event or service, or log in to a service or application we provide, we may request and you may provide certain PI to us. We may use

your PI for any business purpose, including to administer your account and provide you services, to send communications and administrative emails, to respond to your inquiries, and to



send marketing and product update messages. We may also use it to analyze how customers are using our website or services.

- Non-Personal Information. Whether or not you sign up for an account or provide us with Personal Information, we may collect other information when you visit our website. This may include:
- 1. The type of browser and operating system you have used to access the website, a time-stamp, and other browser or device information;
- 2. Your IP address (which is a number automatically assigned to your computer when you access the Internet and can be used to derive your general geographic location);
- 3. Your clickstream data and any URL referral information (such as any website or social media platform that referred you to our website);
- 4. What part(s) of our website you visit, click and view, and how long you view it;
- 5. A unique identifier, which we may associate with a cookie, device identifier or similar technology.

We may collect or store the above information by using cookies, web beacons, and similar technologies, and may target or retarget ads to you using those cookies, device identifiers, or similar technologies, when you browse the Internet or use your mobile device. We may combine any information including Personal Information you provide to us.

While we would be sorry to see you go, you can unsubscribe from our corporate emails by accessing the "opt out" or "unsubscribe" (or similar) link we provide in the footer of each email that we send. Keep in mind, however, that even if you delete your account, we may retain your Personal Information to comply with laws, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigations, enforce our agreements and policies, and take other actions permitted by law. Note that even if you unsubscribe or opt-out, we may still send you communications related to your use of and transactions with our services.

5. How We Work With and Share Data With Third Parties

Make Marketing may share data, including Personal Information and Data Segments, as follows:

- Agents and Service Providers: We may share data, including PI and Data Segments, with agents, business partners and service providers who work on our behalf, or to help us provide services requested by our customers, including to perform any of the services described in this Privacy Policy. We may do so, for instance, to help send or target advertising on behalf of our clients (or ourselves), for analytical purposes, to measure campaigns, or inform future campaigns. We may do so to facilitate the sending of display media, email, or other requested services.
- **Partners:** We may share data, including PI and Data Segments, with business and data partners (such as business partners who provide to marketers their own applications or data services) or with clients, to help provide more tailored advertising and for analytical purposes.
- **Corporate transfers:** If Make Marketing or its significant assets are purchased by another entity, our data will likely be transferred to that entity, including for due diligence prior to any such potential purchase.
- Affiliates, Parents and Subsidiaries: We may share some or all of the data in our possession with affiliated or subsidiary companies. Our affiliates and subsidiaries include (but are not limited to): List your companies here example car service.
- As Required by Law or to Protect Any Party: Make Marketing may disclose data if we believe in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served on us; or (b) to protect or otherwise defend the rights, property or safety of Make Marketing or any other party.



- Data We Collect on Our Website: We use data that you provide to us on our website to market, we may use this data for our business purposes. For instance, if you provide us with
- your name and email address, we may put your into our proprietary database and send you newsletters about our company, our services, and events. We will provide you a way to opt out of these emails, usually through a link in the email footer.

# 7. Your Choices and Opt-Out Rights

- Opting Out of Make Marketing's Database. You may click here to send an email to us, to opt out of Make Marketing's database. If you do so, please include the following information in your email: (a) first and last name, and (b) current address. We also recommend that you provide us with other addresses you have lived at in the past five years, which may help us to opt you out even if we have not yet acquired your current address information. If you decide to opt out in this way, we will stop using data in Make Marketing's proprietary database to help our customers send or tailor ads and content to you, including through email, direct mail or online display marketing. (It usually takes us between 30 to 60 days to process this opt out through all of our databases.) Doing so will not opt you out of our customers' or our partners' databases, only data in Make Marketing's own database so other companies that we work with may still send ads, offers and content to you.
- **Unsubscribing from Our Emails.** In addition, when we send an email to you (whether on our behalf or on behalf of a client), we will provide a way for you to opt out of receiving emails from us in the future. Usually, this appears as an "unsubscribe" or "opt out" link in the footer of the email.

For more consumer choice resources, please see our **Make Marketing Consumer Choice and Resource Center**.

#### 8. Security and Data Integrity

Make Marketing takes steps to ensure that the data we possess is housed and transmitted securely. These steps may include various methods of physical and electronic security, firewall protections, encryption and hashing of data, and access controls to PI. However, neither we nor any platform can guarantee 100 percent safety from hacks or illegal intrusion, so this Privacy Policy does not guarantee against that possibility.

9. International Users, EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield Framework Make Marketing and its Covered Entities participate in, and have an affirmative commitment to compliance with the EU-U.S. Privacy Shield and Swiss-US Privacy Shield Framework (collectively, "Privacy Shield Framework"). As part of its self-certification to the Privacy Shield Framework, Make Marketing has adopted a **EU-US and Swiss-US Privacy Shield Policy** in regards to human resource ("HR") and NON-HR EU and Swiss personal data, which policy with dispute resolution is incorporated into this Privacy Policy via the following link: http://makemkt.com/indexe.html

#### 10. Questions or Concerns

If you have questions or concerns about Make Marketing's privacy efforts or data products, please contact us at:

Privacy and Data Security Officer - Make Marketing: info@Makemkt.com