
Privacy Policy

Document Revision History

Version	Change Date	Changed By	Approver	Approval Date	Comments
1.0	5/25/18	Drew Steed	Drew Steed	5/25/2018	Initial Draft
1.1	1/21/19	Drew Steed	Drew Steed	1/21/2019	Added Revision History
1.2	1/22/19	Drew Steed	Drew Steed	1/22/2019	Added legal basis language for data processing
1.3	3/5/2020	Drew Steed	Drew Steed	3/5/2020	Annual Review – no changes required
1.4	3/12/2021	Drew Steed	Drew Steed	3/12/2021	Annual Review – no changes required
1.5	10/4/2021	Drew Steed	Drew Steed	10/7/2021	Modifications to add language for the CCPA requirements
1.5	1/18/2022	Joe Bishop	Drew Steed	1/20/2022	Annual Review – no changes required
1.5	2/9/2023	Joe Bishop	Drew Steed	2/13/2023	Annual Review – no changes required
1.5	2/28/2024	Joe Bishop	Drew Steed	2/28/2024	Annual Review – no changes required
1.6	7/2/2024	Joe Bishop	Drew Steed	7/2/2024	CCPA Delete Act of 2023 disclosure requirements added
1.7	5/7/2025	Joe Bishop	Drew Steed	5/7/2025	Updated company name from IDM, Inc to IDM, LLC



PRIVACY NOTICE /YOUR PRIVACY RIGHTS

Introduction

IDM, LLC (“us,” “we,” or “our”) collects and processes information about you as described in this Privacy Notice (“Notice”). We are committed to protecting the privacy of those with whom we interact. This Notice contains details about how we collect, use, and share Personal Information that we obtain from and about you when you interact with us via our website, email, and in other online and offline interactions. Please read this Notice carefully.

Applicability: We collect information in several contexts as described below. However, this Notice does not apply to the following information:

- Information about our employees, contractors, agents, and job applicants. Such information is subject to a separate privacy notice that we will make available to individuals.
- Information we collect from individuals with whom we engage in solely business-to-business communications and transactions, such as information about the employees of our business partners and customers.

Changes: We may update this Notice from time-to-time. The current Notice will be effective when posted. Please check this Notice periodically for updates. If any of the changes are unacceptable to you, you should cease interacting with us. When required under applicable law, we will notify you of any changes to this Notice by posting an update on this website. When required under applicable law, we will seek affirmative consent from you before making material changes to the way we handle Personal Information previously collected from you. If you do not provide such consent, Personal Information will continue to be used in a manner that is consistent with the version of this Notice under which it was collected.

Sources of Personal Information

We collect information about you and how you interact with us in several ways, including:

- **Information you provide to us directly.** We collect the information you provide to us directly.
- **Information automatically collected or inferred from your interaction with us.** We automatically collect technical information about your interactions with us (such as IP address and browsing preferences).
- **Information from public sources,** including government entities from which public records are obtained and information you submit in public forums
- **Information from third parties.** We receive information about you and your interactions with us from third parties, such as from data brokers, third party service and content providers, credit reporting agencies, and others interacting with us.



We may combine information that we receive from the various sources described in this Notice, including third party sources and public sources, and use or disclose it for the purposes identified below.

Types of Personal Information We Collect

The types of information that we have collected about you during the previous 12 months are:

- **Identifiers**, such as your name, alias, postal address, country of residence, email address, account name, phone number, social media identifiers (e.g., Twitter handle, Instagram name, etc.) or other similar identifiers.
- **Protected Class and Demographic information**, such as age, race, gender, national origin, religion, sex, disability, citizenship, medical condition, political activity or affiliation, military or veteran status, education, or date of birth.
- **Commercial information and preferences**, including records of personal property, creditworthiness, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Geolocation information**, such as longitude and latitude from your IP address.
- **Professional, employment, or education information**, such as job title, business address, employment history, or other professional information.
- **Inferences** drawn from any of the information we collect to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

How We Use Your Personal Information

We may use each category of your information described above in the following ways:

- **To enable interactions between you and us**, such as to provide you with and support your interactions with us; communicate with you about our data practices; install and configure changes and updates to programs and technologies related to interactions with us; authenticate those who interact with us; or to respond to your requests, complaints, and inquiries.
- **For our own internal business purposes**, such as to evaluate or audit the usage and performance of programs and technologies related to interactions with us; evaluate and improve the quality of your interactions with us and programs and technologies related to interactions with us; perform internal research for technological development and demonstration; conduct data analysis and testing; maintain proper business records and other relevant records.
- **For legal, safety, or security reasons**, such as to comply with legal requirements; protect our safety, our property or rights of those who interact with us, or others; and detect, prevent, and respond to security incidents or other malicious, deceptive, fraudulent, or illegal activity.
- **In a de-identified, anonymized, or aggregated format**. When converted to a de-identified, anonymized, or aggregated format, data no longer constitutes Personal Information, and we may use this information for any purpose.

- **For marketing.** We may use your Personal Information to market our products or services or those of third parties, such as our business partners. We may use your Personal Information when you participate in marketing surveys, questionnaires, promotions, events or contests. We may audit aspects of our ad impressions. We may use your Personal Information for short-term transient use, including for contextual ad customization. We may use your Personal Information to enhance our content and to potentially send you commercial emails.
- **For any other purposes for which you provide consent.**

With Whom We Share Your Personal Information

We may share your Personal Information with the categories of recipients described below:

- **Affiliates and subsidiaries:** We may share your Personal Information within our group of companies, which includes parents, corporate affiliates, subsidiaries, business units and other companies that share common ownership for the purposes described above.
- **Service providers:** We may share your Personal Information with service providers working on our behalf in order to facilitate our interactions with you or request or support our relationship with you, such as hosting service providers, IT providers, operating systems and platforms, internet service providers, analytics companies, and marketing providers (e.g., we may share your email address with our outbound email marketing provider). We may contract with other companies to provide certain services, including identity verification, email distribution, market research, promotions management and payment processing. We provide these companies with only the information they need to perform their services and work with them to ensure that your privacy is respected and protected. These companies are prohibited by contract from using this information for their own marketing purposes or from sharing this information with anyone other than with us, unless at our direction as part of providing the service.
- **Business partners:** We may also provide your Personal Information or provide access to your Personal Information to our business partners, including for third party marketing or as a sale. If legally required, we will seek your consent before engaging in such sharing.
- **For legal, security and safety purposes:** We may share your Personal Information with third parties such as law enforcement or other government agencies to comply with law or legal requirements; to enforce or apply our Terms of Use and other agreements; and to protect our rights and our property or safety of our users or third parties.
- **In connection with a corporate transaction:** If we sell some or all our assets, merge or are acquired by another entity, including through a sale or in connection with a bankruptcy, we will share your Personal Information with that entity.

We may also de-identity, anonymize, or aggregate Personal Information to share with third parties for any purpose.



Security and Retention

We maintain reasonable security procedures and technical and organizational measures to protect your Personal Information against accidental or unlawful destruction, loss, disclosure, alteration, or use.

Children's Privacy

Interactions with us are intended for individuals 16 years of age and older. Our interactions are not directed at, marketed to, nor intended for, children under 16 years of age. We do not knowingly collect or sell any information, including Personal Information, from children under 16 years of age. If you believe that we have inadvertently collected Personal Information from a child under the age of 16, please contact us at the address below and we will use reasonable efforts to delete the child's information from our databases.

External Links

When interacting with us you may encounter links to external sites or other online services, including those embedded in third party advertisements or sponsor information, that we do not control. We are not responsible for the privacy practices and data collection policies for such third-party services. You should consult the privacy statements of those third-party services for details.

Contact Info/Your Choices

If you have questions regarding this Notice, please contact us at:

EMAIL: privacy@idm.us.com

PHONE: 703-547-4961

MAIL: 11654 Plaza America Drive, #858 Reston, VA 20190

If you are a California resident, you may ask us to refrain from sharing your Personal Information with certain affiliates or third parties for their marketing purposes. Please contact us at ccpa@idm.us.com if you would like to do so.

Your California Privacy Rights

This section applies to certain California residents and supplements the rest of our Notice above. This section does not apply to the following information:

- Information about individuals who are not California residents.
- Information about our own employees, contractors, agents, and job applicants. Such information is subject to a separate privacy notice that we will make available to individuals.



- Information we collect from individuals with whom we engage in solely business-to-business communications and transactions, such as information about the employees of our business partners and customers.

Pursuant to the California Consumer Privacy Act of 2018, below is a summary of the Personal Information we collected from consumers, the sources from which we collected the Personal Information, the business or commercial purpose for which the Personal Information was collected and the categories of third parties with whom we share consumer Personal Information. The section references relate to the sections above in this Notice.

Source of Your Personal Information

The categories of sources of personal information are detailed in the Sources of Personal Information Section above and are summarized as follows: (a) directly from you, (b) through automated technologies or interactions, (c) public sources, and (d) from third parties.

Uses of Your personal information

The business and/or commercial purposes for which we collect personal information are detailed in the How We Use Your Personal Information Section and are part of the following general purposes: (a) performing services, (b) auditing, (c) legal and compliance, (d) quality assurance, (e) security, (f) debugging, (g) short term, transient use, (h) internal research, and (i) corporate transactions.

Sharing Personal Information

The categories of third parties to whom we disclose personal information for a business purpose are detailed in the With Whom We Share Your Personal Information Section and are summarized as follows: (a) affiliates and subsidiaries, (b) third party service providers, (c) business partners, (d) legal, safety, and security, (e) corporate transactions, (f) entities related to online data collection, and (g) otherwise with your consent.

Categories of Personal Information we have collected, sold and disclosed for a business purpose over the past 12 months.

Category	Description	Collected, sold and disclosed
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license	We may have collected some of these data elements on California Residents, such as:

	number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> • Real Name • Postal Address • Email • Telephone
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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. Some personal information included in this category may overlap with other categories.	<p>We may have collected some of these data elements on California Residents, such as:</p> <ul style="list-style-type: none"> • Name • Address • Telephone Number
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<p>We may have collected some of these data elements on California Residents.</p>
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<p>We may have collected some of these data elements on California Residents, such as:</p>

		<ul style="list-style-type: none"> • Products or services purchased • Purchase history • Personal property
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	We do not collect this type of information.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	<p>We may have collected some of these data elements on California Residents, such as:</p> <ul style="list-style-type: none"> • “Intent” data that is built on browsing history by webpage topic.
G. Geolocation data.	Physical location or movements.	We may have collected some of these data elements on California Residents, such as:

		<ul style="list-style-type: none"> Physical Location
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	We do not collect this type of information.
I. Professional or employment-related information.	Current or past job history or performance evaluations.	We do not collect this type of information.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	We do not collect this type of information.
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	We may have collected some of these data elements on California Residents.

Please see below for additional information on how IDM collects, sells and discloses personal information on California Residents.

The specific pieces of personal information we have collected about California Consumers.	Please see the "Types of Personal Information We Collect" sections above.
The categories of sources from which the	We collect personal information from the following sources:

personal information was collected.	<ul style="list-style-type: none"> • Government Sources • Third Party Vendors and Data Providers • Data Subjects • Publicly available websites
The business or commercial purpose for collecting personal information	<p>IDM collects personal information so that we can supply commercial data about organizations to other organizations. Our purpose is to enable businesses to manage their financial risks, protect against fraud and dishonesty, know who they are doing business with, meet their compliance and regulatory obligations and better understand organizations, industries and markets.</p> <p>We also collect personal information so that we can license and sell professional business contact information for marketing and data management purposes.</p>
The categories of third parties to whom we sell personal information	<p>We sell personal information to the following third parties:</p> <ul style="list-style-type: none"> • Our customers for sales and marketing and compliance decisions • Our strategic partners who incorporate IDM data into their own solutions <p>For more information, please see the “How We Use Your Personal Information” section above.</p>
The business or commercial purpose for selling personal information	<p>IDM collects information on businesses and business professionals, including personal information, so we can supply our customers with data about organizations and people. Our purpose is to enable businesses, organizations, and public sector entities to market their products and services, manage their financial risks, protect against fraud and dishonesty, know who they are dealing with, meet their compliance and regulatory obligations, insight and better understand organizations, industries, markets, and people.</p>

The categories of third parties with whom we share personal information	See the “How We Use Your Personal Information” section of our Privacy Notice.
The business or commercial purpose for sharing such personal information	<p>The business or commercial purpose for sharing such personal information is to utilize third parties to help us in our purpose of enabling businesses to manage their financial risks, protect against fraud and dishonesty, know who they are doing business with, meet their compliance and regulatory obligations and better understand organizations, industries and markets.</p> <p>We also share personal information with third parties so that we can license and sell professional business contact information for marketing and data management purposes.</p>

Your Rights

California residents have certain rights, subject to legal limitations, regarding the collection, use, and sharing of Personal Information. California residents may exercise the following rights via our webform at [CCPA](#), by emailing us at ccpa@idm.us.com.

Right to Know. You have the right to request information about the categories of Personal Information we have collected about you, the categories of sources from which we collected the Personal Information, the purposes for collecting the Personal Information, the categories of third parties with whom we have shared your Personal Information, and the purpose for which we shared your Personal Information. You may also request information about the specific pieces of Personal Information we have collected about you.

Right to Delete. You have the right to request that we delete Personal Information that we have collected from you.

Right to Opt Out. You have the right to opt out of the sale of your Personal Information.

Right Not to be Discriminated Against. You have the right not to be discriminated against for exercising your CCPA rights.

Verification: In order to exercise your rights, we will need to obtain information to locate you in our records or verify your identity depending on the nature of the request. If you are submitting a request on behalf of a household, we will need to verify each member of the household in the manner set forth above. For a Specific Pieces Report, we will request your phone number, legal first and last name, and complete postal information to



verify your identity and seek a signed declaration, under penalty of perjury, that you are who you say you are. For a Categories Report, we will request your phone number, legal first and last name, and complete postal information to verify your identity. For a Right to Delete request, we will request your phone number, legal first and last name, and complete postal information to verify your identity.

Authorized Agents: Authorized agents may exercise rights on behalf of consumers, but we reserve the right to also verify the consumer directly as described above. Authorized agents may use the webform [CCPA](#) and upload documentation demonstrating the agent has authority to exercise rights on the consumer's behalf. At a minimum, we will require evidence of the agent's identity, proof of registration with the California Secretary of State, and at least one of the following evidencing proof of your legal authority to act on the behalf of the individual consumer:

- Written authorization signed by the Consumer; or
- Certified copy of a Power of Attorney granted under Probate Code.

Timing: We will address Requests to Opt-out within 15 business days. We will respond to Requests to Delete and Requests to Know within 45 calendar days, unless we need more time in which case, we will notify you and may take up to 90 calendar days total to respond to your request.

THE DELETE ACT OF 2023: In compliance with The Delete Act of 2023, IDM discloses the following information for the previous year.

YEAR == 2024	DELETE	TO KNOW	TO ACCESS	TO OPT OUT	TO LIMIT USE	TOTAL COMPLIED	TOTAL DENIED	DELETION NOT REQUIRED
COUNTS	330,619	0	0	83,684	0	414,303	0	0
MEDIAM	5 days	n/a	n/a	4 days	n/a			
MEAN	5 days	n/a	n/a	4 days	n/a			