

ClickDimensions will be adding new functionality to our product to help our customers in their compliance with current and future consumer privacy regulations – including the [GDPR](#). We are committed to our compliance with the GDPR as a data processor and data controller by the May 25 deadline. We're also making these product enhancements to provide our customers with new tools they can use to manage their compliance more efficiently.

## Enabling enhanced privacy functionality

Below is a summary of the new privacy functionality you'll see added to the ClickDimensions product ahead of the May 25 GDPR deadline. When released, an administrator of a ClickDimensions customer account can easily enable this functionality.

We will be providing additional details about these features – including specific release timing – in upcoming emails, webinars, release communications and user documentation.

## Support for leads or contacts who have provided prior opt-in consent

The most common question we hear from customers is whether they can continue to market to their existing leads and contacts after the GDPR takes effect in May. The ClickDimensions system will consider any lead or contact that previously opted-in via a web form and who is currently on a marketing list connected to a subscription list as being opted-in. When the customer enables the new privacy features, our system will automatically append details about the lead or contact's prior consent to their record as required by the GDPR. Customers can continue to send messages to these previously opted-in leads and contacts with no additional changes or effort.

### What if the lead or contact provided opt-in consent outside the ClickDimensions system

Customers wishing to be GDPR-compliant, and who gathered opt-in consent from leads or contacts using processes outside of the ClickDimensions system, will be able to use an enhanced list import tool that will allow ClickDimensions customers to manually import those leads or contacts into a marketing list within ClickDimensions. During the import process, the user will indicate that opt-in consent was received and can also provide details on how/when/where they obtained that consent. This process can be used on both existing or future leads and contacts gathered outside the ClickDimensions product.

### What if you don't have opt-in consent from a lead or contact

Customers wishing to be GDPR-compliant, and who have leads or contacts in their database for whom they do not have opt-in consent to the required GDPR standard, will need to send an email to that segment of their database before the GDPR takes effect. This applies only to leads that do not fall into one of the two categories listed in the sections above. The purpose of sending this email should be to gather the required opt-in consent from the lead or contact that is necessary to continue marketing communications in the future. The customer will need to take this action before they can continue sending messages to those individuals.

## Obtaining opt-in consent in the future

After the customer's ClickDimensions account is enabled with the new privacy functionality, leads or contacts who do not have a valid opt-in consent on record will not receive messages sent from the customer's account. The customer can gather opt-in consent from future leads and contacts by having the lead or contact complete a subscription management form that contains an opt-in consent or by using the approach detailed above for leads or contacts whose opt-in consent is obtained outside of the ClickDimensions system.

## 'Right to be Forgotten' and requests to view or update information on a lead or contact

The GDPR allows leads or contacts to request that a company provide them with a copy of all information stored about them in the company's systems -- including in the company's marketing systems. The lead or contact can also request the company to modify that information or to delete it from their systems. We are adding new functionality and processes to help our customers more efficiently comply with these requirements.

- **Responding to data requests from leads or contacts.** ClickDimensions customers will be able to submit a request for a data lookup using the lead or contact's email address and the ClickDimensions' customer's account key. ClickDimensions will then perform a search for that lead or contact's information -- in the context of their relationship with the specific ClickDimensions customer making the request -- across our data sources. We will then return the results of that search to the customer. Customers will need to combine this information provided by ClickDimensions with other information from their systems (including CRM) and return it to the individual who made the initial request.
- **Modifying lead or contact data.** ClickDimensions already provides its customers with the ability to search for and modify a lead or contact's information in our system. That data can also be modified directly in the CRM system. Changes will take effect from the time of change and going forward. Historical information, such as reporting data that references a contact or lead's email address prior to the change will not be updated retroactively.
- **Deleting lead or contact data from our systems.** ClickDimensions' customers can also request that we delete all information about a lead or contact from our systems. ClickDimensions will confirm when the deletion has been completed and will keep an encrypted copy of that information on our systems along with an audit trail of the deletion as required by

the GDPR. Customers will want to ensure they honor the lead or contact's request by also deleting that lead or contact's information from CRM or other marketing systems as prescribed by the GDPR.

## Consent to and opt out of web tracking

The GDPR requires companies to allow leads or contacts to opt out of having their web activity tracked while on a company's website. To make it easy to comply with this requirement, we're making enhancements to our Web Tracking functionality. These changes will allow our customers to include a Web Tracking Opt-Out pop-up anywhere the web tracking script is present on their websites, landing pages, surveys or web forms. Leads or contacts who elect to not be tracked by clicking on the opt-out button in the pop-up will immediately be removed from future web tracking.

## Opt-in vs opt-out subscription management

The ClickDimensions solutions currently operate in an opt-out configuration – allowing recipients of messages to opt-out or change their subscription status using a link contained in an email message. The GDPR requires that companies only market to data subjects who have opted-in to communications. We're adding new functionality to our Subscription Management feature that will allow our customers to choose between the current opt-out configuration or a new opt-in configuration for their marketing database. These preferences will not apply to transactional messages.

## Subscription management support for SMS

We are adding SMS Subscription Management to versions of our product that support SMS functionality. These changes will allow a lead or contact to opt-in to or opt-out of specific SMS lists in the same way they can with email communications today.

## Collecting opt-in consent in the future

We're making enhancements to our campaign automation functionality to allow users to specify an opt-in consent step in the campaign process. These changes will allow opt-ins to be collected and recorded across interactions with landing pages, surveys, and web forms. Users can also obtain a lead or contact's consent outside the ClickDimensions system, such as at a trade show. That lead or contact information can then be imported into the ClickDimensions application using the manual import tool described previously.

*While our goal in providing this information is to help our customers and prospects understand and comply with the GDPR relating to the use of our services, we recommend our customers consult their legal counsel regarding their compliance and obligations under the GDPR and other consumer privacy regulations.*