

# The Sanguine Social

## PRIVACY POLICY

Welcome to The Sanguine Social's Privacy Policy. We are committed to transparency in how we collect, use, and protect the personal information of our clients, their audiences, and visitors to our services (the "Service"). This policy explains what we collect, why we collect it, how we use and share it, and the choices and rights available to you.

**Effective Date:** July 20, 2026

This version supersedes and replaces the version last updated June 5, 2025. A summary of what changed is provided at the end of this policy.

### 1. WHO WE ARE

The Sanguine Social ("we," "us," or "our") is a social media management and advertising services company operating from the U.S. Virgin Islands, a territory of the United States. This Privacy Policy applies to our website, our client-facing tools, and the social media management services we provide.

### 2. INFORMATION WE COLLECT

#### Personal Information

We may collect the following personal information directly from you:

- Name
- Phone Number
- Postal or mailing address
- Email address
- Payment and billing information (processed through our third-party payment processor — we do not store full card numbers on our own systems)

#### Usage Data

When you access our website or Service, we may automatically collect:

- Usage and access logs, including IP address, browser type, and pages visited
- Device details, such as hardware model, operating system, and unique device identifiers
- Approximate geolocation information derived from your device or IP address
- Information collected through cookies, pixels, and similar tracking technologies (see Section 8, Cookies and Tracking Technologies)

#### Social Media Account & Platform Data

Because we manage social media and advertising on behalf of our clients, we may require access to:

- Login credentials or authorized access tokens for social media and advertising platforms
- Administrative or manager-level account permissions
- Scheduling and content-management tools
- Advertising account access (e.g., Meta Ads Manager, Google Ads, TikTok Ads)
- Customer service or messaging platform access used to respond to your audience

We access this information only as needed to perform the services you have engaged us to provide, and only for the duration of that engagement unless you direct otherwise.

### 3. HOW WE USE YOUR INFORMATION

We use the information we collect to:

- Manage, schedule, and publish content on your social media platforms on your behalf
- Create, monitor, and optimize advertising campaigns across social media channels
- Analyze performance metrics and generate reports on engagement, reach, and conversions
- Develop marketing strategies tailored to your brand goals and audience behavior
- Maintain secure account access and appropriate user permissions
- Communicate with you about campaign updates, approvals, invoices, and performance insights
- Comply with applicable law, respond to legal process, and enforce our agreements

#### What We Will Not Do

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We will not:

- Sell your personal information
- Use your data for purposes beyond those described in this policy or that you have separately authorized
- Retain your information longer than necessary to fulfill the purposes described in this policy or as required by law

### 4. DATA SHARING AND DISCLOSURE

We share personal information only in the following circumstances:

- With your explicit consent
- With service providers who need it to perform services on our behalf (e.g., payment processors, email and scheduling platforms, email and scheduling platforms, hosting providers), under confidentiality and data-protection obligations
- When disclosure is required by law, subpoena, court order, or other legal process
- When necessary to protect the rights, safety, or property of our users, our business, or the public
- In connection with a merger, acquisition, or sale of business assets, subject to this policy or a materially similar one

We do not share your social media account credentials or ad account access with any party other than the personnel and vetted service providers directly performing your contracted services.

### 5. DATA RETENTION

We retain personal information only for as long as reasonably necessary to provide the Service, fulfill the purposes described in this policy, and comply with our legal, accounting, or reporting obligations. When a client engagement ends, we revoke our access to social media and advertising accounts and delete and de-identify personal information we no longer need, except where retention is required by law or for legitimate recordkeeping.

### 6. DATA SECURITY

We take the security of your personal and business information seriously. We implement a combination of technical, administrative, and physical safeguards designed to protect data from unauthorized access, disclosure, alteration, or destruction, including:

- Secure servers and encrypted communications (TLS)
- Role-based access controls limiting who can view or manage sensitive data
- Regular security reviews and vulnerability assessments
- Use of reputable third-party service providers with strong security standards
- Secure storage and transfer of login credentials and access tokens, and prompt revocation of access when no longer needed

No method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security. We are committed to responding promptly to any suspected breach and to continuously improving our security practices.

### **Security Breach Notification (U.S. Virgin Islands Law)**

As a business operating in the U.S. Virgin Islands, we comply with the Virgin Islands data breach notification requirements found at 14 V.I.C. §§ 2208–2209. If we determine that unencrypted personal information (such as a name combined with a Social Security number, driver's license number, or financial account number with an access code) has been, or is reasonably believed to have been, acquired by an unauthorized person, we will notify affected Virgin Islands residents in the most expedient time possible and without unreasonable delay, consistent with the legitimate needs of law enforcement and any measures necessary to determine the scope of the breach and restore the security of our systems. Notification may be delayed at the request of law enforcement. Residents of other U.S. states or territories will be notified consistent with the breach notification law applicable to their jurisdiction.

If you believe your data may have been compromised, please contact us immediately at [thesanguinesocial@gmail.com](mailto:thesanguinesocial@gmail.com).

## **7. YOUR RIGHTS AND CHOICES**

You are in control of your personal data. Depending on where you live, you may have some or all of the following rights, and we extend the core protections below to all individuals regardless of location:

- Access the personal information we hold about you
- Request correction of inaccurate or incomplete data
- Request deletion of your information, where applicable
- Limit or object to certain processing of your data
- Withdraw consent at any time, without affecting the lawfulness of prior processing
- Opt out of the sale or sharing of personal information (we do not sell personal information, so this does not currently apply) and, for California residents, opt out of targeted advertising and certain profiling under the California Consumer Privacy Act, as amended by the California Privacy Rights Act
- Designate an authorized agent to exercise these rights on your behalf, where permitted by law

The U.S. Virgin Islands does not currently have a general consumer privacy statute or a dedicated privacy regulator; the rights above are honored as a matter of our own policy and, where applicable, under the law of your state or country of residence. To exercise any of these rights, contact us using the information in Section 12.

## 8. COOKIES AND TRACKING TECHNOLOGIES

We and our service providers use cookies, pixels, and similar technologies to operate our website, remember preferences, measure performance, and support advertising analytics. You can control cookies through your browser settings; disabling cookies may limit some features of our website. We do not currently respond to browser "Do Not Track" signals because no common industry standard for such signals has been adopted.

## 9. CHILDREN'S PRIVACY

Our Service is intended for businesses, marketers, and adults, and is not directed to children under 13 (or under 16 where applicable law requires that threshold). We do not knowingly collect personal information from children. If we learn that we have inadvertently collected information from a child in violation of applicable law, including the Children's Online Privacy Protection Act, we will delete it promptly. Parents or guardians who believe a child has provided us information may contact us using the details in Section 12.

## 10. INTERNATIONAL DATA TRANSFERS

As a business operating from the U.S. Virgin Islands, a territory of the United States, your information may be processed or stored in the United States and its territories. Where we transfer personal information across borders, we take steps to comply with the data protection laws applicable in the origin jurisdiction and implement appropriate safeguards to keep your information secure.

## 11. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable law. When we do, we will post the revised version on this page and update the "Effective Date" above. If changes are material, we will provide additional notice where required by law.

## 12. CONTACT US

If you have questions, concerns, or would like to exercise any of the rights described in this policy, please contact us:

**Email:** [thesanguinesocial@gmail.com](mailto:thesanguinesocial@gmail.com)

**Address:** PO Box 24844, Christiansted, VI 00824

## 13. GOVERNING LAW

This Privacy Policy is governed by the laws of the United States Virgin Islands and applicable United States federal law, without regard to conflict-of-law principles. Nothing in this policy limits any rights you may have under the mandatory consumer protection laws of your own state, territory, or country of residence.