

# INFLUENCER POLICY

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Daniel J. Edelman Holdings, Inc. and its affiliated companies worldwide (together these are "DJEH Group" and each is a "DJEH Affiliated Company" and referred to in this notice as the "Company", "we", "us" or "our") are strongly committed to protecting your privacy.

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## Introduction to our Influencer Privacy Notice

As part of our commitment to our [Global Privacy Principles](#), we strive to protect the privacy of journalists, social media influencers, members of the media, subject matter experts, and stakeholders (collectively, "influencers") whom each DJEH Affiliated Company (referred to as the "Company", "we", "us" or "our") identify or interact with. Our influencer databases are repositories of information (including contact information for business purposes) relating to influencers, whom we believe are well-positioned and capable of influencing others, including our clients or consumers. **This Influencer Privacy Notice does not apply to other visitors to our websites and other users of our services.**

We believe in transparency and we provide this Influencer Privacy Notice so that where you are an influencer you can understand our privacy practices and the choices you can make about the way your information is collected and used. This Influencer Privacy Notice is provided consistent with that commitment to describe our privacy practices.

## How this Policy Works with Our Privacy Notices and Policies

This Influencer Privacy Policy is intended to capture our processing activities in circumstances where you have not entered into a direct relationship with us or our clients. If, and to the extent you enter into a direct relationship with us, our Privacy Policy also applies. Our Privacy Policy may apply where we process Personal Information that you have provided to us through our

Website, our services, or otherwise communicate with us. You can see a copy at [Privacy Policy | DJE Holdings](#). Where we process your Personal Information on behalf of our client, collection and use of your information may be subject to the client's privacy policy and/or this Influencer Privacy Notice.

## **Influencer Information We Collect and How We Collect It**

We collect personal and other information about influencers in a number of different ways. In terms of the type of information we collect, there are two basic types: personal information and non-personal information.

- **Personal Information** is information that identifies, relates to, describes, or is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you. Specifically, we may collect and process, among other things, the following information about you:
  - Personal identifiers, such as your name, address, email address, telephone number
  - Characteristic information, such as gender, job title, education, employment, interests
  - Web use information, such as IP address, website, other unique identifiers associated with you, your computer or other mobile device, your internet or other electronic network activity, such as public posting activity, public profile picture, public conversations, engagement, followers and follower count
  - Information associated with or derived from the above, such as, inferences
  - Other information voluntarily provided to us by you.
  - Other information made available to the public by you or others
- **Non-Personal Information** does not reveal an individual's identity such as aggregated, de-identified, or anonymous data. This type of information gives us insights regarding, for example, how influencers are communicating about relevant topics. This information is used for our commercial purposes, including providing strategic advice to our existing and potential clients (collectively, "clients") and collaborators. Additionally, Edelman may collect aggregate or anonymized demographic information while providing services to our clients, such as demographic information about an audience's particular interests.

### *Information Influencers Provide*

We may collect personal information from you when you choose to provide it to us when you, for instance, share your social media or other content, material or information with us, or otherwise communicate with us by phone, text, email or other means which may include your name, physical address and email address. Under such circumstances you consent to our use/processing of the information you provide consistent with this notice. As stated above, information that you provide to us directly will also be held in accordance with our Privacy Policy.

### *Influencer Information From Third Parties and Publicly Available Sources*

We may collect personal information about influencers from third parties (e.g., their employers) or from publicly available sources such as:

- Articles blogs you may have written
- Vlogs you may have created
- Your own website
- Your publisher's website
- Your publicly available social media profiles (e.g., Facebook, Instagram, Twitter, and LinkedIn) or channel content including via publicly available APIs provided by social media platforms.
- Telephone conversations which may be recorded for lawful purposes
- Other publicly available online sources
- Other influencers
- Our clients
- From third parties who send us published articles
- Profiles you have created or have been created about you (e.g. Muckrack)

We only collect sensitive or special category personal data (such as data about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union memberships, data about health, genetic and, biometric data) about influencers with their consent, for example when responding to a survey (in which case we will only process that data in accordance with that consent) or where we are permitted to do so by applicable data protection laws, for example where an influencer has manifestly put such data into the public domain by, for example, writing or speaking about it or by posting it on a social media profile or within publicly available content. Any processing of sensitive or special category personal data will be carried out in accordance with this Influencer Privacy Notice.

### **How We Use Influencer Information**

We maintain influencer lists and may process your Personal Information as part of this either with your consent or where it is in our legitimate interest to do so to provide services to you or our clients, the business purposes described below or otherwise support our business needs, or in our client's legitimate interests in receiving our services, in each case provided that these legitimate interests are not overridden by your interests or fundamental rights and freedoms. Where information is made publicly available by you, we believe that this processing will have no negative impact on your privacy, that our use is necessary for these legitimate business purposes in accordance with this Influencer Privacy Notice, is not likely to be found objectionable by you and is not overridden by such interests or fundamental rights and freedoms.

Such business purposes may include research, data analytics, communications for business purposes, including providing information that we believe to be relevant or introducing opportunities for events, influencer marketing arrangements or other campaigns.

Influencer lists may be augmented by other information obtained from other sources, including our clients, third party sources or through our evaluation of the information processed. We take reasonable measures to limit the information processed to be relevant to legitimate business

purposes and minimizes risks to influencers associated with the use of such information. Any influencer may contact us to access, update and/or restrict use of such information consistent with applicable law by contacting us at [compliance@djeholdings.com](mailto:compliance@djeholdings.com).

### **How We Use Influencer Information**

We may use your Personal Information to create an influencer profile for you. We may allow our clients access to databases of information on influencers so that they can, among other things, view your profile, consider you for opportunities, and send you information (either via email or social media) that they think you might be interested in. Based on our assessment, we believe that this is beneficial for you as it means you receive targeted news and other information that may be helpful for you. Our primary role is to facilitate the efficient communication between our clients and influencers.

### **Legal Basis For Processing Influencer Information**

We believe that processing your data in accordance with this Influencer Privacy Notice benefits you as an influencer and also our clients. You will receive focused information from our clients, often ahead of general release, giving you material to write about that is relevant to you and your audience. Our clients are able to communicate more efficiently to influencers who are likely to want to hear what they have to say. We consider and balance any potential negative impact on you and your rights before we process your personal data. We will not use your Personal Information for activities where we believe that our or our client's interests are overridden by your rights and freedoms. If at any time you want us to remove you from a particular list, please email [compliance@djeholdings.com](mailto:compliance@djeholdings.com).

### **How We Secure Information**

We understand that the security of your Personal Information is extremely important. Accordingly, we use appropriate administrative, physical, and technical safeguards to keep your Personal Information protected from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account cost, technology, the risks involved in the processing and the nature of the Personal Information. It is important to keep in mind, however, that no security measures are absolutely effective. Although we will apply appropriate measures to protect your Personal Information, we cannot guarantee the security of your Personal Information, and any transmission to us is at your own risk. If you should become aware of any known or suspected incidents of unauthorized access to, use of, or disclosure of any Personal Information, you should report them immediately to the following email address: [security@djeholdings.com](mailto:security@djeholdings.com). We investigate all reported claims of data incidents.

### **How We Retain Information We Collect**

We only store personal information for as long as necessary to provide services to you and our clients, to comply with legal obligations, or to administer our services, in each case in accordance with our data retention practices and policy. Because of the nature of our business, including identifying influencers related to subject matter expertise and developing and refining

statistical models, this may involve retaining your information for a period after an underlying contract expires, but where possible, we keep this information in an aggregated, de-identified format. We review our data retention policies periodically and comply with all legal requirements. Your personal information is stored on servers and retained by or on behalf the DJEH Group.

### **Notice to California Residents: California Privacy Rights**

California law provides residents of California a number of rights as they relate to personal information collected under circumstances specified by applicable law. These are the “right to know,” the “right to delete,” and the “right to opt out.” We do not “sell” “personal information” as these terms are defined and set forth under California privacy law.

Right to Know. You may request that we provide you the specific pieces of personal information that we have has about you; categories of personal information we have collected about you; categories of sources from which the personal information is collected; categories of personal information that we sold or disclosed for a business purpose about you; categories of third parties to whom the personal information was sold or disclosed for a business purpose; and the business or commercial purpose for collecting or selling personal information.

Right to Delete. California law gives residents a limited right to request deletion of their personal information. However, this right is limited by a number of exceptions, including processing personal information in the context of our role as a service provider to our clients. Fundamentally, if we have a permissible need to retain personal information, we are not under an obligation to delete such information, even when requested. Generally, we retain personal information so we may complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you; detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; enable uses that are reasonably aligned with your expectations based on your relationship with us; comply with a legal obligation; or otherwise use your personal information in a lawful manner that is compatible with the context in which you provided the information. As such, we generally do not accept requests to delete personal information in its entirety. However, we will respond to requests to remove personal information from some of our systems as a part of a request to close or otherwise disable a membership account.

Right to Opt Out. We may share personal information with clients or partners as their service provider for marketing purposes. If the processing is outside of our role as a service provider, you may choose to opt out of the sharing of your personal information with third parties for marketing purposes by submitting a request as set forth below.

Designating an Authorized Agent. California law permits California residents to designate an agent to manage their rights under California law. If you would like to designate an agent to manage your privacy preferences, you may do so using the mechanisms noted below under “Exercising California Privacy Rights”.

Non-discrimination. California law does not permit us to discriminate against you because you exercised any your rights under this title, including, but not limited to, by: denying you access to goods or services; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level or quality of goods or services; suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising California Privacy Rights. If you are a California resident and would like to exercise any of your rights please submit your request in writing to [compliance@djeholdings.com](mailto:compliance@djeholdings.com) or by using our [CCPA Request Form](#). Please note that with respect to any request we reserve the right to seek additional personal information in order to verify your identity and your or your agent's rights to the data subject to your request.

### **Processing Subject to EU and UK Data Protection Rules**

Applicable data protection rules (particularly those of the EU and UK) may restrict the transfer of Personal Information to jurisdictions that do not have levels of protection that are deemed adequate. Where necessary we rely on Standard Contractual Clauses approved by the EU Commission and the UK Government ("SCCs") to permit the transfer of Personal Information among members of the DJEH Group, and with our clients. We require all service providers who may process personal data across borders to execute SCCs where necessary. We maintain policies and procedures designed to assess the risks associated with the processing of Personal Information and protect Personal Information in a manner calculated to address those risks in jurisdictions such as the United States where the data privacy laws are deemed to be inadequate so that the protection in the United States is equivalent to the protections afforded data subjects in their country of origin.

Daniel J. Edelman Holdings, Inc. has self-certified with the U.S. Department of Commerce regarding the collection, use, and retention of personal data from European Union member countries in connection with the EU-US Data Privacy Framework Principles ("Privacy Framework Principles") as part of the Privacy Framework Program. While this certification, in and of itself, is not considered by the EU and UK authorities to provide an adequate level of protection, Daniel J. Edelman Holdings Inc nonetheless considers that compliance with the Privacy Framework Principles provides a level of protection with regard to the processing of personal data and transparency with regard to our data processing standards. To learn more about the Privacy Framework Program, and to view Daniel J. Edelman Holdings, Inc.'s certification, please visit <http://www.privacyshield.gov>.

We comply with all SCCs that we have entered into and any supplemental measures required by applicable law as well as the Privacy Framework Principles for all transfers of Personal Information from the EEA and UK, including the onward transfer liability provisions. When we provide your Personal Information to service providers, this is done under a contract which requires the companies to, among other things, use the Personal Information only for the limited purposes for which it is provided to them in providing services to us, not to transfer the Personal Information to another party without our approval, and to agree to hold the Personal Information

securely and confidentially in accordance with this Privacy Policy, applicable law and the Privacy Framework Principles.

### **Internal and Independent Recourse Mechanisms**

We commit to resolve complaints about our collection or use of your Personal Information in accordance with applicable law. We will cooperate in investigations by, and comply with the advice of, the appropriate EU and UK data protection authorities (“DPA”) in managing any dispute. Further, we are also subject to the applicable investigatory and enforcement powers of the U.S. Federal Trade Commission. If you have questions or complaints regarding the use or disclosure of Personal Information in compliance with the principles of this Influencer Privacy Notice, you should contact Company first at the contact noted below. If contacting Company does not resolve your concern or complaint, you may raise your complaint with the relevant DPA where you live or work (see [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm) for contact information or refer to [www.ico.org.uk](http://www.ico.org.uk) for the UK) or other applicable regulator. A binding arbitration option is available in the event that residual complaints related to EU- or UK- compliance are not resolved by any other means.

This Influencer Privacy Notice does not create or confer upon any individual any rights or impose upon Company any rights or obligations outside of, or in addition to, any rights or obligations imposed by the privacy laws applicable to such individual's personal information as defined under such privacy laws. Should there be, in a specific case, any inconsistency between this Influencer Privacy Notice and such privacy laws, this Influencer Privacy Notice shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

### **Notification of Changes**

As we provide more services and as privacy laws and regulations evolve, it may be necessary to revise or update our Influencer Privacy Notice. We show the date of the most recent version of this notice so that you will know when the Influencer Privacy Notice has been most recently updated.

### **Accessing and Updating your Information; Limiting or Opting-out**

Where the EU, UK or other relevant data protection rules provide, you have the right (subject to any limitations set out in the applicable laws) to:

- Access your Personal Information
- Request correction of your Personal Information, though we may need to verify the accuracy of any new data you provide.
- Request erasure of your Personal Information in certain situations.
- Object to processing of your Personal Information where we are relying on a legitimate interest in certain situation.
- Object to processing your Personal Information for direct marketing purposes.
- Request restriction of processing of your Personal Information in certain situations.

- Request the transfer of your certain of your Personal Information to you or a third party.
- Withdraw any consent you gave to processing your Personal Information.

If you would like to exercise any of these rights, you may contact us at [compliance@djeholdings.com](mailto:compliance@djeholdings.com). Similarly, influencers who wish to subscribe or unsubscribe to our marketing and informational communications or limit our use of any Personal Information in any way may do so by using the subscribe/unsubscribe options contained in our emails or by sending an email to [compliance@djeholdings.com](mailto:compliance@djeholdings.com). We will comply with all legal requirements as it relates to a valid legal request. To verify your identity, we may also ask for additional information to authenticate your request. In some circumstances we will not be able to limit use of your Personal Information without unsubscribing you from communications or deleting your information.

### **How to Contact Us**

CONTACT INFORMATION: Please direct all requests, questions or concerns related to this Influencer Privacy Notice or your personal information (with the exception of potential security breaches as noted above) to [compliance@djeholdings.com](mailto:compliance@djeholdings.com).