

Privacy Statement

We are Harte Hanks, a global behavioral marketing company based in the United States with operations in Europe and Asia. Through our digital, direct, sampling, fulfillment, and customer care services, we help our clients manage a full consumer experience. And in doing so, we are helping clients shorten the distance between behavior and action. In addition to processing personal information legitimately, ethically, and lawfully, we believe marketing is, and will always be, about establishing trust with individuals and working hard to maintain it. Providing you with a simple, honest description of how we use (or “process”) your information is critical to establishing this trust. We also believe that giving you control over how we use your information is critical to keeping your trust. You have certain rights regarding the information we process about you and can exercise your privacy rights at any time by visiting our [Preferences page](#) or by calling our privacy team toll-free.

Our privacy team is here to help

We have staff dedicated to addressing your privacy inquiries, questions, concerns, requests, and preferences. Our Data Protection Officer is responsible for leading our privacy team and is supported by our business teams across the U.S., Europe, and Asia. If you have any questions or concerns about the ways we use information about you or how you can control information about you, please let us know. While we are committed to addressing your concerns, you can also lodge a complaint with [American](#), [European](#) or [Philippine](#) authorities regarding our use of information about you.

United States	Europe	Asia
<p>privacy@hartehanks.com</p> <p>Phone: +1-800-541-5594</p> <p>Attention: Data Protection Officer</p> <p>2800 Wells Branch Parkway Austin, TX 78728</p>	<p>euprivacy@hartehanks.com</p> <p>Phone: 00441895511010</p> <p>Attention: Compliance Facilitator</p> <p>138 Pacurari Street IDEO Building Iasi, Romania, 700521</p>	<p>apprivacy@hartehanks.com</p> <p>Phone: 180013120025</p> <p>Attention: Compliance Facilitator</p> <p>4th Floor Market! Market! Mall, Fort Bonifacio, Global City Taguig, Philippines 1634</p>

Your privacy rights and how to exercise them

You have certain rights regarding the information we process about you and can exercise your privacy rights at any time by visiting our [Preferences page](#) or by calling our privacy team toll-free. As a marketing services provider, you should understand that most of the information we use about you is considered our client's information. When we use client information, we do so for the client's benefit under a contract as their sub-contractor, also referred to as a data processor or services provider. Client information is different from Harte Hanks information, which is any information we assemble and use for our own purposes and control. When we use information about you that is defined as Harte Hanks information, we do so as a data controller or business.

Your rights when we are a data processor or services provider

We are a *data processor* or *services provider* when we use information about you defined as client information. Client information is provided to us by and is used for the express purpose and benefit of, our clients. When we use client information, we must operate in accordance with strict privacy and security

obligations defined in our client's contract. We are prohibited from using client information for our own purposes, combining it with other information and sharing it with anyone else. If you exercise your rights when we are using client information, we will immediately contact the client who provided us with such information, relay your choices to them and help them address your requests. For the reasons described above, however, we cannot assert your choices and preferences across different clients.

Your rights when we are a data controller or business

We are a *data controller* or *business* when we use information about you defined as Harte Hanks information. You have complete control over information about you that is defined as Harte Hanks information. Visit the [We use information about you to offer our clients data, We use information about you for profiling, advertising and direct marketing purposes, and We use information about you to compile the Behavioral Index](#) sections of this document to learn more about how we use Harte Hanks information.

Verifying your identity in connection with your requests

We take our obligation to secure your data from unauthorized use and disclosure seriously. With the exception of exercising your rights to prevent direct advertisement and marketing solicitations, we need you to provide us with information about you (such as your name, address, phone number, email address and company name) when you submit privacy-related requests. When we receive your requests, we will use the information you provide us to match information about you that we process and facilitate your requests. This matching process helps validate your identity when you exercise your privacy rights. If we are unable to match the information you provide to us with the information we process, it is not likely we are processing information about you. We will let you know that we are unable to process your request further.

Because of these obligations and more, you must submit your privacy requests via our [Preference page](#) or by calling our privacy team toll-free. While you are welcome to contact us, ask questions about or seek help with exercising your rights via email, we cannot facilitate privacy requests solely through email.

Privacy rights common across the markets we serve

The following information summarizes the privacy rights available to individuals across the markets we serve. Just as privacy laws are different across markets, some of these rights may not apply to you directly—especially in relation to the client information we process and use. When we are processing information about individuals, we make every effort to provide everyone with equal privacy rights across the markets we serve. It is our practice that all individuals, whether they exercise their privacy rights or not, be treated equally, fairly and enjoy protection against discriminatory treatment.

When you exercise a privacy right with Harte Hanks, we will treat your request with priority. You should know that some requests require coordination across departments and will take us longer to address than others. Of course, some of your privacy rights and preferences can only be fulfilled when we are processing information about you and we may need to confirm your identity before we can address them. Using the information you provide to us along with your requests, we will confirm your identity by verifying your email address (or mobile telephone number should you choose to provide it) and matching the information you provide against the information we process. We will let you know if we are unable to confirm your identity or match your information against information we process.

The following table summarizes the privacy rights common across the jurisdictions we serve, and how these rights apply within Harte Hanks. We will let you know when this information is relevant to your request.

Common privacy rights	How these rights apply within Harte Hanks
Receive information about how we process personal information	You have the right to be fully informed about our processing of information about you. We work hard to be transparent about our business objectives and the information about you that we process in support of such objectives. We also work to notify you when we acquire or collect information about you and when we use such information for the purpose of communicating with you. In addition, we include choice mechanisms in our disclosures to allow you complete control over the processing of information about you.
Inquire, access, view or obtain a copy of personal information	You have the right to inquire if we process information about you, access or review such information, or even obtain an electronic copy of such information that you can use elsewhere.
Change personal information	You have the right to change your personal information at any time.
Object to the processing of personal information	<p>You have the right to object to our processing of your personal information for purposes of:</p> <ul style="list-style-type: none"> <li data-bbox="581 1770 1117 1797">• Pursuing our legitimate business interests

- Supporting our advertising and direct marketing objectives
- Making automatic decisions concerning you
- Creating or using profiles to make inferences about you
- Licensing or selling information about you to other parties
- Sharing information about you outside your home country or region
- Presenting you with online advertisements based on your location or online behavior

Request the deletion of personal information

You have the right to request we delete information about you.

Not be discriminated against for exercising your rights

You have the right to not be discriminated against for exercising your privacy rights.

Prevent solicitations

You have the right to prevent product and service solicitations from being delivered to you via:

- Email
- Telephone calls
- Direct mail

Request assistance

You have the right to:

- Ask us questions about our processing activities and the processing of information about you
- Request that we help you exercise your rights

- Engage an authorized agent or third party to help facilitate your rights on your behalf

Issue a complaint

regarding the processing of your information

You have the right to issue a complaint about our processing of information about you:

- Through our privacy department
- With a regulator responsible for protecting your privacy and security rights

Restrict the processing of personal information

You have the right to temporarily suspend, or place a legal hold on, our processing of information about you. This right is typically reserved to prevent the deletion of information about you for 90 days and give you time to engage a regulator or other legal representative in preparation of a lawsuit or to pursue legal remedies.

Using authorized agents or other third parties to facilitate your rights

You have the right to engage an authorized agent or a third party to help facilitate privacy rights and preferences on your behalf. When we receive requests from such parties, we are required by law to have those parties help verify your identity and prove you gave them written authorization to act on your behalf. In the event we are unable to verify your identity or the agent is unable to demonstrate that you provided them with written permission to act on your behalf, then we will inform the agent that we are unable to comply with their request. Just like we would ask of you, your agents must submit your privacy requests using our [preference form](#) or by calling our privacy team toll-free.

Records associated with your privacy rights

When you provide us with information about you while exercising your privacy rights, we will only use such information to facilitate your request, remember your choices overtime and demonstrate our efforts to satisfy it. You should know the law requires we create records concerning your privacy-related requests and to make public information about our efforts to comply with such requests. When you submit a privacy-related request, these records will retain information about you. We are responsible for protecting any such information and preventing it from being used for any purpose. Visit our [Privacy in](#)

Action page and select the “Privacy in Action” button to review the information we're required to make public about privacy requests and the amount of time it normally takes us to address them.

An overview of how we use information about you

- We provide our products and services to other businesses:
 - We do not offer our products and services to consumers or to children.
 - We may use information about you that our clients provide to us. We do not own or control such client information.
 - We will use information concerning you, including payment information where required, when you are responsible for facilitating the delivery of our products and services to your company.
- We may assemble and provide to a client information about you:
 - That we have obtained from data aggregators and brokers
 - That we compile through searching publicly available information published on certain websites
 - Following strict guidelines regarding how such information can be used
 - In support of our own or our clients' business, advertising, and marketing purposes
 - Visit [We use information about you to offer clients data](#) to learn more.
- We build and use profiles with information about you using cookies and similar tracking technologies to:
 - Make inferences about you and your company's needs
 - Provide additional content regarding these needs
 - Advertise and market the products and services we believe are relevant to such needs
 - Visit [We use information about you for profiling, advertising and direct marketing purposes](#) to learn more.
- We may assemble information about your behavior, beliefs, sentiments, opinions, and interests in connection with the Behavioral Index:
 - That we obtain from searching information made publicly available on social media platforms and from third party data providers
 - Use to build and analyze profiles of aggregated personal information
 - Necessary to understand and inform strategic business, advertising, and marketing decisions about human behavior
 - Visit [We use information about you to compile the Behavioral Index](#) to learn more.
- We are responsible for ensuring, but cannot guarantee, the privacy and security of information we use about you:

- We use technical and organizational measures to support our privacy and security obligations
 - We regularly review, test, and seek to improve our privacy and security practices
 - Visit [We implement technical and organizational measures to protect information](#) to learn more.
- Other details you should know about our use of information about you
 - We will use information about you to contact you:
 - When you provide such information to us
 - When you submit an inquiry or request
 - When you request that we contact you for any other purpose
 - Unless you tell us not to contact you
 - We support the use of information about you from all over the world, including staff, software, and technologies located in the United States, Europe, and the Philippines.
 - We rely on special contracts, often referred to as Data Transfer Agreements, Standard Contractual Clauses or Model Clauses, to ensure adequate privacy and security protections across different jurisdictions.
 - We will share information about you:
 - With parent, sister, or subsidiary Harte Hanks companies
 - With service providers we retain under a contract
 - To respond to any inquiries or requests you initiate
 - To comply with the law
 - To protect or enforce the rights and safety of Harte Hanks or anyone else
 - In support of a change to our corporate control, such as a merger, acquisition or other sale of our company or assets
 - We store information about you differently based on specific circumstances:
 - For as long as needed to maintain a relationship with our existing client
 - Under specific requirements defined in our contracts
 - In accordance with our legal obligation to establish and maintain business records

We license information about you to our clients

We may assemble, license, and sell to our client information about you that we obtain from automated searches of publicly available information published on certain websites, data aggregators, and data brokers. At any time, you can object to or prevent the sale of information about you for such purposes by visiting our [Preferences page](#) or by calling our privacy team toll-free. Subject to your rights and preferences, information about you collected for these purposes is used by us and our clients:

- To identify new, and cultivate deeper relationships with existing, customers
- To acquire new data
- To enhance or verify existing data
- For analytical purposes in support of legitimate business, advertising, and marketing objectives

Legal basis for using information about you

We use information about you and make it available to our clients under our legitimate business interests. We require our clients to establish their own legal basis to use information about you that we make available to them. At any time, you can at any time stop the use of information about you in this manner.

Where information about you comes from

We obtain information about you from third-party data providers, commonly referenced as data brokers or data aggregators. When working with such parties, we assess their compliance efforts in relation to our intended use of such information. We require all such parties to:

- Collect and process information about you in accordance with applicable law.
- Ensure they made notice available to you regarding the use of your information
- Honor your choices and preferences regarding information about you
- Promise that the information they share with us does not infringe upon your rights or the rights of anyone else

The kinds of information we use about you

We classify information about you used for these purposes into two distinct categories we refer to as **Business to Business** and **Business to U.S. Consumer** information.

- Business to Business includes information about companies and their employees that our clients use to promote their products and services to other businesses. This information describes corporations and businesses from all over the world, and some of this information may be about you if you are an employee responsible for certain information, technology, marketing, purchasing and similar functions within your company. Examples of such information include:

- Organizational details such as company name, affiliates, business address, company phone number, website address, business category, number of employees and annual revenue
 - Contact details for individuals within the organization responsible for specific functions such as the employee's name, job function, job title, gender, company email, company phone number or interests you've expressed to a third-party data provider.
- *Business to U.S. Consumer* includes information about persons and households that our clients use to promote their products and services to consumers located in the United States. This information may describe you, but only if you live in the United States. Examples of such information include:
 - Unique identifiers such as names, postal addresses, email addresses, social media identifiers and phone numbers
 - Demographic attributes such as age, homeownership, marital status, gender, and certain wealth measures
 - Behavior indicators such as brand alliances, communication channel preferences and purchasing habits
 - Interest indicators such as life stage, lifestyle, or activities
 - Property attributes such as the number of adults or children present at an address or automotive details

Notice of our use of information about you

We provide you with notice regarding our use of information about you in accordance with applicable law. The following illustrates the ways we ensure notice is made available to you.

- We require data suppliers to provide you with notice that they share information with other companies, like Harte Hanks, in support of business, advertising and marketing purposes. Before sharing such information, we may request such parties:
 - Provide you with notice of their intent to share such information with us
 - Offer you the ability to object having your information shared with us
- Our privacy disclosures explain how we obtain and use information about you and how you can control our use of such information.
- We may send you an email, provided we have email address and can lawfully send it to you, about our intent to use information about you for these purposes and before we make it available to our clients.
- When using information they obtain from us, we require our clients to also provide you with:

- Notice that they obtain information about you from data providers, like Harte Hanks, in support of their business, advertising and marketing objectives
- Confirmation if they obtained information about you from Harte Hanks
- Our contact information so you can learn more about, or control, our use information about you

Client use of information about you

We license information about you to our clients in support of their business, advertising, and marketing objectives. With respect to information they obtain from us, we require clients:

- Use information about you in accordance with all applicable laws
- Secure such information using appropriate organizational and technical measures
- Conform to the requirements described in the Notice of our use of information about you
- Limit the use of such information for the sole purposes we make it available to them
- Honor your choices and preferences regarding information about you
- Not share such information with others
- Return or destroy such information once their license expires

We also take steps to verify that clients use the information about you received from us in accordance with our standards and requirements. In most instances, we reserve rights to review our clients' direct marketing materials in advance and monitor their use of the information we make available. We prohibit clients from using information about you that they receive from Harte Hanks to:

- Violate applicable law
- Determine your eligibility for employment, insurance, credit worthiness, credit approval, credit standing, credit capacity, manner, or mode of living
- Exclude under-served, under-represented and vulnerable populations
- Advertise, sell, or exchange any adult-oriented products or services involving sexual paraphernalia, drug paraphernalia, adult films, adult recordings or adult magazines, weapons, credit repair services or other illegal or illicit activities
- Send pornographic or sexually explicit content, chain letters, pyramid fundraising solicitations or other similar communications
- Monetize such information as part of any online, digitally targeted advertising campaign without our express consent, including but not limited to online, display, video, digital TV, search, mobile campaigns or other similar digital media measurement or modeling services
- Support individuals who are incarcerated in prison or correctional institutions
- Exceed the scope of the license we grant to them

Profiling information about you

Information we use about you is based on the creation and use of profiles. Simply put within Harte Hanks, a profile describes information about groups of people that match information associated with a defined business, advertising, or marketing objective. Once a profile is defined, we compile a list of individuals whose information matches the kind of information defined under the profile. You can control our use of information about you in such a manner by objecting to information about you being used to create a profile or having decisions made about you using profiles, or by requesting we delete information about you altogether.

Cross-border transfers and sharing of information about you

We support the use of information about you from all over the world, including the use of staff, software and technologies located in the United States, Europe, and the Philippines. In support of all cross-border transfers of information, we rely on special contracts with the recipients of such information to ensure adequate privacy and security of information about you. These contracts are often referred to as Data Transfer Agreements, Standard Contractual Clauses or Model Clauses. You may request that we provide you with information regarding the specific transfers of information about you and certain details related to the contracts governing such transfers. Additionally, we require recipients to adhere to our privacy and security standards, and we remain responsible for their errors and omissions. We may transfer and share information about you with:

- Our clients when under a contract and license agreement
- Other Harte Hanks entities when a client contracts with a different Harte Hanks entity to provide additional services using such information
- Service providers we retain under a contract to facilitate specific business, compliance, marketing, and advertising functions on our behalf

How long we retain information about you

We retain information about you for one year unless you otherwise object to our use of such information or request that it be deleted. In the absence of you controlling our use of such information, we determine the one-year retention timeframe based on the most recent date associated with when:

- We first obtain it
- It is updated by a data provider
- It is used by a client to communicate directly with you

We use information about you for our profiling, advertising, and direct marketing purposes

We use information about you to build and use profiles for our advertising and direct marketing purposes. These profiles help us make inferences about you and your company's needs, inform our decisions to send you and your company information about relevant products and services we offer. We build such profiles and make inferences based on our collection and use of information about:

- Your use of our website, articles, blogs, and similar content
- Advertisements about Harte Hanks you are presented or interact with
- Marketing emails about Harte Hanks products and services you read
- Phone calls about Harte Hanks product and services you receive
- Direct mail and sampling marketing materials sent to you

Legal basis for using information about you

We collect and use information about you in support of our profiling, advertising and direct marketing purposes under our legitimate interests, when you are not affiliated with an existing client, to advertise and market the products and services we offer to other companies. Should you provide it, we may use your information for such purposes with your consent. Finally if you are an employee of an existing Harte Hanks client, we may rely on our contractual relationship to process your information for these purposes. Of course, you may object, or withdraw your consent, to our use of your information for such purposes at any time.

Where information about you comes from

Unless you tell us not to or give us your permission as the case may be, we may collect information about you through the use of cookies and similar tracking technologies associated with your visit to our website, from you should you chose to provide it or from your employer (when your employer is an existing Harte Hanks client). We may also supplement this information with additional information we obtain from publicly available sources of information or data providers.

The kinds of information about you we use

We use the following kinds of information about you and your company for our profiling, advertising, and direct marketing purposes.

- Your connection to our website, such as the unique identifiers associated with the device you are using, unique identifiers assigned by your internet provider, your internet browser, and your operating system
- Your use of our website, such as the pages and content you view and your interactions with website features
- Your efforts to share our content with others, contributions to our blogs, articles or similar content available on social media platforms supporting our business endeavors, such as your social media identifiers and content shared (e.g. - email content, blog posts, likes and tweets)
- Your chat sessions with us and any inquiries or other requests you submit to us, such as any identifying information specific to you facilitating your communication and the nature of your inquiry or request
- Your company's
 - Organizational details such as company name, affiliates, business address, company phone number, website address, business category, number of employees, annual revenue
 - Contact details for individuals within the organization responsible for specific functions such as employee name, job function, job title, gender, company email, social media identifiers or company phone number
- Your willingness to receive, and your responses related to, our direct marketing communications
- Your expressed choices and preferences about our use of information about you and any information provided by you to facilitate such choices and preferences

Notice of our use of information about you

We provide you with notice about our use of information about you in support of our profiling, advertising, and direct marketing purposes. The following describes the ways we ensure notice is made available to you.

- We display a cookie and advertising disclosures about our collection and use of information about you when you visit our website and offer you choices regarding how we use cookies and similar tracking technologies for such purposes.
- We align our practices in accordance with the interest-based advertising principles established by the [Digital Advertising Alliance](#), and respect your choices and preferences regarding any advertising we may display to you based on your browsing history and interests.
- Our privacy disclosures explain how we use information about you for different purposes and how you can control our use of such information.

- We require data suppliers to provide you notice that they share information with other companies, like Harte Hanks, in support of business, advertising and marketing purposes. Before sharing such information, we may request that they:
 - Provide you notice of their intent to share such information with us
 - Offer you the ability to object having your information shared with us
- We ensure that our direct marketing communications provide you with information about our use of information about you and how you can control our use of such information.

Profiling information about you

We create profiles using information about you and compare such information against profiles we create about other individuals to better understand you and your company's needs. In addition, we use profiles to send you and your company information about those needs, as well as any relevant products and services we offer. The following profiling activities do not apply to information about you if you prevent us from using cookies and similar tracking technologies, tell us not build or use profiles in relation to information about you, or otherwise limit our ability to send you direct marketing communications.

- We build a profile of your visit to our website describing:
 - Information about your connection
 - Information about the devices you use to connect
 - The content viewed
 - Predetermined business needs associated with our electronic content
 - Predetermined products and services we offer association with our electronic content
 - Your engagement with electronic content based on the time you spend reviewing it
- We compare your profile against other profiles and lists of:
 - Internet Protocol (or "IP") addresses assigned to companies to associate you with a company
 - Known individuals responsible for specific functions within the company
 - Companies that are current or former Harte Hanks clients
- We share your profile internally with Harte Hanks employees based on:
 - Your identified needs
 - Your level of engagement with our electronic content
 - Our employees' assigned responsibilities for supporting existing clients

- Our employees' assigned responsibilities for developing relationships with new clients based on their specialties supporting:
 - Markets in the United States and abroad
 - Verticals, industries, products, or services
- We use your profile, in accordance with our ability to do so lawfully and your control of how we use information about you, to send you direct marketing communications when you:
 - Identify yourself to us through the chat or contact us features on our website, sign up to receive, or otherwise inquire or request, information about the products and services we provide
 - Are responsible for a specific function, as an employee within your company, which relates to an identified need, product, or service we offer

Cross-border transfers and sharing of information about you

We support the use of information about you from all over the world, including the United States, Europe, and the Philippines. In support of cross-border transfers and our sharing efforts, we rely on special contracts with the recipients of such information to ensure the adequate privacy and security of information about you. These contracts are often referred to as Data Transfer Agreements, Standard Contractual Clauses or Model Clauses. You may request that we provide you with information regarding the specific transfers of information about you and certain details related to the contracts governing such transfers. Additionally, we require recipients to adhere to our privacy and security standards, and we remain responsible for their errors and omissions. We may transfer and share information about you with:

- Other website visitors when you contribute comments to our blogs or articles
- Social media platforms, should you choose to initiate such sharing through features we make available on our website and acknowledge that we do not control the processing of such information
- Other Harte Hanks entities, when we determine your company has a specific need that is best addressed by another Harte Hanks affiliate company
- Service providers we retain under a contract to help facilitate specific business, compliance, marketing, or advertising functions on our behalf

How long we retain information about you

Subject to your control over our use of information about you, we retain such information for different periods based on different factors.

- Our cookies expire after 30 days.

- We retain information about you as a prospective client until you ask us to delete it, limit our ability to process it or we determine it is inaccurate.
- We retain information about you as a client contact for as long you remain a customer; unless our contract with your company ends and requires that we delete it.
- We retain information based on different obligations to establish and maintain other business records required by law.

We use information about you to compile the Behavioral Index

Subject to your privacy choices and preferences, we may assemble information about your behavior, beliefs, sentiments, opinions, and interests in connection with the Behavioral Index. The Behavioral Index refers to reports we create to describe human behavioral trends and inform strategic business, advertising, and marketing decisions. Personal information used in this manner is obtained by searching social media platforms and any information made publicly available by social media account holders. Combined with information describing internet searches, we search social media platforms based on perceived trends of behavior, beliefs, sentiments, opinions, and interests. The resulting information obtained describes publicly available information matching the search criteria and social media account holder who made such information available. We group these search results together to describe a percentage; and create reports which describe or predict the behavior, sentiment, opinion, or interest relevant to the behavioral trend identified. As a general matter, Behavioral Index reports are not created to describe information about, or make decisions concerning, you or any other unique individual. However we may include samples of “posts,” which may identify a social media account holder, as an example of the behavioral trend or prediction relevant to the report. Other than potentially being described as a sample post, we do not retain information about you, your social media account, or social media posts used to produce a Behavioral Index report. We also want you to know that the Behavioral Index report describes trends and predictions that are specific to a point in time. We will retain Behavioral Index reports until we determine the trend or prediction described is no longer reflective of the behaviors, beliefs, sentiments, opinions, or interests relevant to strategic business, advertising, or marketing decisions.

Legal basis for using information about you

We collect and use information about you in support of compiling the Behavioral Index under our legitimate interests to help inform strategic business, advertising, and marketing decisions. You may object to our use of your information for such purposes at any time. You should also consider that any preferences you have regarding your social media accounts, or the use of any information you make publicly available on social platforms, should also be expressed with the social media provider.

Where information about you comes from

We obtain information about you from searching information made publicly available on social media platforms. Our searches are subject to strict contracts, terms and conditions defined by the owners of social media platforms. We also supplement this information with information about your internet

searches and other behavioral data from third-party data providers, commonly referenced as data brokers or data aggregators. When working with third party data providers, we assess their compliance efforts in relation to our intended use of such information. Additionally, we require all such parties to:

- Collect and process information about you in accordance with applicable law.
- Ensure you received notice regarding the use of your information by social media platforms, by internet search engines and by other parties compiling information about your behavior and your rights to limit or prevent such uses of your information.
- Honor your choices and preferences regarding your information before it is made available.
- Promise that the information they share with us does not infringe upon your rights or violate the rights of anyone else.

The kinds of information about you we use

We use the following kinds of information about you in support of building the Behavioral Index.

- Identifiers assigned by a social media platform to or enable a direct communication with you uniquely as social media subscriber, such as your Facebook id, Twitter id or YouTube id).
- Content (posts) you make public on social media platforms attributable to your behavior, beliefs, sentiments, opinions, or interests.

Notice of our use of information about you

We provide you with notice regarding our use of information about you in support of the Behavioral Index in accordance with applicable law. The following illustrates the ways we ensure notice is made available to you.

- We require social media platforms and data suppliers to verify notice has been made available to you regarding the use and sharing your information. Before sharing such information, we may request such parties:
 - Provide you with notice of their intent to share such information with us
 - Offer you the ability to object having your information shared with us
 - Honor any preferences you express to them directly regarding the use of your information
- Our website, advertising and marketing materials describe the Behavioral Index:
 - We provide clear and conspicuous notice on our website about the Behavioral Index.
 - We describe the purposes associated with Behavioral Index and the benefits of understanding human behavior.

- Our privacy disclosures explain how we obtain and use information about you in support of the Behavioral Index:
 - We illustrate the information about you that we process, the purposes for processing such information, and your rights.
 - We remind you that the information we process about you is limited to information you have made public.
 - We illustrate how you can exercise your privacy rights with Harte Hanks.

Profiling information about you

Subject to your expressed privacy choices and preferences, you should know that Behavioral Index reports describe an aggregate profile of behaviors, beliefs, sentiments, opinions, and interests. To create such aggregate profiles, we combine information about your behavior, beliefs, sentiments, opinions, or interests you make publicly available with similar information made publicly available by other individuals. You should know that these “profiling” techniques are not automated; we search, analyze, compile, and prepare each Behavioral Index report as a unique project. We also want you to know that Behavioral Index reports are used to inform general business, advertising, and marketing decisions. The Behavioral Index is not used to inform decisions concerning you or to predict your specific behavior, beliefs, sentiments, opinions, interests, or location.

Cross-border transfers and sharing of information about you

We support the use of information about you in support of the Behavioral Index from all over the world, including the use of staff, software and technologies located in the United States, Europe, and the Philippines. In support of all cross-border transfers of information, we rely on special contracts with the recipients of such information to ensure adequate privacy and security of information about you. These contracts are often referred to as Data Transfer Agreements, Standard Contractual Clauses or Model Clauses. You may request that we provide you with information regarding the specific transfers of information about you and certain details related to the contracts governing such transfers. Additionally, we require recipients to adhere to our privacy and security standards, and we remain responsible for their errors and omissions. We may transfer and share information about you with service providers we retain under a contract to facilitate specific business, compliance, marketing, and advertising functions on our behalf.

How long we retain information about you

Subject to your privacy choices, preferences and control over our use of information about you in connection with the Behavioral Index, we will retain Behavioral Index reports until we determine the trend

or prediction described is no longer reflective of the behaviors, beliefs, sentiments, opinions, or interests relevant to business, advertising, or marketing decisions. Other than being described as sample post within a Behavioral Index report as previously described, we do not retain information about you, social media account holders, or social media posts used to produce each Behavioral Index report.

We implement technical and organizational measures to protect information

We rely on a variety of technical and organizational measures designed to ensure the appropriate governance, processing, privacy, and security of information about you. We have policies and standard operating procedures in place that are applicable to all Harte Hanks processing activities, systems, and suppliers. We also rely on several measures designed to assess and ensure privacy and security before and after processing activities begin. On an annual basis, we hire third-party experts to assess our measures, controls, and practices as a means of further identifying risks and continuously improving. We require that all our employees complete annual training specific to privacy, security, and ethical business practices. We also require additional training for select employees supporting more sensitive kinds of information. We govern the access to information by our employees solely on a need-to-know basis and require they acknowledge and honor their commitment to ensuring the privacy and security of the information they support.

Unfortunately, we cannot guarantee the security of the information we process, our websites, or any other websites connected to our websites that we do not own or operate. It is important for you to protect yourself against unauthorized access to your information by taking simple steps to protect yourself, such as:

- Signing off and logging out when you use shared devices
- Using appropriately complex passwords
- Not sharing your passwords
- Keeping your passwords secure