

PRIVACY POLICY

whosrunning.vote

Effective Date: July 14, 2026

Last Updated: July 14, 2026

This Privacy Policy ("Policy") describes how Who's Running? LLC, a Michigan limited liability company ("Who's Running?," "we," "us," or "our"), collects, uses, discloses, and safeguards information in connection with your access to and use of the website located at whosrunning.vote and any associated subdomains, features, content, forms, and services we provide (collectively, the "Site"). By accessing or using the Site, you acknowledge that you have read, understood, and agree to the practices described in this Policy. If you do not agree with this Policy, you should not access or use the Site.

This Policy is incorporated into and subject to our Terms of Service. Capitalized terms not defined in this Policy have the meanings given to them in our Terms of Service.

1. Scope and Application

This Policy applies to information we collect through the Site, including through public browsing, our contact form, candidate-submitted content and premium profile applications, payment transactions, and any communications you send to us. This Policy does not apply to (a) information collected by third-party websites, platforms, or services that may be linked from the Site, or (b) information practices of candidates, campaigns, or other third parties whose content may appear on the Site. We encourage you to review the privacy policies of any third party before providing them with your information.

2. Information We Collect

We collect information in three general ways: information you provide to us directly, information collected automatically through your use of the Site, and information we obtain from third parties and public records.

2.1 Information You Provide Directly

We collect information that you voluntarily submit to us, which may include:

- **Contact and inquiry information.** When you submit our contact form or otherwise communicate with us, we collect your name, email address, the reason for your inquiry, and the contents of your message.
- **Candidate and campaign information.** If you apply for or purchase a premium candidate profile, we collect information you submit for publication or verification, which may include your name, the office you seek, your political party affiliation, district, biography, policy positions, photographs, campaign logos, campaign website and social media links, campaign committee name and address, and related materials.
- **Payment information.** If you purchase a premium profile or other paid service, payment is processed by our third-party payment processor. We do not collect or store full payment card numbers on our own systems. We may receive limited transaction information such as confirmation of payment, the amount, the date, and the name associated with the transaction.

- **Communications and marketing preferences.** If you elect to receive newsletters, election reminders, blog updates, or other communications from us, we collect your email address and any preferences you provide.

2.2 Information Collected Automatically

When you access the Site, certain information may be collected automatically by us or by the third-party infrastructure providers that operate and secure the Site. This information may include:

- **Device and connection data,** such as your Internet Protocol (IP) address, browser type and version, operating system, device identifiers, and referring or exit pages.
- **Usage data,** such as the pages you view, the dates and times of your visits, the searches you perform on the Site, and general interaction data.
- **Local storage data.** The Site uses your browser's local storage to remember your display preferences (for example, light or dark mode, layout selection, and similar settings). This information is stored on your own device and is not transmitted to us as personally identifying information.

The Site does not currently use advertising cookies or third-party analytics tracking. If we introduce such technologies in the future, we will update this Policy and, where required by law, obtain your consent.

2.3 Information from Public Records and Third Parties

A substantial portion of the candidate information displayed on the Site is derived from public records, including candidate filing data published by the Michigan Bureau of Elections, county clerks, and other governmental sources. This information is a matter of public record and is not collected from you directly. We may also receive information from our service providers as described in this Policy.

3. How We Use Information

We use the information we collect for the following purposes:

- To operate, maintain, secure, and improve the Site and its features;
- To display non-partisan candidate and election information to the public;
- To respond to your inquiries, process your requests, and provide customer support;
- To review, verify, process, and publish candidate-submitted content and premium profiles;
- To process payments and fulfill paid services;
- To send you administrative communications, such as confirmations, security alerts, and changes to our policies;
- To send you newsletters, election reminders, blog updates, or other marketing or informational communications where you have requested them or where otherwise permitted by law, from which you may unsubscribe at any time;
- To detect, prevent, investigate, and address fraud, security incidents, abuse, and violations of our Terms of Service or applicable law;
- To comply with legal obligations, including applicable election and campaign-finance laws, and to establish, exercise, or defend legal claims.

4. Legal Bases for Processing

Where required by applicable law, we process personal information on one or more of the following bases: your consent; the performance of a contract with you; compliance with a legal obligation; and our legitimate interests

in operating a non-partisan voter-information platform, securing the Site, and communicating with users, provided those interests are not overridden by your rights and freedoms. Where we rely on your consent, you may withdraw it at any time as described in this Policy.

5. How We Disclose Information

We do not sell your personal information. We do not share your personal information with third parties for their own direct-marketing purposes. We may disclose information in the following limited circumstances:

5.1 Service Providers

We share information with third-party vendors and service providers who perform services on our behalf, subject to obligations to protect that information. These include, without limitation, our website hosting and content-delivery provider, our domain and network-security provider, our email and productivity provider, and our payment processor. These providers are authorized to use your information only as necessary to provide services to us.

5.2 Public Display of Candidate Content

Information that you submit for the express purpose of publication, such as premium profile content, is by its nature intended to be displayed publicly on the Site and may be viewed, shared, indexed by search engines, and copied by others. You should not submit for publication any information you wish to keep private.

5.3 Legal and Safety Disclosures

We may disclose information if we believe in good faith that doing so is necessary or appropriate to: comply with applicable law, regulation, legal process, or governmental request, including under Michigan election and campaign-finance law; enforce our Terms of Service and other agreements; protect the rights, property, or safety of Who's Running?, our users, or the public; or detect, prevent, or address fraud, security, or technical issues.

5.4 Business Transfers

If we are involved in a merger, acquisition, financing, reorganization, sale of assets, or similar transaction, or in the event of insolvency or bankruptcy, information we hold may be transferred as part of that transaction, subject to the commitments made in this Policy.

6. Data Retention

We retain personal information for as long as reasonably necessary to fulfill the purposes described in this Policy, including to provide the Site and our services, to comply with our legal, accounting, tax, and campaign-finance recordkeeping obligations, to resolve disputes, and to enforce our agreements. Candidate content and related records may be retained through the applicable election cycle and for such additional period as may be required or advisable to comply with applicable law. When information is no longer needed, we will take reasonable steps to delete or de-identify it.

7. Data Security

We implement reasonable administrative, technical, and organizational safeguards designed to protect information against unauthorized access, disclosure, alteration, and destruction, including the use of encrypted connections (HTTPS/TLS) for the Site. However, no method of transmission over the Internet or method of electronic storage is completely secure. We cannot guarantee absolute security, and you provide information to

us at your own risk.

8. Your Choices and Rights

Depending on your jurisdiction, you may have certain rights regarding your personal information, which may include the right to access, correct, update, or delete the personal information we hold about you; the right to object to or restrict certain processing; and the right to withdraw consent where processing is based on consent. To exercise any of these rights, please contact us using the information in the "Contact Us" section below. We will respond to your request as required by applicable law.

Marketing communications. You may opt out of receiving newsletters, election reminders, blog updates, or other marketing communications at any time by following the unsubscribe instructions contained in those messages or by contacting us directly. Please note that even if you opt out of marketing communications, we may still send you non-marketing administrative messages relating to your use of the Site or a paid service.

Public records. Candidate information derived from public records is generally not subject to deletion at our discretion where its display serves the Site's non-partisan voter-information purpose; however, you may contact us to request correction of factual inaccuracies, and we will review such requests in good faith.

9. Do Not Track Signals

Some browsers offer a "Do Not Track" ("DNT") setting. Because there is no industry-standard mechanism for responding to DNT signals, the Site does not currently respond to them. We will continue to monitor developments regarding DNT and may update this Policy accordingly.

10. Children's Privacy

The Site is intended for a general audience and is not directed to children under the age of 13, and we do not knowingly collect personal information from children under 13. If you believe that a child under 13 has provided us with personal information, please contact us and we will take appropriate steps to delete such information.

11. Third-Party Websites and Content

The Site may contain links to third-party websites, including candidate campaign websites, social media platforms, and governmental resources such as michigan.gov/vote. We are not responsible for the privacy practices or content of these third parties. This Policy applies solely to information collected by us through the Site.

12. State-Specific Disclosures

Residents of certain states may have additional rights under applicable state privacy laws. To the extent any such law applies to us and to our processing of your personal information, we will honor the rights afforded to you under that law, which may include rights to know, access, correct, delete, and opt out of certain processing, as well as the right not to be discriminated against for exercising those rights. As stated above, we do not sell personal information and do not share it for cross-context behavioral advertising. To exercise any applicable state-law rights, please contact us as described below.

13. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, technologies, legal requirements, or for other operational reasons. When we make changes, we will revise the "Last Updated" date at the top of this Policy and, where appropriate or required by law, provide additional notice. Your continued use of the Site after the effective date of a revised Policy constitutes your acceptance of the revised Policy.

14. Contact Us

If you have questions, concerns, or requests regarding this Policy or our privacy practices, or if you wish to exercise any of your rights, please contact us at:

Who's Running? LLC

Attn: Privacy

Email: contact@whosrunning.vote

Web: whosrunning.vote

Who's Running? is a non-partisan voter-information platform. We do not endorse any candidate or political party. This document is provided for informational purposes and constitutes the Privacy Policy governing use of the Site.

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