

Privacy Policy

Marchex, Inc., its subsidiaries and affiliates (collectively “we” or “Marchex”) respect your privacy. This Privacy Policy applies to: (i) the information Marchex collects on marchex.com, including the site’s customer log-in areas (our “Site”); (ii) to the information we collect on behalf of our Clients in provision of our Services to our Clients; and (iii) to our US-based free telephone listing information service available by dialing 1-800-FREE411 or through select wireless carrier partners (collectively, “Free 411 Service”). This Privacy Policy describes how we collect and use the personal information we collect on our Site, the information we collect on behalf of our Clients who use our Services, and the information we collect in connection with our Free 411 Service. The Policy also describes the choices you have regarding our collection and use of your personal information. Our Site contains links to other third-party sites. We are not responsible or liable for the privacy practices or content of such sites since we do not control them.

Marchex Site

What Information Do We Collect on our Site?

We may request that an entity applying for an account with Marchex, on our Site, provide us with certain personal information (such as name, email address, login information, etc.) relevant to our provision of services to the entity.

Our Site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas is public and may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, contact us at privacy@marchex.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

Our Site includes social media features, such as, Facebook and Twitter buttons and widgets. These features may collect information, including your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing such features. Please visit each social media feature’s website to learn more about their privacy practices and how they may utilize your personal data.

In general, we may also collect personal information when you fill out a contact form, download a white paper, request a product demonstration, participate in a marketing survey or campaign, apply for a job, or communicate with Marchex via this Site.

We also collect information automatically from customers and Site users, as described below.

Cookies. Like most sites, for account management purposes, Marchex and our service providers may use session ID cookies and persistent cookies, as well as other tracking technologies to compile statistics about Site users. Cookies are alphanumeric identifiers that we transfer to your computer’s hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site, while others are used to enable a faster log-in process or to allow us to track your activities at our Site, including your IP address, page(s) you visited and keyword searches you conducted on our Site. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Site who disable cookies will be able to browse certain areas of the Site, but some features may not function.

Do-Not-Track. Our Site does not currently respond to web browser Do-Not-Track signals.

Web Beacons, E-Tags, and JavaScripts. We and our partners, affiliates, or analytics or service providers may use these tracking technologies in analyzing trends, administering the website, tracking users’ movements around the site, and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis.

Third-Party Analytics. We use automated devices and third-party applications, such as Google Analytics to evaluate usage of our Site and Marketo to evaluate our email marketing. We and our third-party providers also may use other analytic means, such as clear GIFs to evaluate our Site and to help us improve our Site, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. Such third parties may combine the information that we provide about you with other information that they have collected. This Policy does not cover such third parties' use of the data.

How Do We Use Information Collected on Our Site?

We may use the information we collect on our Site for account management purposes, such as to register and administer your account, to answer to your customer service requests, to communicate with you about your account and other internal business or reporting purposes.

Cookies, web beacons and related monitoring technologies enable us to track user trends, preferences and patterns. The information helps us provide improved services, develop new products, and provide customized content, including targeted advertising. As such, we may send periodic promotional or informational emails to customers and other users of our Site, including newsletters. You may opt out of such communications by following the opt-out instructions contained in the email. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your account or any purchases. Marchex does not use the information we collect via our Services to market Marchex services.

Third-Party Ad Network. We may engage third parties to assist us in marketing Marchex services on third-party websites. For example, we may engage third parties, such as network advertisers, to display Marchex ads on third-party websites after you have visited our Site. Network advertisers are third parties that display advertisements based on your use of our Site and other third-party websites and mobile applications. This enables us and these third parties to target advertisements by displaying ads for products and services in which you might be interested. Third-party ad network providers, advertisers, sponsors, and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), and other technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one.

You may opt out of many website third-party ad networks, including those operated by members of the Network Advertising Initiative ("NAI") and the Digital Advertising Alliance ("DAA"). For more information regarding this practice by NAI members and DAA members, including how to opt out of third-party ad networks operated by NAI and DAA members, please visit their respective websites: www.networkadvertising.org/optout_nonppii.asp (NAI) and www.aboutads.info/choices (DAA). If you are located in the European Union, you may opt out of many ad networks by visiting <http://www.youronlinechoices.eu>.

Opting out of one or more NAI member or DAA member networks (many of which will be the same) only means that those members no longer will deliver targeted content or ads to you. It does not mean you will no longer receive any targeted content or ads on our Site or other websites. You may continue to receive advertisements, for example, based on the particular website that you are viewing. Also, if your browsers are configured to reject cookies when you visit this opt-out page, or you subsequently erase your cookies, use a different computer or change web browsers, your opt out may no longer be effective. Additional information is available on the NAI and DAA websites accessible by the above links.

With Whom Do We Share Information that We Collect on our Site?

We may provide the aforementioned third-party advertisers with information about your usage of our Site. We do not share, sell or rent your personal information collected on our Site, such as name, email address, or other personal information with these (or any other) third parties. These third parties may collect IP address and related site usage data; however we don't permit them to collect your name, contact information or other personally identifiable information through our Site.

Marchex may share some information about our users with advertisers, business partners, sponsors, and other third parties. Such information may include, for example, your IP address, pages(s) you visited and keyword searches you conducted on our Site; however, we don't share with them your name, contact information or other personally identifiable information collected through our Site. This information may allow such third parties to provide you customized advertising. You can opt-out from getting these third party advertising by following the instructions discussed on the previous section.

In addition, Marchex may partner with other parties in connection with the various services offered on our Site, such as credit card processors, job application platforms, or email delivery services. In such instances, we may share limited personal information that is necessary for the third party to provide its services. These companies are only permitted to use this information on our behalf.

If you choose to share our website with others (e.g., sharing investor pages or sending job posts to friends), we will ask you to provide the name and email of the recipient and send that person an email regarding our website. This information will only be used for sending a one-time email. Marchex does not store this information. If you believe that someone has provided us with your personal information and you would like to request that it be removed from our database, please contact us at privacy@marchex.com. Certain users may have additional rights as stated in the Additional Consumer Rights section below.

Marchex Analytics and Performance Advertising Services

Marchex provides analytics services and related online and mobile advertising services (collectively, “Services”) to its business customers and clients (collectively, “Clients”). As part of these services, Marchex:

- Provides click-to-call and view-to-call analytics services to Clients, helping Clients track and evaluate advertising performance by measuring and analyzing actual calls delivered from online and mobile ad campaigns or via certain websites.
- Helps Clients drive calls and/or other desired outcomes through targeted ad campaigns on third-party sites and provides related analytics services.
- Provides call recording and other analytics services to its Clients related to their inbound or outbound calls.
- Collects and transmits SMS and/or MMS message content sent from or to our Clients (“Messaging Content”) and related data to telecommunications carriers to route to the intended recipient and provides analytics services related to such communications.

Information Collected and Used in Provision of Our Analytics and Advertising Services

For the purpose of providing Services to Clients, we collect online usage and analytics information across third-party websites. We may link this information with other information we collect from third parties, including cross-device information, as well as information we collect offline.

The types of information we passively collect in providing our Services include IP address, a date and time stamp, device ID, cookie ID, URL and referring URL, browser type, advertising identifiers, header information, and other information about the ad or web page or mobile application the user was viewing. We collect this information automatically via cookies and pixel tags or from third party providers. We may also collect information related to calls placed and/or Messaging Content sent to or from our Clients, such as caller ID information of the caller/sender or recipient, and may link this information to the online activity we have collected, as well as to information collected from third parties which may include cross-device information. Such correlations may be used to help our Clients deliver targeted advertising content to their users based on anonymous identifiers or segments thereof grouped based on common interests.

Sometimes we may collect sensitive information as part of providing Services to our Clients. Sensitive information includes information or an opinion (that is also personal information) about an individual’s health, racial or ethnic origin, political opinions, philosophical beliefs, criminal record and sexual orientation, amongst other things.

The use of information collected through our Services is for the purpose of providing our Services to our Clients. More specifically, Marchex uses this information to provide analytics, advertising and performance measurement services on behalf of Clients, and to provide Clients with reports and metrics about their advertising campaigns, sales performance, and/or customer service interactions.

Marchex collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal information we process. If you are an individual who would no longer like to be contacted by one of our Clients, please contact that Client directly. Marchex acknowledges that you have the right to access your personal information. An individual who seeks access, or who seeks to correct or delete their personal information, should direct their query to the Client, the data controller. Certain end users of our Clients may have additional rights as stated in the Additional Consumer

Rights section below. If Clients request Marchex to correct or delete their personal information, we will respond within a reasonable timeframe.

We may transfer personal information to companies that help us provide our Services. These companies do not have permission to use your personal information for any other purpose. Transfers to subsequent third parties are covered by the service agreements with our customers. We do not sell your personal information to such third parties.

Free 411 Service (available in the United States only)

When you dial any Toll-Free telephone number, there are certain aspects of the telecommunications system in the U.S. which may allow for your phone number to be visible even if your number is unlisted or you have enabled Caller ID Blocking.

We collect information related to calls placed to our Free 411 Service, such as Caller ID information, the category selected, the listing requested, the party called, and the date and time of the call. We also collect non-personal information, such as the number of users who searched for a specific listing. We may link any information we collect related to calls placed to our Free 411 Service to online activity we have collected in connection with our Services, as well as to information collected from third parties which may include cross-device information. The resulting correlations may be used to help our Clients or their designees deliver targeted advertising content to their users based on anonymous identifiers or segments thereof grouped based on common interests. When we provide this information to our Clients or their designees, we remove any direct identifiers, such as name or telephone number prior to making it available for use for marketing purposes.

Our Free 411 Service may present you with offers or advertisements from our Clients. You will have the choice to accept the offer or to decline it and simply receive the information you initially requested. If you choose to connect through to a Client whose offer is presented to you, we may collect additional information on their behalf in connection with the analytics services we provide to such Client as described in the preceding section.

Opt Out

If you would like to opt out of our online analytics in connection with our Services, you may do so by [clicking here](#) to obtain the Marchex opt-out cookie.

If you opt out of our online analytics provided with our Services, it tells our servers not to link the fact that you viewed a particular ad to the fact that you placed a call to a Client or to our Free 411 Service; we will still count you when compiling aggregate information, such as number of impressions of an ad or number users who searched for a listing. Further, opting out of our online analytics services will not opt you out of Marchex call recording and offline call analytics services provided to Clients.

If your browser is configured to reject cookies when you visit the opt-out page, or you subsequently erase your cookies, use a different computer or change web browsers, your opt-out will no longer be effective.

EU-US Privacy Shield Program

Marchex, Inc., and its subsidiary Marchex Sales, LLC, participate in and have certified their compliance with the EU-U.S. Privacy Shield Framework. Marchex is committed to subjecting all personal data received from the European Union (EU) and the United Kingdom, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List at <https://www.privacyshield.gov/list>.

Marchex is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Marchex complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Marchex is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Marchex may be required to

disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website at <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

Disclosure to Overseas Recipient

Marchex is headquartered in the United States, with affiliates in a number of jurisdictions worldwide. Further, some of the organizations we use to assist us in providing you with our products and services are located overseas. If we share your personal information with an organization that's located outside of your home jurisdiction, we will take reasonable steps to require that it is handled in accordance with this Privacy Policy and applicable privacy laws. We may transfer your personal information to the United States and other jurisdictions. The location of our overseas service providers may vary from time to time.

General

Additional Ways We May Share Information

Marchex may provide personal information when disclosure may be required by law (e.g., subpoenas, search warrants, court orders or similar legal process), to enforce the terms of our Privacy Policy, Terms of Service, or other applicable terms and conditions and as evidence in litigation in which we are involved. We may also determine that such action is reasonably necessary to protect our or another party's rights, property, or well-being. This action may include exchanging information with other companies and organizations for the purposes of fraud detection or protection, or in other situations involving suspicious or illegal activities.

In the event of a transfer of ownership of Marchex, such as acquisition by or merger with another company, or in the case of bankruptcy, a user's information (as well as any other information we collect via our Site, the Services, or our Free 411 Service) may be transferred to the acquiring company.

User Access and Retention of Information

Upon request Marchex will provide you with information about whether we hold any of your personal information. Certain end users of our clients, and other consumers may have additional rights, such as the right to request a disclosure of personal information collected or shared for a Marchex business purpose and the right to request the deletion of personal information. For more details on whether you are entitled to such rights please read the Additional Consumer Rights section below.

Marchex customers may access, change or delete most of their personal information on record with us, by logging into their account and updating it. If you have any questions or need assistance in changing, deleting, or accessing some information, you may contact us at privacy@marchex.com. We will respond to your request to access within 45 days.

We will retain your information (including information we collect on behalf of our Clients) for as long as your or that Client's account is active or as needed to provide you services, and as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, or as otherwise reasonably necessary for our business purposes.

Children

Marchex does not knowingly collect personal information from individuals under age 13. If you have reason to believe that we may have accidentally received personal information from an individual under age 13, please contact us immediately at privacy@marchex.com.

Security

The security of your personal information is important to us. We have implemented safeguards, including where appropriate SSL encryption for sensitive data in transmission, to protect the personal information submitted to us. No method of transmission over the Internet, or electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Site, you can contact us at privacy@marchex.com.

Consent and Changes to this Privacy Policy

Use of Marchex services is subject to separate terms and conditions. Marchex may decide to change this Privacy Policy from time to time. If and when we do, we will post the changes on this page so that you are always aware of the information we collect, how we use it, and under what circumstances we disclose it. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Additional Consumer Rights

In addition to the information supplied in this Privacy Policy, if you are a resident of the State of California, effective January 1, 2020, you are entitled to certain rights under the California Consumer Privacy Act (also known as California Assembly Bill: No. 375) (the “CCPA”). The following notice applies only to these residents. To exercise any of these rights please, you can go to www.marchex.com/ccpa-form, call 1-800-498-0868, or email us at privacy@marchex.com.

For the purposes of this section, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Your Rights

- **Right to Deletion:** You have the right to request the erasure of past data about you under certain conditions.
- **Right of Disclosure or Access:** You have the right to request disclosure of the following: (1) categories of Personal Information collected about you; or (2) specific pieces of Personal Information collected about you. You also have the right to request the disclosure of a sale of Personal Information to third parties; however, we do not sell Personal Information to third parties.
- **Right of Data Portability:** You have the right to request a copy of your Personal Information in a readable and useable format.
- **Right to Equal Services and Prices:** You have the right to exercise your rights under the CCPA and not be discriminated against for having done so (i.e. being denied goods or services, being charged a different price or rate for goods or services, or being provided a different level or quality of goods or services, or being subject to a suggestion that any of the foregoing will occur).
- **Right to Opt-Out of the Sale of Personal Information:** You have the right to opt-out of the sale of Personal Information; however, Marchex does not sell or rent any Personal Information to any third parties.

We will process any requests in accordance with applicable law. In order to process your request, we will need to verify your identity in order to avoid fraudulent requests and ensure you are the California resident who is making the request. In order to properly verify your identity, we may ask you to provide some information that we can attempt to match with Personal Information we may have about you. This may include your full name, your phone number, and/or your email and/or postal address.

Once a request is verified, we will search our internal systems for any of your Personal Information that we may have. Once we have located any of your Personal Information, we will work to comply with your applicable request. If we store your Personal Information as a service provider to one or more of our Client(s), we will provide you with their information so that you can submit your request to them directly.

Authorized Agent

You have the right to appoint an agent who is registered with the Secretary of State of California to submit requests and exercise the above rights on your behalf. We may require the agent to submit to us written permission from you as well as have you verify your identity directly with us. In the event an agent is not able to provide written permission to act on your behalf, we are within our rights to deny a rights request.

Categories of Personal Information Collected and Used for Internal Business Purposes

As part of our Site, Marchex may collect the following categories of data that may contain Personal Information:

- Contact information submitted through our Site (e.g. information required to send us a message through the Site, register for a webinar, download an e-book, etc.)
- Web session data (e.g. IP address, cookie ID, or device ID)
- Any personal information you voluntarily post to our blog

Marchex does not sell such information to third parties but does generally use the above categories of Personal Information collected through our Site for the following internal business purposes:

- Developing new Site features
- Developing customized content
- Account management
- Trend and pattern tracking and analysis
- Marketing our Services

As part of our Services, Marchex may collect the following categories of data that may contain Personal Information:

- Call detail records
- Messaging Content
- Call recordings and transcripts
- Web session data (e.g. IP address, cookie ID, or device ID)
- Cross-device information

Marchex does not sell such information to third parties but does generally use the above categories of Personal Information collected through our Services for the following internal business purposes:

- Providing and improving the Services we deliver to our Clients
- Providing reports and metrics for Client ad campaigns, client sales performance, and/or Client interactions
- Call quality assurance
- Product debugging and repair
- Protecting against malicious, deceptive, fraudulent, or illegal activity
- Compliance with our obligations under applicable law

Contact Information for Questions and Concerns

Feel free to contact us at any time with any questions or concerns you may have regarding our Privacy Policy.

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