

WelcomePAC Privacy Policy

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At WelcomePAC, we are committed to protecting our democracy and building a big-tent Democratic Party that wins. This Privacy Policy is designed to help you understand how WelcomePAC ("WelcomePAC" "we", "our", "us") collects, uses, and shares your personal information.

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1. SCOPE

This Privacy Policy applies to personal information processed by us, including on our websites, applications, and other online or offline offerings. To make this Privacy Policy easier to read, our websites, applications, and other offerings are collectively called the "**Services.**" By using our Services, you consent to the terms of this Privacy Policy.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Information You Provide to Us Directly

We may collect the following personal information that you provide to use:

- **Donations.** We may collect personal information when you make donations, including name, address, email address, and cell phone. Federal law also requires us to use our best efforts to collect certain employment information, including your occupation, name of employer, and address if your contributions exceed \$200 in a calendar year. Your donations are processed by a third-party payment processor through our online fundraising platforms, including Act Blue. We

do not directly collect or store any payment card information entered through our Services, but we will receive information associated with your payment , as described above.

- **Your Communications with Us.** We may collect personal information, such as name, email address, phone number, or mailing address when you contact us through the Services, or otherwise communicate with us.
- **Social Sharing Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., social media pages). Any information you provide using the public sharing features of the Services will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.

B. Information Collected Automatically

We may collect personal information automatically when you use our Services:

- **Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Cookies, Pixel Tags/Web Beacons, and Other Technologies.** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through your use of our Services.
 - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity and improve security or that allow you to make use of our functionality;

- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;

See “[Your Privacy Choices and Rights](#)” below to understand your choices regarding these Technologies.

- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services. Some of our analytics partners include:
 - **Google Analytics.** For more information, please visit [Google Analytics’ Privacy Policy](#). To learn more about how to opt-out of Google Analytics’ use of your information, please click [here](#).
 - **LinkedIn.** For more information about LinkedIn, please visit [LinkedIn’s Privacy Policy](#).
 - **Instagram.** For more information about Instagram, please visit [Instagram’s Privacy Policy](#).
 - **X.** For more information about X, please visit [X’s Privacy Policy](#).
 - **TikTok.** For more information about TikTok, please visit [TikTok’s Safety Center](#).
 - **Facebook Connect.** For more information, please visit Facebook’s [Data Policy](#). You can object to the collection of your data by Facebook pixel, or to the use of your data for the purpose of displaying Facebook ads by contacting the following address while logged into your Facebook account: <https://www.facebook.com/settings?tab=ads>.
 - **Substack.** For more information, please visit [Substack’s Privacy Policy](#).

C. Information Collected from Other Sources

We may obtain information about you from other sources, including through third-party services and organizations that allow us to license personal data and that provide market research services.

3. HOW WE USE YOUR INFORMATION

We use your information for a variety of purposes, including to provide our Services, for administrative purposes, and to promote our Services, as described below.

A. Provide Our Services

We use your information to fulfill our contract with you and provide you with our Services, such as:

- Managing your information;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Sending you newsletters (via an affiliated non-profit that runs the newsletter through a third-party service provider, Substack,) and alerts and otherwise providing you with news and

information that we think will be of interest to you, such as sending you information to keep you informed about various campaigns, candidates, issues, events, activities, and resources;

- Soliciting donations and support for WelcomePAC and for candidates, issues, and organizations that we support; and
- Communicating with you about policy changes.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Improving, upgrading or enhancing our Services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions and other compliance activities;
- Enforcing our agreements and policies; and
- Complying with our legal obligations.

C. Marketing and Advertising our Services

We **do not** share or sell your information with or to any third-party advertisers.

We may contact you directly to promote WelcomePAC, including through email campaigns, text messages, and phone calls.

If you have any questions about our marketing practices, you may contact us at any time as set forth in [“Contact Us”](#) below.

D. Other Purposes

We also use your information for other purposes as requested by you or as permitted by applicable law.

- **Consent.** We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.
- **De-identified and Aggregated Information.** We may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, information about the device from which you access our Services, or other analyses we create.

4. HOW WE DISCLOSE YOUR INFORMATION

We disclose your information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your information are described below.

- **Individuals You Share or Interact With.** The Services may include various tools and functionalities that permit you to share personal information with other individuals.
- **Service Providers.** We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Partners.** We may share your personal information with partners with whom we have relationships, as well as organizations, groups, and causes that we believe have similar missions or goals.
- **Affiliates.** We may share your personal information with our company affiliates.
- **Advertising Partners.** We **do not** share your personal information with third-party advertising partners.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests; comply with legal proceedings, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email and Telephone Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails and we may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our

Terms or this Privacy Policy). In addition, to comply with federal election law, our contributor records will be continuously maintained in a secure database.

We process requests to be placed on do-not-mail, do-not-phone, and do-not-contact lists as required by applicable law.

- **Text Messages.** You may opt out of receiving text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us.
- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Interest-Based Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#) and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#) and [the Digital Advertising Alliance](#).

Please note you must separately opt out in each browser and on each device.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on our Services, by mail or by sending an email to you.

7. INTERNATIONAL DATA TRANSFERS

WelcomePAC is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Sites or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries.

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect indefinitely.

9. CHILDREN'S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian believe your child has uploaded personal information to our site without your consent, you may contact us as described in "[Contact Us](#)" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account if applicable.

10. OTHER PROVISIONS

Third-Party Services. Certain features and functionalities of the Services may link to or allow you to interface, interact, or share information with, access and/or use third-party websites, services, products, and technology (collectively, "**Third-Party Services**") through the Services. WelcomePAC does not provide or control any aspect of the Third-Party Services and is not responsible for any compatibility issues, errors or bugs in the Services or Third-Party Services caused in whole or in part by the Third-Party Services or any update or upgrade thereto. We encourage our users to read the privacy policies of each Third-Party Service with which they interact. We do not endorse, screen or approve, and are not responsible for, the privacy practices or content of such Third-Party Services. Providing personal information to Third-Party Services is at your own risk.

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you directly as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you an email notification). We encourage you to review the Privacy Policy whenever you access the Services to stay informed about our information practices and the ways you can help protect your privacy.

11. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at info@welcomepac.org.