

[Insert name of entity] PRIVACY POLICY

**[PLEASE NOTE: This template privacy policy is for illustration purposes only. It is designed to provide you an example of the structure of a privacy policy generally and is not designed for your specific business. This policy contains examples of information and provisions that may be appropriate for your privacy policy, but, depending on your business and your actual privacy and technology practices, certain elements may not be appropriate and certain other elements may be needed. In particular, but without limitation, this template is not exhaustive of elements that may be required by law or by service provider guidelines (by way of example only, this template does not contain elements that may be required with regard to certain health care or financial information). In short, it is NOT the case that one privacy policy fits all. The ultimate policy that you use should accurately reflect your company's privacy practices, and should be clearly visible via a link on all pages within your Site(s) that collect information from users. Please be advised that this template should NOT be construed as legal advice or used as a substitute for seeking professional legal advice. The drafters and providers of this template are not responsible for the use of this template or any information or absence of information in this template.]**

Last Updated: \_\_\_\_\_, 201\_\_

This privacy policy ("Policy") explains how personal information is collected, used, disclosed and secured by [Insert Name of Entity] ("Company" [Or insert short version of entity name], "we" or "us") when you ("you", "your", "user") access the Company web site(s) at [Insert website address; if more than one, include all and make "Site" plural (i.e., "Sites")] (the "Site"). If you do not agree to the terms of this Policy, please do not use the Site(s).

We reserve the right to change the provisions of this Policy at any time. We will alert you that changes have been made by indicating on the Policy the date it was updated. We encourage you to review this Policy from time to time to make sure that you understand how any personal information you provide will be used. Your continued use of the Site(s) following the posting of changes to these terms will mean you accept those changes. [Note that for material changes, such as how personal information is used and shared, you will need to consult your attorney regarding whether or not to send out a notice to users and obtain each user's affirmative opt-in to the updated Policy.]

[For ease of consumer use, consider adding a Table of Contents, with hyperlinks to each relevant section included in this Policy.]

### What Is Personal Information?

As used herein, the term "personal information" means information that specifically identifies an individual (such as a name, address, telephone number, mobile number, e-mail address, date of birth, credit card number, social security number), or information about that individual that is directly linked to personal information. [Note that if Company collects sensitive personal information (like social security numbers, bank details and credit card numbers), all pages collecting the sensitive information must use a secure processing server (https://) and have a clearly visible link to this Policy.] Personal information does not include "aggregate information", which is data we may collect about the use of the Site(s) or about a group or category of users, from which individual identities or other personal information has been removed. This Policy in no way restricts or limits our collection and use of aggregate information.

## **How Do We Collect Information, and What Types of Information Do We Collect?**

We collect several types of personal information about you in a number of ways when you visit or use the Site:

### Active Collection:

We collect certain information when you voluntarily provide it, such as if you send us an email [*and Insert any means by which users might voluntarily provide information through the Site, e.g., by creating an account on the Site, subscribing to a newsletter, participating in a community forum or chat room, shopping on the Site, making a purchase on the Site, receiving customer or technical support, participating in contests, sweepstakes, events or promotions, etc. If you have purchased ReachLocal's TotalLiveChat product, be sure to include "receiving customer or technical support (including via an online chat widget)."*] or you otherwise provide or request information. Such information may include various types of personal information. Additionally, we may also collect demographic information such as your age, gender, country and zip code of residence, recent purchases, and preferences. This demographic information may be associated with your personal information. If this demographic information is connected with personal information, we will treat the demographic information as personal information. [*Only include the foregoing sentences (starting with "Additionally") if relevant, and revise as appropriate.*]

[*Only include this if relevant; otherwise, delete.*] For some features of the Site, you may be able to submit information about other people. For instance, if you [*Insert any features that involve the submission of others' information, e.g., referring a friend, shipping a purchase to a friend, etc.*] you may submit someone else's personal information. Company will use any such information that we collect from you about another person to carry out your request.

### Passive Collection:

When you use the Site, some information is also automatically collected, such as [*Insert the various types of information, if any, that may be automatically collected by users of the Site, e.g., Internet Protocol (IP) address, operating system, browser type, address of a referring web site, activity on the Site, etc.*]. We treat this information as personal information if we combine it with or link it to any of the personal information mentioned above. Otherwise, it is used in the aggregate only. [*Only include the previous two sentences if they are accurate. Otherwise, disclose how the information will be treated.*]

[*If the Site uses cookies or web beacons, or if you have registered for ReachLocal's Latent Conversion Tracking and/or enabled Remote Conversion Tracking product(s), insert the following paragraph. Otherwise delete.*] We may also automatically collect certain information and monitor user activity through the use of "cookies" (including persistent and/or session cookies) or web beacons (also known as web bugs, pixel tags, tracking pixels, or clear gifs) on the Site. A "persistent cookie" is stored on a user's hard drive until it expires (persistent cookies are set with expiration dates) or until the user deletes the cookie. Persistent cookies help websites remember your information and settings when you visit them in the future. "Session cookies" are cookies that expire upon the conclusion of your visit to a website. These types of cookies are widely used to facilitate a consumer's interaction with a website. [*Insert a statement describing whether (or not) the cookies and web beacons collect or link to identifying information, and if so, how the information is treated (i.e., like personal information above, or otherwise).*] If you wish to block, erase, or be warned of cookies on the Site, please refer to your browser manufacturer to learn about these functions. However, if you choose to remove or reject cookies, this could affect certain features on the Site. In addition to the above, information provided by cookies, web

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beacons, or other devices may be used, among other things, to *[Insert how the information might be used, e.g., to analyze data, to determine the popularity of content, to deliver targeted advertising, to make recommendations to users, to better understand the Site's usage or the effectiveness of Ads, to track user actions/behavior on the Site, etc. If you have registered for ReachLocal's Latent Conversion Tracking and/or enabled Remote Conversion Tracking product(s), be sure to indicate each of the foregoing purposes, as applicable, such as tracking web events or site visits, and emails to you].*

*[If you have purchased ReachRetargeting or Reach Display Awareness for implementation on your website(s), consider incorporating the following and make sure that it's consistent with the other sections of your privacy policy:]*

We work with a company called ReachLocal, which assists us in advertising our products and/or services. One of the products that we have purchased from ReachLocal is a retargeting product, which enables ReachLocal to show you advertisements for our Site when you visit other sites in the ReachLocal network or in third-party networks. ReachLocal is able to do this through the use of cookies that are provided by ReachLocal through its third-party partners (the "Advertising Cookies"). The sole use of these cookies is, as stated above, to simply show you advertisements for our site, they are not being used to track you in any other way. Moreover, ReachLocal does not link the information in the cookies or any other cookie to any personal information that you may have provided.

You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies, though either of those actions may affect the use of our Site. However, if you wish to opt out of any of the Advertising Cookies, you can do this simply by navigating to <http://www.reachlocal.com/opt-out>, which will take you to a web page where you will be able to opt out of the Advertising Cookies currently used in connection with ReachLocal's remarketing product.

If you have any questions regarding ReachLocal and/or the Advertising Cookies, you are encouraged to contact ReachLocal at [privacy@reachlocal.com](mailto:privacy@reachlocal.com).

*[If advertisements are run on the Site(s) via third party ad servers, please consult your attorney to include disclosures pertaining to such practices. Further, if Company obtains non-personal information about users (e.g., demographic, geographic, other usage information) from third parties, consult your attorney to include disclosures pertaining to such practices.]*

### **How Do We Use the Personal Information We Collect?**

We use personal information we collect through the Site for the purposes described in this Policy or elsewhere on the Site. For example, we may use personal and other information we collect to *[Insert here the various ways that Company might use personal information, e.g., to process transactions, request feedback, communicate with the user, contact the user about their account, respond to user inquiries/problems, deliver targeted ads, provide recommendations, monitor Site usage trends, send promotional messages, confirmations, or security alerts, prevent fraud, conduct surveys, etc. If you purchase ReachLocal's TotalLiveChat product, include all of the foregoing (other than "deliver targeted ads", which is not done via personal information collected via TotalLiveChat). Of course, if you use PII to deliver targeted ads, you should include that regardless of whether you purchase TotalLiveChat.]* and for any other purpose for which the information was collected.

If you no longer wish to receive *[Describe all applicable direct communications, e.g., email, phone calls, direct mail, etc.]* from us, you may opt out of all future communications by *[Insert the method by which users may opt out of future communications.]*

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Further, we may make collected personal information available to third parties for their marketing and promotional purposes. If you decide that you do not want us to share your personal information with these companies for their marketing and promotional purposes, please send an e-mail to \_\_\_\_\_ . In this email state that you would like Company to not share your personal information with third parties for their marketing purposes. Your opt out request will be processed within thirty (30) days of the date of which we receive it. *[Remove this paragraph if Company is not going to share personal information for third party marketing and promotional purposes and doesn't want to reserve the right to do so. Also, please note that if this provision is applicable and you're a California company or have California consumers, you may have to specifically call out such obligations under a heading entitled "Your California Privacy Rights," such as the following:*

**Your California Privacy Rights:** The following applies solely to California residents who have an established business relationship with Company. If we collect personal information from you, we may make the personal information available to third parties for their marketing and promotional purposes. If you decide that you do not want us to share your personal information with these companies for their marketing and promotional purposes, please send an e-mail to \_\_\_\_\_. In this email state that you would like Company to not share your personal information with third parties for their marketing purposes. Your opt out request will be processed within thirty (30) days of the date of which we receive it.].

**What Personal Information Do We Share With Third Parties?**

We will not share the personal information we collect from you through the Site(s) with third parties, except as described in this Policy or on the Site(s). For example, we may share personal information as follows: *[List all of types of people/companies with whom the personal information is shared and the circumstances under which Company would provide such information, e.g., to service providers in connection with the operation of the Site and/or the marketing of our products and/or services, upon user request or with user consent, to enforce the Policy, to enter you in sweepstakes, contests or promotions, to comply with law, to prevent fraud, in connection with the sale of Company assets, etc. If you purchase TotalLiveChat, be sure to include "to service providers in connection with the operation of the Site and/or the marketing of our products and/or services."]*

**Aggregate Information:** *[If the Site uses or shares aggregate information, consider including the following type of language (with adjustments as applicable).]*

We may take your personal information and make it non-personally identifiable, either by combining it with information about other individuals (aggregating your information with information about other individuals), or by removing characteristics (such as your name) that make the information personally identifiable to you (i.e., de-personalizing your information). This can include usage information and/or information that is not connected to personal information. Given the nature of this information, no restrictions apply under this Privacy Policy on our right to aggregate or de-personalize your personal information, and we may use and share in any way with third parties the resulting non-personally identifiable information.

**Purchase or Sale of Businesses:**

From time to time, we may purchase a business or sell one or more of our businesses and your personal information may be transferred as a part of the purchase or sale. If we purchase a business, the personal information received with that business would be treated in accordance with this Policy, if it is practicable and permissible to do so. If we sell a business, we will include provisions in the selling contract requiring the purchaser to treat your personal information in the same manner required by this Policy (including any

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amendments to this Privacy Policy). The provisions of this paragraph will also apply if we are sold as part of bankruptcy proceedings. *[Please confirm the foregoing is true and adapt/revise as necessary.]*

Disclosures Required By Law and Disclosures to Help Protect the Security and Safety of Our Websites and Others:

We will disclose personal information when we believe in good faith that such disclosures (a) are required by law, including, for example, to comply with a court order or subpoena, or (b) will help to: enforce our policies; enforce contest, sweepstakes, promotions, and/or game rules; protect your safety or security, including the safety and security of property that belongs to you; and/or, protect the safety and security of our Site(s) or third parties.

### **How Can You Modify Or Delete Your Personal Information?**

You may modify or delete the personal information collected through the Site at any time by *[Describe all methods available to users for them to modify or delete their personal information, e.g., visiting your profile, modifying your account, contacting Company via email and/or phone, etc.]*.

### **Does This Policy Apply to Other Websites Linked To From the Site(s)?**

The Site(s) may contain links to other websites. Any personal information you provide on linked pages or applications is provided directly to that third party and is subject to that third party's privacy policy. This Policy does not apply to such linked sites, and we are not responsible for the content or privacy and security practices and policies of these websites or any other sites that are linked to or from the Site(s). We encourage you to learn about their privacy and security practices and policies before providing them with personal information.

### **Do We Collect Information From Children Under the Age of 13?**

The Site(s) is not intended for use by children under the age of 13, and Company does not knowingly collect or use any personal information from such children. If we become aware that we have unknowingly collected personal information from a child under the age of 13, we will make commercially reasonable efforts to delete such information from our database. *[Include the foregoing if accurate. If, however, personal information is collected from children under the age of 13, additional provisions will be needed, and Company will need to comply with the Children's Online Privacy Protection Act. Please consult your attorney for further information.]*

### **What Steps Do We Take To Protect Your Information?**

*[Consider revising this section as appropriate to reflect your actual practices.]* We take measures designed to protect your personal information in an effort to prevent loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. Please be aware, however, that despite our efforts, no security measures are perfect or impenetrable and no method of data transmission can be guaranteed against any interception or other type of misuse. *[Consider including the following if relevant.]* To protect the confidentiality of personal information maintained in your account, you must keep your password confidential and not disclose it to any other person. You are responsible for all uses of the Site(s) by any person using your password. Please advise us immediately if you believe your password has been misused.

### **Miscellaneous**

This Policy and the privacy practices of Company will be subject exclusively to the laws of the State of *[Insert chosen state.]* in the United States. Company makes no representation that this Policy and our practices comply with the laws of any other country or jurisdiction. Users of the Site who reside outside the United States do so on their own initiative and are responsible for compliance with local laws, if and to the extent local laws are applicable. If you reside outside of the United States, by using the Site, you consent to the transfer, processing and use of your information outside your country.

### **Questions?**

If you have any questions about this Policy, please contact us at *[Insert applicable contact information.]*