

**PRIVACY POLICY OF THE**  
**ASSOCIATION FOR CONSUMER EFFECTIVENESS!**



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**1. DEFINITIONS**

**A. True owner:** A true owner is the individual consumer, person, or corporation who is the individual consumer, person, or corporation which any said data or information is describing or identifying with particularity, or whose actions do cause there to be a third party monitoring and recording of the behaviors, actions, or decisions of that individual by any third party for any commercial, scientific, or governmental purposes.

**B. Commercial Data Broker:** Any third party who monitors, collects, harvests, gathers, and stores the data or information generated by a true owner of data or information, for the purposes of selling, trading, analyzing, or utilizing that true owners information for a profit or research driven motives.

**C. Hacker:** An individual who unlawfully or without express permission does seek to gain access to information to which direct access to has not been expressly granted.

**D. Third Party:** Any party not being the Association for Consumer Effectiveness or a True Owner of data, for the purposes of this privacy policy.

**E. Personal Information:** Any data or information which contains the name, social security number, or other identifiable information or characteristics that would tend to identify a true owner specifically or individually; or "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include information that is lawfully made available to the general public from federal, state, or local government records.

**F. Club Member:** Any individual who has signed up to be a member of the Associations "Do not track me club," and whose monthly dues are current and paid in full.

**G. Market Channel Compliant Data Brokers:** Those data broker partners who have agreed to receive and utilize our generated master list of Do Not Track Club Members for the exclusive purposes of complying with the Californian Consumer Privacy Act, by respecting our club members right to opt out and be deleted.

**H. Non-compliant Bad Actor Data Brokers:** Those data brokers which we are investigating for lack of compliance with the **Californian Consumer Privacy Act** due to their failure to accept and utilize our master list of consumers who have invoked their right to privacy in accordance with the **Californian Consumer Privacy Act** in order to institute civil enforcement actions against those same bad actor data brokers, and in order to report those bad actor data brokers to the Office of Californian Attorney General for criminal enforcement actions for those same unlawful violations of the **Californian Consumer Privacy Act**.

## **2. WHAT INFORMATION THE ASSOCIATION DOES COLLECT THROUGH THIS WEBSITE AND THE USAGE OF THAT INFORMATION**

- A. The Association for Consumer Effectiveness only collects two types of information. The first type of information is the personal information submitted by Do Not Track Club members. That information is added to the master list of Do Not Track Club Members, which are those individuals who have granted the Association the required limited power of attorney to speak on their behalf to data brokers. That information is collected, stored, and then distributed to data brokers for the exclusive purposes of informing those data brokers of the legal invocation of club members right to have their personally identifiable information “Opted out” and “Deleted” as defined by the Californian Consumer Privacy Act as well as in accordance with other like kind privacy laws wherever located.
- B. The second type of data we collect and maintain is the official e-mail addresses of data brokers who are subject to the jurisdiction of the Californian Consumer Privacy Act, which those data brokers are required by law to maintain for the exclusive purposes of providing consumers an effective manner of communicating with those data brokers the invocation of the right to “opt out” and be “deleted.” The reason we collect and store that information is for the exclusive purposes of informing those data brokers of the invocation of the right to privacy by all Do Not Track Club Members whose memberships are in good standing.

## **3. PROMISE OF THE ASSOCIATION**

- A. It is the direct promise of the operators of the website for the Association for Consumer Effectiveness that under no circumstances, other than a direct court order or lawfully served warrant signed by a neutral magistrate, shall the Association divulge or sell any members or true

owners information or divulge or sell any true owners consumer information to any third party without the strictest contractual consent of the true owner of that individual information.

B. Any information the operators or owners of this website collect shall be only upon a written plain language contractual agreement for the limited purposes of facilitating the on mass noticing of all known commercial data brokers of the wish to opt out of any and all commercial collecting or usages of the personal information of the true owner of that information.

C. Any information collected to facilitate the gaining of an ISSN or other tracking number for the benefit of a true owner of information, shall only be utilized for that limited purposes, and destroyed or erased as soon as feasible to ensure the proper cataloging for the use of the true own to assert commercial ownership rights over their own personal information.

#### **4. Commercial Transactions**

Any commercial transactions or purchases made on the Association website shall be conducted by third party internet transaction companies. As such the Association shall never have access to any true owner or club members financial information, nor shall the Association ever seek to possess any such information.

#### **5. Third Party Bad Acts**

A. The failure of Data Brokers to accept the legal notices served upon them by the Association legally informing those data brokers of the invocation of our club members privacy rights in accordance with the **Californian Consumer Privacy Act**.

B. The Association shall maintain reasonable security policies and procedures for any data it may happen to have to store in order for certain programs to work such as the master list of “Do Not Track” club members, which contains only the information given to us by club members solely for the purposes of that information being forwarded to data brokers for the sole purposes of informing those data brokers whose information they may no longer collect or store in accordance with the **California Consumer Privacy Act**. However, as the primary security measure of the Association is simply not to collect and not to store consumer information as much as possible, the Association shall not be held liable for any third party bad acts from hackers or other malicious individuals or groups whom attack the Association data storage with the intent of gaining that information without permission.

#### **6. Participation**

By utilizing this website you agree to these stipulations and agree not to hold the Association or the Association website liable for things that may occur beyond our control. These terms may change from time to time, but if they do change a notice will be posted on the front page of the website and on the blog telling you exactly what we changed and why.

## **7. Opt-Out**

Anyone may opt out from having their information stored for the purposes above by e-mailing us at [joel\\_drotts@effectiveconsumer.com](mailto:joel_drotts@effectiveconsumer.com), and simply tell us to erase your data or information. However, our main opt out system is simply do not give us your information, as we want as little of your data and information as possible and will only accept the personal information of a true owner for specific purposes such as to accomplish the goals of any program we may hold open to consumers for their privacy benefit.