

Data Partners Inc. Privacy Policy

We did our best to write our Privacy Policy in plain, easy-to-understand, language. However, if there is any part of the policy that you think is unclear or that you would like explained, feel free to contact us. You can email us at info@datapartners.com, write us at Data Partners Inc., 12857 Banyan Creek Drive, Ft. Myers, Florida 33908 or call us toll-free at 866.423.1818.

If you would like to print a hardcopy of our Privacy Policy, [click here](#) to download a .pdf version, or contact us directly, and we will be happy to reply with a printable hardcopy.

I. General Information

This privacy notice discloses the privacy practices for all of the websites below and for Data Partners Inc., a Florida corporation, which is the company who owns and operates these websites:

- www.datapartners.com
- www.brandnewmovers.com
- www.brandnewhomeowners.com
- www.brandnewbusinesses.com

When we say “websites” or “our sites” in this Privacy Policy, we are referring to all of these websites above. When we say “DPI”, “we,” “our,” or “us,” in this Privacy Policy, we are referring to Data Partners Inc.

This Privacy Policy provides useful information on how we use consumer and business data and how you may control information pertaining to you. This Privacy Policy applies to information collected by our websites as well as to the information buying and selling practices of DPI. It notifies you of the following:

- What personally identifiable information is collected from you through our websites, how it is used and with whom it may be shared.
- What personally identifiable information we license from third-party providers and/or relicense to our clients.
- What choices are available to you regarding the use of your data.
- The security protections in place to protect the misuse of your information.

II. CALIFORNIA RESIDENTS – SPECIAL ADVISORY

In order to comply with the California Consumer Privacy Act of 2018, we have dedicated a special subsection of our Privacy Policy that applies only to California residents.

[California residents should click HERE to review it.](#)

We encourage California residents to also review all the other sections of our Privacy Policy below since those sections also apply to California residents to the extent they are not contradicted by the California-specific subsection.

III. Information Collection and Use

A. Information Collected Directly by Us

DPI is the sole owner of the information collected through our websites or directly by our company representatives. We only have access to/collect information that you voluntarily give us via email, contact form, or other direct contact initiated by you. We may gather your name, address, email address, telephone number, IP Address, and/or Mobile Device ID in your voluntary use of our websites or when you contact our representatives.

We will use your information to respond to you, regarding the reason you contacted us, and for appropriate follow-up. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request, e.g. to ship an order, or as a means to enhance our communications with you (like via an email provider). This information is used solely to help us better communicate directly with you. **We do not sell or rent this information to anyone.**

Unless you specifically ask us not to, we may contact you via telephone, email, text message, or online display in the future to tell you about specials, new products or services, or changes to this privacy policy. If you do not wish us to contact you any further, please see the Opt Out section below on how to unsubscribe from our communications.

B. Information We License from Third-Parties

Our core business is relicensing consumer and business information to help our clients market their products and services more effectively. The products we sell contain information on individuals and households that we license from third-parties. The information we license is collected by these third parties from many sources. These sources include public records, publicly available information, subscriptions, warranty cards, surveys, point-of-sale information, website visits, online activity, mobile applications, and commercially available data from other information providers who may or may not have collected the data directly from you.

Some of this information may have been developed, modeled, or inferred from other information. For example, if you subscribe to a bridal magazine or subscribe to a bridal registry service, you might be designated as “recently engaged” (i.e. we “infer” from this activity that you are engaged) even if we do not have actual information that you are engaged. Or, the provider of information might make an educated guess on your net worth, based on lookalike characteristics we find in other consumers in that net worth range (i.e., we “model” your net worth). Both inferring and modeling are common practices in trying to match consumers with products and services they are most likely to want.

Identifiers such as name, address, and telephone numbers are sourced from publicly accessible sources such as the white and yellow page telephone directories, online directories, website postings, public records, public websites, property and assessor files, governmental issued licenses, and information available to the public through directory assistance.

C. What We Do with Information We License from Third-Parties

Our clients are small, medium, and large businesses, non-profit organizations, government agencies, and political organizations who want to market to consumers. Our clients use our products to enhance their marketing efforts and better align their products and services with consumer wants and needs.

Examples of the types of information we license for use in marketing are general contact information (like consumer and business names, titles, addresses, telephone numbers); consumer demographics (like age, gender, income, marital status, home value, net worth etc.); household makeup (like number of adults or presence of children); consumer buying behavior (like owning a boat, or buying pet toys); consumer interests (like an interest in golf); telecommunications characteristics (like whether you have a satellite dish or high-speed internet service); business firmographics (sales volume, number of employees, years in business, etc.); and life-event triggers (a recent move, purchase of a home, or recent marriage).

Our products are sometimes used by us (on behalf of our clients) or by our clients directly to draw inferences about consumers or develop predictive models. These predictions are used to make educated guesses about consumer preferences and future buying behavior and enable our clients to deliver marketing messages to the consumers who are most likely to want to receive them.

We may sometimes match different elements of information or points of contact together to help our clients engage in “multichannel” marketing. For example, a client with a list of telephone numbers of their customers may wish to add email addresses and mailing addresses to their list so they can reach their customers via email and direct mail. We may also use anonymized (hashed) versions of our information to match our products to our client’s files.

Ultimately, our goal is to help our clients ensure their marketing messages reach consumers who are most likely to want to receive them, and avoid consumers who don’t. Practically speaking, our clients use our products to send targeted offers to consumers and businesses via various marketing channels (direct mail, telemarketing, digital ads, social media ads, mobile ads, etc.).

The explanation and examples above are intended to give you a good idea of the major categories of information we maintain and most of the ways we use that information. However, it is not intended to be an exhaustive list of all the information we maintain and all the ways that information might be used.

D. Limitations

Our clients are permitted to use the information we provide for a limited purpose. Our clients may use our data only for lawfully conducted marketing or for things related to marketing (such as cleaning their customer lists or verification of data they already have). No other purpose is allowed.

This means that our clients are prohibited from using our data for any purpose or in any way that might violate any U.S. federal or state laws that protects your privacy or consumer rights. Among those are the CAN-SPAM Act (intended to reduce unwanted email solicitations); the Telephone Consumer Protection Act of 1991 (intended to reduce unwanted telephone solicitations) as well as the privacy and best practice policies set out by the Data and Marketing Association (“DMA”).

We do not provide personal information on any person under 18 years old. We may identify households with children present (with or without age ranges) or consumer activity that may indicate the presence of a child (such as purchasing toys), but no personally identifiable information regarding minors is ever kept by us or provided by us.

E. Information we Do **NOT** Collect, Use, or Sell

We do not collect, store, or use personal information that falls into any of the following categories, either directly on our sites or from third-party data providers, nor do we ever sell this information to our clients:

- personal signatures (other than in regard to agreements we may sign with our clients)
- credit card numbers or debit card numbers (other than to process purchases made by our clients)
- social security numbers
- passport numbers
- national ID numbers
- drivers’ license numbers
- state ID card numbers
- military ID numbers
- insurance policy numbers
- bank account numbers
- financial account numbers (other than to process purchases made by our clients)
- facial recognition data
- physical characteristics or descriptions
- exact dates of birth
- citizenship
- actual credit scores
- actual medical conditions
- actual physical or mental disabilities
- gender identity or expression other than birth gender
- sexual orientation
- audio information (except for our clients who may call us directly)
- video information
- genetic information (including familial genetic information)
- online account usernames or passwords (other than those we issue for access to our sites)

- internet browsing or search history, or
- any personally identifiable information regarding any person under 18 years of age.

IV. Your Access to and Control Over Information

We believe that consumers should ultimately be in control of their information. Accordingly, you may exercise control over your information as follows:

A. Communications Sent by Us to You:

Opt Out: All email offers for goods and services sent to you by us include an opportunity to opt-out from receiving future communications from us about our services. Simply follow the “Opt Out” instructions included in the email message.

Mailing List Removal: If you wish to no longer receive any emails from us, send an email the subject heading “REMOVE ME” to: unsubscribe@datapartners.com. Be sure that the email list from which you wish to be removed is a list maintained by us. We cannot remove you from any list that we do not maintain.

Correct/Update: You may modify information previously provided to us by sending an email to info@datapartners.com.

B. Third-Party Information We License

You may opt out of any consumer marketing database we maintain by sending an email to optout@datapartners.com. You will need to provide your full name and any variants of your name (Robert Smith, Bob Smith, Bobby Smith, etc.), your current full address, and your telephone number(s) so that we can identify your record(s). We recommend that you also supply any previous addresses so we can be sure to opt those out as well.

Your request will be processed as soon as possible, but may take up to twenty (20) business days. If you are a third-party attempting to opt-out another person, you must provide evidence of legally sufficient authorization before we will opt the other person out.

Alternatively, you can call us toll-free at 866.423.1818 and provide the information above if you wish to opt-out by telephone.

If you choose to opt out of our consumer database(s), we will stop licensing your information to any of our clients. Please understand that opting out of our databases:

- Does NOT mean we will delete or destroy information pertaining to you. Instead, we flag your record as an “Opt Out” that will not be delivered to any of our clients. We preserve your data so that we can show continuing compliance with your opt-out request.

- Does NOT mean that any of our clients or providers will also opt you out of their databases. We can promise only that we will opt you out of our databases, and will no longer use your information to help our clients target their marketing messages.
- Does NOT guarantee you will no longer receive marketing messages. We can only opt you out from databases that we maintain. Your information may appear on databases maintained by companies other than ours.

C. Other Sources for Opt-Out Information

The websites listed below are NOT maintained or affiliated with us in any way. We are providing these links only as convenient information on how you can better regulate your preferences on marketing materials you receive.

Source	Link
Data & Marketing Association's consumer choice portal for both direct mail and email opt-outs	www.dmchoice.org
The federal National Do-Not-Call Registry	www.donotcall.gov
A listing of state-specific do-not-call registries	https://thedma.org/resources/compliance-resources/do-not-call-lists/
The DMA's Email Preference Service	https://www.ims-dm.com/cgi/offemaillist.php
Opting out of Prescreened Credit Offers	www.optoutprescreen.com
Opting out of interest-based targeting cookies	http://optout.networkadvertising.org
Opting out of interest-based targeting cookies	http://www.aboutads.info/choice

D. Non-Discrimination

We do NOT discriminate in any way against any consumer who chooses to opt out of one or more of our databases. We offer no financial benefit, service difference, reward, or other incentive to you for disclosing information to us or allowing us to share your information, nor do we penalize you in any way for choosing to opt out. How and whether we use your personal information is entirely up to you.

V. Security

We take commercially reasonable precautions to protect the information we house. Steps we may use to protect the information we house may include physical restrictions, intrusion alarms, electronic monitoring, firewall protections, security logs, encryption of data, and access controls. As part of these security protections, we regularly do all of the following:

- review the hardware and software connected to our network;
- implement security settings on key systems;
- limit user and administrator privileges;
- patch software and firmware to stay current;
- secure critical hardware and data assets at appropriate levels;
- utilize software and/or hardware to defend against viruses, malware, and intrusions;
- block vulnerable access points;
- provide security training to our employees who have access to the network;
- monitor accounts and network audit logs;
- test our defenses; and
- review our plan to respond to security incidents.

Whenever we collect sensitive information (such as credit card data) from our clients online, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser, or looking for “https” at the beginning of the address of the web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are always kept in a secure environment that is not accessible to the public or third parties.

We may house certain information outside of our facility. Anytime information is housed outside of our facility, it is kept in a secure environment that meets or exceeds the standards for security that we use at our own facility, and we only use service providers who promise us by contract to keep our information safe and secure on networks that meet industry standards for security.

VI. Requests for Information and Correspondence

If you fill out our online submission form to obtain more information from us regarding one of our products or services, you must submit information on how we may contact you such as your name, business name, title, address, telephone number and/or email address. If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses and contact you regarding the subject matter of your inquiry. We will retain any information you submit so that we may more effectively communicate with you in the future.

Information that you submit to induce us to contact you is never sold or rented to third parties.

VII. Orders

We request information from you on our order forms and agreements. Like any vendor, to buy from us, you must provide contact information (like your name, business name, and address) and sometimes financial information (like credit card number and/or expiration date). All information you submit on an

order form is used for billing purposes and to fill your orders only. It will never be sold, rented, or disclosed to third parties, except as necessary to complete the transaction (e.g., providing your credit card number to a payment processor). If we need to contact you regarding an order, we will use this information to contact you.

VIII. Cookies

We may use “cookies” on this site. A cookie is a piece of data stored on a site visitor’s computer to help us improve your access to our site and identify repeat visitors to our site. For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving you time when visiting our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our site. Usage of a cookie is in no way linked to any personally identifiable information on our site and it is never sold, rented to, or accessible by third parties.

IX. Sharing Information

A. Information You Send to Us

Except for the limited situations described below, **we never share, sell, or rent information you send directly to us with third parties.**

- We use a credit card processing company to bill users for goods and services. These companies do not retain, share, store or use personally identifiable information for any secondary purposes beyond fulfilling your order.
- We may partner with a third party to provide specific services to our clients. In that event, we will share names, or other contact information that is necessary for the third party to provide these services to that client. These third parties are not allowed to use personally identifiable information except for the purpose of providing the services we have authorized.
- If Data Partners Inc. is acquired, our user information may be among the assets transferred to the buyer in the sale.

B. Information We License from Third-Parties

Information about you that we license from third-parties is shared with our clients who re-license that information from us. For example, our client may request a list of names and addresses of consumers who recently moved into neighborhoods near their store locations.

As stated above, any sharing of your information with third parties is limited exclusively for purposes of lawful marketing, such as mailing you offers for goods and services. No other purpose is permitted.

X. Links

Our websites may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

Some of our linkage sites make chat rooms, forums, message boards, and/or newsgroups available to their users. Please remember that any information that is disclosed in these areas, in some cases, becomes public information and you should exercise caution when deciding to disclose your personal information on these other sites.

XI. Surveys & Contests

From time-to-time our websites may request information via surveys or contests. Participation in these surveys or contests is completely voluntary and you may choose whether or not to participate and disclose this information. Information required may include contact information (such as name and shipping address), and demographic information (such as zip code, age level). Contact information will be used to notify the winners and award prizes. Survey responses will be used for purposes of improving client satisfaction or development of new products and services.

XII. Minors

Persons under 18 are prohibited from submitting any personally identifiable information to us including name, mailing address, telephone number, or email address. Users who submit information to us warrant (by acknowledging having read our Privacy Policy) that they are age 18 or older. If you are under age 18, you are permitted to view our public website only. If we learn that personal information of a person under 18 has been submitted to us, we will delete that information from our systems immediately. Protection of young children is particularly important to us. Accordingly, consistent with the Federal Children's Online Privacy Protection Act of 1998 (COPPA), we will never knowingly request, collect, or maintain personally identifiable information from anyone under the age of 13, and no portion of our website is structured or intended to attract anyone under age 13.

XIII. Legal Compliance

We may disclose your personal information when required by law or in the good-faith belief that such action is necessary in order to conform to federal, state, or local laws or regulations, or to comply with a court order, an investigation by law enforcement, or when legal process served on us.

XIV. Log Files

We may record log files in regard to visits to our websites. The information we log may include your internet protocol (IP) address, browser type, referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the website, track users' movements in the aggregate,

and gather broad demographic information for aggregate use. None of this information, including IP addresses, are linked to personally identifiable information, and this information is never sold or rented to third parties.

XV. Consent

By using this site, you consent to the collection and use of your information consistent with this Privacy Policy.

XVI. Revisions

We may change our Privacy Policy in the future in order to adjust to changes in the law or best practices. We recommend that you check it frequently.

Current Version: 1.0

Last Reviewed: 11/13/2019

Last Updated: 11/13/2019

XVII. Contact Us

If you have any questions about our Privacy Policy, this site, or the practices of Data Partners Inc., you can email us at info@datapartners.com, write us at Data Partners Inc., 12857 Banyan Creek Drive, Ft. Myers, Florida 33908 or call us toll-free at 866.423.1818.