

# Clairvoyix Data Privacy

## Data Collected

Clairvoyix keeps the following data elements that can be identified as Personally Identifying Information that we obtain from the data feeds of our clients:

- Name (first, middle initial, and last)
- Mailing address (all elements)
- Email address (both personal and company email, if provided)
- Phone number (both home and business or cell, if provided)

We do not receive or maintain “sensitive” or “restricted” data, nor do we maintain any information that is not publicly available. Examples would include, but are not limited to: social security numbers, passport numbers, credit card numbers, driver’s license numbers, professional/employment information, biometrics, network related information, geolocation data, protected data, educational information, or commercial information.

Clairvoyix follows the theory of minimization, which we interpret as:

- Only collect the data we need
- Only use it for the purposes granted by our clients
- Only keep it for the period-of-time agreed to by our clients

From the data that is received and maintained, which also includes transactional information from a guest action, such as hotel stay-dates, revenue amounts, and marketing identifying fields (guest type, source of data, etc.), marketing campaigns are developed and deployed. These campaigns are performed for and at the specific direction and approval of our clients. **This guest data is not used for any other purpose other than as authorized by our clients.**

## Email Preferences

Clairvoyix maintains opt-in/ opt-out status. This information comes to us either directly from the client’s data, or from the specific email service provider used by the client. Clairvoyix provides the capability to opt-out or opt-in persons via their email address, and this functionality is available for use by our clients.

Within the functionality of opt-in/ opt-out, Clairvoyix will provide the capability of “right to erasure or to be forgotten,” which, if used instead of opt-out, will completely erase the person from the database. NO record of their prior existence will be maintained. This right must be initiated by our client, who will verify the request from the consumer.

## Consumer Information Access Requests

All requests for consumer information must be provided to Clairvoyix by our client, who will verify the request before forwarding it to Clairvoyix.

## Use of Third Parties

Clairvoyix utilizes services of Third Parties for data cleansing, data augmentation of publicly available information, email deployment, and statistical representation of client data. All vendors utilized maintain a confidentiality agreement with Clairvoyix.