

Last updated: February 12, 2026

# Privacy Policy

InMarket Media, LLC (“InMarket,” “we,” “us,” or “our”) is committed to honoring the privacy rights and respecting the privacy decisions of individuals. We believe you deserve to understand and make choices about how your data is collected, used and shared.

## Introduction

This Privacy Policy explains how InMarket collects, uses, and may sell, share or disclose personal information that we receive about you via our Services. Our “Services” means our mobile applications, third party mobile applications that incorporate our software development kit, our advertising platform (including our demand side platform), our technology, our websites, and our related products and services. As of the date of this Privacy Policy, InMarket owns and operates mobile and web-based applications called CheckPoints, ListEase, Key Ring, Subscription Stopper and Out of Milk (the “InMarket Applications”). This Privacy Policy will also apply to any additional apps that we may offer.

We partner with third party companies to help us provide our Services. As used in this Privacy Policy, “Third Party Partners” are companies who integrate with or use our Services, such as advertisers and agencies (our customers), digital marketers, data companies, and web or app publishers and platforms. Our Third Party Partners may use cookies, device/browser identifiers, hashed identifiers, or similar technologies in order to provide you with relevant advertising based upon your browsing activities and interests. This practice is sometimes referred to as personalized, targeted or interest-based advertising.

## Accountability

### Industry and Self-Regulatory Affiliations

InMarket is a proud member of the Network Advertising Initiative (NAI), and we adhere to the **Digital Advertising Alliance Principles**.

## Notice & Transparency

### Sources of Personal Information Collected

#### *Information from You*

You may provide information manually while using our Services, for example, by typing your name and email address or by using a social profile to register for or update an account in one of the InMarket Applications or by uploading purchase receipts through one of the InMarket Applications. Some InMarket

Applications allow you to link to your banking or payment card accounts via a third party provider; however, we do not collect your account number or payment card number. We also collect personal information when you communicate with us, including for support or when you register for a promotion.

#### *Information from our Services*

Our Services may collect personal and device information through the InMarket Applications, our Third Party Partners' mobile applications, and our websites. Our Services and our Third Party Partners may also collect data using technology such as cookies, ad tags, and pixels. Pixels are invisibly embedded electronic images and are about the size of the period at the end of this sentence. We use cookies to store this type of information when we serve ads onto Internet browsers. Some of our partners send us information directly via a "server to server" file instead of using web technologies like cookies, ad tags, and pixels. We also collect mobile advertising identifiers (IDFA for Apple devices or AAID for Android devices), third party proprietary identifiers, ad exposure information such as URL, site name, creative, publisher, and channel, precise geolocation information, session information, operating system, internet protocol address (IP address), hashed email address, device model and settings, and related statistical identifiers. All of these technologies help us (and Third Party Partners) to deliver relevant ads, provide ad measurement and reporting, and to generate market insights.

#### *Information from Third Party Sources*

We may also collect information about you and your device from third party sources including public databases, social media platforms, data append services, third party marketing partners, data brokers, and others. The information we collect from third party sources may include categories such as demographic information, predicted interests or characteristics, and commercial information. We combine this third party data with the personal information that we have collected.

#### **Categories of Personal Information Collected**

InMarket collects, and has collected in the past 12 months, the following categories of personal information:

- (a) personal and online identifiers (for example, your name , email address, postal address, phone number, mobile advertising identifier, persistent IP address, and persistent cookie ID);
- (b) customer records information;
- (c) protected class characteristics (for example, gender);
- (d) commercial information (for example, shopping lists, purchase transaction receipts, purchase histories and tendencies). We collect your purchase transaction details when, for example, you connect your bank account or

payment card with an InMarket Application or a participating partner application. The categories of data include vendor category, transaction date and time, amount, merchant name, merchant description, merchant location, financial institution name, last two to four digits of your account number, and personal finance category. However, we do not collect, store, or use consumer's actual bank account numbers or credit/debit card numbers.

(e) internet activity information (for example, information regarding your interactions with a website, mobile application or advertisement, device operating system and settings, browser type, referring website, the pages viewed on the website or application, and the application name and version, social profile data);

(f) coarse and precise geolocation information;

(g) Inferences drawn from personal information (for example, to build audience attributes such as health food purchaser, discount shopper, fast food customer); and

(h) sensitive personal information, such as your account credentials when you have an InMarket Application and precise geolocation information.

#### **Notice of Financial Incentives**

InMarket offers financial incentives to consumers in exchange for voluntarily sharing certain personal information with us through websites and mobile applications we own, such as CheckPoints.

In the CheckPoints mobile application, consumers can earn points redeemable in a rewards program in exchange for various activities such as sharing precise geolocation information (for example, by visiting a retail location), scanning product barcodes in a retail location, sharing purchase records, taking surveys, and sharing personal information such as name and email address. The specific instructions for how to participate and the rewards offered as incentives in each mobile application may vary and are set out within each mobile application.

We collect and use the information we obtain through the InMarket Applications to serve users and customers in accordance with our Privacy Policy. We offer an incentive to consumers who provide us with information through the InMarket Applications. InMarket receives a nominal fee for certain completed surveys in the CheckPoints mobile application, which is the basis upon which we value this CheckPoints survey information.

Regarding the rest of the data for which we offer an incentive in the InMarket Applications, one consumer's data has nominal value to us because in large data sets that also include data collected without incentive, the utility and value of the set is only nominally enhanced by the inclusion of one additional entry.

To participate in any of these incentive-based offers you can opt in by intentionally sharing the required information through the InMarket Applications.

You can opt out of participation in any of our incentive-based offers at any time. If you wish to opt out, stop submitting additional information and please submit a “Do Not Sell My Personal Information” request or a “Delete My Personal Information” request as described below in this Privacy Policy. You may also delete the mobile application.

## Responsible Data Usage

### How We Use Personal Information

We use the data we collect to offer, maintain, and improve our Services. We may use and disclose the categories of personal information we collect for business and commercial purposes related to:

- Your Account. To manage your InMarket Applications accounts, operate our rewards programs, or maintain business records.
- Communication. To communicate with you about our Services and our offerings.
- Business Operations and Continuous Improvement. For business operational needs like accounting, verifying advertisement performance, and other record keeping. We also use it to improve our Services, consider new opportunities in the marketplace, and make improvements to our operations and products. Sometimes we use artificial intelligence and machine learning to help offer and improve our Services; however, we do not use automated decision-making technologies (as that term is defined by California law.)
- Advertising. To help InMarket and our customers deliver more relevant advertising to you, including but not limited to (i) when you use our Services, (ii) in mobile applications, (iii) on websites, (iv) across your devices, including CTV/OTT streaming devices (such as smart TVs or streaming hardware devices), and (v) to fulfill advertising orders. For example, as legally permitted, we use merchant addresses included on purchase transaction records, or precise geolocation information (such as latitude/longitude coordinates collected via mobile applications operated by InMarket and Third Party Partners), to deliver relevant advertisements to consumers, provide ad measurement and reporting, and generate market insights.
- Consumer Attributes. To generate insights regarding consumers' attributes (for example, “Fast Food Customer” or “Pet Owner”) based on

inferences from data we collect. We combine the data we collect with third party data sets that provide additional attributes. However, we do not process personal information to conduct profiling that produces legal or similarly significant effects.

- Audience Segments. To create audience segments for use in targeted advertising.
- Insights, Analytics, and Market Reports. To perform analytics and produce market research reports based on aggregated data.
- Ad Campaign Attribution and Measurement. To measure the impact of ad campaigns in driving consumer visits and sales and to help advertisers optimize investments and quantify return on ad spend.
- Security. To protect, defend or investigate potential violations of the Terms of Use for our websites, the InMarket Applications, or third party applications that integrate our Services. We may also use such information to protect privacy, security, safety, rights, property, and to prevent fraud.
- Legal Compliance. We may use and disclose personal information that we collect to comply with any applicable law or regulation. We also use the personal information we collect to comply with legal process, including subpoenas and search warrants.
- With your consent or with additional disclosures. We may use and disclose personal information we collect with your consent or as otherwise disclosed at the time information is collected.

To the extent permitted by applicable law, we also may use and share deidentified information without limitation. We maintain and use deidentified information only in deidentified form—we do not attempt to reidentify such information except as needed to determine that the information is appropriately deidentified.

#### **Disclosures of Personal Information**

InMarket discloses the personal information we collect for legally permitted purposes. Specifically, in the past 12 months, we disclosed for business purposes consumer personal information that falls within the following categories to Third Party Partners: (a) personal and online identifiers; (b) customer records information; (c) protected class characteristics; (d) commercial information; (e) internet activity information; (f) coarse and precise geolocation information; (g) inferences drawn from personal information; and (h) sensitive personal information, such as log-in credentials when you have an InMarket Application and precise geolocation information.

We may also disclose each category of personal information we collect to third parties: (i) to comply with any applicable law, regulation, subpoena, governmental request or legal process; (ii) to protect, defend or investigate potential violations of the Terms of Use for our websites, the InMarket Applications, or any third party applications that integrate our Services; (iii) to protect the safety, rights, property, or security of InMarket or any third party; (iv) to detect, prevent or address fraud, security or technical issues; and (v) in connection with a potential or actual corporate merger, consolidation, restructuring, sale of our business or assets, or any other corporate change.

**NOTICE: As defined by certain state privacy laws, and where permitted by law, InMarket may engage in targeted advertising (including sharing for targeted advertising) that may be considered sales of personal information.**

In the past 12 months, InMarket has sold (or shared for interest-based advertising) personal information to its Third Party Partners that falls within these categories: (a) personal and online identifiers; (b) customer records information; (c) protected class characteristics; (d) commercial information; (e) internet activity information; (f) coarse and precise geolocation information; (g) inferences drawn from personal information; and (h) sensitive personal information, such as log-in credentials when you have an InMarket Application and precise geolocation information. For clarity, we do not sell or share for interest-based advertising personally identifiable information revealing the personal identity of consumers, and we do not sell (in the plain language sense of that word) or license to customers any personal information that contains precise geolocation information.

**Data Security**

We incorporate commercially reasonable physical, electronic, and administrative security and safeguards to protect the information we collect. No security system is impenetrable, and we do not guarantee the security of any information.

**Minors and Children**

Our Services are intended for general adult audiences and are not intended for children. We do not knowingly collect, store, use or sell the personal information of children who are under 18 years of age. If you believe we have collected such information, please contact us immediately at [privacy@inmarket.com](mailto:privacy@inmarket.com).

**Data Retention Schedule**

The retention period for categories of personal information we collect is included below, though we will delete personal information sooner where required by law (such as in response to a valid data deletion request under

state privacy laws). When you establish an account with us through any of the InMarket Applications, we retain personal information we collect about you so long as your account is active. If required due to a pending legal matter, we may retain personal information for a longer period, and we will delete the information after this legal obligation expires. Deidentified data, including aggregated data, is not included in the categories below.

<b>Category of Information</b>	<b>Business Purpose(s) for Collecting, Using, and Retaining Information</b>	<b>Retention Period</b>
First and last name; email address or other online contact information, not including persistent identifiers; and telephone number	<ul style="list-style-type: none"> <li>• To manage your account in some InMarket Applications, operate our rewards programs, and maintain business records.</li> <li>• To communicate with you about our Services and our offerings.</li> <li>• For business operational needs like accounting and other record keeping.</li> <li>• To protect, defend or investigate potential violations of the Terms of Use for our websites, the InMarket Applications, or third party applications that integrate our Services.</li> <li>• To protect the safety, rights, property, or security of InMarket or any third party and to prevent fraud.</li> <li>• For legal compliance.</li> <li>• For other purposes with your consent or with additional disclosures.</li> </ul>	Account holder names, email addresses, and telephone numbers are retained for the life of the account, and deleted within 30 days of account closing.

<p>Location data that reveals a mobile device's or consumer's precise location, including any unique persistent identifier combined with such data</p>	<ul style="list-style-type: none"> <li>• To help our customers deliver relevant advertisements to consumers, including when you use our Services.</li> <li>• To support advertising, including to provide ad attribution, measurement, and reporting.</li> <li>• To generate consumer and market insights.</li> <li>• To create audience segments for use in targeted advertising.</li> <li>• To manage your InMarket Applications accounts, operate our rewards programs, or maintain business records.</li> <li>• To communicate with you about our Services and our offerings.</li> <li>• For business operational needs like accounting, verifying advertisement performance, and other record keeping.</li> <li>• To protect, defend or investigate potential violations of the Terms of Use for our websites, the InMarket Applications, or third party applications that integrate our Services.</li> <li>• To protect the safety, rights, property, or security of InMarket or any third party and to prevent fraud.</li> <li>• For legal compliance.</li> </ul>	<p>37 months from the date of collection.</p>
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	<ul style="list-style-type: none"> <li>• For other purposes with your consent or with additional disclosures.</li> </ul>	
<p>Persistent identifiers, such as information held in cookies, static IP addresses, and mobile device IDs</p>	<ul style="list-style-type: none"> <li>• To help our customers deliver relevant advertisements to consumers, including when you use our Services,</li> <li>• To support advertising, including to provide ad attribution, measurement, and reporting.</li> <li>• To generate consumer and market insights.</li> <li>• To create audience segments for use in targeted advertising.</li> <li>• To manage your InMarket Applications accounts, operate our rewards programs, or maintain business records.</li> <li>• To communicate with you about our Services and our offerings.</li> <li>• For business operational needs like accounting, verifying advertisement performance, and other record keeping.</li> <li>• To protect, defend or investigate potential violations of the Terms of Use for our websites, the InMarket Applications, or third party applications that integrate our Services.</li> </ul>	<p>Account holder identifiers are retained for the life of the account, and deleted within 30 days of account closing. Identifiers from other sources will be deleted within 37 months of collection.</p>

	<ul style="list-style-type: none"> <li>• To protect the safety, rights, property, or security of InMarket or any third party and to prevent fraud.</li> <li>• For legal compliance.</li> <li>• For other purposes with your consent or with additional disclosures.</li> </ul>	
Socio-economic or demographic data	<ul style="list-style-type: none"> <li>• To help our customers deliver relevant advertisements to consumers, including when you use our Services,</li> <li>• To support advertising, including to provide ad attribution, measurement, and reporting.</li> <li>• To generate consumer and market insights.</li> <li>• To create audience segments for use in targeted advertising.</li> <li>• For business operational needs like accounting, verifying advertisement performance, and other record keeping.</li> <li>• To protect the safety, rights, property, or security of InMarket or any third party and to prevent fraud.</li> <li>• For legal compliance.</li> <li>• For other purposes with your consent or with additional disclosures.</li> </ul>	Account holder demographic data is retained for the life of the account, and deleted within 30 days of account closing. Demographic data from other sources will be deleted within 37 months of collection

Credit and bank card transaction information	<ul style="list-style-type: none"> <li>• To provide you with our Services.</li> <li>• To help our customers deliver relevant advertisements to consumers, including when you use our Services.</li> <li>• To support advertising, including to provide ad attribution, measurement, and reporting.</li> <li>• To generate consumer and market insights.</li> <li>• To create audience segments for use in targeted advertising.</li> <li>• For other purposes with your consent or with additional disclosures.</li> </ul>	37 months from transaction date
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## Consumer Control

### Options for Opting Out of Ad Targeting

InMarket offers consumers the ability to opt out of our processing of your personal information to serve personalized ads to you across devices, mobile applications, and websites. Please note that opting out will not stop advertising from appearing in your browser or applications. You will continue to receive ads but they won't be targeted by us based on your specific interests over time.

Your opt-out choice will be applied only to the browser or device that has opted out.

(a) Mobile OS Opt-Out. We honor the mobile device advertising ID settings for Android and Apple iOS devices. To exercise this opt-out, please visit the privacy settings of your Android or iOS device and select **"limit ad tracking" (Apple iOS)** or **"opt-out of interest based ads" (Android)**. For devices with this setting enabled, we will not use the advertising ID for targeted advertising.

(b) Mobile Location Choices. If you'd like to adjust your setting regarding the use of precise geolocation information by third parties such as InMarket, you may do so via the privacy settings on your device. This can either be done

globally across all apps by turning off Location Services, or you can turn Location Services off for specific apps. Mobile applications that collect precise geolocation information typically offer mechanisms in the operating system settings to control the collection and use of precise geolocation information. Please note that these choice mechanisms won't impact previously collected precise geolocation information.

(c) DAA Opt-Out Mechanism. If you wish to opt out of interest-based advertising from participating third parties, visit the DAA's opt-out page [WebChoices browser opt-out page](#).

(d) Connected TV/Over the Top Streaming Devices ("CTV/OTT"). Some data we collect may be used to target ads or perform ad campaign attribution and measurement on CTV/OTT devices. You may limit ad tracking on many CTV/OTT devices; your device manufacturer may provide instructions for updating ad tracking settings. The NAI provides additional information on opting out on CTV/OTT devices and instructions for updating privacy preferences of many such devices at [Connected TV Choices](#).

(e) Hashed Personally Identifiable Information. Consumers who wish to opt out of the use of hashed PII for targeted advertising by other companies, including our Third Party Partners, should visit the Digital AdvertisingAlliance's [AdChoices token opt-out page](#) to submit a request.

(f) State Law Opt-Out Rights. Depending on your state of residence, you may have the right to opt out of certain disclosures and/or processing related to targeted advertising. To opt out, you may complete this [Do Not Sell or Share My Personal Information \(Opt-Out\)](#) form or call us toll-free at 1 (877) 782-0530.

(g) Global Privacy Control. As required by applicable law, we recognize Global Privacy Control ("GPC") signals to opt out of our processing, sale, and sharing of personal information for targeted advertising purposes. You can activate GPC by implementing a browser or extension that offers this control. GPC is a third party tool. More information and instructions on implementing this tool are available [here](#).

### **State Privacy Rights and Submitting Privacy Requests**

Certain U.S. states, including California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia, have privacy laws that grant individuals rights in relation to personal information we process. If you are a resident of such a state, this section of the Privacy Policy explains rights that may be available to you, subject to certain exceptions and limitations.

#### *Right to Access*

You may have the right to confirm whether we are processing personal information about you and, in some states, to obtain the categories of personal information we process.

In some states, you may have the right to obtain the categories of third parties to which we disclosed your personal information. In other states, you may have the right to obtain a list of the third parties (other than our service providers) to which we disclosed personal information.

You may have the right to access a copy of the specific pieces of personal information we maintain about you.

You also may have the right to request additional information about our collection and use of your personal information, including: the categories of personal information that we have collected about you, the categories of sources of such information, our purposes for collecting, selling, or sharing personal information, the categories of information we disclosed, shared, or sold, and the categories of third parties to which we disclosed, shared, or sold it.

To submit any of these requests, please complete this [Access my Information](#) form or call us toll-free at 1 (877) 782-0530.

#### *Right to Delete*

You may have the right to request that we delete personal information we collected about you. To submit a request, you may complete this [Delete My Personal Information](#) form or call us toll-free at 1 (877) 782-0530.

#### *Right to Opt Out*

You have the right to opt out of our processing and sharing of personal information for targeted advertising purposes, as well as our sales of personal information. To opt out, you may:

- Complete this [Do Not Sell or Share My Personal Information \(Opt-Out\)](#) form (which you can also access from the “Do Not Sell or Share My Personal Information” link provided on our websites and in our applications),
- Call us toll-free at 1 (877) 782-0530, or
- Activate Global Privacy Control (“GPC”) As required by applicable law, we recognize GPC signals to opt out of our processing, sharing, and selling of personal information for targeted advertising purposes, when we receive a GPC signal. You can activate GPC by implementing a browser or extension that offers this control. GPC is a third-party tool. More information and instructions on implementing this tool are available [here](#).

#### *Sensitive Information Rights*

You may have rights related to certain personal information we collect that is considered “sensitive” under some state privacy laws, such as precise geolocation information.

In states where you gave us consent to process this information, you have the right to withdraw your consent. You can do this at any time on your mobile phone by updating the Location Services choices in your Settings menu. To submit a request to withdraw your consent, please complete this [Opt Out](#) form or call us toll-free at 1 (877) 782-0530.

In other states, you may have the right to limit how we use and disclose this information. For example, California residents have the right under the California Consumer Privacy Act (CCPA) to limit our use and disclosure of “sensitive personal information” as defined by the CCPA. You can submit this request by completing this [Limit the Use of My Sensitive Personal Information](#) form or call us toll-free at 1 (877) 782-0530.

#### *Right to Correct Inaccurate Personal Information*

You may have the right to correct any inaccuracies in your personal information. To submit a request, please complete this [Update Inaccuracies](#) form or call us toll-free at 1 (877) 782-0530.

#### *Right to Nondiscrimination*

We will not discriminate or retaliate against you for exercising your rights under applicable state privacy laws.

#### *Submitting Requests*

Please submit any consumer rights requests through the means described above. For certain requests, we may need you to provide additional information to verify your request. We will try to verify your identity by comparing information in your request to personal information we have collected, but we may need you to provide additional personal information to help verify your identity. We will not use such verification information for any purpose besides handling your request.

Where permitted by law, you may designate an authorized agent to make a request on your behalf. The designation must be in writing.

#### *Appeals*

Depending on your state, if your request is rejected, you will receive a notification with the details of reason for rejection and instructions about how to appeal the decision to reject.

#### *Business to Business Contacts*

While this Privacy Policy generally describes our information practices about consumers related to our Services, InMarket also collects personal information as part of its business-to-business operations, including sales and marketing efforts and communications with current and prospective customers, vendors, agencies, service providers and others. This personal information includes names, business email addresses, phone numbers, mailing addresses, and employment information like employer and job title. We do not collect sensitive personal information about our business contacts. We may collect this information from you, your employer, through our Services, and from third party sources, such as third party marketing partners.

InMarket does not sell such personal information for monetary consideration or share this information with third parties for targeted advertising purposes, but we may use it for marketing or promotional materials and share it with others for this purpose. We also may use this information for our general business purposes and share this information with our vendors and service providers for these purposes. If you interact with InMarket for business purposes and are a California resident, you may have rights, as described above, related to personal information we maintain. If you wish to exercise your rights, please call us toll-free at 1 (877) 782-0530, or complete the relevant form: [Business Contacts – Opt-Out of Sharing My Personal Information](#), [Business Contacts – Delete My Personal Information](#), Business Contacts - Access My Personal Information or Business Contacts - Correct My Personal Information.

### **Consumer Requests**

InMarket will comply with its legal obligations with respect to consumer requests. Requests that are not based on a consumer's legal rights will be reviewed and may be granted at InMarket's sole discretion. Granting any such request does not waive InMarket's rights under applicable law, applicable terms of use, or this Privacy Policy.

### **Marketing Communications**

You can opt out of our promotional email lists by following the unsubscribe link included at the bottom of such emails. Depending on our relationship, we may still send you transactional messages, including information about changes to our policies and other important notices. Generally, users cannot opt out of these communications, but they are informational, not promotional.

### **Canadian Residents: Access to Personal Information**

Subject to applicable law, Canadian residents have the right to access, update and correct inaccuracies in their personal information in our custody and control. You may request access, updates and corrections of inaccuracies to your personal information in our custody or control by emailing or calling us at the contact information set out below. We may request certain personal information for the purpose of verifying the identity of individuals seeking access to personal information records.

## **InMarket Integration Source Links**

### **InMarket Integration Source Links**

InMarket may integrate with advertising platforms through API connections in order to provide you with our products. If you authenticate a connection to any API via the InMarket platform, you agree to the terms of services of each API client connection. Google API – The relevant Google API connection terms and policies to which you will agree are provided below:

[\*\*YouTube Terms of Service\*\*](#)

[\*\*Google Privacy Policy\*\*](#)

[\*\*Google Security Revocation Link\*\*](#)

[\*\*Google APIs Terms of Service\*\*](#)

[\*\*Google API Services User Data Policy\*\*](#)

## **Statistics on California Consumer Privacy Request Statistics**

Information about California Consumer privacy requests submitted to InMarket in 2024:

- InMarket received 17,450 requests to opt-out and complied with such requests within a median of 7 days and a mean of 6.5 days. No opt-out requests were denied.
- InMarket received 0 requests to limit the use of sensitive personal information.
- InMarket received 55,981 requests to delete and complied with such requests within a median of 7 days and a mean of 6.5 days. No delete requests were denied.
- InMarket received 0 requests to know or access what personal information InMarket has collected (which included requests to know what personal information is sold or shared and to whom).

## **Modifications**



We reserve the right to change this Privacy Policy at any time.

### **Contact Us**

If you would like more information or have questions about this Privacy Policy, please contact us at [privacy@inmarket.com](mailto:privacy@inmarket.com) or at (877) 782-0530.