

# Return Path Corporate Privacy Policy

Effective Date: November 17, 2014

## Introduction

We know that your privacy is important to you. At Return Path, Inc. (“Return Path”, “Company”, “We”, “Us” or “Our”), we’re committed to helping you understand how we manage and protect it. We take privacy seriously, and have taken many steps to help safeguard the information we collect and manage for you.

This privacy policy (“Privacy Policy”) is provided to inform you of our policies and practices and of the choices you can make about the way your information is collected and how that information is used.

If you have questions or concerns regarding this policy, you may contact the Return Path Privacy Office using this [simple online form](#).

Our privacy policy will tell you about:

- The Organization Collecting Information at this Website
- The Information we Collect and Use
- Retention of Personal Information
- Information Sharing and Disclosure
- Communications From the Site
- Choice/Opt-out
- Security and Information Protection
- Privacy Policy for Children
- Changes to this Policy

Thank you for visiting our websites and using our products and services.

Sincerely,  
Matt Blumberg, CEO

## TRUSTe Program and Scope



Return Path, Inc. has received TRUSTe's Privacy Seal signifying that this Privacy Policy and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal. The TRUSTe certification does not

cover information that may be collected through downloadable software. The TRUSTe certification covers only our collection, use and disclosure of information we collect through our website [www.returnpath.com](http://www.returnpath.com) and our service platform. The use of information collected through our service shall be limited to the purpose of providing the service for which the Client has engaged Return Path.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact [TRUSTe here](#).

## **E.U. and Swiss Safe Harbor**

Return Path, Inc. complies with the U.S. – E.U. Safe Harbor framework and the U.S. – Swiss Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Return Path, Inc. has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Return Path, Inc.’s certification, please visit <http://www.export.gov/safeharbor/>

## **The Organization Collecting Information at this Website**

[Return Path](#) owns and operates the website located at [www.returnpath.com](http://www.returnpath.com) (the “Site”). Return Path collects information about you when you sign-up for newsletters, special promotions, or initiate requests for information regarding Return Path services (the “Service”).

## **The Information We Collect and Use**

By information we mean information about you collected through our website(s), including your email address and other information you provide to us by registering for our services or making requests for information about our services. Any information provided to us will be retained and used solely for the purposes of fulfilling your request for information, fulfilling a request through a Site feature, performing and carrying out the terms of the Service, or communicating with you as a member of Return Path services.

## **Aggregate Information**

From time to time, we may collect general, non-personal, statistical information about the use of the Site and the Service, such as how many visitors visit a specific page on the Site, how long they stay on that page, and which hyperlinks, if any, they “click” on. We collect this information through the use of technologies such as “cookies” and “IP addresses”, which are discussed in greater detail below. We may also group this information into aggregate visitor data in order to describe the use of the Site and Service to our existing or potential business partners or other third parties, or in response to a government request. However, please be assured that this aggregate data will in no way personally identify you, other list members or any other visitors to the Site.

## **User Access and Choice**

If your personal information changes, or if you no longer desire our service, you may correct, delete or ask to have it removed by completing this [simple online form](#) or by contacting us by telephone or postal mail at the contact information listed below. If you no longer desire our service, contact us directly. We will respond to your request to access within 30 days.

## **Retention of Personal Information**

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is applicable by law. We will make good faith efforts to delete the data if you contact us by following the instructions at the beginning and at the end of this Privacy Policy, provided Return Path is not required to retain it by law or for legitimate business purposes. We may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

## **IP Addresses**

An IP address is a number that's automatically assigned to your computer whenever you're surfing the web. Web servers, the computers that "serve" web pages, automatically identify your computer by its IP address. Company collects IP addresses for purposes of system administration, to report aggregate information to third parties and to track the use of the Site. When visitors request pages from the Site or click on a link in a mailing sent through the Service our servers log the visitors' IP addresses. We reserve the right to use IP addresses to identify a visitor or list member when it will enhance the users experience or if we feel it is necessary to enforce compliance with the Site's policies or to protect Company, the Site, its visitors, the Service, our Internet Service Provider partners, the list members or others.

## **Cookies and other Tracking Technologies**

Technologies such as: cookies, beacons, tags and scripts are used by Return Path and our marketing partners, affiliates, or analytics or service providers. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use cookies to remember users' settings (e.g. language preference), tracking for marketing purposes, and for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

## **Log Files**

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We do not link this automatically collected data to other information we collect about you.

## **Behavioral Targeting / Re-Targeting**

We partner with a third party to either display advertising on our Web site or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#) (or if located in the European Union click [here](#)). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

## **Profile**

We store information that we collect through cookies and clear gifs to create a “profile” of your preferences. We tie your personal information to information in the profile to provide tailored promotions and marketing offers or to improve the content of the Site for you.

We do not share your profile with third parties.

## **Information Sharing and Disclosure**

Except for the limited situations listed here in this Privacy Policy, we will not share your personal information with third parties. To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

## **Agents and Third Party Service Providers**

To provide the Service to you, we may sometimes use other businesses to perform certain specialized services such as data processing or other technology services. In such instances, we may provide your personal information to those businesses but they are not permitted to retain or use your information for any other purpose.

## **Change of Control / Asset Transfer**

As the Company develops, we may buy other businesses or their assets or sell all or parts of our business assets. Customer information is generally one of the business assets involved in such transactions. Thus, in the event that the assets of the Company in whole or in parts are acquired by a third-party, customer information, including any visitor information collected through the Site or the Service, would be one of the transferred assets. In the event of a corporate change in control or sale of all or parts of our business assets our users will be notified in accordance with the “Changes to this Policy” section of the policy if their personal information is provided to the new corporate entity or asset purchaser.

## **Legal Compliance**

Company reserves the right to disclose member information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally

or unintentionally) Company's rights or property, other visitors, list members, or anyone else that could be harmed by such activities. Company also reserves the right to disclose visitor or list member information when we believe in good faith that the law requires it such as to comply with a subpoena or similar legal process.

## **Communications From the Site**

### **Service Email**

We will send you service-related announcements, which are not promotional in nature, on occasions when it is necessary to do so. For example, if our service is temporarily suspended for maintenance, we may send you email notification. You do not have an option to opt out of these emails.

### **Customer Service**

Based upon the information you provide us, we will communicate with you in response to your inquiries, to provide the services you request, and to manage your account. We may communicate with you by email or telephone.

### **Newsletters and Promotions**

We may provide you the opportunity to opt-in to additional newsletters or promotional communications sent by email. If you have opted in or otherwise qualify to receive these forms of communication, we will use your name and email address to communicate with you. Out of respect for your privacy, we provide you a way to unsubscribe by following the instructions included in each communication.

## **Security and Information Protection**

The security of your information is important to us. When you enter sensitive information (such as a credit card number) on our payment forms or login credentials on our login form, we encrypt that information using Secure Socket Layer (SSL) technology.

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. If you have any questions about security on our website, you can contact us by completing this [simple online form](#).

### **Firewalls**

Protecting the security of your personal information is very important to us. When we store information that you have provided to us when registering for the Service, that information is protected by security measures that include "firewalls" (a combination of computer hardware and software that helps keep unauthorized visitors from accessing information within our computer network), "intrusion detection systems" (a combination of computer hardware and software that helps detect any unauthorized visitors) and other tools such as data encryption

and physical security, where appropriate. Unfortunately, no data transmission over the Internet or data repository can be guaranteed to be 100% secure. As a result, while Company strives to protect your personal information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction, or inadvertent disclosure of your personal information.

## **Links to Other Sites**

Please be aware that when you are on the Site, or when you receive an email message from us through the Service, you could be directed to other sites that are beyond our control. There may be links to other sites from the Site's pages or from the email message we send to you that take you outside our Site. These other sites may send their own cookies to visitors, collect data, or solicit personal information. The privacy policies of these other sites may be significantly different from this Privacy Policy. We are not responsible for the privacy practices of these other sites and cannot guarantee the security of any of your personal information collected there. Note that when you link to a third party site from the Site, you may see pre-populated data fields with your personal information; however, that information is not available to the third party unless you take certain actions on the third party's site, such as submitting a form

## **Blog**

Our website offers publicly accessible blogs. Our blog is managed by a third party application that may require you to register to post a comment. We do not have access or control of the information posted to the blog. You will need to contact or login into the third party application if you want the personal information that was posted to the comments section removed. To learn how the third party application uses your information, please review their privacy policy.

## **Testimonials**

We display personal testimonials of satisfied customers on our website in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us by completing this [simple online form](#).

## **Social Media Widgets**

Our website includes Social Media Features, such as the Facebook button and Twitter Tweet button or interactive mini-programs that run on our website. These Features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. Your interactions with these Features are governed by the privacy policy of the company providing it.

## Information Related to Data Collected through the Return Path Service (Email Intelligence Suite)

### Information Related to Data Collected for our Clients

- Return Path, Inc. collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal data it processes. If you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly. We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our Clients.

### Access and Retention of Data Controlled by our Clients:

- Return Path, Inc. has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his query to the Return Path, Inc.'s Client (the data controller). If requested to remove data we will respond within 30 days.
- We will retain personal data we process on behalf of our Clients for as long as needed to provide services to our Client. Return Path, Inc. will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## Privacy Policy for Children

We do not knowingly collect information from children under the age of 13 on the Site or through the Service. If you are under the age of 13, please do not provide any information to us. If we become aware that we have collected information from a child under the age of 13, we will make commercially reasonable efforts to delete such information from our database.

## Changes to this Policy

The terms of this Privacy Policy may change from time to time. We will notify you of any material changes to this Privacy Policy by posting a notice on the homepage of the Site for a reasonable period of time prior to the change becoming effective. We encourage you to check this page periodically for any changes. Your continued use of the Site and participation in following the posting of changes to these terms will mean you accept those changes.

## Contacting us

We value your opinions. If you have comments or questions about our privacy policy, you may contact the Return Path Privacy Office using this [simple online form](#), or contact:

Return Path, Inc.  
3 Park Avenue, 41st Floor  
New York, New York 10016  
Attn: Chief Privacy Officer  
Phone: 212-905-5500  
Fax: 212-905-5501