



**CLICKBANK™**

# CLICKBANK'S GDPR GUIDE

ClickBank has prepared this guide to help its clients (vendors and affiliates) understand how ClickBank intends to comply with the new European Union (EU) data privacy regulation known as the General Data Protection Regulation (GDPR). The law can be found here: <https://gdpr-info.eu/>

**READ ON TO LEARN HOW YOU CAN COMPLY**



# ARE YOU GDPR COMPLIANT?

LEARN MORE BELOW

**As described below, ClickBank vendors and affiliates must take several steps to comply with GDPR, including:**

- Honor customer's requests to access, correct or delete their data
- Be capable of processing customer data for limited purposes—for example, to fulfill an existing order, but not for marketing
- Sign a contract with ClickBank agreeing to these terms
- Use appropriate technical and operational measures to protect customers' privacy

## **GDPR Background**

- **GDPR becomes effective on May 25, 2018.** It applies to any person or business that sells goods or services to EU residents or deals with personal data of European Union residents. The definition of “personal data” under GDPR is broad—it covers any information that could identify the data subject.

LEARN THE BASIC REQUIREMENTS BELOW



# CLICKBANK'S ROLE UNDER GDPR

- ClickBank is **creating a unique order form** that will **automatically** be served to EU customers. This form will include a checkbox that allows customers to opt-in to have their data processed for specific purposes, such as marketing.
- ClickBank will implement processes to **honor any requests** it receives from EU residents to **correct, erase or transport personal data** of EU residents.
- ClickBank will **revise its Client Contract and its Privacy Policy** to comport with GDPR.
- ClickBank will **provide additional disclosures and consent rights** to visitors of ClickBank.com
- ClickBank will **disable certain features** (such as automated product recommendations) that could be seen as “profiling”.

ClickBank is an internet retailer and is the merchant of record for **all transactions** completed by its customers. ClickBank is a “data controller” under GDPR because it **receives and processes data about EU residents**.

# VENDOR AND AFFILIATE RESPONSIBILITIES UNDER GDPR



## VENDORS AND AFFILIATES **MUST** COMPLY WITH GDPR

If ClickBank receives a request from an EU customer to correct, delete or transport that customer's data, ClickBank will comply with the request, and it will also forward the request to any vendors who process the same data. Vendors and affiliates must be capable and prepared to comply with any such requests. In addition, vendors and affiliates must honor customers' requests to process personal data only for specific consented-to purposes.

ClickBank is not responsible for any customer acquisition activities that vendors or affiliates undertake outside of ClickBank's domains. Vendors and affiliates should consult their own counsel to ensure that their marketing practices comply with GDPR.