



**Jason Lowry**

**COO**

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Finch takes the new GDPR guidelines very seriously. The protection and privacy of our clients, and their customers data, is high priority. Existing measures and protocols insure complete compliance with new regulations that go into effect May 25, 2018.

In summary, Finch does not collect or store any sensitive data. Collected data is limited to anonymized data from advertising portals and client name, company, email, and billing address. Additionally, Finch is fewer than 250 employees and doesn't collect or process any data which poses any risk to any individuals privacy.

The purpose of this document is to provide disclosure into the data we process for the purposes of Finch-related services. The Finch platform is designed to analyze and optimize digital media campaigns within the Google Adwords, Microsoft BingAds, and other online advertising portals. These advertising portals anonymize user data so that sensitive information is not obtained or stored. We rely on the advertising portal Programmer Interfaces (APIs) to obtain and transfer data and we never have direct access to sensitive information.

As a prospective Finch client you would have received an audit of your advertising efforts. During this audit we obtained only anonymized data from the advertising portals along with your name, company and email address. As a Finch client, you would additionally provide billing information; specifically billing address, credit card information, or invoices. Finch does not store credit card data. It is processed through Authorize.net, a leading payment gateway provider, and follows all current Payment Card Industry (PCI) security standards.

The Finch system does not store or record any information related to our client's customers. When your advertising portal account is unlinked from the Finch platform, we are unable to reference any data within the portal. Any remaining data in the Finch system is anonymized.

Finally, Finch maintains an internal CRM system (Salesforce) which contains a list of prospective, active, and past Finch clients. The CRM system contains only basic information about you, your business, and your interaction with online advertising portals. Per the terms of the GDPR, you may



request to view the data we have collected about you or your business. Prospective and former clients may request that we remove this data.

As an organization we value data; it has been the lifeblood of Finch since establishment. As stewards to the cause we ask that you take it upon yourself as a Finch partner to be weary of your data and the means of obtaining it. This will insure a healthy partnership for many years to come.

If you have any questions or concerns relating to your data, or the policies and processes we have in place, please reach out via email to our Data Protection Officer.

Sid Severson, DPO  
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Sincerely,

Jason Lowry