

# GDPR Data Collection Notices & Data Subject Request Processes

This document serves as a high-level breakdown of ZoomInfo's notice and choice program as it relates to EU individuals. These processes were implemented in order to maintain high standards of transparency around our processing of personal data, and to afford data subjects with easy mechanisms to act upon their right to privacy.

The protocols and infrastructure implemented to maintain deliverability on this notice program have been independently audited, and found to exceed the standards of most Fortune 500 companies. Ask your Account Rep for a copy of the report: *Email Industries Deliverability Audit*

## Direct Notification at the Point of Collection

ZoomInfo sources data through a combination of technologies and human input, resulting in profiles, and even singular data points, being derived from multiple sources. There are a number of contributing factors that influence exactly when a notice is sent in this collection process, but for our EU data subjects, notice is **always** sent before publication to ZoomInfo's customer facing database. In fact, publication of an EU profile is contingent upon successful delivery of the notice to the individual's business email address; a technical control monitored by our expert deliverability team.

**A note regarding non-EU data subjects:** We strive to provide the same level of transparency across our entire database, even in areas where direct notice is not required by law. Outside of our EU dataset, which has 100% notice coverage, we have achieved 90% notice coverage.

## Contents of the Notice

The notice provided to ZoomInfo contacts is written in alignment with Article 14 of the GDPR. It contains information about our processes, the types of data we collect, and the fact that we sell the data to our customers who are B2B sales, marketing, and recruitment professionals. Most importantly, the notice reaffirms the rights of the individual and provides them with easy mechanisms to act upon those rights. Ask your Account Rep for a copy of the notice we provide.

## Data Subject Rights Requests Management

We maintain three primary mechanisms for individuals to act upon their rights under the GDPR.

**Automated Privacy Center**

The primary method we use for managing data subject rights is our robust [privacy center](#). Here individuals can access, update, and remove their personal information in real time. This system is monitored by our Privacy Technology Principal in partnership with our engineering and web teams to ensure proper functionality. Individuals who use our privacy center to remove their information can expect their information to be removed within 24 hours of their request. Those who request access are presented with their ZoomInfo profile data in real time. A fuller .tsv of their data is provided within a couple of days after the request is processed through our APIs with the 3rd party DSAR management system, DataGrail.

**Email & Phone**

The other two primary methods are our email [privacy@zoominfo.com](mailto:privacy@zoominfo.com), as well as our toll free number, (833) 901-0859. These are monitored by our full-time Privacy Fulfillment team. This team, overseen by our Compliance Operations Manager, consists of 5 trained individuals who ensure data subject requests are properly honored in a timely manner. ZoomInfo also invests in ensuring the rest of our staff can identify a privacy request, and know to forward those requests to the privacy team for assistance. Individuals who reach out through email or phone can expect their request to be processed within one week of receipt.

**A note regarding non-EU data subjects:** ZoomInfo honors all data subject requests, even for individuals in jurisdictions that do not have privacy laws requiring ZoomInfo to honor their requests.

**Suppression of Opted-Out Individuals**

Once a request for removal has been processed, the contact record is run through a tool which adds a suppression record. The information is removed from core products and is temporarily displayed (for 30 days) on the Opt-Out list available to our customers within the platform. This list is available for our customers to leverage. Our standard terms that govern our license agreements include an obligation for our customers to remove opt-out information from their own systems if they obtained that information from ZoomInfo and do not have an independent lawful basis to retain such information. After the 30 days, the record is no longer accessible via the opt-out list and remains suppressed in perpetuity.