



# Gateway Data Privacy Policy

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## Introduction

Aluum LLC d/b/a Gateway Data (collectively, “Gateway,” “we,” “us” or “our”) is the world’s largest alumni database. We work with universities and educational institutions to enable them to access and reconnect with their alumni. This Privacy Policy describes how Gateway processes personal information we collect through our digital and online properties or services that link to this Privacy Policy (including, as applicable, our websites, our application, electronic communications, and social media pages) as well as our marketing activities and other activities described in this Privacy Policy (collectively, the “Services”).

See the [U.S. State Privacy Rights Notice at Collection](#) section of this Privacy Policy for additional information if you are a U.S. resident.

This policy applies to:

1. Users of our website and services
2. Individuals whose data we collect and sell as part of our Contact Database, even if they do not directly use our services

This Privacy Policy does not apply to information that we process on behalf of our business customers while providing services to them. Our use of information that we process on behalf of our business customers is governed by our agreements with such customers. If you have concerns regarding your personal information that we process on behalf of our business customer, please direct your concerns to the business customer with which you have a relationship.

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## Personal Information We Collect

**Information you provide to us.** Personal information you may provide to us includes:

- Contact information (such as name, email address, phone number)
- Account information (such as username, password, company details)
- Billing information (such as for purchasing services, if applicable)
- Marketing information (such as your preferences for receiving our marketing communications and details about your engagement with them)
- Support and inquiry Information (such as when contacting customer support)

**Information we obtain from third parties.** We may receive personal information about you from third-party sources, such as commercial data providers, service providers, ad networks, data analytics providers, social media platforms, integration partners, and publicly available sources, and we may combine personal information we receive from you with personal information we obtain from other sources. Our third-party partners may collect information available through public APIs, websites, social media platforms, and other publicly accessible sources on the internet. This data may include:

- Full name
- Email address
- Phone number
- Employment information (e.g. Job titles and company names)
- Social media profiles (e.g. LinkedIn url)
- Education information (e.g. Universities attended, majors, degrees)
- Birthdate
- Gender

If your information is included in our database and you wish to opt out, refer to the "[YOUR CHOICES](#)" section or the [U.S. State Privacy Rights Notice at Collection](#) section below.

**Automatic data collection.** We, our service providers, and our advertising partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Services, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, unique identifiers (including identifiers used for advertising purposes), browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.

- **Communication interaction data** such as your interactions with our email, text, chat or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails enabling us to detect if you have opened or forwarded a message.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to our website, navigation paths between pages or screens, information about your activity on a page or screen, access times, duration of access, and whether you have opened our emails or clicked links within them.
- **Approximate location data**, for example, as inferred from network data or device settings.

**Tracking technologies.** Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, credentials, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a web browser session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our service providers and other third parties place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed, clicked or forwarded.

## How We Use Your Personal Information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery and operations.** We may use your personal information to:

- provide and operate the Services;
- enable security features of the Service;
- personalize the service, including remembering the devices from which you have previously logged in and remembering your selections and preferences as you navigate the Service;
- establish and maintain your user profile on the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, user-to-user communications, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications;
- provide support for the Service, and respond to your requests, questions and feedback; and

- fraud prevention and security.

**Research and development.** We may use your personal information for research and development purposes, including to develop, analyze and improve our products and services. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal We may use this anonymous or de-identified data and share it with third parties for any lawful business purposes. We do not attempt to reidentify deidentified information derived from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.

**Marketing.** We may use your personal information to send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, court orders, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**With your consent.** In some cases, we may specifically ask for your consent to collect, use or share your personal information for further purposes, if those purposes are not compatible with the initial purpose for which that personal information was collected.

**Tracking technologies.** In addition to the other uses included in this section, we may use the [Tracking technologies](#) described above for the following purposes:

- **Technical operation.** To allow the technical operation of the Service, such as remembering selections as you navigate the site and remembering whether you are logged in.
- **Functionality.** To enhance the performance and functionality of our services.
- **Analytics.** To help us understand user activity on the Service, including the volume and demographics of users, which pages are most and least visited and how users move around the Service or interact with our emails. For example, we use Google Analytics for this purpose. You can learn more about Google Analytics and how to prevent the use of Google Analytics relating to your use of our sites here: <https://tools.google.com/dlpage/gaoptout>.

**Data sharing in the context of corporate transactions.** We may share certain personal information in the context of actual or prospective corporate transactions – for more information, see [How we share your personal information](#), below.

**Retention Period for Personal Information.** We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, including sensitive personal information, we may consider factors such as the length of time we have an ongoing relationship with you and provide services to you; the amount, nature, and sensitivity of the personal information; the potential risk of harm from unauthorized use or disclosure of your personal information; the purposes for which we process your personal information and whether we can achieve those purposes through other means; whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); whether retention is advisable in light of our legal position, such as in regard to applicable statutes of limitations, litigation or regulatory investigations; and applicable legal requirements. For example, we will retain your personal information for as long as you have an account with us or keep using our services, and the length of time thereafter during which we may have a legitimate need to reference your personal information to address issues that may arise. When we no longer require the personal information we have collected about you, we may either delete it or de-identify it.

## **How We Share Your Personal Information**

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, on other applicable notices, or at the time of collection.

**Affiliates.** In some cases, our corporate parent, subsidiaries, and affiliates might have access to personal information.

**Service providers.** Third parties that provide services on our behalf or help us operate the Services or our business (such as internet service providers, information technology, customer support, hosting, analytics, email delivery, marketing, database management services, and consumer research and website/data analytics).

**Customers.** We may share information with universities, educational institutions, and other business partners who use our platform to access alumni contact information for legitimate purposes such as alumni relations, fundraising, and marketing.

**Third parties designated by you.** We may share your personal information with third parties where you have instructed us or provided your consent to do so.

**Professional advisors.** We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties in litigation, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.



**Corporate transactions.** We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Gateway, financing of Gateway, public stock offerings, the sale, transfer or merger of all or part of our business, assets or shares, liquidation or reorganization). For example, we may need to share certain personal information with prospective counterparties and their advisers. We may disclose your personal information to an acquirer, successor, or assignee of Gateway or a portion of our business assets as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

## Your Choices

In this section, we describe the choices available to you.

**Access or update your information.** If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account and navigating to your account profile and settings.

**Opt-out of communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). It may take time for your opt-out to be effective. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

**Mobile location data.** You can disable our access to your device's precise geolocation in your mobile device settings.

**Cookies.** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit <http://www.allaboutcookies.org>.

**Blocking images/clear gifs.** Most browsers and devices allow you to configure your device to prevent images from loading, so the business hosting the image will not detect that you have viewed a page. To do this, follow the instructions in your particular browser or device settings.

**Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

## Other Sites and Services



The Services may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

## **Data Security Measures**

We employ administrative, technical, and physical security measures to safeguard personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

## **International Data Transfers**

We are headquartered in the United States and we may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

## **Children and Teens**

Gateway does not knowingly collect, sell, or process personal data from children under the age of 18. Our Services are intended for business professionals and are not designed for use by anyone under 18 years of age.

If you are a parent or guardian of a minor from whom you believe we have collected personal information in a manner prohibited by law, or if information was provided on your behalf when you were under 18, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

## **Changes to this Privacy Policy**

The "Last Updated" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. We reserve the right to modify this Privacy Policy at any time. We will notify you by updating the "Last Updated" date. Depending on the kind of change we make, we may also notify you directly or ask for your consent to the change. Any modifications to this Privacy Policy will be effective upon our posting the modified version or as otherwise indicated at the time of posting.

## **How To Contact Us**

Please direct any questions or comments about this Policy or privacy practices to [hello@gatewaydata.io](mailto:hello@gatewaydata.io). You may also write to us via postal mail at:



Aluum, LLC d/b/a Gateway Data  
15051 N. Kierland Blvd, Suite 300  
Scottsdale, Arizona 85258

## U.S. State Privacy Rights Notice at Collection

Except as otherwise provided, this section applies to residents of California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, Virginia, and other states to the extent they have privacy laws applicable to us that grant their residents the rights described below (collectively the “**State Privacy Laws**”).

This State Privacy Rights Notice at Collection is part of our full [Privacy Policy](#).

This section describes how we collect, retain, use, disclose, and sell personal information of residents of these states and the rights these users may have with respect to their personal information. Please note that not all rights listed below may be afforded to all individuals and that if your state does not afford you these rights, you may not be able to exercise these rights. In addition, we may not be able to process your access, correction or deletion request if you do not provide us with sufficient detail to allow us to confirm your identity and understand and respond to your request.

For purposes of this section, the term “personal information” means information that relates to an identified or identifiable natural person, or that is reasonably capable of being used to identify, contact, or precisely locate a natural person, household, or a particular computing system or device.

We do not attempt to reidentify deidentified information derived from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.

**Your privacy rights.** You may request to exercise the rights listed below. We will respond to your request in accordance with applicable law. We may decline to honor your request where an exception applies.

- **Right to know.** You can request to know whether we process your personal information
  - The categories of personal information that we have collected.
  - The categories of sources from which we collected personal information.
  - The business or commercial purpose for collecting, selling, and/or sharing personal information for targeted advertising purposes.
  - The categories of personal information that we sold or shared for targeted advertising purposes, and the categories of third parties to whom this information was sold or shared, categorized by the type of personal information for each type of third party.

- The categories of personal information that we disclosed for business purposes and the types of entities to whom this information was disclosed.
- The specific third parties to which we have disclosed personal information.
- **Access.** You can request a portable copy or representative summary of the personal information that we have collected about you.
- **Correction.** You can ask us to correct inaccurate personal information that we have collected about you.
- **Deletion.** You can ask us to delete the personal information that we have collected from or about you.
- **Revoke consent.** You may have the right to revoke your consent to our processing of your personal information.
- **Opt-out.**
  - **Opt-out of targeted advertising.** We do not “share” or otherwise process your personal information for “targeted advertising” purposes, as defined under applicable law.
  - **Opt-out of sale of your Personal Information.** We “sell” personal information. You can opt out of our sale of your personal information.
  - We do not knowingly “sell” or “share” personal information (including Sensitive Personal Information) of minors under 18 years of age.
  - **Automated decision making.** We do not use your personal information to engage in automated processing or profiling personal information to evaluate, analyze, or predict personal aspects related to your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements to make a decision that produces legal or similarly significant effects.
- **Sensitive Personal Information**
  - **California Residents: Limit processing of Sensitive Personal Information.** We may collect certain categories of Sensitive Personal Information as described in this Privacy Policy. We use Sensitive Personal Information as necessary for certain business purposes, including providing goods or services as requested; ensuring safety, security; and integrity; countering wrongful or unlawful actions; short term transient use such as displaying first party, non-personalized advertising; performing services for our business, including maintaining and servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic

services, providing storage, or providing similar services on behalf of our business; activities relating to quality and safety control or product improvement; and other collection and processing that is not for the purpose of inferring characteristics about an individual.

While we process certain categories of Sensitive Personal Information as described in this Privacy Policy, we do not process Sensitive Personal Information for purposes beyond those listed above.

- **Residents outside California: Sensitive Personal Information.** You can opt-out of our processing your Sensitive Personal Information by electing not to provide it to us or by notifying us of your opt-out.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the State Privacy Laws.
- **Appeal.** You can appeal our denial of any request validly submitted.

**Exercising your right to know, access, correction, deletion, and appeal.** You may submit requests using the [Contact Us](#) page on our website, calling us toll free at 1-480-442-7603, or via email to [hello@gatewaydata.io](mailto:hello@gatewaydata.io).

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

**Exercising your right to opt-out of/revoke your consent to the sale of your personal information.** You can submit requests to opt-out of sales of personal information here: <https://www.gatewaydata.io/privacy/opt-out>, via email to [hello@gatewaydata.io](mailto:hello@gatewaydata.io).

**Verification of Identity; Authorized agents.** We may need to verify your identity to process your know, access, correction, deletion, or appeal requests and reserve the right to confirm your residency. We may need to request your email address, full name, and/or university attended, in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to reauthenticate yourself before disclosing or deleting your personal information. If you make a request to delete, we may ask you to confirm your request before we delete your personal information.

Under some State Privacy Laws, you may enable an authorized agent to make a request on your behalf. However, we may need to verify your authorized agent's identity and authority to act on your behalf. Depending on the kind of request you have made, we may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your State Privacy Law rights on your behalf, the information we request to



verify your identity, or confirmation that you have given the authorized agent permission to submit the request.

**Personal information that we collect, use and disclose.** We have summarized the personal information we collect and may disclose or sell to third parties by reference below to both the categories of personal information defined in the “Personal Information We Collect,” “How We Use Your Personal Information,” and “How We Share Your Personal Information” sections of this Policy above and the categories of personal information specified in state law. This table describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

See our full [Privacy Policy](#) for descriptions of each entry in this table.

Statutory Category of Personal Information (PI) (Cal. Civ. Code § 1798.140)	PI We Collect In This Category (See PI We Collect for description)	Source of PI	Business/Commercial Purpose for Collection	Categories of Third Parties to Whom We “Disclose” PI for a Business Purpose	Categories of Third Parties to Whom We “Sell” PI
Identifiers	First Name, Middle Name, Last Name, Full Name Personal Email addresses Mobile Phone Number, Phone Numbers (Other) Social Profiles (LinkedIn, Facebook, X)	You Third parties	Service delivery and operations Research & development Marketing Compliance & protection With your consent	Service providers Customers Professional advisors Authorities and others	Customers
California Customer Records	Full Name Phone Numbers Education information Employment information	You Third parties	Service delivery and operations Research & development Marketing Compliance & protection With your consent	Service providers Customers Professional advisors Authorities and others	Customers
Protected Classification Characteristics	Birthdate (age) Gender	Third parties	Service delivery and operations Research & development Marketing	Service providers Customers Professional advisors	Customers

			Compliance & protection	Authorities and others	
Professional or Employment Information	Current Employer Current Title Current Employment Start Date Previous Work Experience Previous Title Previous Company Employment Start/End Dates	Third parties	Service delivery and operations  Research & development  Marketing  Compliance & protection  With your consent	Service providers  Customers  Professional advisors  Authorities and others	Customers
Education information	Education Institution Education Degree Education Start/End Dates Education Major	Third parties	Service delivery and operations  Research & development  Marketing  Compliance & protection  With your consent	Service providers  Customers  Professional advisors  Authorities and others	Customers
Geolocation data	Location	Third parties	Service delivery and operations  Research & development  Marketing  Compliance & protection  With your consent	Service providers  Customers  Professional advisors  Authorities and others	Customers

### Additional Information for California Residents

- Shine the Light Law.** Under California's Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for their own direct marketing purposes, and the categories of personal information disclosed. If you are a California resident and would like a copy of this notice, please submit a written request to us via email at [hello@gatewaydata.io](mailto:hello@gatewaydata.io) or at Aluum LLC d/b/a Gateway Data, 15051 N. Kierland Blvd, Suite 300, Scottsdale, AZ 85258. You must put the statement "Shine the Light Request" in your request and include your first and last name, mailing address, city, state, and ZIP code and



certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency.

- **California Privacy Rights Report.** We publish an annual report on our metrics responding to consumer requests made by California residents. You can find our 2025 report here.

Type of request	Number of requests received	Requests completed in whole or in part	Requests denied	Average and median time to substantively respond
Request to Know	0	n/a	n/a	n/a
Request to Access	0	n/a	n/a	n/a
Request to Delete	0	n/a	n/a	n/a
Request to Opt-out of Sale of Personal Information	0	n/a	n/a	n/a
DROP Requests	n/a	n/a	n/a	n/a

#### Additional Information for Texas Residents

- **THE ENTITY MAINTAINING THIS WEBSITE AND MOBILE APPLICATION IS A DATA BROKER UNDER TEXAS LAW. TO CONDUCT BUSINESS IN TEXAS, A DATA BROKER MUST REGISTER WITH THE TEXAS SECRETARY OF STATE (TEXAS SOS). INFORMATION ABOUT DATA BROKER REGISTRANTS IS AVAILABLE ON THE TEXAS SOS WEBSITE.**

**The entity maintaining this website and mobile application is a data broker under Texas law. To conduct business in Texas, a data broker must register with the Texas Secretary of State (Texas SOS). Information about data broker registrants is available on the Texas SOS website.**