

Privacy Policy

Campaign Center takes data privacy seriously. This privacy policy explains who we are, how we collect, share and use Personal Information, and how you can exercise your privacy rights. We recommend that you read this privacy policy in full to ensure you are fully informed.

If you have any questions or concerns about our use of your Personal Information, then please contact us at dpo@campaign-center.net.

To the extent we provide you with notice of different or additional privacy policies, those policies will govern such interactions.

Last Updated on 9th of September 2020

1. The Basics

A. About Us

Campaign Center is an online marketing platform operated by Luka Mrovlje, ESY5525896E, EU, Spain, Catalunya ("we", "us", "our", "CC" or "Campaign Center").

Our Service enables our Members to, host their websites, gather contacts on Campaign Center platform and manage Hosting or Campaign Center Promotions and create Websites and Landing Pages. We also provide other related services, such as real-time data analytics and insights to help our Members track and personalize their marketing activities.

B. Key Terms

In this privacy policy, these terms have the following meanings:

"Affiliate" means an entity that directly or indirectly Controls, is Controlled by or is under common Control with an entity.

"Contact" is a person a Member may contact through our Service. In other words, a Contact is anyone on a Member's Distribution List. For example, if you are a Member, a lead in your Campaign Center promotion would be considered a Contact. If you host your own Email marketing platform, it is your responsibility to handle your Contacts and their Personal Data as stated in our Terms of Service.

"Control" means an ownership, voting or similar interest representing fifty percent (50%) or more of the total interests then outstanding of the entity in question. The term "Controlled" shall be construed accordingly.

"Distribution List" is a list of Contacts a Member may manage on our platform and all associated information related to those Contacts (for example, email addresses).

"Campaign Center Sites" is a Service of Hosting and an online marketing platform located at <https://campaign-center.net> and on Members' domains as a stand-alone promotion.

"Member" means any person or entity that is registered with us to use the Service.

"Personal Information" means any information that identifies or can be used to identify an individual directly or indirectly. Examples of Personal Information include, but are not limited to, first and last name, email address or other demographic information.

"Service" means Hosting of your Websites on our Server and Campaign Center promotions.

"Visitor" means, depending on the context, any person who visits any of our Campaign Center Sites, offices, or otherwise engages with us at our events or in connection with our marketing or recruitment activities.

"you" and "your" means, depending on the context, either a Member, a Contact, or a Visitor.

2. Privacy for Members

This section applies to the Personal Information we collect and process from a Member or potential Member through the provision of the Service. If you are not a Member, the Visitor or Contact section of this policy may be more applicable to you and your data. In this section, "you" and "your" refer to Members and potential Members.

A. Information We Collect

The Personal Information that we collect depends on the context of your interactions with Campaign Center, your Campaign Center account settings, the products and features you use, your location, and applicable law. However, the Personal Information we collect broadly falls into the following categories:

(i) Information you provide to us: You (or your organization) may provide certain Personal Information to us when you sign up for a Campaign Center account and use the Service, consult with our customer service team, send us an email, integrate the Service with another website or service (for example, when you choose to integrate your Campaign Center promotion into your Website), or communicate with us in any other way.

This information may include:

- Business contact information (such as your name, job title, organization, location, phone number, email address, and country);
- Account log-in credentials (such as your email address or username and password when you sign up for an account with us);
- Troubleshooting and support data (which is data you provide or we otherwise collect in connection with support queries we receive from you. This may include contact or authentication data, the content of your chats and other communications with us, and the product or service you are using related to your help inquiry); and
- Payment information (including your credit card numbers and associated identifiers and billing address).

(ii) Information we collect automatically: When you use the Service, we may automatically collect or receive certain information about your device and usage of the Service (collectively “Service Usage Data”). In some (but not all) countries, including countries in the European Economic Area (“EEA”), this information is considered Personal Information under applicable data protection laws. We use cookies and other tracking technologies to collect some of this information. For further information, please review the section.

Service Usage Data may include:

- Device information: We collect information about the device and applications you use to access the Service, such as your IP address, your operating system, your browser ID, and other information about your system and connection.
- Log data: Our web servers keep log files that record data each time a device accesses those servers and the nature of each access, including originating IP addresses and your activity in the Service (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take (for example, which features you used)), device event information (such as system activity, error reports (sometimes called ‘crash dumps’)), and hardware settings. We may also access metadata and other information associated with files that you upload into our Service.
- Usage data: We collect usage data about you whenever you interact with our Service, which may include the dates and times you access the Service and your browsing activities (such as what portions of the Service you used). We also collect information regarding the performance of the Service, including metrics related to the deliverability of emails and other communications you send through the Service.

B. Use of Personal Information

We may use the Personal Information we collect or receive through the Service (alone or in combination with other data we source) for the purposes and on the legal bases identified below:

- To bill and collect money owed to us by you to perform our contract with you for the use of the Service or where we have not entered into a contract with you, in accordance with our legitimate interests to operate and administer our Service. This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if we need a different credit card number. We use third parties for secure credit card transaction processing, and those third parties collect billing information to process your orders and credit card payments. To learn more about the steps we take to safeguard that data, see the "Our Security" section of this privacy policy.
- To send you system alert messages in reliance on our legitimate interests in administering the Service and providing certain features. For example, we may inform you about temporary or permanent changes to our Service, such as planned outages, or send you account, security or compliance notifications, such as new features, version updates, releases, abuse warnings, and changes to this privacy policy.
- To communicate with you about your account and provide customer support to perform our contract with you for the use of the Service or where we have not entered into a contract with you, in reliance on our legitimate interests in administering and supporting our Service.
- To enforce compliance with our Terms of Service and applicable law, and to protect the rights and safety of our Members in reliance on our legitimate interest to protect against misuse or abuse of our Service and to pursue remedies available. This may include developing tools and algorithms that help us prevent violations. For example, sometimes we review the content our Members send or display to ensure it complies with our Terms of Service. To improve that process, we have software that helps us find content that may violate our Terms of Service. We may or our third-party service provider may also review content that our Members send or display. This benefits all Members who comply with our Terms of Service because it reduces abuse and helps us maintain a reliable platform. Please do not use Campaign Center to send or display confidential information.
- To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.

- To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements in reliance on our legitimate interests.
- To prosecute and defend a court, arbitration, or similar legal proceeding.
- To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- To provide, support and improve the Service to perform our contract with you for the use of the Service or where we have not entered into a contract with you, in reliance on our legitimate interests in administering and improving the Service and providing certain features. For example, this may include sharing your information with third parties in order to provide and support our Service or to make certain features of the Service available to you. When we share your Personal Information with third parties, we take steps to protect your information in a manner that is consistent with our obligations under applicable privacy laws. For further information about how we share your information, refer to Section 5 below.
- To perform data analytics projects in reliance on our legitimate business interests in improving and enhancing our products and services for our Members. As always, we take the privacy of Personal Information seriously, and will continue to implement appropriate safeguards to protect this Personal Information from misuse or unauthorized disclosure.
- To personalize the Service, content and advertisements we serve to you in reliance on our legitimate interests in supporting our marketing activities and providing certain features within the Service. We may use your Personal Information to serve you specifically, such as to deliver marketing information, product recommendations and non-transactional communications (e.g., email, telemarketing calls, SMS, Skype, Viber or Whatsapp) about us, in accordance with your marketing preferences and this privacy policy.

C. Third-Party Integrations

We may use the Personal Information we collect or receive through the Service, as a processor and as otherwise stated in this privacy policy, to enable your use of the integrations and plugins you choose to connect to your Campaign Center account.

D. Cookies and Tracking Technologies

We and our third-party partners may use various technologies to collect and store Service Usage Data when you use our Service (as discussed above), and this may include using cookies and similar tracking technologies, such as pixels and web beacons. For example, we use web beacons in the emails we send on your behalf, which enable us to track certain behavior, such as whether the

email sent through the Service was delivered and opened and whether links within the email were clicked. We allow us to collect information such as the recipient's IP address, browser, email client type and other similar data as further described above details. We use this information to measure the performance of your email campaigns, to provide analytics information, enhance the effectiveness of our Service, and for other purposes described above. Reports are also available to us when we send email to you, so we may collect and review that information.

E. Member Distribution Lists

In order to send an email campaign or use certain features in your account, you need to upload a Distribution List that provides us information about your Contacts, such as their names and email addresses. We use and process this information to provide the Service in accordance with our contract with you or your organization and this privacy policy.

A Distribution List can be created in a number of ways, including by importing Contacts, such as through a CSV or directly from your email client. We do not, under any circumstances, sell your Distribution Lists. If someone on your Distribution List complains or contacts us, we might then contact that person. You may export (download) your Distribution Lists from Campaign Center by accessing the "Audience" tab from within your account.

If we detect abusive or illegal behavior related to your Distribution List, we may share your Distribution List or portions of it with affected ISPs or anti-spam organizations to the extent permitted or required by applicable law.

F. Your Data Protection Rights

Depending on the country in which you reside, you may have the following data protection rights:

- To access; correct; update; port; delete; restrict; or object to our processing of your Personal Information.
- You can manage your individual account and profile settings within the dashboard provided through the Campaign Center platform, or you may contact us directly by emailing us at dpo@campaign-center.net. You can also manage information about your Contacts within the dashboard provided through the Campaign Center platform to assist you with responding to requests to access, correct, update, port or delete information that you receive from your Contacts. Note, if any of your Contacts wish to exercise any of these rights, they should contact you directly, or contact us as described in the "Privacy for Contacts" section below. You can also contact us at any time to update your own marketing preferences (see Section 5. General Information, C. Your Choices and Opt-Outs below). Campaign Center takes reasonable steps to ensure that the

data we collect is reliable for its intended use, accurate, complete and up to date.

- The right to complain to a data protection authority about the collection and use of Personal Information. For more information, please contact your local data protection authority.
- Similarly, if Personal Information is collected or processed on the basis of consent, the data subject can withdraw their consent at any time.

Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent. If you receive these requests from Contacts, you are required to respect their request.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request. If we receive a request from one of your Contacts, we will either direct the Contact to reach out to you, or, if appropriate, we may respond directly to their request.

3. Privacy for Contacts

This section applies to the information we process about our Members' Contacts as a data controller. Our Service is intended for use by our Members. As a result, for much of the Personal Information we collect and process about Contacts through the Service, we act as a processor on behalf of our Members. Campaign Center is not responsible for the privacy or security practices of our Members, which may differ from those set forth in this privacy policy. Please check with individual Members about the policies they have in place. For purposes of this section, "you" and "your" refer to Contacts.

A. Information We Collect

The Personal Information that we may collect or receive about you broadly falls into the following categories:

(i) Information we receive about Contacts from our Members: A Member may provide Personal Information about you to us through the Service. When a Member uploads their Distribution List or integrates the Service with another website or service (for example, when a Member chooses to connect their e-commerce account with Campaign Center), or when you sign up for a Member's Distribution List on a Campaign Center or other signup form, the Member may provide us with certain contact information or other Personal Information about you such as your name, email address, address, or telephone number. You may

have the opportunity to update some of this information by electing to update or manage your preferences via an email you receive from a Member.

(ii) Information we collect automatically: When you interact with a campaign that you receive from a Member or browse or purchase from a Member's connected store, we may collect information about your device and interaction with an email. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies is discussed more below.

- Device information: We collect information about the device and applications you use to access campaign through our Service, such as your IP address, your operating system, your browser ID, and other information about your system and connection.
- Usage data: It is important for us to ensure the security and reliability of the Service we provide. Therefore, we also collect usage data about your interactions with campaigns (and/or emails) sent through the Service, which may include dates and times you access campaigns (and/or emails) and your browsing activities (such as what pages are viewed and which emails are opened). This information also allows us to ensure compliance with our Terms of Service, to monitor and prevent service abuse, and to ensure we attain certain usage standards and metrics in relation to our Service. We also collect information regarding the performance of the Service, including metrics related to the deliverability of emails and other electronic communications that our Members send through the Service. This information allows us to improve the content and operation of the Service and facilitate research and perform analysis into the use and performance of the Service.

B. Use of Personal Information

We may use the Personal Information we collect or receive about you in reliance on our (and where applicable, our Members') legitimate interests for the following purposes:

- To enforce compliance with our Terms of Service and applicable law. This may include utilizing usage data and developing tools and algorithms that help us prevent violations.
- To protect the rights and safety of Members, third parties, or Campaign Center. For example, sometimes we review the content of our Members' campaigns to make sure they comply with our Terms of Service. To improve that process, we have software that helps us find email campaigns that may violate our Terms of Service. We, or our third-party service provider, may review those particular email campaigns, which may include your contact information. This reduces the amount of spam being sent through our servers and helps us maintain high deliverability.

- To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- To prosecute and defend a court, arbitration, or similar legal proceeding.
- To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- To provide, support and improve the Service. For example, this may include sharing your information with third parties in order to provide and support our Service or to make certain features of the Service available to our Members. When we share Personal Information with third parties, we take steps to protect your information in a manner that is consistent with applicable privacy laws. For further information about how we share information, refer to Section 5 below.
- To carry out other business purposes. To carry out other legitimate business purposes, as well as other lawful purposes about which we will notify you.

C. Cookies and Tracking Technologies

We and our third-party partners may use various technologies to automatically collect and store certain device and usage information (as discussed above) when you interact with a Member's campaign or connected website, and this may include using cookies and similar tracking technologies, such as pixels and web beacons. For example, we use web beacons in the emails we send on behalf of our Members. When you receive and engage with a Member's campaign, web beacons track certain behavior such as whether the email sent through the Campaign Center platform was delivered and opened and whether links within the email were clicked. Web beacons allow us to collect information such as your IP address, browser, email client type, and other similar data as further described above. We use this information to measure the performance of our Members' campaigns, and to provide analytics information and enhance the effectiveness of our Service, and for the other purposes described above.

D. Your Data Protection Rights

Depending on the country in which you reside, you may have the following data protection rights:

- To access; correct; update; port; delete; restrict or object to our processing of your Personal Information.
- For more information about how you can exercise these rights, please write to us at dpo@campaign-center.net. You also have the right to complain to a data protection authority about our collection and use of

your Personal Information. For more information, please contact your local data protection authority.

As described above, for much of the Personal Information we collect and process about Contacts through the Service, we act as a processor on behalf of our Members. In such cases, if you are a Contact and want to exercise any data protection rights that may be available to you under applicable law or have questions or concerns about how your Personal Information is handled by Campaign Center as a processor on behalf of our individual Members, you should contact the relevant Member that is using the Campaign Center Service, and refer to their separate privacy policies.

If you no longer want to be contacted by one of our Members through our Service, please unsubscribe directly from that Member's newsletter or contact the Member directly to update or delete your data. If you contact us directly, we may either forward your request to the relevant Member or provide you with the identity of the Member to enable you to contact them directly.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

4. Privacy for Visitors

This section applies to Personal Information that we collect and process when you visit the Campaign Center Sites, and in the usual course of our business, such as in connection with our recruitment, events, sales and marketing activities or when you visit our offices. In this section, "you" and "your" refer to Visitors.

A. Information We Collect

(i) Information you provide to us on the Campaign Center Sites or otherwise: Our Campaign Center Sites offer various ways to contact us, such as through form submissions, email or phone, to inquire about our company and Service. For example, we may ask you to provide certain Personal Information when you express an interest in obtaining information about us or our Service, take part in surveys, subscribe to marketing, apply for a role with Campaign Center, or otherwise contact us. We may also collect Personal Information from you in person when you attend our events or trade shows, if you visit our offices (where you will be required to register as a visitor and provide us with certain information that may also be shared with our service providers) or via a phone call with one of our sales representatives. You may choose to provide additional

information when you communicate with us or otherwise interact with us, and we may keep copies of any such communications for our records.

The Personal Information we collect may include:

- Business contact information (such as your name, phone number, email address and country);
- Professional information (such as your job title, institution or company);
- Nature of your communication;
- Marketing information (such as your contact preferences); and
- Any information you choose to provide to us when completing any 'free text' boxes in our forms.

(ii) Information we collect automatically through the Campaign Center Sites: When you visit our Campaign Center Sites or interact with our campaigns, we use cookies and similar technologies such as pixels or web beacons, alone or in conjunction with cookies, to collect certain information automatically from your browser or device. In some countries, including countries in the EEA, this information may be considered Personal Information under applicable data protection laws. Our use of cookies and other tracking technologies is discussed more below.

The information we collect automatically includes:

- Device information: such as your IP address, your browser, device information, unique device identifiers and the web browser you used (software used to browse the internet) including its type and language)
- Usage data: such as information about how you interact with our campaigns, Campaign Center Sites, and other websites (such as the pages and files viewed, searches, operating system and system configuration information and date/time stamps associated with your usage).

B. Use of Personal Information

We may use the information we collect through our Campaign Center Sites and in connection with our events and marketing activities (alone or in combination with other data we collect) for a range of reasons in reliance on our legitimate interests, including:

- To provide, operate, optimize, and maintain the Campaign Center Sites.
- For recruitment purposes if you have applied for a role with Campaign Center.
- To respond to your online inquiries and requests, and to provide you with information and access to resources or services that you have requested from us.

- To manage the Campaign Center Sites and system administration and security.
- To manage event registrations and attendance, including sending related communications to you.
- To register visitors to our offices for security reasons and to manage non-disclosure agreements that visitors may be required to sign.
- To improve the navigation and content of the Campaign Center Sites.
- To identify any server problems or other IT or network issues.
- To process transactions and to set up online accounts.
- To compile aggregated statistics about site usage and to better understand the preferences of our Visitors.
- To facilitate the security and continued proper functioning of the Campaign Center Sites.
- To carry out research and development to improve our Campaign Center Sites, products and services.
- To carry out other legitimate business purposes, as well as other lawful purposes, such as data analysis, fraud monitoring and prevention, identifying usage trends and expanding our business activities in reliance on our legitimate interests.
- To cooperate with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Information to protect our rights or is necessary for our legitimate interest in protecting against misuse or abuse of our Campaign Center Sites and Service, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes, or responding to lawful requests.

C. Public Information and Third-Party Websites

- Links to third-party websites. The Campaign Center Sites include links to other websites, whose privacy practices may be different from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

D. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to collect and use Personal Information about you. For further information about the types of cookies and tracking technologies we use, why, and how you can control them, please see our Cookie Statement.

Depending on the country in which you reside, you may have the following data protection rights:

- To access; correct; update; port; delete; restrict or object to our processing of your Personal Information. You can exercise these rights by emailing dpo@campaign-center.
- You may also have the right to complain to a data protection authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority.
- Similarly, if we have collected and processed your Personal Information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

5. General Information

A. How We Share Information

We may share and disclose your Personal to the following types of third parties for the purposes described in this privacy policy (for purposes of this section, "you" and "your" refer to Members, Contacts, and Visitors unless otherwise indicated).

(i) Our service providers: Sometimes, we share your information with our third-party service providers working on our behalf for the purposes described in this privacy policy. For example, companies we've hired to help us provide and support our Service or assist in protecting and securing our systems and services and other business-related functions.

Other examples include analyzing data, hosting data, engaging technical support for our Service, processing payments, and delivering content.

We use Google Captcha API services in connection with our Service to provide security features. As such, you acknowledge and agree that by signing up for an account and using the Service, you are also bound by [Google's Privacy Policy](#). In addition to the rights set forth in Section 2, you may manage your Google Captcha API data by visiting Google's security settings page at <https://security.google.com/settings/security/permissions>

(ii) Any competent law enforcement body, regulatory body, government agency, court or other third party where we believe disclosure is necessary (a) as a matter of applicable law or regulation, (b) to exercise, establish, or defend our legal rights, or (c) to protect your vital interests or those of any other person.

(iii) A potential buyer (and its agents and advisors) in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition. In that event, any acquirer will be subject to our obligations under this privacy policy, including your rights to access and choice. We will notify you of the change either by sending you an email or posting a notice on our Campaign Center Site.

(iv) Any other person with your consent.

B. Legal Basis for Processing Personal Information

If you are located in the EEA or UK, our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it.

However, we will normally collect and use Personal Information from you where the processing is in our legitimate interests and not overridden by your data-protection interests or fundamental rights and freedoms. Our legitimate interests are described in more detail in this privacy policy in the sections above titled "Use of Personal Information", but they typically include improving, maintaining, providing, and enhancing our technology, products, and services; ensuring the security of the Service and our Campaign Center Sites; and supporting our marketing activities.

If you are a Member, we may need the Personal Information to perform a contract with you. In some limited cases, we may also have a legal obligation to collect Personal Information from you. If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not, as well as of the possible consequences if you do not provide your Personal Information.

Where required by law, we will collect Personal Information only where we have your consent to do so.

If you have questions or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided in the "Questions and Concerns" section below.

C. Your Choices and Opt-Outs

All opt-out requests can be made by emailing us using the contact details provided in the "Questions and Concerns" section below. Please note that some communications (such as service messages, account notifications, billing information) are considered transactional and necessary for account management, and Members cannot opt out of these messages unless you cancel your Campaign Center account.

D. Our Security

We take appropriate and reasonable technical and organizational measures designed to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. If you have any questions about the security of your Personal Information, you may contact us at dpo@campaign-center.net.

Campaign Center accounts require a username and password to log in.

Members must keep their username and password secure, and never disclose it to a third party. Because the information in a Member's Campaign Center account is private, account passwords are hashed, which means we cannot see a Member's password. We cannot resend forgotten passwords either. We will only provide Members with instructions on how to reset them.

E. International Transfers

(i) We operate in the European Union

Our servers and offices are located in the European Union, we will not transfer your data to United States.

If you think the information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, we will take reasonable steps to correct that information upon your request. If you find that the information we have is not up to date or is inaccurate or incomplete, please contact us in writing at dpo@campaign-center.net, so we can update our records. We will respond to all requests for correction within a reasonable time.

F. Retention of Data

We retain Personal Information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we'll refer to these criteria in order to determine retention period:

- Whether we have a legal or contractual need to retain the data.
- Whether the data is necessary to provide our Service.
- Whether our Members have the ability to access and delete the data within their Campaign Center accounts.
- Whether our Members would reasonably expect that we would retain the data until they remove it or until their Campaign Center accounts are closed or terminated.

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.

G. Do not Track

Certain state laws require us to indicate whether we honor “Do Not Track” settings in your browser. Campaign Center adheres to the standards set out in this Privacy Policy and does not monitor or follow any Do Not Track browser requests.

H. Changes to this Policy

We may change this privacy policy at any time and from time to time. The most recent version of the privacy policy is reflected by the version date located at the top of this privacy policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this privacy policy or other notice on the Campaign Center Sites. We encourage you to review this privacy policy often to stay informed of changes that may affect you. Our electronically or otherwise properly stored copies of this privacy policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this privacy policy that was in effect on each respective date you visited the Campaign Center Site.

I. Questions & Concerns

If you have any questions or comments, or if you have a concern about the way in which we have handled any privacy matter, please email us at:

dpo@campaign-center.net.