

Protecting your private information is our priority. This Privacy Policy offers you information on how we deal with your personal and non-personal data – whether you visit our website, whether we collect data from you as a client (Merchant, Affiliate or Agency) or whether you are a user (visitor of our website or our clients' website and platforms). The collection, processing and use of your data takes place in compliance with all applicable data protection regulations.

Clients confide in us for effectively online marketing their products and services to customers. By providing our technologies and services we may collect information about your device (a computer, mobile phone or any other device that you use to browse and enter a website), e.g. its operating system and browser.

The collection, processing and use of your data takes place in compliance with all applicable data protection regulations. Highest standards of quality, transparency and openness are the reasons for our success. The integrity of internet users and in particular data protection are crucial to all our activities.

This privacy policy applies to ShareASale.com, Inc, an Illinois, USA corporation ("ShareASale").

## **1 Personal Data**

Personal data (also "Personally identifiable information") includes individual information by which you as a natural person are or can be identified by, e.g. your name, address, telephone number, email address or date of birth, as well as information which does not reveal your name, but which relates to you or your device and enables you to be treated individually.

Non-personally identifiable data is information that cannot be connected to your real identity, e.g. the number of users visiting our website or other any other kind of aggregated information.

ShareASale does not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this website.

## **2 Collection of personal data and other information**

The way you get in touch with us or our technologies and services determine the scope of how we collect and process personally identifiable information on you or other information. With this Privacy Policy we want to keep you informed which personal and other kinds of data we receive, why we use it and your rights in respect of that data. Data as a general term may include all kinds of information such as your name, your address or information on your device (e.g. your operating system or browser).

### **2.1 When visiting our website ShareASale.com**

This section provides information on how and which data we may collect from visitors of our website [www.shareasale.com](http://www.shareasale.com).

Our web servers temporarily log traffic data provided by the device you use to enter our website (including the host name (IP address) of the requesting computer), date, time and duration of your visit, data specifications of your browser and operating system as well as the name of your access provider, and the website you were referred from to our website (so called Referrer URL). This information is stored in a log file until it is automatically deleted in accordance with our retention policy.

The collection and processing of this data is carried out for the purposes of facilitating the use of our website (connection set-up), understanding how visitors use it and to ensure the security and stability of our systems as well as the technical administration of the network infrastructure. We do this in the pursuit of our legitimate interest of maintaining and improving our website and enhancing its usability.

We do not record your name, address, telephone number or email address, unless voluntarily provided by you, e.g. as part of a survey or when attempting to enter into a contractual relationship.

### 2.1.1 Cookies

We use cookies on our website to optimise its usability. Cookies are small text files that are sent from our servers to your browser to be stored on your device (laptop, tablet, smartphone or similar). Cookies do not cause damage to your device, do not contain viruses, trojans or other malicious software. The cookie stores information, which is linked to respective device used. This does not mean, however, that we store personal information about you or are aware of your identity.

In general, cookies help to improve and optimise the usability of websites and other online services, including our own websites and online services and those of others. Our use of cookies is strictly compliant with any applicable cookie and data privacy legislation.

Cookies used on our website are listed below.

Domain	Cookie name	Purpose of the Cookie and further information
*.shareasale.com	_ga _gat	Analytic cookies by Google Analytics, please find more information <a href="#">here</a> .
	__cfduid	Server software session cookie
blog.shareasale.com	PHPSESSID	PHP session id
	JCS_INENTIM	Cookie generated by wp-spamshield for anti-spam checks
	JSC_INENREF	Cookie generated by wp-spamshield for anti-spam checks
	awinCookieRebrand	Stores the click on the rebranding notice to avoid showing you the message multiple times. Cookie expires after one year.

Visiting and surfing on our website is possible without cookies. Most browsers accept cookies automatically. You may alter the security settings of your web browser in order to stop your device receiving and storing cookies, to allow receiving and storing cookies from selected websites only, or to be notified before receiving cookies. Please note, however, that these settings may have negative effects on the usability and user guidance of websites and other online services. You may delete cookies stored in your browser at any time. Information stored in such cookies will be removed from your device.

## 2.1.2 Social Plugins

As ShareASale is participating in social networks, there are some social plugins on our websites which we would like to inform you about.

Visitors wishing to avoid connecting to plugins used on our websites may install privacy-enhancing browser plugins, such as Ghostery (<https://www.ghostery.com/>), NoScript (<https://noscript.net/>) or DoNotTrackMe (<https://www.abine.com/index.html>) etc.

### a. Facebook

Facebook is a social network of Facebook, Inc., 1 Hacker Way, Menlo Park, California 94025 (hereinafter „Facebook“). In our online services, we have included different Facebook plugins (for example, "Like", "Share"). These are marked with the Facebook logo. Depending on the type of function, additional information may be added (e.g., "Like", "Recommend"). For a summary of all Facebook plugins please refer to <http://developers.facebook.com/docs/plugins/>

When you enter a page on our website that contains a Facebook plugin your browser or app will establish a direct connection to Facebook's servers where the plugin is loaded from. The information that your browser has visited the corresponding page of our online services will be transmitted to Facebook, even if you do not have a Facebook account or are not logged into your account. This information (including your IP address) will be sent by your browser directly to a server of Facebook in the USA and stored there.

If you are logged into your Facebook account at the same time, it is also possible to assign the page impression to your Facebook profile. If you click on embedded Facebook buttons and log into your Facebook account (or are already logged in), this information will be sent directly to a Facebook server and stored there. The corresponding information is published on your Facebook profile and in your chronicle/timeline in short form. Facebook can thus collect and store additional usage data. If you want to prevent the transmission and storage of your data and your behaviour on our online services through Facebook, you must log out of your Facebook account before you visit our sites and delete any cookies placed by Facebook. You can also prevent the loading of the Facebook plugins with add-ons for your browser, e.g. with the online "Facebook Blocker".

For more information on your rights and on how Facebook is recording and processing data please see Facebook's Data Privacy Policy which is available at <http://www.facebook.com/about/privacy/> and <https://www.facebook.com/help/443483272359009#!/help/340599879348142/>.

### b. Twitter

Twitter is a microblogging service of Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA (hereinafter "Twitter"). Twitter plugins on our websites are usually marked with Twitter's logo which is a little bird.

When you enter a page on our website that contains a Twitter plugin your browser will directly connect to Twitter's servers where the plugin is loaded from. The information that you (including your IP address) have visited our online services will be transmitted to Twitter, even if you are not logged into your account. If you are actively using a Twitter plugin, Twitter may even process more data and publish content that you are entering into the dialogue box ("twittering"). This allows Twitter to map the visit of our pages to your user account. We would like to point out that as a provider of the pages we are not aware of the content of the transmitted data as well as their use by Twitter.

If you want to prevent the assignment of your visit of our websites to Twitter, you must log out of your Twitter account before you visit our site and delete any cookies placed by Twitter.

For more information on your rights and on how Twitter is recording and processing data please see Twitter's Privacy Policy which is available here: <https://twitter.com/privacy/>. You can change your privacy settings in the account settings of your Twitter profile at <http://twitter.com/account/settings>. HYPERLINK "http://en-gb.facebook.com/about/privacy/"HYPERLINK "http://en-gb.facebook.com/about/privacy/"

### **c. LinkedIn**

LinkedIn is a social network of LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA (hereinafter „LinkedIn“). LinkedIn's plugins are integrated on this website. You can recognize the LinkedIn plugins through the LinkedIn logo or the "Share" button on this website. When you visit this website, the plugin is used to establish a direct connection between your browser and the LinkedIn server. The information (which online service was being visited) is transmitted to LinkedIn, even if you are not logged into your LinkedIn account.

If you click on the LinkedIn "Share Button" while being logged into your LinkedIn account, you can link the content of this website on your LinkedIn profile. This allows LinkedIn to map the visit of this website to your user account. For details on data collection (purpose, scope, further processing, usage), as well as your rights and settings, please refer to LinkedIn's Privacy Policy [http://www.linkedin.com/static?key=privacy\\_policy&trk=hb\\_ft\\_priv](http://www.linkedin.com/static?key=privacy_policy&trk=hb_ft_priv).

All social media plugins are used in the pursuit of our legitimate interest of marketing our business and communicating with our business partners and the public.

### **2.1.3 Analysis: Google Analytics**

We use Google Analytics which is a web analysing tool of Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter "Google") for the purposes of the adequate design and continuous optimization of our website. Google Analytics works with cookies and creates pseudonymised usage profiles, which enable an analysis of your use of our website. Information stored in such cookies (such as browser type/version, operating system used, referrer URL, Hostname of the accessing computer, time of server request) are usually transmitted to and stored on Google's servers in the USA. We do this in the pursuit of our legitimate interests of better understanding how our website is used and to report aggregated usage statistics.

Due to the activation of the IP anonymization (IP masking), Google will truncate and therefore anonymize the IP address of your device within the European Union or the European Economic Area.

We contracted Google to analyse your use of this website in order to produce reports on the activities on our website and provide more services connected to the use of our website and the internet in general. The IP address provided by your browser will not be combined with other Google data. The information may be transferred to third parties if this is required by law or if third parties process this data on behalf of Google. You can prevent cookies from being stored on your device by adjusting your browser software accordingly. Please note, however, that changing your settings may have negative effects on the usability of our website. You may prevent Google from recording and processing data on your use of our website (including your device's IP address) and storing such information in a cookie by downloading and installing a browser deactivation add-on from <http://tools.google.com/dlpage/gaoptout?hl=en>.

For more information, see Google's privacy policy: <https://www.google.com/intl/en/policies/privacy/>.

## 2.2 When you are our client or becoming one

### 2.2.1 Registration in our Network

You need to register in our Network in order to obtain access to our technologies and services as contractually agreed upon. If you enter into a contractual relationship with us and/or register in our Network, we record all data, including personal data, which has been provided by you such as your name, address, telephone number or email address. You can see from our online registration form which personal data in detail we record. We do not record any further personal data other than voluntarily provided by you (e.g. as part of a survey or a request for information).

We may also collect information on the device you are using to enter our User Interface page (...) such as your operating system and browser of your device.

We use all such data in order to comply with our obligations under agreements with users of the marketplace or the UI, or in the pursuit of our legitimate interest of fraud prevention and the proper administration of our business.

### 2.2.2 Cookies in the User Interface

We use cookies on our User Interface pages with the purpose of pursuing our legitimate interests of improving and optimising usability for our clients.

Cookies used on our User Interface pages are listed below.

Domain	Cookie name	Purpose of the Cookie and further information
*.shareasale.com	FeaturedCampaign<merchantid>	Set on affiliate browser for tracking merchant featured program signups
	userid	Numeric affiliate identity
	merchantid	Numeric merchant identity

opm	Numeric OPM identity
ariddle	Encrypted affiliate authentication
mriddle	Encrypted merchant authentication
oriddle	Encrypted OPM authentication
SHRSL_ID	Identity traced for account sign ups
express	User preference to redirect to the login page
SignupCampaign<merchantid>	Set on affiliate browser for tracking merchant sign up campaigns
HC	Deprecated UI preferences cookie
atoken	Demo affiliate account session token
mtoken	Demo merchant account session token
shsc	Authorization cookie for merchant and affiliate accounts
HolidayFeaturedCampaign<merchantid>	Set on affiliate browser for tracking affiliate sign up campaign
__utma __utmb __utmc __utmli __utmt __utmz	Analytics cookies by Google, more information available <a href="#">here</a> .

### 2.2.3 Google Analytics

We use Google Analytics which is a web analysing tool of Google Inc. on our User Interface pages. More information is available [here](#).

## 2.2.4 Newsletter

With the following information, we will inform you about the contents of our newsletter as well as the registration, dispatch, statistical evaluation procedure and your right of objection. By subscribing to our newsletter, you agree to the receipt of the newsletter and the procedures described. We do this in the pursuit of our legitimate interest of marketing our business.

We send out newsletters, e-mails and other electronic notifications with promotional information (hereinafter "Newsletter") subject to the consent of the recipient or a legal permission.

The registration for our newsletter is handled through a so-called double opt-in procedure, which means you will receive an e-mail after your registration, in which you will be asked to confirm your registration once again. The registrations for the newsletter are recorded in order to prove the accurate registration process according to legal requirements. This includes storing the time of logon and confirmation. Furthermore changes to the data stored by Mailchimp are being recorded.

The newsletter will be sent by means of "MailChimp", a newsletter platform of the US company Rocket Science Group // 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA or "Cheetah Digital", a newsletter platform of the US company Experian Information Solutions, Inc // 475 Anton Boulevard, Costa Mesa, CA 92626 United States. The e-mail addresses of our newsletter recipients, as well as further data described in the context of this information, are being stored on the servers of MailChimp in the USA. MailChimp uses this information to send out and evaluate the newsletters on our behalf. In addition, MailChimp can use this data to optimize or improve its own services, e.g. for the technical optimization of the dispatch and the presentation of the newsletter or for economic purposes in order to determine from which countries the recipients come from. However, MailChimp does not use the data of our newsletter recipients to contact them independently or transfer data to third parties.

MailChimp is certified under the US-EU-Data-Privacy-Agreement the "Privacy Shield" and is committed to comply with EU data protection requirements. Furthermore, we have concluded the "EU Model Clauses" with MailChimp. This is a data protection agreement which obliges MailChimp to protect the data of our users, to process according to its privacy regulations on our behalf and in particular not to pass data on to third parties. You can view the privacy policy of MailChimp here: <https://mailchimp.com/legal/privacy/>.

In order to register for the newsletter, we only need your e-mail address. Further voluntarily provided information about you is only used to personalize the newsletter.

There are cases where we direct the newsletter recipients to the MailChimp websites. E.g. our newsletters contain a link with which the newsletter recipients can access the newsletters online (for example in the case of display problems in the e-mail program). Furthermore, newsletter recipients can subsequently change their data (like their e-mail address). Likewise, the data privacy policy of MailChimp is only available on their website.

You may terminate the receipt of our newsletter at any time, which means revoke your consent. Therewith your consent to the dispatch of the newsletter via MailChimp as well as the statistical analyses expire at the same time. A separate cancellation of the dispatch via MailChimp or the statistical evaluation is unfortunately not possible. You will find a link to unsubscribe from our newsletter at the bottom of each newsletter.

## 2.3 When using our technologies and services via websites and online services of our clients

### 2.3.1 Our Tracking | Use of Cookies

We use cookies to provide our tracking services, which also include our reporting services. Please find some general information on cookies [here](#).

Tracking allows us to understand which website referred a user to another website, so that the second website can acquire more website traffic. We measure the success of these referrals and assist the payment of commissions from the website receiving the traffic to the website referring that traffic.

We store cookies on devices of users who are visiting websites and using online services of our clients in order to record business transactions (leads and sales such as signing up for a newsletter or placing an order in a web shop). The only purposes of our tracking cookies are to allocate one successful advertisement to a particular business transaction, and to perform corresponding billing services. Personally identifiable information on the user are neither collected nor processed nor used in tracking. Nothing but the information when and on which device a click on an advertisement occurred is stored in tracking cookies. We only store an individual sequence of figures that cannot reveal the name of a particular user and contains information on

- the Merchant’s Partner Programme
- the Affiliate
- the specific time of the user’s action (click or view)

While tracking we may also collect information on the device that is used to perform a business transaction such as the device’s operating system and browser.

We collect this data ourselves and share this data with Merchants, Affiliates and Agencies which use our network from time to time. We also receive this data from those entities.

Our tracking cookies are listed below.

Domain	Cookie name	Purpose of the Cookie and further information
*.shareasale.com, *.shareasale-analytics.com	<merchantid>c	Encoded userid, tracking gap, & click data
	<merchantid>o	
	<merchantid>u	
	sscid sstitd	Base 36 encoded date & hit id data
	XD<0-39>	Data structure containing tracking data; userid, click id, expirations

	xaj	For merchants with advanced analytics enabled, a comma delimited list <merchantid>=<timestamp>
	xsj	Comma delimited list of encoded data structures containing affiliate id, expiration, and click data references
	xdj	Comma delimited list of merchant ids

You may alter the security settings of your browser in order to limit the use of cookies on your device. You may choose to stop your device receiving and storing cookies at all, to allow receiving and storing cookies from selected websites only, or to be notified before receiving cookies. Please note, however, that these settings may have negative effects on the usability and user guidance of websites and other online services. You may delete cookies stored to your browser at any time. Information stored in such cookies will be removed from your device.

### 2.3.2 Information on Cookies and Third Party Cookies

In contrast to “normal” cookies (so-called first party cookies), which are mostly used by the website operator itself, third party cookies are cookies from a third party that place their cookies on the website of another website operator. As a Affiliate you may be obliged – depending on the jurisdiction you are active in – to inform users of your website about cookies that are used on your website, including such placed by ShareASale (as so called third party cookies). This obligation to provide information also includes information on the purpose of the cookie and how the user may prevent cookies being placed on his/her device. A user must give his/her consent to the use of cookies on the Affiliate’s website, before a cookie is placed, either by the Affiliate or a third party. The Affiliate who operates the website is responsible for receiving this consent which shall include the consent regarding cookies placed by ShareASale. Please see [here](#) for a list and description of cookies used for tracking purposes by ShareASale.

### 2.3.3 General

The above processing is undertaken in the pursuit of our legitimate interests of operating our affiliate networks, generating revenue and fraud prevention.

We control how data is processed for the purposes of tracking alongside the Merchants and Affiliates which use our network from time to time.

## 3 Processing and use of personal data

We use personal data provided by our clients only for administrating and providing our technologies and services, for responding to clients’ enquiries and, where applicable, executing the contract between a client and ShareASale. We store personal and any other kind of data strictly in compliance with

applicable data protection and privacy legislation and our contractual duties, and will prevent unauthorized access to data to the best of our abilities.

Provided you have given your consent or have not objected – where legal provisions allow so – we may use your personal data for advertising and market research. By registering with our Network you give your consent that we may contact you via telephone, via mail and email in order to provide you with information on ShareASale offers. You may withdraw your consent at any time.

We may transmit your data to our subcontracted service providers, both in and out of the US, but only if we contractually assigned these to process data on our behalf and, both ourselves and the subcontracted service providers comply with all requirements of commissioned data processing regulations.

In order to fulfil our contractual obligations we may transmit your data to companies that we control and subsidiaries of such provided that these companies are subject to this Privacy Policy or privacy guidelines ensuring at least equal protection for your data.

We do not transmit data to other third parties unless you have given your consent thereto or the transmission is made to state institutions on the basis of mandatory national legislation.

## **4 Data security**

ShareASale takes all technical and organisational security measures required to protect your personal data from loss, unauthorised disclosure or other forms of misuse. Data is stored in a safe environment that is not open to public access. Your personal data may be encrypted before transmission in certain cases (e.g. processing your login data). This means that – support by your browser provided – communication between your device and our servers will include recognized encryption measures.

Our staff has been trained in privacy matters and in dealing with data and information, which they gain access to in a responsible manner.

Please be aware that should you contact us via email, confidentiality of information therein may not be ensured. Third persons may have access to contents of emails.

## **5 Individual Rights, Access, rectification, deletion and blockage**

You have the right of access to some categories of your personal data at any time and may request rectification or erasure of your data. You may also object to data processing. Where you have given consent to any processing, that consent may be withdrawn at any time.

In case you registered as a client on our website, you may use your client account to exercise some of these rights..

You may exercise your legal rights by contacting us on our details set out in paragraph 7.

If you are not happy with our processing of your data, you may make a complaint to your local data protection regulator.

While observing applicable privacy legislation we will erase your data without any action required by you, if retention of your data is no longer necessary for the purpose pursued or retention is no longer allowed for any legal reason. We may restrict processing instead of erasing your data where legally not allowed to erase (e.g. legal obligations to maintain your personal data).

## **6 Amendments**

We may modify this Privacy Policy and our data security provisions from time to time, in particular if new laws and regulations need to be adopted or we regard amendments reasonable. The date of amendments will be posted below the heading of this Privacy Policy.

## **7 Questions / Contact**

ShareASale is a wholly owned subsidiary of Awin AG, a company registered in Germany (Eichhornstr. 3, 10785 Berlin, GERMANY).

Please bring any questions regarding this Privacy Policy, requests for further information on how we process your data, suggestions and possible complaints to the attention of the Group Data Protection Officer of AWIN AG via email: [global-privacy@awin.com](mailto:global-privacy@awin.com), fax: +49(0)30 50 96 91-99 or mail: AWIN AG, Eichhornstr. 3, 10785 Berlin, Germany.