



Rotation Digital, LLC Website Privacy Policy

Effective date: 6.16.2026 **Last updated:** 6.16.2026

This Privacy Policy explains how Rotation Digital, LLC (“Rotation Digital,” “we,” “us,” or “our”) collects, uses, discloses, and protects personal information when you visit www.rotationdigital.com, contact us, or otherwise interact with our website and services (the “Services”). We respect your privacy and are committed to handling your personal information transparently and in accordance with applicable data protection laws.

If you have any questions about this Policy, contact us by email at info@rotationdigital.com.

1. Scope of This Policy

This Policy applies when Rotation Digital acts as the controller of your personal information — that is, when we decide why and how your information is processed. This includes when you:

- Visit a Rotation Digital website that links to this Policy;
- Submit a contact, inquiry, or sign-up form on our site;
- Subscribe to receive emails, updates, or marketing communications from us;
- Engage with us as a representative of a current or prospective client or partner; or
- Otherwise communicate with us by email, phone, or through our website.

This Policy does not apply to information we process on behalf of our clients under a services agreement, where the client determines the purpose of the processing. In those cases the client is the controller and its own privacy notice governs; please direct any requests to that organization.

2. Key Definitions

Personal information means information that identifies, relates to, or could reasonably be linked to an identified or identifiable individual. It does not include information that has been aggregated, de-identified, or anonymized so that it can no longer reasonably be associated with you.

Sensitive personal information means categories such as government identifiers, precise geolocation, account login credentials, racial or ethnic origin, religious beliefs, health data, or biometric data. We do not intentionally collect sensitive personal information through our Services.

Processing means any operation performed on personal information, such as collecting, storing, using, disclosing, or deleting it.

Services means our website, online content, forms, and related communications.

3. Information We Collect

Information you provide to us

When you fill out a form, request information, subscribe to communications, or contact us, you may provide:

- **Contact details:** name, email address, telephone number, and postal address.
- **Professional details:** company name, job title, and professional role.
- **The content of your inquiry:** any message, request, or other information you choose to share with us.

Information collected automatically

When you access our website or interact with our emails and online content, we automatically collect certain technical and usage information. In some jurisdictions this may be considered personal information:

- **Technical information:** IP address, device type, unique device identifiers, operating system, browser type, and broad geographic location (such as country- or city-level location derived from your IP address).
- **Usage information:** the pages you visit and features you use, the website you came from (the referring page), and how you interact with our content (for example, when you open a marketing email, click an embedded link, or watch a video).

Some of this information is collected using cookies and similar technologies. See **Section 5 (Cookies and Tracking Technologies)** for details and your choices.

Information from other sources

We may receive business contact information about you from third parties such as marketing and data-enrichment providers, event co-sponsors, or publicly accessible sources (for example, your company website or professional networking profiles). We may combine this with information you provide to keep our records current and to identify relevant opportunities to communicate with you.

Sensitive personal information. We do not seek sensitive personal information. If you send us sensitive information (for example, in an unsolicited message or attachment), we will delete it promptly upon discovery unless we are required to retain it by law.

4. How We Use Your Information and Our Legal Bases

We use personal information to:

- Respond to your inquiries, requests, and correspondence;
- Provide and manage the Services you request;
- Send you administrative messages and, where permitted, marketing communications about our services;
- Operate, maintain, secure, and improve our website and content;
- Analyze how our website is used so we can improve its quality and relevance;
- Detect, prevent, and investigate fraud, security incidents, and misuse; and
- Comply with our legal obligations and establish, exercise, or defend legal claims.

Where the EU or UK General Data Protection Regulation (**GDPR**) applies, we rely on the following legal bases:

- **Performance of a contract** — to respond to your requests and provide services you have asked for.
- **Legitimate interests** — to operate and secure our website, conduct analytics, and market our services to existing and prospective business contacts, balanced against your rights.
- **Consent** — where required, for example for certain marketing communications and non-essential cookies. You may withdraw consent at any time.
- **Legal obligation** — where processing is necessary to comply with applicable law.

5. Cookies and Tracking Technologies

We and certain third-party providers use cookies and similar technologies to operate our site, remember your preferences, measure traffic, and understand how visitors use our content. These may include:

- **Strictly necessary cookies** that enable core site functionality;
- **Analytics cookies**, such as Google Analytics, which help us understand site usage; and
- **Functional and advertising cookies**, where used, which support personalization and relevant messaging.

You can manage cookies through your browser settings, and you can opt out of Google Analytics using the [Google Analytics Opt-out Browser Add-on](#). You can also adjust how Google personalizes ads through [Google Ad Settings](#) or opt out through the [Network Advertising Initiative](#).

6. How We Disclose Your Information

We do not sell your personal information for money. We may disclose personal information in the following circumstances:

- **Service providers.** To vendors that perform services on our behalf — such as website hosting, email delivery, analytics, and customer support — under contracts that require them to use the information only as instructed by us.
- **Legal and safety reasons.** To comply with applicable law, legal process, or government requests; to enforce our terms; and to protect the rights, property, or safety of Rotation Digital, our users, or others.
- **Business transfers.** In connection with a merger, acquisition, financing, or sale of all or part of our business, in which case we will require the recipient to honor this Policy.
- **With your consent or at your direction.** When you ask us to share your information with a third party.

Some state privacy laws define the use of advertising or analytics cookies to share information with third parties as a “sale” or “share.” See **Section 9 (Your Privacy Choices and Opt-Out Signals)** for how to opt out.

7. International Data Transfers

Rotation Digital is based in the United States. If you access our Services from outside the United States, your personal information will be transferred to, stored in, and processed in the United States, where data protection laws may differ from those in your jurisdiction.

Where we transfer personal information from the European Economic Area, the United Kingdom, or Switzerland, we use an appropriate transfer mechanism — such as the European Commission’s **Standard Contractual Clauses**, the **UK International Data Transfer Agreement / Addendum**, or another lawful safeguard — to ensure your information receives an equivalent level of protection.

8. How Long We Keep Your Information

We keep personal information only for as long as necessary to fulfill the purposes described in this Policy, unless a longer retention period is required or permitted by law. In deciding how long to keep information, we consider its amount, nature, and sensitivity; the potential risk of harm from unauthorized use or disclosure; the purposes for which we process it; and applicable legal requirements.

As general guidance, we retain:

- **Contact-form and inquiry submissions** for up to 24 months after our last meaningful contact, unless an active relationship or legal requirement warrants longer;
- **Marketing contact records** until you unsubscribe or ask us to delete them;
- **Website analytics data** for up to 14 months; and
- **Security and server logs** for up to 12 months.

When we no longer have a legitimate need to retain your information, we will delete or de-identify it, or securely isolate it from further processing if immediate deletion is not feasible (for example, in backups).

9. Your Privacy Choices and Opt-Out Signals

Marketing communications

You may opt out of marketing emails at any time by using the unsubscribe link in any message or by emailing info@rotationdigital.com. We will promptly remove you from our marketing lists; we may still send you non-promotional messages related to your requests.

SMS / text messages. We do not send marketing text messages, and we do not sell or share mobile information for marketing or promotional purposes.

Opt-out preference signals (Global Privacy Control)

Several states require us to honor opt-out preference signals such as the **Global Privacy Control (GPC)**. Where applicable, we treat a GPC signal as a valid request to opt out of the sale or sharing of personal information and of targeted advertising for that browser or device. To learn more, visit globalprivacycontrol.org.

Do Not Track

Separately, some browsers send “Do Not Track” (DNT) signals. There is no common industry standard for responding to DNT, and we currently do not respond to DNT signals. We do, however, honor GPC signals as described above.

10. Your Privacy Rights

Depending on where you live, you may have some or all of the following rights regarding your personal information:

- **Access** the personal information we hold about you and how we use it;
- **Correct** inaccurate or incomplete information;
- **Delete** your personal information;
- **Port** your information in a structured, commonly used, machine-readable format;
- **Opt out** of the sale or sharing of personal information and of targeted advertising;
- **Object to or restrict** processing based on our legitimate interests; and
- **Withdraw consent** where we rely on it, without affecting processing already carried out.

We will not discriminate against you for exercising these rights.

How to exercise your rights

To make a request, email us at info@rotationdigital.com or write to us at the address in **Section 16 (Contact Us)**. Please tell us what right you wish to exercise. We may also be reached by phone at +1 (202) 972-4620.

- **Identity verification.** To protect your privacy, we will take reasonable steps to verify your identity, typically by confirming the name and email address associated with your information, before acting on your request.
- **Authorized agents.** You may designate an authorized agent to submit a request on your behalf; we may require written permission and verification of the agent’s authority.
- **Response timing.** We will acknowledge your request promptly and respond within the timeframe required by applicable law — generally within 45 days for most U.S. state laws and within one month under the GDPR — and will let you know if we need additional time.

If your information was provided to us by or on behalf of one of our clients, and you wish to exercise rights with respect to that information, please contact that organization directly.

11. U.S. State Privacy Rights

Residents of certain U.S. states — including California, Colorado, Connecticut, Virginia, Utah, Texas, Oregon, Montana, Iowa, Delaware, New Jersey, Nebraska, Maryland, Minnesota, Indiana, Kentucky, and Rhode Island, among others — have specific rights under their state privacy laws. These generally include the rights listed in **Section 10** above. The categories of personal information we collect, the sources, and the purposes are described throughout this Policy.

California residents (CCPA/CPRA)

Under the California Consumer Privacy Act, as amended, California residents have the rights to know, access, correct, and delete their personal information, to opt out of the sale or sharing of personal information, and to be free from discrimination for exercising these rights. We do not sell personal information for monetary value, and we do not knowingly sell or share the personal information of consumers under 16 years of age.

In the preceding 12 months, we may have collected the following categories of personal information:

Category	Examples	Collected?
A. Identifiers	Real name, email address, telephone number, postal address, IP address, and online identifiers.	Yes
B. Customer records (Cal. Civ. Code § 1798.80)	Name, contact information, employer, and similar details you submit through our forms.	Yes
C. Protected classifications	Age, gender, and similar characteristics protected under state or federal law.	No — not requested
D. Commercial information	Records of services inquired about or considered.	Yes, where applicable
E. Biometric information	Fingerprints, faceprints, voiceprints.	No
F. Internet / network activity	Browsing activity on our site and interactions with our website and emails.	Yes
G. Geolocation data	Approximate location derived from IP address (e.g., city or country).	Yes (coarse)
H. Sensory data	Audio, electronic, visual, or similar information.	No
I. Professional / employment information	Job title, company name, professional role.	Yes
J. Education information	Non-public records covered by FERPA.	No
K. Inferences	Profiles reflecting professional interests or preferences drawn from the above.	Yes, for relevance
L. Sensitive personal information	Government IDs, precise geolocation, account credentials, racial/ethnic origin, health, etc.	No — not intentionally

12. How We Protect Your Information

We maintain technical, administrative, and physical safeguards designed to protect personal information against unauthorized access, disclosure, alteration, and destruction. These include access controls that limit information to personnel with a legitimate need, encryption of data in transit using TLS, monitoring for suspicious activity, and regular review of our security practices. No method of transmission over the internet or electronic storage is completely secure, so we cannot guarantee



absolute security. You are responsible for keeping any credentials you use to access our Services confidential.

13. Children's Privacy

Our Services are intended for adults and businesses. We do not knowingly collect personal information from anyone under 18 years of age. If you believe a minor has provided us with personal information, please contact us and we will take appropriate steps to delete it.

14. Data Breach Notification

If we become aware of a security incident that affects your personal information, we will notify affected individuals and the relevant regulators where, and within the timeframes, required by applicable law.

15. Changes to This Policy

We may update this Policy from time to time. When we make changes, we will post the updated version and revise the "Last updated" date above. If the changes are material, we will provide a more prominent notice. We encourage you to review this Policy periodically.

16. Contact Us

If you have questions about this Policy or wish to exercise your rights, contact us at info@rotationdigital.com or:

Rotation Digital, LLC

Attn: Privacy

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Richmond, VA 23294

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