

Introduction

LMSYS, LLC., DBA CampaignBuddy, and its affiliates (collectively, “CampaignBuddy”, “we,” “us,” “our”) are committed to protecting the privacy of our users, customers and visitors (collectively, “you”) when using CampaignBuddy’s website, mobile application, or accounts that CampaignBuddy operates on social media sites, and any other online interactions you may have with CampaignBuddy.

We collect, use, and share information from or about you in accordance with the CampaignBuddy Privacy Notice which provides information regarding the use and sharing of your information.

Privacy Notice

Personal Information and Personal Data are terms used in this privacy notice, both of which refer to any information relating to an identified or identifiable individual. CampaignBuddy is committed to protecting your privacy and ensuring that your Personal Information is treated securely and will be collected, used, stored and disclosed in accordance with this notice. This includes, in relation to a customer or prospective or former customer of CampaignBuddy (including individuals who maintain a card with one of our financial institution clients), any sole trader and any principals, including the managing and financial directors, any other directors and officers, shareholders, partners and beneficial owners of a customer as well as any member of staff accessing or using the CampaignBuddy Services on behalf of a customer.

This notice (together with CampaignBuddy’s terms of use and any other documents referred to on it) sets out the basis on which any Personal Information CampaignBuddy collect from you, or that you provide to CampaignBuddy, will be processed. Please read the following carefully to understand CampaignBuddy’s views and practices regarding your Personal Information and how CampaignBuddy will treat it. By accessing and using CampaignBuddy Services, including CampaignBuddy’s interactions with you via our websites, mobile sites and applications (“**Sites and Services**”), you agree to the collection, use and transfer of your information as set out in this privacy notice.

Together these are referred to in this notice as “**CampaignBuddy Services**”. When CampaignBuddy use the word ‘card’ in this notice, it applies to all payment methods and types and not simply those involving a physical card; and use of the term ‘cardholder’ applies to any shopper or individual whose payment transactions may be processed.

Data Protection Officer contact details

CampaignBuddy is based in St. Paul, Minnesota, the United States. CampaignBuddy has appointed a Data Protection Officer for you to contact if you have any questions or concerns about CampaignBuddy’s Personal Information policies or practices. CampaignBuddy’s Data Protection Officer and contact information are as follows:

Data Protection Officer

CampaignBuddy
PO Box 16578
St Paul, Minnesota, 55116

What Personal Information Does CampaignBuddy collect, use and process?

CampaignBuddy collects, records, stores and processes Personal Information relating to users and subscription holders or merchants, campaign suppliers, IT professionals and programmers and other business partners for legal, regulatory, law enforcement, credit risk, security, marketing and customer service/account management purposes. CampaignBuddy may collect Personal Information from various sources, including:

- Information you voluntarily provide;
- Information automatically collected when you use our Sites and Services, including information used to process payments;
- Account information from social media accounts and other platforms, including analytics, traffic information and other data related to site or account traffic;
- Information collected by cookies and other tracking technologies when you use our Sites; and
- Information collected from third parties, including fraud monitoring providers, and commercial databases or providers.

This Personal Information may include:

- **Contact information**, including: name (first, family and business), telephone numbers, address (home, billing and business), fax, email address and other communications, including; information about you and your use of CampaignBuddy Services when you open messages from CampaignBuddy and from the use of electronic identifiers. For example, Internet Protocol (IP) addresses;
- **Demographic information**, including: nationality, country of residence, data of birth, marital status, birth place, gender, preferred language, citizenship;
- **National Identification information**, such as: national insurance number, passport, social security number, taxpayer identification number, driver's license information, or other forms of identification which verify the user or subscriber;
- **Monitoring or Recording**, including: monitoring or recording telephone calls, emails, web chats, CCTV, access control or other communications with you;
- **Merchant or User identification**, such as the user, merchant or customer ID;
- **Merchant or User management**, including contact and billing information, invoices, receipts, cancellation notices, transaction history, reconciliations and reporting;
- **Information related to campaigns**, including content, deliverables, third party affiliates, communications, and campaign analytics;
- **Payment transaction information**, including: Alternative Payment Methods ("APMs"), transaction monitoring, fraud monitoring, products/services, trend analysis, analytics;
- **Financial and credit card information**, including: PAN or account number, card expiration date, CVC numbers, and banking information;

- **Credit risk information**, including information obtained about you from credit reference or fraud prevention agencies, credit history, credit score, fraud monitoring;
- **Technical information**, including the Internet protocol (IP) address used to connect your computer or device to the Internet, your device ID, login information (username/password), browser type and version, time zone setting, browser plug-in types and versions, device operating system platform, mobile carrier, location or GPS/geo-location;
- **Tax information**, including TIN, EIN, W-4 form information, and any other information necessary and required for tax reporting and compliance;
- **Information about your subscription use**, including the full Uniform Resource Locators (URL) clickstream to, through and from CampaignBuddy's site (including date and time), campaigns or services you requested, viewed, declined, or utilized, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to browse away from the site page, any contact information or link used to facilitate CampaignBuddy's services;
- **Public information**, including information accessible in comments, reviews, ratings and opinions, and used by CampaignBuddy, through Internet searches or posted on social networking sites such as Facebook, Google, Yelp and LinkedIn;
- **Insights** gained through CampaignBuddy campaigns on an anonymized basis from your website interactions;
- **Social media posts** on CampaignBuddy social media sites or made publicly about CampaignBuddy on social media; and
- **Applications information**, including applications used to interact with CampaignBuddy, information about your location, your device or the server you are using during interactions or transactions using CampaignBuddy.

User Contributions: You may provide information to be published or displayed on public areas of the Site and/or Services, or transmitted to other users of the Site and/or Services (collectively, "User Contributions"). Your User Contributions are posted and transmitted to others at your own risk. We cannot control the actions of other users of the Site with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Lead Data: You have the option of using the CampaignBuddy platform to build forms and solicit information from individual data subjects ("Lead Data") in the CampaignBuddy Marketplace. In these situations, since you choose which data to collect and process, the nature of the data, as well as the purposes and means of processing, you are acting as "Data Controller" under applicable laws (including, but not limited to, the General Data Protection Regulation ("GDPR")) and you have the associated responsibilities under these applicable laws.

By maintaining an Account with us, you voluntarily consent to the collection, storage, use, and disclosure of Personal Data as specified in this Privacy Policy. Without limiting the foregoing, we may on occasion ask you to consent when we collect, store, use, or disclose your Personal Data in specific circumstances. These circumstances may include, but are not limited to, Trial Programs, Beta Tests, research and development, and other changes, updates, or additions to the Services.

How and Why does CampaignBuddy use your Personal Information?

The Personal Information CampaignBuddy uses are related to the following six primary business purposes: process related to its main processing activities, which include:

- **Account Management**
- **Campaigns Management**
- **Operations**
- **Risk Management**
- **Marketing**
- **Product Development**

CampaignBuddy may disclose your Personal Information to third parties for the following other purposes:

- **Legal or regulatory purposes**
- **Business purposes**
- **Suppliers or third-party affiliates who assist in creating campaigns and providing services**

CampaignBuddy uses and processes your Personal Information for purposes that assist users and customers in creating effective and appropriate marketing campaigns, but also for appropriate and legitimate purposes authorized by law. The following of a summary of the primary ways your Personal Information may be used and processed.

Customer Services and Account Management

- To enable you to contact us;
- For training purposes;
- For establish commercial merchant accounts;
- To allow you to subscribe to or register for CampaignBuddy's service;
- To process payment for subscription or web-based services;
- To notify you of service deliverables or changes to CampaignBuddy services or policies;
- For maintaining internal recordkeeping and reporting;
- To enable you to upload user business and campaign information;
- To manage, investigate and resolve complaints;
- To allow you access to campaign tools;
- To manage your services and payment.

Creating User Campaigns

- To allow you to participate in interactive features of CampaignBuddy's service;
- To allow you to contact us;
- To allow you to enter or upload campaign information;

- To manage CampaignBuddy campaigns;
- To solicit third parties for content and campaign creation;
- For marketing or market research;
- Performing analysis and comparisons;
- Creating profiles and marketing opportunities;
- Promotional materials for future campaigns or events;
- Social media site integration and interaction;
- To deliver or provide you with information, products or services you requested;
- To notify you about important changes or developments to CampaignBuddy's website or CampaignBuddy's goods and services;
- To improve and develop CampaignBuddy's business;
- To provide or develop more innovative and effective CampaignBuddy services for our merchants or other customers;
- When CampaignBuddy communicates with you or each other;
- To enable you to take advantage of special offers or opportunities;
- To optimize CampaignBuddy's websites/portals, products and services;
- For commercial purposes, such as trend analysis and the use of data analytics to obtain learnings and insight around user experience;
- To analyze deliverables to better improve your experience and results;
- To improve CampaignBuddy's site and ensure content presented in effective way;
- To enable you to participate in discussion boards or other social media functions on CampaignBuddy's site; and
- Obtain your views on goods, services and CampaignBuddy's website(s);
- Maintaining internal recordkeeping and reporting.

Product Development

- Provide or develop more innovative and effective methods and services;
- Maintain internal recordkeeping and reporting;
- Commercial purposes, such as trend analysis and the use of data analytics to obtain learnings and insight around cardholder transaction patterns and usage; and
- Better understand user interactions to improve product or user experience.

Security and Fraud Monitoring

- For conducting internal due diligence checks;
- To allow us to administer CampaignBuddy's processes for internal operations, including troubleshooting;
- To assure CampaignBuddy's operations safe and secure;
- For internal recordkeeping and reporting purposes;
- To allow for identifying and monitoring for fraud;
- To monitor transactions to prevent security breaches or fraud;

Credit Risk Purposes

- For conducting internal due diligence checks;
- To allow CampaignBuddy to check credit status/profile and identity;

- To monitor and track transaction details;
- For internal recordkeeping and reporting purposes;
- To allow for identifying and monitoring for fraud;
- To monitor transactions to prevent security breaches or fraud;

Legal Purposes

- To assure compliance with local and national laws and cooperate with law enforcement and regulatory authorities;
- To assure compliance with local and national tax laws and cooperate with law enforcement and regulatory authorities;
- To enforce our legal rights and satisfy any user legal obligations, including without limitation any reporting or disclosure obligations under applicable law or regulations or subpoena, court order or other judicial or administrative process, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property or safety of others;
- For conducting internal due diligence checks;
- To prevent, detect and prosecute fraud or crime or to assist others in doing so;
- To assure compliance with any service or legal obligations between you and CampaignBuddy;
- To manage and enforce CampaignBuddy's rights, terms of use or any other contracts with you and your business;
- For assessing financial and insurance risks;
- To notify you about important changes or developments to CampaignBuddy's website or CampaignBuddy's goods and services;
- To recover debt or in relation to your insolvency, including tracing your whereabouts.

Analytics

CampaignBuddy may use analytical tools such as "Google Analytics" or "Adobe Analytics" to collect non-personal information about use of our sites. They are used collect information such as the frequency of website use, navigation, interactions, or other sites used prior to using the CampaignBuddy site. This information is used strictly to improve our services and the campaigns created on your behalf and collect only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information. You can prevent Google Analytics and Adobe Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

Children and Minors

CampaignBuddy respects the privacy of children and encourages parents to supervise their children's computer usage. We do not intentionally or knowingly collect or retain Personal Information from individuals or children under the age of 18. To learn more about the Children's Online Privacy Protect Act (COPPA) please visit the Federal Trade Commission's website at <http://www.business.ftc.gov/privacy-and-security/children's-privacy>.

Cookies and Technologies

CampaignBuddy’s websites and mobile applications (and some emails) use “cookies” and other technologies to store small amounts of information on your computer or device, allowing certain information from your web browser to be collected.

Information collected by cookies and similar technologies are treated as non-Personal Information. To the extent that Internet Protocol (IP) addresses (or similar identifiers) are clearly defined to be Personal Information by law that is applicable to CampaignBuddy services, CampaignBuddy will manage those identifiers as Personal Information.

Cookies and similar technologies are widely used on the internet and allow a CampaignBuddy to recognize a user’s device or computer without uniquely identifying the individual person using the device or computer. The technologies help make it easier for you to log on and use the site. CampaignBuddy may use the aggregate information from these cookies and technologies to research and understand how the Sites and Services are used and can be improved.

You be able to configure your browser not to accept cookies, although please note this may affect your ability to use the services CampaignBuddy provides or to subscribe to or unsubscribe from the services.

CampaignBuddy may offer certain features that are only available if the user agrees to the use of tracking technologies. You will be notified or prompted if such tracking applies to your services.

Temporary cookies are used to enable you to navigate our websites and use their features. These are deleted when you close your browser. IP addresses are used with cookies to “remembering” computers or other devices used to access our websites.

CampaignBuddy uses analytical and performance cookies which collect anonymous information about how users interact using CampaignBuddy. They allow us to analyze information related to visitor counts, search terms, and user interaction on our website or application. This information is based on visitor’s IP address, and we cannot view unique individual activity tied to a single person.

Your consent

By using our websites, mobile sites and mobile apps you accept the use of cookies in accordance with this cookie policy and the use of cookies stated here or any alternate policy provided by the specific site or app. This policy applies in addition to any other Terms of Use or contract provision for the particular CampaignBuddy service being used. If you do not accept the use of cookies, please disable them as explained below or in any other notice provided to you when you visit a CampaignBuddy website or download a CampaignBuddy app.

Links to third party sites and public posting

CampaignBuddy’s websites may also contain links to and from the websites of users, partner networks, advertisers and affiliates. These websites have and maintain their own privacy and

cookie policies and CampaignBuddy does not accept or assume any responsibility or liability for use of interactions with these third-party websites. If you follow such a link or if you post information or content, such as commenting on content or participating in online forums or communities, or when you interact with our websites through social media sites, plug-ins or other applications, depending on your privacy settings, this information may become public on the Internet. CampaignBuddy does not have control of these third-party websites and any link on the CampaignBuddy site does not constitute a partnership or endorsement of those websites.

How CampaignBuddy Secures your Personal Information

CampaignBuddy has in place technical and administration measures designed to assure your Personal Information is protected from data breaches, loss, and unauthorized access, use, alteration or disclosure. By submitting Personal Information, you agree to transfer, storing and processing by CampaignBuddy.

CampaignBuddy will take reasonable steps to ensure that your Personal Information is treated securely and in accordance with this privacy notice. However, securing your information requires you take measures to assure protections from breaches of data using your device or computer.

Any CampaignBuddy password or access code which enables you to access certain parts of CampaignBuddy's websites/portals or mobile applications must be kept confidential and should not be shared with anyone. Use is restricted to the individual user and all precautions must be taken to maintain the user's security for the website. You therefore authorize CampaignBuddy to act upon instructions and information received from any person that enters your user password or access code and you agree to be fully responsible for all use and any actions that may take place during the use of your account. You also agree to promptly notify CampaignBuddy of any information you have provided which has changed.

CampaignBuddy will take reasonable steps to protect your Personal Information, CampaignBuddy but cannot guarantee the security of data you transmit to CampaignBuddy's site; therefore, any transmission is at your own risk.

CampaignBuddy maintains security standards that are designed to protect your information as it is transmitted from your device or computer using Secure Socket Layer (SSL) technology. SSL is a security protocol for data transfer on the Internet and helps to protect the safety and confidentiality of your information.

How long does CampaignBuddy store and retain your Personal Information?

CampaignBuddy will store your Personal Information only as long as necessary to achieve the purposes for which it was collected. However, retention periods for transactions and other data categories may vary, depending on your interaction and requests and our obligations.

Changes and updates to the privacy notice

CampaignBuddy may make changes to this privacy notice periodically. If any material changes are made CampaignBuddy, you will be notified through this Privacy Notice on this website/portal. You are responsible for ensuring you periodically visit this websites/portals and privacy notice to check for any changes. By continuing to use CampaignBuddy Sites and Services, you agree to the changes in this Privacy Notice.

This Privacy Notice is not intended to override any legal rights in any territory where such rights prevail. In such event, the rights and obligations set out in this notice will apply, subject only to amendment under any applicable local law having precedence.

Any questions?

All comments, queries and requests relating to CampaignBuddy's use of your data are welcomed if you should wish to exercise any of your rights or receive further information as to which applicable CampaignBuddy group companies to which this notice applies. Please contact CampaignBuddy's Data Protection Officer:

Data Protection Officer

CampaignBuddy
PO Box 16578
St Paul, Minnesota, 55116

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CampaignBuddy uses analytical and performance cookies which collect anonymous information about how users interact using CampaignBuddy. They allow us to analyze information related to visitor counts, search terms, and user interaction on our website or application. This information is based on visitor's IP address, and we cannot view unique individual activity tied to a single person.

Your consent

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We use cookies to offer you a better browsing experience, analyze site traffic, personalize content, and serve targeted advertisements. If you continue to use this site, you consent to our use of cookies.