

## GDPR DATA SUBJECT ACCESS RESPONSE

Dear Ms. Tougas,

Please find below the required information following your Data Subject Access Request dated May 1, 2019.

GDPR Access Report Case Number: GDPR0001445

Recipient: Daisy Tougas

Unique Identifier: daisitougas@teleworm.us

Initial submission date: May 1, 2019

Report generation date: May 8, 2019

### Customer Profile:

Categories of personal information collected about the data subject:

- Name (First Name, Last Name)
- Address (house number & street name, postal code & city, country)
- Email
- Phone
- Occupation
- Company

Categories of sensitive personal information collected about the data subject:

- Date of Birth
- National Identification Number (ID)
- Gender
- Ethnicity
- Marital Status
- Credit Card Number
- Mother's Maiden Name

### Lawful Basis:

According to our records, explicit consent was given during account setup.

### Legal Rights:

You are eligible to the following rights under GDPR:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

You also have the right to withdraw your consent.

You also have the right to lodge a complaint with a supervisory authority.

You are not under a statutory or contractual obligation to provide the personal data.  
Your details are not being processed by a decision-making, including profiling.

**Retention Period:** All categories of personal information will be retained until consent is revoked and/or 3 years.

This report summarizes the information held by *Acme Inc.* about you as of the report generation date above. It is based on the information contained in your User Profile.

For more information or questions visit the [ACME GDPR FAQs](#) or Email [privacy@acme.com](mailto:privacy@acme.com).

Best Regards,

Charles Coriolan  
ACME DPO

### Use of Collected Information:

| Function/<br>Recipient        | Location of<br>Information | Business Purpose   | 3 <sup>rd</sup> Party | PI Shared   | Sensitive PII<br>Shared  | Purpose of<br>Sharing/Processing  |
|-------------------------------|----------------------------|--|-----------------------|---|--|---|
| <b>Loyalty<br/>Program</b>    | Marseille, France          | Tracks information about users who have signed up for the loyalty program                    | Capgemini             | First Name<br>Last Name<br>Address<br>Email<br>Phone<br>Company | Date of Birth<br>National ID<br>Credit Card<br>Number<br>Mother's Maiden<br>Name | Data from loyalty sign up is stored in database and sent out based on action/status change. Consumer uses QR code to activate Loyalty profile and purchase              |
|                               | Caldes de Montbui, Spain   |  | Merkle                | First Name<br>Last Name<br>Address<br>Email<br>Phone            | -  | Consumer signs up to receive coupons and earn points. Data is sent to customer/supplier for reward fulfillment and receipt processing                                   |
| <b>Customer<br/>Analytics</b> | Marseille, France          | Customer data is used by analytics team to analyze customer preferences and purchase pattern | Capgemini             | First Name<br>Last Name<br>Address<br>Email<br>Phone<br>Company | Date of Birth<br>National ID<br>Credit Card<br>Number<br>Mother's Maiden<br>Name | Team conducts consumer analytics. Provides consumer service history data for analysis. Marketing analytics results are sent to retail stores for marketing improvements |
|                               | Caldes de Montbui, Spain   |  | Harte Hanks           | First Name<br>Last Name<br>Address<br>Email<br>Occupation       | Date of Birth<br>Gender<br>Ethnicity<br>Marital Status                           | Survey sent to consumers to understand experience   |
|                               | AWS-EU Cloud               |  | Merkle                | First Name<br>Last Name<br>Address<br>Phone<br>Email            | -  | Provides consumer service data for reward fulfillment   |

| Function/<br>Recipient       | Location of<br>Information                           | Business Purpose  | 3 <sup>rd</sup> Party | PI Shared   | Sensitive PII<br>Shared  | Purpose of<br>Sharing/Processing   |
|------------------------------|--|---|-----------------------|---|--|--|
| <b>Marketing</b>             | AWS-EU Cloud   | Customer database<br>storing all the<br>customer<br>information for<br>marketing purposes<br>including purchase<br>history, promotional<br>entries and prize<br>fulfillment | Capgemini             | First Name<br>Last Name<br>Address<br>Email<br>Phone<br>Company | Date of Birth<br>National ID<br>Credit Card<br>Number<br>Mother's Maiden<br>Name | Commerce & Store -<br>Consumers purchase<br>product online or in<br>store and order details<br>are sent to<br>customer/supplier  |
|                              |  |   | Global<br>Response    | First Name<br>Last Name<br>Address<br>Email<br>Phone            | Date of Birth<br>Credit Card<br>Number<br>National ID<br>Mother's Maiden<br>Name | Prize Fulfillment -<br>Winners are contacted<br>and additional<br>information collected<br>to deliver prize or make<br>arrangements related<br>to winnings (e.g. travel) |
|                              |  |   | LiveRamp              | First Name<br>Last Name<br>Address<br>Email<br>Occupation       | Date of Birth<br>Gender<br>Ethnicity<br>Marital Status                           | Commerce & Store -<br>Consumers purchase<br>product online or in<br>store and order details<br>are sent to understand<br>customer preferences                            |
|                              |  |   | Hatteras<br>Press     | First Name<br>Last Name<br>Address                              | -  | Promotional Entry -<br>Members of the public<br>can submit their<br>information for<br>consideration in a<br>drawing or contest  |
|                              |  |   | MailChimp             | First Name<br>Last Name<br>Email                                | -  | Promotional Entry -<br>Members of the public<br>can submit their<br>information for<br>consideration in a<br>drawing or contest  |
| <b>Customer<br/>Service</b>  | AWS-EU Cloud   | Identify customer<br>when a customer<br>calls service center  | None                  | -   | -  |  |
| <b>Order<br/>Fulfillment</b> | Marseille, France<br><br>Caldes de Montbui,<br>Spain | Track customer<br>purchase and fulfill<br>orders  | None                  | -   | -  |  |