### **Privacy Policy Highlights**

Last Modified: September 26, 2018 (View Archived Versions)

Consumer Reports is an independent, nonprofit organization that works side by side with consumers to create a fairer, safer, and healthier world. As part of that mission, we are committed to following a core set of <a href="Privacy Principles">Privacy Principles</a>.

Please note that the Consumer Reports Privacy Policy has been updated. Please review the revised Privacy Policy carefully before using any of our products, services and programs. By using our products, services and programs you consent to the terms of our updated Privacy Policy. Click here for more information about the updates.

For more information, please read our complete Privacy Policy.

### **Scope of Privacy Policy**

This Privacy Policy covers the Consumer Reports family of digital services, print publications, and other products, services and programs that provide an authorized link to this Privacy Policy (collectively, "CR Publications, Services and Programs").

### **Information Collected**

We collect a variety of information about you, including:

- Information you provide directly to us.
- Information we collect automatically on the CR Publications, Services and Programs, including through the use of cookies, web beacons, and other technologies. For more information, please see our Cookie Policy.
- Information we obtain from other sources where permitted by law.
- Information that is combined or supplemented with information from other sources.

### Read More

#### **Use of Information**

We use the information we collect for a variety of purposes, including:

- To fulfill products, services and information you've requested.
- To customize your experience so that we can make a better, more compelling experience for our users.
- To provide you with products, services and programs we believe may be of interest to you.
- To conduct consumer policy and mobilization activities, such as running campaigns on consumer policy issues, and informing our efforts to recruit, train and connect our consumer activists.
- As otherwise described to you at the time of collection or with your consent.

### Read More

#### **Disclosure of Information**

We may share information within the Consumer Reports family and with various third parties, including:

- With our authorized service providers
- When you make a donation
- When you enter a sweepstakes or contest
- When you submit a user review
- For direct-mail campaigns
- With policymakers when you take action on a policy issue
- To protect our websites and users
- When required by law

### Read More

### **Choice/Opt Out**

You have choices regarding the use of information we collect.

- You can stop the delivery of promotional email from the CR Publications, Services and Programs by following the instructions in the message.
- You have choices about the collection and use of your information by third parties to display relevant advertisements.
- You can opt out of receiving communications from us in connection with donations, surveys, policy and mobilization emails, direct mail, and other communications.

You can opt out of direct mail promotional offers from third parties.

### Read More

### Other

- For those of our members, customers, activists, donors, suppliers and business contacts
  who are natural persons located in the European Economic Area (EEA) and Switzerland,
  we provide information about how CR treats your personal data, our valid bases for
  processing your personal information, and your rights under the General Data Protection
  Regulation (GDPR). Read More
- We have adopted commercially reasonable information security policies and practices to help protect your information, but please note that no method of transmitting or storing electronic data is ever completely secure.
- We may revise the Privacy Policy to reflect changes in our practices, in which event we
  will update the date the Privacy Policy was last modified posted at the top of the Policy.
- For more information about our privacy practices, please review our complete Privacy Policy.
- If you have any questions about this Privacy Policy, please contact us via email or write to us at:

Consumer Reports
Attn: Member Support
101 Truman Avenue
Yonkers, NY 10703

For more information, please read our complete Privacy Policy.

### **Privacy Principles**

Consumer Reports is committed to these privacy principles:

### **Transparency**

 We provide clear notice of our privacy practices through a Privacy Policy that is readily accessible across all Consumer Reports Publications, Services and Programs. • We will provide consumers with clear disclosure about the information we collect, how and why we collect it, and what we do with it.

#### Consumer Control and Choice

- If you choose to share personal information with us, we will identify any options you have to control the use of the information.
- You are given the opportunity to opt out of receiving promotional emails or text messages by following the instructions contained in any such communication.
- You have choices about the collection and use of your data by third parties to deliver relevant advertising.
- Where we provide subscriber information to third-party entities for direct marketing purposes or fundraising communications, we will always provide a clear opt-out option.
- We provide opt-out options for our fundraising, policy and mobilization, and survey communications.

### **Notice and Disclosure**

We will provide notice and disclosure about material changes we make in our privacy policies.

### Security

We have adopted commercially reasonable information security policies and practices to help protect your information (but recognize that no method of transmitting or storing electronic data is ever completely secure).

#### Access

Consumer Reports allows you to update contact information you have provided through the Consumer Reports website located at <a href="https://www.CR.org">www.CR.org</a>.

For more information, please read our complete Privacy Policy.

### Privacy Policy FAQs

We have recently updated our Privacy Policy. Please find answers below to some questions you may have about our updated Privacy Policy. To review our Privacy Policy, click here.

What changes have you made to the Privacy Policy?

We update our Privacy Policy from time to time to reflect changes in our business practices and in the law:

- As of May 25, 2018, a new privacy law is in effect in the European Union (EU) and the European Economic Area (EEA) called the General Data Protection Regulation (GDPR). The GDPR expands privacy rights of individuals in the EU and EEA with respect to their "personal data." For purposes of the GDPR, "personal data" constitutes any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. For those of our members, customers, activists, donors, suppliers and business contacts who are natural persons located in the European Union, European Economic Area and Switzerland, we provide additional information in our Privacy Policy about how CR treats your personal data, our valid bases for processing your personal data, and your rights under the GDPR.
- We have clarified those provisions that impact only our members and other users of the CR Publications, Services and Programs located in the United States and Canada.
- Our Privacy Policy now links to our Cookie Policy, which provides more specific
  information about the cookies and similar technical methods CR and its service
  providers use, and identifies how you can make choices about them when you use our
  websites and mobile applications.

What are the "core" privacy principles that Consumer Reports follows?

We abide by our core privacy principles of transparency, consumer control and choice, notice and disclosure, security and access. For more information, please click here.

Will you share my contact information with third parties?

We share contact information with third parties such as service providers who perform services on our behalf and as otherwise disclosed in our Privacy Policy, for example, we share the names and mailing addresses of our print publication subscribers with third parties for their promotional purposes. If you participate in one of our consumer advocacy campaigns, for example, by sending a message to a policy decision-maker through an online form, your contact information is shared along with your message. For more information, please click here.

Does Consumer Reports share contact information across CR Publications, Services and Programs?

We share information within the Consumer Reports family of publications, services and programs so we can better inform our users about offerings in which they may be interested and to otherwise help support our mission. For more information, please click here.

Do you use my data for advertising purposes?

Consumer Reports does not accept third party advertising. However, we may use some data about you to tailor advertisements for products and services from the Consumer Reports family of companies. For more information, please <u>click here</u>.

For more information, please read our complete Privacy Policy.

### Consumer Reports Cookie Policy

Effective Date: September 26, 2018

When you use our websites or other digital services or open our emails, we or our service providers may collect information through cookies, web beacons and other technologies. This Cookie Policy explains these technologies and how you can control their use. This policy applies to all Consumer Reports websites and other digital services that link to this policy.

These cookies and other technologies help make our digital services better and enhance the user experience by offering you a more relevant and customized experience. We also use cookies to monitor and stabilize our websites, measure the use and effectiveness of our content, remember you when you log in, and promote Consumer Reports products and services that are relevant to your interests.

This Cookie Policy should be read with the Consumer Reports Privacy Policy and the Consumer Reports User Agreement. We may change this Cookie Policy at any time. When we do so, we will update the date at the top of this policy.

What Are Cookies?

We use "cookies" to store, and sometimes to track, information about how you use our websites. A cookie is a small data file that is sent to your browser when you visit a website. It is stored, accessed and maintained on your computer's hard drive or on a tablet or mobile device. A cookie contains a unique number that allows our websites or another website to recognize your device each time you visit and remember information about you.

We use both temporary and persistent cookies. A temporary cookie (also referred to as a session cookie) tracks visitor activity during a session or visit and expires when you close your browser. We use them to provide continuity as you visit website pages. Persistent cookies are not deleted from your device after you close your browser. They store a unique credential that allows us to automatically log you back in if you are registered on CR.org so you do not have to re-enter your user name and password each time you visit. We or our service providers may also use Flash cookies (also referred to as Local Shared Objects or LSOs)

We may also use HTML5 local storage, a browser feature which, like cookies, allows for storing certain information on your computer in order to help provide a better user experience. Many Internet browsers allow you to disable HTML5 local storage or delete information contained in HTML5 local storage using browser controls.

We and our service providers also use web beacons (sometimes referred to as clear GIFs or pixels), often in conjunction with cookies. Web beacons are small pieces of code that are embedded on web pages and applications in order to provide us with information about how our sites and applications are used. We also use web beacons in HTML emails that we send to our visitors to determine whether the recipient has opened those emails and/or clicked on links in those emails.

#### Information collected

The information we collect through cookies and other technologies may include the following:

 Standard server log information (e.g., your Internet Protocol (IP) address, browser and device type, operating system, name of your Internet service provider, date and time of your visit), and addresses of the websites you access before and after you visit a Consumer Reports website.

- Geo-location information, which is information about your real-world location at a given time based on latitude and longitude. This information may be collected directly from your computer depending on how your settings are configured, or may be provided in other ways, for example, in the metadata of photographs you send to us that describe the time and place the photo was taken. For more information, see our complete Privacy Policy.
- Information about your interactions with our content, Consumer Reports ads and communications.
- Device information, including the device type you use to access our digital services, your
  device's operating system, and unique device identifier information, which is a unique
  alphanumeric character string associated with an individual user's smartphone or similar
  handheld device.

On their own, cookies, web beacons and other technologies do not contain or reveal information such as your name or email address. However, if you choose to furnish Consumer Reports with personally identifiable information, this information can be associated with the data collected using the cookies or other technologies.

### Types of Cookies

We use the following types of cookies:

- <u>Strictly Necessary/Essential Cookies</u>: These cookies are essential for our digital services
  to function correctly. They include cookies necessary to enable members to log in to
  CR.org, access account information, and use certain features and services available to
  CR members.
- <u>Functional and User Enhancement Cookies</u>: These cookies allow us to remember you, your preferences and settings to help enhance the user experience.
- <u>Performance and Analytics Cookies</u>: We use these cookies to monitor the performance and use of our digital services, test website features, help us make our marketing efforts more effective, and monitor compliance with our User Agreement and Privacy Policy.
   We may also use this information to inform our consumer product testing, improve our content and help our advocacy efforts.
- Marketing Cookies: We use these cookies to promote Consumer Reports' own products
  and services that are relevant to your interests. If you are located in the U.S. or Canada,
  we also use cookies to serve ads for CR products and services on other websites you
  visit. We may also send you emails or other communications regarding CR products and
  services. For example, if you view car-related content on CR.org, you may see an ad or
  receive an email or other communication about our Car Buying & Pricing Service or

other CR product or service. Consumer Reports does not accept third-party advertising. You can opt out of interest-based advertising, as well as advertising on your mobile device, by visiting our Ad Choices manager or our cookie management tool described below.

 <u>Social Network Sharing Cookies</u>: These cookies enable content sharing with social networking and similar sites (e.g. Facebook, Twitter and Pinterest). These third-party services might use information about your visit to our digital services to show you ads relevant to your interests when you visit their websites.

### More Information about Third-Party Cookies

Certain third parties that provide us with services (e.g., Google and Adobe) employ their own cookies and similar technologies to collect information about your online activities when you visit CR.org and other websites.

- We may use Google Analytics Advertising Features and its associated tracking technologies to help display the CR ads you see on other websites (if you are located in the U.S. or Canada), and to help us manage and optimize our online advertising efforts. To opt out of Google Analytics Advertising Features, visit Google's Ad Settings page. Website users can also access the Google Analytics Opt Out Browser Add-on to opt out of being tracked by Google Analytics across all websites.
- We may also use Adobe Analytics to collect information about your online activities. To
  opt out of Adobe Analytics cookies on our websites, click here.

#### How to Control Cookies

### **Browser Settings**

The Help function on most web browsers contains information on how to set your browser to notify you before accepting cookies or to disable cookies entirely. For the cookies used by Adobe Flash, please be aware that they are not managed by the same browser settings as are used for other cookies, so you may need to follow separate instructions from Adobe to manage and delete Flash cookies. If you use more than one browser, you will have to adjust your cookie settings on each browser.

If you adjust your settings to reject cookies, you won't be able to take advantage of various features on our websites. If you are a CR member and you reject certain cookies on our CR.org website, you may not be able to use certain features of that site or enjoy full membership benefits.

You can learn more about managing cookies on popular browsers by clicking on the links below.

- Apple Safari
- Google Chrome
- Mozilla Firefox
- Microsoft Edge
- Microsoft Internet Explorer

You can also manage cookies through the browser Settings function on your mobile device.

### Cookie Management Tool

To help you manage cookies, you can use our cookie settings tool available here. If you use more than one browser, you will have to manage your cookies in each one.

For more information, please read Consumer Reports' complete Privacy Policy and User Agreement.

### Protection of Information

We work to protect your personal information from loss, misuse, or unauthorized alteration. We have put in place physical, electronic, and managerial procedures to help safeguard and help prevent unauthorized access and maintain security over the data we collect. When Consumer Reports transmits information over the Internet, we work to protect the information through the use of data encryption methods.

Please note that no method of transmitting or storing electronic data is ever completely secure. Therefore, we cannot promise or guarantee that such information will never be accessed, used, or released in a manner that is inconsistent with this Privacy Policy.

### Reporting Suspicious Activity

Any unauthorized access to or use of any of our websites and other products, services and

programs or to the information collected and maintained by us should be immediately brought to our attention by contacting us via e-mail or by writing to us at Consumer Reports Customer Relations, Attn: Security, 101 Truman Avenue, Yonkers, NY 10703.

In the unlikely event that we believe the security of your personally identifiable information, such as payment card information, in our possession or control has been compromised, we will endeavor to provide required notice as soon as possible under the circumstances. If we have your email address, we may notify you by email to the most recent email address you have provided to us in your account profile. Please keep your email address in your account up to date. You can change that email address at any time in your account profile. If you receive a notice from us, you can print it to retain a copy of it. To receive these notices, you must check your email account using your computer or mobile device and email application software. You consent to our use of email as a means of such notification. If you prefer for us to use the U.S. Postal Service to notify you in this situation, please email us. You can make this election at any time, and it will apply to notifications we make after a reasonable time thereafter for us to process your request. You may also email us to request a print copy, at no charge, of an electronic notice we have to sent to you regarding a compromise of your personal information.

#### Account Security

When you set up an account with us on CR.org, you are asked to provide your email address and password. When you later log on to your account, you will be asked to enter your email address and password. If you wish to log on to your account and have forgotten your password, the online system will request your e-mail address and we will promptly send you an e-mail with a link to reset your password. You will be prompted to reset it to a new password.

If you originally established an account on CR.org with a user name that is not your email address, then in order to log on to your account you will be asked to enter your user name and password. If you have forgotten your user name, you will be asked to provide the e-mail address you used when you created the account (or an updated e-mail address that you have previously provided) and we will send you an email containing your user name. If you wish to log on to your account and have forgotten your password, the online system will request both your e-mail address and your user name, and we will promptly send you an e-mail with a link to reset your password. You will be prompted to reset it to a new password.

If you want to change your password or other account information, you may do so at any time through your personal account page on CR.org.

If you have a print subscription that you manage on our CR.org website, you will need to provide us with your account number to make any changes to your password or other account information. Both digital and print subscribers may also call our customer support at 1-914-378-2035 (or 1-800-333-0663) to retrieve forgotten account information or to otherwise make changes to your information. In that case, you will be asked to provide your name or e-mail address, as well as the street or post office address we have on record for you, prior to a customer-service representative providing or changing your password.

It is your responsibility to control the dissemination and use of your user name and password and to control access to and use of your account. We urge you to keep your password confidential and not disclose it to anyone. We also recommend that you never reuse the same password across different websites and other online products and services. Be sure to sign off when finished using our websites, especially if you are using a shared or public computer. We will not be responsible or liable for any loss or damage, such as a third party's unauthorized access to your information, if you fail to comply with this provision.

Please be aware that information disclosed to us in e-mails may not be secure or encrypted and thus may be available to others. Exercise caution when deciding to disclose any personal or confidential information in e-mails sent to us, or when using email tools on our websites to send communications to others (e.g., political representatives).

For more information, please read our complete Privacy Policy.

### Surveys

Consumer Reports surveys consumers to understand their experiences with products and services they use and their views on various consumer issues for the purposes described below. We address information collected through participation in these consumer surveys separately because we treat these survey responses differently.

Please note that for purposes of our Privacy Policy, we differentiate our consumer surveys described in this section, which follow scientific methodological standards, from our efforts to gauge consumer views of our CR Publications, Services and Programs, and from informal questionnaires, quizzes and polls that appear in the CR Publications, Services and Programs.

Consumer Reports conducts consumer surveys using our own research staff or through research firms we hire. Because Consumer Reports tests and reports on products sold in the U.S. and Canada, our consumer surveys are intended for residents of the U.S. and Canada only. Our consumer surveys are conducted by phone and in electronic formats. We store survey data securely and retain it beyond the initial publication of results so that we can track trends over time.

When you participate in one of our consumer surveys, we ask for a variety of information - some of which constitutes personally identifying information about you or your family, including: (1) demographic information, such as your age, gender, and geographic location, and other information about you; (2) your experiences with products and services; and (3) your views and opinions on various topics.

The following principles govern our use of the information we collect through these consumer surveys:

First, your survey responses will be used only in combination with those of other survey respondents to produce information designed to help consumers in today's marketplace, including our own efforts to provide better products and services to consumers, and to move the marketplace in ways that protect and empower consumers. Aggregated survey information is used to develop content for our editorial reporting. We also use it to support engagement and advocacy efforts to influence legislative and regulatory bodies, and other important marketplace actors, working to get them to do more to protect consumers from unsafe, risky, or poorly performing products and services.

Your individual responses will remain confidential to Consumer Reports (and our agents and service providers) and will be used only for such research, product and advocacy purposes,

unless you expressly agree otherwise.

We may provide certain survey response data with academic researchers and other third parties for their own research purposes, provided that such purposes are consistent with our organizational mission.

Consumer Reports may retain your survey responses to analyze product performance over time and to avoid asking you the same questions in subsequent surveys. For example, if you have already answered questions about a product you own, we may later ask whether you still own that product and whether you continue to experience a problem you previously reported.

Second, you will not receive marketing or other non-research materials as a result of participating in a survey, unless you expressly agree otherwise. However, it is possible that you may receive such materials as a result of your other business relationships with Consumer Reports, as described elsewhere in the Privacy Policy.

There are two general exceptions to these principles concerning when and how we contact you:

- (1) As part of our quality control efforts, if you participate in a survey, you may be contacted by Consumer Reports or its agents to validate that you did take part in the survey; and
- (2) Our researchers may follow up with you based on your specific answers to a survey. For example, if you tell us you have a particular car model and we have additional questions about that car, we may select you to participate in a second survey. If you do not wish to receive follow-up contacts, you can opt out of receiving survey-related communications from us. If you opt out, you will not receive any follow up questions about past surveys and you will also not receive any more consumer surveys described in this section from us.

For some surveys we may contract with other companies to issue survey invitations on our behalf, host surveys for us, or to perform other information-gathering, processing, and validation-related services. We provide these companies only with the information they need to perform their services.

If you opt out of receiving survey communications from us, please allow up to 10 business days from the time you contact us for your opt out to take effect. During that time you may continue to receive communications from us that were already in process.

To opt out from receiving consumer surveys, you can follow the opt out instructions in each survey email invitation. You can also call us at 1-800-333-0663 or write to us at:

Consumer Reports

Attn: Member Support 101 Truman Avenue Yonkers, NY 10703.

For more information, please read our complete Privacy Policy.

### Choice / Opt-Out

We want to give you control over how we use your information.

Here is how to opt-out of receiving communications from us:

Opting out of email communications (promotional, email newsletters, Ratings alerts, non-transactional member communications, and consumer policy and mobilization communications)

If you subscribe to any of our digital services and print publications (for example, Consumer Reports magazine or the Consumer Reports website), participate in our programs, or sign up for our Ratings alerts or email newsletters, we may send you promotional emails about our other products and services or to ask you about your experience.

If you register to receive consumer policy and mobilization communications or take action on a policy issue, we may send you email communications about consumer policy issues, other Consumer Reports products, services and programs, or to ask you about your experiences.

### Opting out online

You can opt out of receiving these email communications from us by following the instructions

and links provided at the bottom of each email. If you use this method, you will stop receiving promotional emails only from the line of business or business unit that sent you the message.

If you are a subscriber to one of our paid products or services, you can manage your email communication preferences on your personal account page by <u>clicking here</u>.

If you wish to change your preferences for policy and mobilization email, click here.

### Opting out by telephone

You may also opt out of receiving these email communications by calling us at 1-800-333-0663.

Please allow up to 10 business days for changes to your email preferences to take effect. During that time, you may continue to receive email communications from us that were already in process.

Opting out of receiving email or other communications from us will not affect your receipt of service-related communications such as those relating to your account, order confirmations, renewal/expiration notices, and payment card notifications.

Opting out of postal mail promotional communications

### Opting Out Online

If you subscribe to any of our paid products, services or programs or to any of our email newsletters or we receive your name and address from a third party, and you are located in the U.S. or Canada, we may send you by postal mail promotional materials about our other products, services and programs. We may also share your postal mail contact information with third parties for their marketing purposes as described in the <a href="Sharing for Marketing">Sharing for Marketing</a>
<a href="Purposes">Purposes</a> section. If you do not want us to send you these promotional mailings or to share your contact information with third parties, please <a href="Click here">Click here</a> to manage your postal mail preferences or contact <a href="Member Support">Member Support</a>.

### Opting out by calling or writing

Another way you can opt out of having promotional materials sent to your postal mailing address is by calling us at 1-800-333-0663 or by writing to us at:

Consumer Reports

Attn: Opt Out Preference Center

PO Box 2109

Harlan, IA 51593

If you are writing to us, please include your full name and street address and specify which type of promotional postal communications you no longer wish to receive.

Opting out through the Direct Marketing Association (DMA)

If you reside in the United States, you may also opt out of receiving promotional communications through the <u>Direct Marketing Association</u> (DMA). Canadian residents may visit the <u>Canadian Marketing Association</u> (CMA) web site to be removed from marketing lists used by Canadian Marketing Association members.

It can take up to 8 weeks for your postal mail opt out request to become effective. During that time you may continue to receive promotional mailings that were already in process.

Opting out of fundraising communications

If you wish to opt out of receiving fundraising communications from us, please click here. You may also call us at 1-800-333-0663 or write to us at:

Consumer Reports

**Fundraising Solicitations** 

P. O. Box 96552

Washington, DC 20090-6552

If you are writing to us, please include your full name and contact information and specify whether you want to opt out of receiving postal mail, telephone and/or email fundraising solicitations from us. Please also let us know if you do not wish us to share your information with third parties as described in our <a href="Sharing for Fundraising Purposes">Sharing for Fundraising Purposes</a> section of our Privacy Policy.

Because we schedule many fundraising communications in advance, it may take up to 8 weeks for an opt out request to become effective.

Opting out of consumer surveys

We have supplementary policies that specifically address information collected through

participation in our consumer surveys. You can stop receiving consumer surveys by following the opt out instructions in each survey email invitation. You can also stop receiving future surveys by calling us at 1-800-333-0663 or by writing to us at:

Consumer Reports Customer Relations

Attn: Member Support 101 Truman Avenue Yonkers, NY 10703

If you are writing to us, please include your full name and email address.

Opting out of digital advertising

To help maintain our independence and impartiality, we accept no outside advertising. However, we may place ads for our CR Publications, Services and Programs on our own websites and online properties, as well as on other websites and online properties you visit. Ads for CR Publications, Services and Programs may be customized to your interests and preferences based on information collected as you browse online. Tracking technologies like cookies and web beacons are used for these purposes. You can opt out of interest-based advertising, as well as advertising on your mobile device, by visiting <u>TrustARC's Ad Preference Manager</u>.

Certain third parties that provide us with analytics services employ their own tracking technologies, such as cookies, when you visit our digital services. Those third parties are able to collect information about your online activities across CR's digital services and other websites and online services. You can opt out of data collection by some of these data providers as follows:

- Some of our digital services, including the Consumer Reports web site, use Google
  Analytics Advertising Features and its associated tracking technologies to help display
  CR ads you see on other sites, and to help us manage and optimize our digital
  advertising efforts. To opt out of Google Analytics Advertising Features, visit Google's
  Ad Settings page. Website users can also access the Google Analytics Opt Out Browser
  Add-on.
- Some of our digital services, including the Consumer Reports website, use Adobe Analytics and its associated cookies to help us understand how users engage with us so

that we can improve and enhance our users' experience. To opt out of Adobe Analytics cookies on our websites, click here.

Do Not Track: Some Internet browsers include the ability to transmit "Do Not Track" signals that give consumers control over the collection and use of web browsing information. Consumer Reports does not process or respond to such signals in users' web browsers at this time.

### Cookies

We or our service providers may collect tracking information through cookies. You can opt out of accepting cookies or disable them from your browser. The Help function on most browsers contains information on how you can set your browser to notify you before accepting cookies or can disable them entirely. You can also manage cookies by using the tool in our Cookie Policy. To learn more about cookies and similar technical methods and how to opt-out, please click <a href="here">here</a>.

If you opt out of cookies, you will not be able to take advantage of various features of the Consumer Reports website that are available to other users. For example, we use cookies to recognize you by name when you return to this site so you don't have to login again and provide your password.

For more information, please read our complete Privacy Policy.

# Consumer Reports Privacy Policy: Your Privacy Rights

JUMP TO:

Section Navigation...

Last modified: September 26, 2018 (View Archived Versions)

What's new?

Consumer Reports has updated the Privacy Policy that applies to our family of digital services, print publications, our other products, services and programs, and our associated websites, applications and digital tools.

This updated Privacy Policy contains supplemental provisions applicable to users located in the European Economic Area and Switzerland. If you are a resident of the European Economic Area or Switzerland, please see the "Special Terms for Residents of the European Economic Area" section of this Privacy Policy.

Please click here if you would like more information about the updates to our Privacy Policy.

Consumer Reports is an independent, nonprofit member organization that works side by side with consumers for truth, transparency, and fairness in the marketplace. Consumer Reports and its corporate affiliates (which we refer to in this policy as "CR", "we" or "us") publish our organization's privacy principles and apply them to the way in which we treat your information.

This Privacy Policy describes the types of information we collect about you, how your information may be used, when it may be disclosed, how it is protected, and how you can control the use and disclosure of your information.

### Scope

This Privacy Policy covers the Consumer Reports family of digital services, print publications and our other products, services and programs, and associated online and mobile websites, applications and digital tools (including those related to our consumer policy and mobilization activities) that refer to or provide an authorized link to this Privacy Policy (collectively "CR Publications, Services and Programs").

This Privacy Policy applies to information collected about you and your devices when you engage with us.

### **Information Collected**

### Information you give us

When you purchase a subscription from us or otherwise engage with CR, you may give us different types of information including the following:

- Contact information, including name, email address, mailing address, telephone number, and mobile number
- Work contact information, such as name, title, name of the business you work for, business address, business telephone number, and business email address
- User name (which may be your email address) and password
- Photograph
- Birthday
- Billing information, subscription preferences and payment card (credit or debit) information where needed for payment
- Information about you and your household, including demographic information (e.g., age, gender, geographic location)
- Your experiences with specific consumer products and services, including product models you own
- Your experiences with various consumer issues
- Your opinions and actions on various topics and consumer policy issues, whether submitted via our websites or through social media channels
- In certain circumstances, the name of your employer or the organization with which you volunteer or are affiliated
- You may also elect to give us limited information about others, for example, the name and address of someone to whom you give a subscription to one of our publications. That information will be protected according to this Privacy Policy.

You may choose to provide us with certain information considered "sensitive information" and designate it for publication, for example, health and financial-related information you provide when engaging with CR about U.S. policy matters of importance to you, ranging from unfair financial practices to healthcare enrollment challenges. You are not required to provide any of this information in order to use the CR Publications, Services and Programs. We use this information in our editorial reporting about these consumer matters and in our advocacy work on behalf of consumers at the U.S. state and federal level. We request that you not provide us with any Social Security number, financial account information, or similar sensitive data when sharing your story with us to inform our efforts on behalf of consumers.

You are not required by law to share your personal information with us. However, some of this information may be necessary in order for us to provide our services to you. In particular, we

will not be able to subscribe you to our print or online offerings, or accept donations or other contributions without obtaining your personal details and your payment information.

### Information collected automatically

We and our service providers collect certain information automatically about your online activities through technical means, including through the use of cookies, web beacons, and other technologies. This information may include the following:

- Standard server log information, which is data generated automatically by the computer servers that host our digital publications when users visit them. This information may include your Internet Protocol (IP) address (which is a unique numerical address that identifies your device when you access the Internet), your browser and device type, operating system, name of your Internet service provider, date and time of your visit, and addresses of the websites you access before and after you visit a Consumer Reports website.
- Geo-location information, including your IP address, which can be used to derive your general geographic area at a city or postal code level. Geo-location information also includes information about your real-world location at a given time based on latitude and longitude, as well as your general geographic area or more precise information about your street-level location. This information may be collected directly from your computer depending on how your settings are configured, or may be provided in other ways, for example, in the metadata of photographs you send to us that describe the time and place the photo was taken. Our online and mobile websites, applications and digital tools may collect precise information about your computer's or device's geographic location. If your computer or device is equipped with GPS or can connect with wireless access points or hot spots, or if your device is also a phone that communicates with cell towers or satellites, then your computer or device is able to use these features to determine its precise geographic location. If you have consented, the geographic location of your computer or device will be transmitted to CR in real time in accordance with the privacy settings you have set. Once you set your computer or device to transmit its location information to us, it will continue to transmit its location information to us until you set it to no longer do so. You may at any time opt out from further allowing us to have access to your computer's or device's precise location information via the privacy settings on your computer or device.
- Information about your interactions with our content, Consumer Reports ads and
  communications, including the areas you visit on CR digital services and which of our
  Consumer Reports ads and content you see on other organizations' websites (such as
  the Consumer Reports Facebook page) and whether you open email messages from us
  or click on Consumer Reports ads served by our ad partners when you visit other
  websites on which our ads appear.

Device information, including the device type you use to access our digital services, your
device's operating system, and unique device identifier information, which is a unique
alphanumeric character string associated with an individual user's smartphone or similar
handheld device.

#### Information we obtain from other sources

We may collect additional information about you from other sources to supplement, correct and validate the information you provide to us directly, to personalize content and activities for you, and to generally improve your experience with CR Publications, Services and Programs. These sources, whose practices are governed by their own privacy policies, include organizations with which we have a business relationship to provide products and services to you, publicly available data sources such as open government databases, and commercial data sources. Examples of the type of additional information we may collect include:

- Updated mailing address
- Updated payment card information
- Information from social media/networking sources like Facebook, Twitter, Instagram, and LinkedIn. We may also obtain your social media profile (including user name, bio, and location) and your engagement with our content (for example, comments or likes on the Consumer Reports Facebook page), and your other public social media activity. The information we collect from social media sources depends on what individuals choose to make public, their privacy settings within their social media accounts and the social media source's privacy policy, which we encourage you to read carefully.
- Information about products and services you access through our business partners, for example, if you purchase a vehicle in the U.S. or Canada through our Car Buying service.
- For certain of our consumer policy and mobilization activities, your legislative district information

If you are located in the U.S. or Canada, we may also collect:

- Information about your interests (e.g., pets, sports, travel, cars)
- Demographic data (e.g., age, gender, general income bracket, ethnicity, children in household)

### **How We Use Your Information**

Use of Information

The information we collect is used for a variety of purposes. These include:

 To satisfy our obligations arising from any agreement between CR and you, including administering and processing transactions for CR Publications, Services and Programs,

- communicating with you about your account, for administrative purposes, and to respond to questions and comments;
- Consumer policy and mobilization activities, such as running campaigns on consumer policy issues, and informing our efforts to recruit, train and connect our consumer activists;
- Editorial and survey purposes to inform our testing, reporting, and consumer policy and mobilization activities;
- Personalizing and customizing the CR Publications, Services and Programs for those who engage with us in order to provide you with a richer, more relevant experience tailored to what interests you;
- Contacting you regarding your use of our CR Publications, Services and Programs and matters that affect you;
- Responding to your requests and comments;
- Updating and maintaining the accuracy of our information about you;
- Analyzing, testing, securing and improving CR Publications, Services and Programs and other work we do;
- CR's marketing and fundraising purposes, including: providing you with information about products and services that may be of interest to you, including services and benefits from our business partners; serving our Consumer Reports ads to users located in the U.S. and Canada; and management of contests, sweepstakes and similar initiatives (for U.S. users only)
- Providing others with your information for the limited purposes described in this Privacy Policy.

### Combining Information

We may match the information we collect from you directly with the information we receive about you from other sources, and use such information along with information from other sources.

### Disclosure of Information

When You Make It Public

Personal information you submit to a CR publication or elect to post in a public area of a digital service is public. And because of the way the Internet works, it is likely public forever. If you submit user reviews, those submissions may also be shared by us with other websites or we may provide links to your submissions from other websites. You may also choose to share information about yourself and your experience on our websites, such as the content you view, with third-party social networking sites. Please keep this in mind when deciding what information you want to share publicly. If you don't want people to know your name, email address, or other

information that identifies you personally, do not include that information in your public posts. Additionally, please go to the Choice/Opt-Out section to learn more about how you can opt out of certain of our information-sharing practices.

### Sharing With Our Affiliates

We may share your information among our corporate affiliates, which are related legal entities.

### Sharing for Consumer Policy and Mobilization Purposes

When you participate in one of our consumer policy campaigns, for example, by signing a petition or sending a message to policy decision-makers or corporations, we pass along to the petition or message recipient certain of your personal information with your message, including your first and last name, street address and email address.

If you have shared information about yourself and your experiences with a particular consumer product, service or consumer issue, we may also share certain personal information such as your first name and state of residence when disclosing your experiences to policymakers, fellow consumers and groups and the media (unless you have asked us to keep your first name and state private).

### Sharing For Fundraising Purposes

We may share donor information among our corporate affiliates. We may also share certain donor data (such as full name, mailing address and donation information, but excluding your email address, telephone number(s) and any financial account information) with other organizations.

### Please note:

If you became a customer of Consumer Reports before January 3, 2013, and make a donation directly to Consumer Reports, none of the information from that donation is rented or exchanged with any other company or organization.

### **Sharing For Marketing Purposes**

For users located in the U.S. and Canada, we may share certain information about you with other companies that offer products or services through direct-mail and other channels if you purchased or subscribed to one of our print publications on or after August 1, 2014. If you prefer not to receive these offers, you can opt out. To do so, please go to <a href="Choice/Opt Out">Choice/Opt Out</a> for instructions.

Please note that if you are an existing customer and have been continuously since before August 1, 2014, and you receive Consumer Reports magazine or our print newsletters or purchase any of our print publications either by mail, phone, or online, we may exchange or rent your name and mailing address (but not your email address) with other companies that offer products or services through direct-mail. We screen all such offers and strive to select trustworthy, reputable companies which offer high quality products or services of interest to you.

Each mailing list exchange or rental limits the recipient company's use to one promotional effort only. If you prefer not to receive these offers, please go to Choice/Opt Out for instructions.

#### **Sharing With Business Partners**

Our business partners are third parties with whom CR engages to offer you certain products and services, for example, car-buying services available through our website(s) for those purchasing a vehicle in the U.S. or Canada. You may be asked to provide information about yourself in order to obtain these products and services. When you do so, your information is shared with both CR and the business partner(s), and may be governed by the user agreement and privacy policy of both CR and our business partner(s). CR may share information about you with our business partners to fulfill your request for products and services, and our business partners may share certain information about you with us that you provide to them when you use its products and services.

### Sharing With Service Providers

We may share your information with third-party service providers who help us with specialized services, such as payment processing, customer support, shipping, mail and e-mail distribution, mobile messaging, website and database hosting, monitoring of user reviews and ratings, digital publishing, analytics, promotions management, surveys, and mobile payment processing. We also may share personal information with legal advisers, accountants, fund administrators, and companies engaged to dispose of or store data including personal information. We provide these companies only with the information they need to perform their services. For mobile payment processing, the mobile payment service providers will provide your information to your mobile telephone service provider to bill you.

We will take reasonable steps to ensure that where personal information is shared, it is treated securely and in accordance with this notice and applicable laws. For more on disclosure to third parties, please see our Cookie Policy.

We authorize certain service providers to use certain aggregated, anonymous information derived from data collected when you use the products and services they support on our behalf. They do so for their business purposes, such as to report on usage or industry trends to their customer base, and in accordance with their privacy policies.

### Promotional Offers, Sweepstakes, or Contests

Users located in the U.S. may be eligible to enter sweepstakes, contests or other promotions. If you choose to enter a sweepstakes, contest or other promotion, your information may be disclosed to third parties who help design, administer and implement the promotion, including in connection with winner selection, prize fulfillment and aggregated data analysis. Your information also may be disclosed as required by U.S. law, such as on a winners list.

### **Substantial Corporate Transactions**

We may share your information in connection with a substantial corporate transaction, which

may include the sale of one or more of our businesses, a merger, the creation of a separate business to provide certain of our products and services, or in the unlikely event of bankruptcy. We may also share your information in connection with a transaction in which CR seeks financing, investment, support, or funding.

If we engage in any of these types of transactions, your information will be subject to our privacy policy in effect prior to the time of the transfer of that information.

We will notify you if we transfer ownership or control of your personally identifiable information to an unaffiliated third party in connection with a substantial corporate transaction.

### Legal Requirements

We may access, preserve, and disclose your information if we believe that we are required to do so by applicable law, such as to comply with a search warrant, court order, subpoena, or requests from law enforcement, to enforce our legal rights, or to defend against legal claims.

#### Protect Our Websites and Users

We may also disclose your information to investigate, prevent or take action regarding suspected illegal activities, including fraud, or any violation of CR's applicable User Agreement or to protect and defend the legal rights, safety, and property of CR and our employees, agents and contractors (including to enforce our agreements) or in connection with any safety or security concerns, including the personal safety of our users and the public.

### Information Collected by Third Parties

When you visit our digital services, third parties we work with (such as ad networks that serve CR ads, analytics companies and social networking platforms), may collect or receive information through cookies, web beacons, mobile ad identifiers, and other technologies about your online activities over time and across CR's digital services and other online services, for example, information about your interactions with our ads, our content and the websites you visit.

The information they collect about you on our digital services may be aggregated with data these companies collect about you across different websites, online services (including social media services), and your associated devices. These third parties use your information for their business purposes and in accordance with their own privacy policies. For more information, please see CR's Cookie Policy.

#### **Choice/Opt Out**

As a non-profit membership organization engaged in ongoing consumer product testing, news reporting and consumer advocacy, we often engage with consumers like you online and through other communication channels. Your feedback and involvement are critical to our work on your behalf.

We want to give you control over how we use your information. Here's how to opt-out of receiving communications from us:

Opting out of email communications (promotional, email newsletters, Ratings alerts and consumer policy and mobilization communications)

If you become a member of CR and receive any CR publication (like *Consumer Reports* magazine) or digital service (like the Consumer Reports website), participate in our programs, or sign up for email newsletters and product alerts, we may send you promotional emails about our other products and services or to ask you about your experience, unless your account settings indicate that you are located in Switzerland or in an EEA member country and you have not opted in to receive such communications.

If you register to receive consumer policy and mobilization communications or take action on a consumer issue, we may send you email communications about other Consumer Reports services, products and programs, or to ask you about your experiences.

### Opting out online

You can opt out of receiving these email communications from us by following the instructions and links provided at the bottom of each email. If you use this method, you will stop receiving promotional emails only from the line of business or business unit that sent you the message.

If you are a member who receives one of our paid products or services, or participates in our programs you can manage your email communication preferences on your personal account page by clicking <a href="here">here</a>.

If you wish to change your preferences for policy and mobilization email, click here.

### Opting out by telephone

You may also opt out of receiving these email communications by calling us at 1-800-333-0663.

Please allow up to 10 business days for changes to your email preferences to take effect. During that time, you may continue to receive email communications from us that were already in process.

Please note that opting out of receiving email or other communications will not affect your receipt of service-related communications such as those relating to your account, order confirmations, renewal/expiration notices, and payment card notifications.

### Opting out of postal mail promotional communications

If you subscribe to any of our paid products and services or to any of our email newsletters or we receive your name and address from a third party, and you are located in the U.S. or Canada, we may send you by postal mail promotional materials about our other products and

services.

If you purchase or subscribe to one of our print publications, we may also share your postal mail contact information with third parties for their marketing purposes as described above under Sharing For Marketing Purposes.

### **Opting Out Online**

If you do not want us to send you these promotional mailings or to share your contact information with third parties, please click here to manage your postal mail preferences or contact Member Services.

Opting out by calling or writing

You can also call us at 1-800-333-0663 or write to us at:

Consumer Reports
Attn: Opt Out Preference Center
PO Box 2109
Harlan, IA 51593

If you are writing to us, please include your full name and street address and specify which type of promotional postal communications you no longer wish to receive.

Opting out through the Direct Marketing Association (DMA)

If you live in the United States, you may also opt out of receiving promotional communications through the <u>Direct Marketing Association (DMA)</u>.

Canadian residents may visit the <u>Canadian Marketing Association (CMA)</u> web site to be removed from marketing lists used by Canadian Marketing Association members.

It can take up to 8 weeks for your postal mail opt out request to become effective. During that time, you may continue to receive promotional mailings that were already in process.

### Opting out of fundraising communications

If you wish to opt out of receiving fundraising communications from us, please click <u>here</u>. You may also call us at 1-800-333-0663 or write to us at:

Consumer Reports
Fundraising Solicitations
P. O. Box 96552
Washington, DC 20090-6552

If you are writing to us, please include your full name and contact information and specify

whether you want to opt out of receiving postal mail, telephone and/or email fundraising solicitations from us. Please also let us know if you do not wish us to share your information with third parties as described in the Sharing For Fundraising Purposes section above.

Because we schedule many fundraising communications in advance, it may take up to 8 weeks for an opt out request to become effective.

### Opting out of consumer surveys

We have supplementary policies that specifically address information collected through participation in our <u>surveys</u>. You can stop receiving consumer surveys by following the opt out instructions in each survey email invitation. You can also stop receiving future surveys by calling us at 1-800-333-0663 or by writing to us at:

Consumer Reports Customer Relations
Attn: Member Support
101 Truman Avenue
Yonkers, NY 10703

If you are writing to us, please include your full name and email address.

### Opting out of digital advertising

To help maintain our independence and impartiality, we accept no outside advertising. However, we may place ads for our own products and services on our own sites and online properties. If you are located in the U.S. and Canada, you may see ads for Consumer Reports on other websites and online properties you visit. Ads for CR Publications, Services and Programs may be customized to your interests and preferences based on information collected as you browse online, a practice that is often referred to as interest-based advertising. Tracking technologies like cookies and web beacons are used for these purposes. You can opt out of interest-based advertising, as well as advertising on your mobile device, by visiting <a href="mailto:TrustARC's Ad Preference">TrustARC's Ad Preference</a> <a href="Manager">Manager</a>.

Certain third parties that provide us with analytics services employ their own tracking technologies, such as cookies, when you visit our websites and other digital services. Those third parties are able to collect information about your online activities across our digital services and other websites and online services. You can opt out of data collection by some of these data providers as follows and by managing your cookies as described in our Cookie Policy:

Some CR Publications, Services and Programs, including the Consumer Reports
website, use Google Analytics Advertising Features and its associated tracking
technologies to help display the CR ads you see on other websites, and to help us

- manage and optimize our online advertising efforts. To opt out of Google Analytics Advertising Features, visit Google's Ad Settings page. Website users can also access the Google Analytics Opt Out Browser Add-on.
- Some CR Publications, Services and Programs, including the Consumer Reports
  website, use Adobe Analytics and its associated cookies to help us understand how
  users engage with our CR Publications, Services and Programs. To opt out of Adobe
  Analytics cookies on our websites, click here.

#### Do Not Track

Some Internet browsers include the ability to transmit "Do Not Track" signals that give consumers control over the collection and use of web browsing information. CR does not process or respond to such signals in users' web browsers at this time.

#### Cookies

We or our service providers may collect tracking information through cookies. You can opt out of accepting cookies or disable them from your browser. The Help function on most browsers contains information on how you can set your browser to notify you before accepting cookies or can disable them entirely. If you opt out of cookies, you will not be able to take advantage of various features of the Consumer Reports website that are available to other users. For example, we use cookies to recognize you by name when you return to this site so you don't have to login again and provide your password. For more information and to manage cookies, please see the Consumer Reports Cookie Policy.

### **Accessing Your Information**

If you have provided your personal information to us in an online account for a CR publication, service or program, you can access and edit that information by logging in and visiting your account <a href="here">here</a>.

If you registered to receive policy and mobilization-related communications from us, you can access and edit that information here, or click the "unsubscribe" link in any policy and mobilization-related email communication from us and follow instructions to edit your information.

For any other requests, please contact us in any of the ways described in our online <u>Member Support portal</u>.

Users located in the EEA should refer to the "Special Terms for Residents of the European Economic Area" section of this policy for information on how to exercise their data subject rights.

### **Security / Protection Of Information**

We are committed to protecting your information. We have put in place physical, technical and administrative procedures designed to help safeguard and prevent unauthorized access and misuse of your information. When Consumer Reports transmits information over the Internet, we work to protect the information through the use of data encryption methods.

While we endeavor to protect the security and integrity of information that we collect via our websites and other online properties, due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that any information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers.

Visit the <u>Protection of Information</u> page to learn more about how the information you provide is secured.

If you create an account on a CR website, you are responsible for maintaining the strict confidentiality of your account password and for any activity that occurs using your account credentials. Please notify us of any unauthorized use of your password or account or any other breach of security.

### **Children's Privacy**

CR Publications, Services and Programs are intended for general audiences and are not directed to children. If you are the parent or guardian of a child under age 13 and believe your child has provided us with his or her personal information, please contact us. You must be 18 or older to participate in certain activities, such as contests and sweepstakes.

### **Third Party Sites and Services**

We maintain a presence on several social networking and blogging platforms, such as Facebook and Twitter. For your information and convenience, CR's websites and other services incorporate some third party social networking features onto CR's websites and contain links to websites, applications and services maintained by other organizations that operate under their own privacy policies. Through these platforms, features and links, we receive some information about you. Unless otherwise indicated, this Privacy Policy does not cover any information that may be collected through another organization's website, application or service.

Similarly, if you purchase a CR publication or digital service or communicate with us through a company or service other than Consumer Reports (such as a magazine subscription service,

online store, digital application service provider, telecommunication service provider, or social media service), then the privacy policy of that company will control any information you provide to that company. However, information that is provided by you to that company and later provided by such company to CR will be covered by this Privacy Policy.

We encourage you to review the privacy policy of any company before submitting your personal information.

### **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. When we do, we will let you know by posting the changed Privacy Policy on this page with a new "Effective Date." In some cases (for example, if we significantly expand our use or sharing of your personal information), we may also tell you about changes by additional means, such as by sending an e-mail to the e-mail address we have on file for you, or other means consistent with applicable law. In some cases, we may request your consent to the changes. If you use the CR Publications, Services and Programs or other products and services after the new Effective Date, you are deemed to consent to our updated privacy policy, provided that we will obtain your affirmative consent where legally required.

### Your California Privacy Rights

Under California law, residents of the State of California may request from us once per year and free of charge a list of all third parties to whom your personal information has been disclosed during the preceding year for those third parties' direct marketing purposes. If you are a California resident and want such a list, please submit your request in writing in one of the following two ways:

Email us at: legaldept@consumer.org

OR

Write to us at:
Consumer Reports
Attn: Legal Department
101 Truman Avenue
Yonkers, NY 10703

For all requests, you must put the statement "Your California Privacy Rights" in the subject line of your request and include the name of the CR website with respect to which you are requesting the information, as well as your name, street address, city, state, and zip code.

## Special Terms For Residents Of The European Economic Area And Switzerland

As of May 25, 2018, a new privacy law is in effect in the European Union (EU) and the European Economic Area (EEA) called the General Data Protection Regulation (GDPR). The GDPR expands privacy rights of individuals in the EU and EEA with respect to their "personal data", which means any information relating to an identified or identifiable natural person. For those of our members, customers, activists, donors, suppliers and business contacts who are natural persons located in the European Economic Area and Switzerland (hereafter collectively referred to as "Data Subjects"), the following section sets forth information about how CR treats your personal data (information), our valid bases for processing your personal information, and your rights under the GDPR.

### Lawful Basis for Processing Personal Information

Under the GDPR, entities like CR that act as data controllers – meaning those entities that determine the purpose and means of processing of personal information – must have a lawful basis for processing that information. In order to provide Data Subjects with CR Publications, Services and Programs and otherwise comply with our legal obligations, CR needs to collect and process certain types of personal information from Data Subjects. The lawful bases that we rely upon to process the personal information held about Data Subjects are as follows:

- To carry out our obligations arising from our agreements with Data Subjects, such as membership, subscriptions and donations, and to take steps at Data Subjects' request prior to entering into such agreements.
- To send communications to Data Subjects about our activities and offerings to the extent
  we have Data Subject consent or when doing so is in our legitimate interests (and not
  overridden by the interests or fundamental rights and freedoms of Data Subjects).
- To comply with our legal obligations.
- For consumer policy and mobilization purposes carried out in CR's legitimate interests and in compliance with your fundamental rights and freedoms.
- For direct marketing purposes carried out in CR's legitimate interests and in compliance with your fundamental rights and freedoms.

### Personal Information Retention

We shall retain your personal information for so long as is required for the purposes of the relevant agreement between you and CR (see our <u>User Agreement</u>) and/or in accordance with legal and regulatory requirements and tax and accounting rules. We will endeavor not to keep personal information in a form that allows a Data Subject to be identified for any longer than is reasonably necessary for achieving the permitted purposes. At the end of the applicable

retention period, we may destroy, erase from our systems, or anonymize personal information as part of such efforts. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### Storage and Transfer of Personal Information

We maintain physical, electronic and procedural safeguards designed to protect Data Subjects' personal information, prevent unlawful or unauthorized processing of personal information, and prevent unauthorized disclosure of, or accidental loss of, or damage to, such information.

We may process personal information in, and transfer personal information to, countries that may not guarantee the same level of protection for personal information as the country in which Data Subjects reside, and which may not have received an adequacy decision from the European Commission.

Personal information will also be processed by staff who work for us and operate outside the European Economic Area. This includes staff engaged in, among other things, the provision of administration and support services. All such staff are subject to appropriate confidentiality and security obligations.

We restrict access to non-public personal information about Data Subjects to those of our employees and agents who need to know the information to enable us to provide services.

For more information about steps we take to protect your personal data, please click here.

### Rights in relation to Personal Information

Data Subjects have certain rights in relation to their personal information, including the right to be informed about the collection and use of their personal information, as outlined in this Privacy Policy.

These include, where certain conditions are met:

- the right to request access to the personal information we hold about them
- the right to have inaccurate information about them amended or updated
- the right to object to processing of personal information about them
- the right to withdraw consent at any time (where relevant)
- the right to have personal information about them erased or to restrict processing in certain limited situations
- the right to lodge complaints with applicable data supervisory authorities.

Data Subjects should use the contact information below to get more information and/or to make a formal request.

We will endeavor to keep the personal information we store about Data Subjects reasonably accurate and up-to-date by enabling them to correct it by request or by logging into My Account and correcting it directly. Data Subjects should notify us if any of their personal information changes or if they become aware of any inaccuracies in the personal information we hold about them.

### **How To Contact Us**

If you have questions about this Privacy Policy, you can reach us in any of the ways described in our Member Support portal.

If you feel that we have not followed our Privacy Policy, please let us know by emailing us at privacy@consumer.org and we will do our best to address your concerns. You may also contact:

- The Direct Marketing Association's Committee on Ethical Business Practices at ethics@the-dma.org
- Your state or local consumer protection office
- The Better Business Bureau (BBB), or
- The Federal Trade Commission (FTC) by phone at (202) 326-2222 or online at <a href="http://www.ftc.gov">http://www.ftc.gov</a>.

### **Disputes**

Any disputes regarding this Privacy Policy are subject to our User Agreement.