



Subtext Privacy Policy

Last Updated: June 12, 2025

Note for California Residents: This Policy describes how we collect, use, disclose, sell, share, and retain your personal information on our Services and your rights and choices over our processing of your personal information. The [Your Privacy Choices And Rights; Submitting Requests Under Applicable Local Laws](#) section below contains specific details related to your rights under California law, including your right to opt-out of the Services.

This Privacy Policy ("Policy") describes how Alpha Group, a division of Advance Local Media LLC ("Alpha Group" "Advance Local" "we," "us," or "our") collect, use, disclose, and retain personal information about you in connection with our text message communication services ("Services").

Alpha Group provides the Services to you on behalf of Clients. "Clients" organizations who purchase our proprietary text communication software-as-a-service known as Subtext ("Subtext"). Subtext acts as the Clients' service provider and data processor of your information. In providing the Services on behalf of our Clients, we collect, use, disclose, and retain information you provide directly to us or our Clients when you register to be contacted by Clients via text messages. No mobile opt-in data will be shared with third parties.

This Policy also describes the rights that you may have regarding our processing of your personal information under applicable local law.

By accessing or using any of our Services, you acknowledge and agree that your personal information will be handled as described in this Policy. Your use of the Services, and any dispute over privacy, is subject to this Policy, including its applicable limitations of liability and the resolution of disputes.

You may download a printable copy of this Policy (PDF): [here](#).

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1. Categories of Personal Information We Collect About You



Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to you. We may collect the following categories of personal information about you directly from you, automatically through your use of the Services, and from Clients:



- **Identifiers**, such as your name, zip code, email address, telephone number, or similar identifier.
- **Messaging Information**, such as your purchase, registration, log-in and Services usage history, such as your messaging history and any information included in those messages or other activity information related to your interaction with the messages you receive from us on behalf of Clients.
- **Payment records**, such as your financial account information, credit card number, debit card number, or other payment card information, when necessary for the Services.
- **Internet or other electronic network activity**, such as clickstream data, information regarding your interaction with an internet website related to your use of our Services; the length of time you visit our Services; and the referring URL, or the website or application that led you to our Services.
- **Inferences**, such as inferences drawn to create a profile reflecting your preferences related to your use of our Services.
- **Sensitive personal information**, as defined under applicable local law, such as certain characteristics of protected classifications as defined above, account login credentials and passwords, and financial account information, credit card number, debit card number, or other payment card information.

Information We Collect Directly From You. We collect personal information directly from you when you use our Services, such as when you provide us with information online or at an in-person event. If you register for our Services (e.g. signup to receive text messages), we may collect your name, telephone number(s), zip code, email address, and information regarding your preferences (such as whether you want to receive relevant text messages). If you make a purchase through our Services, we may collect your financial account information, credit card number, debit card number, or other payment card information. If you contact us, we may collect information such as your name, email address, the contents of a message or attachments that you may send to us, and other information that you choose to provide.

Information We Collect From Other Sources. We collect personal information about you from our Clients that you have provided to those Clients or third parties acting on their behalf.

2. How We Use Your Information

Alpha Group does not (i) collect, retain, use, or disclose your personal information for any purpose other than to operate Subtext for our Clients or as otherwise permitted under the CCPA; or (ii) sell, rent, lease, disclose, disseminate, make available, transfer, or otherwise communicate by any means your personal information for monetary or other valuable consideration. In addition, any third party may not sell or share your personal information unless you have received explicit notice and is provided an opportunity to exercise the right to opt-out pursuant to CCPA and/or applicable law.

We use the categories of personal information described above for the following business and commercial purposes:

- To Provide Our Services and Fulfill Your Requests. We use your information to provide and maintain our Services, to process and fulfill your requests or orders, to communicate with you about your use of our Services, to respond to your inquiries, and for other customer service and business administration purposes.
- To Improve Our Services. We use your information to understand and analyze our user base and how you use the Services, to improve and enhance the Services, and to develop new products, services, features and functionality.
- Identification and Authentication Purposes. We may use your information for identification and authentication purposes. For example, when you enter your login ID and/or password to enter one of our registration or login portals, we use your credentials and password for authentication purposes.

- Personalization. We use your information to tailor the content and information that we may send or display to you, to offer location customization, to provide personalized offers, personalized help and instructions, and to otherwise personalize your experiences while using the Services.
- Marketing and Promotional Purposes. Our Clients may use your information to send you news and newsletters, event updates, and to communicate with you about new features, events, or products offered by our Clients. Clients may also use your information to analyze trends and to track your movements around the Services. Your preferences and general geolocation data (e.g. zip code) may specifically be used to show you content based on the information you provide to us. Where required by applicable law, we will obtain your prior consent before using your personal information for marketing and promotional purposes.
- Combining Information. We (and our third party business partners) may merge, co-mingle, or otherwise combine information, including your personal information, in furtherance of the purposes described above.
- To Comply With Legal Obligations. We may use your information where we believe necessary to comply with our legal obligations or to exercise or defend our rights or the rights of a third party, including complying with law enforcement or government authority requests and participating in compliance audits.
- To Protect Us and Others. We may use your information where we believe necessary to investigate, prevent, or take action regarding suspected or actual illegal activities, fraud, situations involving potential threats to the safety of any person or to otherwise enforce this Policy or the integrity of the Services.
- Deidentified Data. We may also deidentify or anonymize your data in such a way that you may not reasonably be re-identified by us or another party, and we may use this deidentified data for any purpose permitted under applicable law. To the extent we deidentify any data originally based on personal information, we will maintain and use such data in deidentified form and will not attempt to reidentify the data.
- Tracking Technologies. We, our Clients, and/or our service providers may use QR codes, URL shorteners, link management services and similar technologies (collectively, "Tracking Technologies") on Subtext, including in our text message communications with you and throughout your use of the Services. We, our Clients, and our service providers may use Tracking Technologies to determine which messages have been opened or clicked on by recipients.
- Global Privacy Control (GPC) and similar privacy preference signals. Where required by applicable local law, and as further described in the Your Privacy Choices and Rights; Submitting Requests Under Applicable Local Laws section below, we honor user-initiated browser based opt-out preference signals recognized under applicable local law, such as the Global Privacy Control (GPC). To find out more about GPC, please visit <https://globalprivacycontrol.org/>.

3. How We Disclose the Information We Collect

We may disclose each of the categories of personal information described above for our business and commercial purposes as follows:

- **Related Entities**. We may disclose the personal information we collect about you to our parent company Advance Publications, Inc. ("Advance"), its subsidiaries, and related entities that are owned or controlled by Advance, such as those listed at <https://www.advance.com/>.
- **Service Providers**. We may disclose the personal information we collect about you to service providers, contractors, and agents who perform functions and business operations on our behalf, for the purposes set out above. For example, we engage service providers to help us with technical maintenance, database management, fraud prevention, and audience authentication, as well as credit/debit card or other payment processing, order fulfillment, credit pre-authorization, and address verification.
- **Clients**. In providing the Services on behalf of our Clients, we may disclose the personal information you provide directly to us or those Clients when you register to be contacted by Clients via text messages.

We may also disclose your personal information in the following circumstances:

- **Business Transfers**. If (i) we are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or

insolvency proceeding or otherwise, we may transfer the information we have collected about you to the other company. As part of the business transfer process, we may disclose certain of your information to lenders, auditors, and third party advisors, including attorneys and consultants.



- **In Response to Legal Process.** We may disclose your personal information where we believe necessary to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We disclose your personal information where we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which we are involved.
- **Aggregate and Deidentified Information.** We may disclose aggregate, anonymized, or deidentified information about you for any purpose permitted under applicable law.
- **Consent.** We may disclose your personal information with your consent.

4. Your Privacy Choices And Rights; Submitting Requests Under Applicable Local Laws

You may have certain rights regarding our processing of your personal information under applicable local law, including if you are a consumer in California, Colorado, Connecticut, or Virginia. If our processing of your personal information is governed by such laws, this section provides you with additional information regarding your rights and our processing of your personal information under applicable local law.

Retention

Your personal information will be held for only so long as it is necessary for the purpose for which it was originally collected, and in accordance with applicable local law. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy. When assessing retention periods, we first examine whether it is necessary to retain the personal information collected and, if retention is required, work to retain the personal information for the shortest possible period permissible under applicable law.

Your Privacy Choices and Rights; Submitting Requests Under Applicable Local Laws

Depending on the jurisdiction in which you live, including if you are a consumer in California, Colorado, Connecticut, or Virginia, you may have the following rights under applicable local law:

- request information about our processing of your personal information (right to know);
- request a copy of your personal information (right to access);
- rectify, correct, or update the personal information we hold about you (collectively right to correct);
- request deletion of your personal information;
- opt-out of the Services;
- restrict or limit our use of your personal information or your sensitive personal information (right to restrict);
- object to our use of your personal information;
- where you have provided consent, withdraw such consent to our processing of your personal information at any time;
- ask that we transfer the personal information we maintain about you to another organization, or to you, in certain circumstances (right to portability);
- not be unlawfully discriminated against for exercising your rights;
- lodge a complaint.

These rights may be limited or denied in some circumstances. For example, we may retain your personal information where required or permitted by applicable law.

To learn more about your rights to limit our use and disclosure of sensitive personal information under applicable local law, please see the section below on Submitting Requests.

Submitting Requests

To exercise your rights under applicable local law or if you are an authorized agent or parent or guardian seeking to exercise rights on behalf of a minor in accordance with applicable local law (specifically, including California, Colorado, Connecticut, and Virginia) please follow the instructions provided below.

- To exercise your right to opt-out of our Services (e.g. receiving text messages via Subtext), respond to any of our text messages with the following reply: **STOP**. In addition, you may also fill out this [form](#) or call 1-888-914-9661 and use PIN 981105.
- To exercise your rights to know, access, correct, delete, restrict, object, or portability, under applicable local law as described above, contact us at 1-888-914-9661, using the PIN 981105, or submit a request by completing this [form](#).
- If you have any questions about or are experiencing any problems with our Services, please email hello@joinsubtext.com.

California residents may view metrics for California Consumer Privacy Act ("CCPA")-related requests we have received during calendar year 2021, by clicking [here](#).

Verification

We reserve the right to take reasonable steps to verify your identity before fulfilling your requests to know, correct, or delete. For example, we may seek to establish your identity to a reasonable or a reasonably high degree of certainty by matching information that you submit alongside your request with information that we have in our records. We may ask you or your authorized agent for supplemental information as needed to establish your identity. Authorized agents may also be required to provide a copy of the consumer's signed permission authorizing the agent to submit requests on the consumer's behalf under applicable local law.

Appeals

You may have a right to appeal a decision we make relating to requests to exercise your rights under applicable local law. To appeal a decision, please contact us by [email](#).

California Online Erasure. California's "Online Erasure" law, Business and Professions Code §§ 22580-22582, requires operators of certain websites and online services to allow registered users who are under the age of 18 and residents of California to request removal of content they post. If you fit that description and posted content on a section of our Service that is directed to California residents at least 13 and younger than 18 years of age, you may request removal of the content by contacting us by [email](#) or as described at the end of this document. In response to your request, we may elect to make the content invisible to other users and the public (rather than deleting it entirely), in which case the content may remain on servers we control and/or may be publicly available elsewhere if a third party copied and reposted the content.

5. Security of My Information

We implement physical, technical, and organizational security measures designed to safeguard personal information. These measures are aimed to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee security.

6. Third Party Links

When you opt-in to receive text messages from our Clients, you may receive text, links, images, GIFs, video, emojis, and other rich media as part of the Services. Therefore, our Services may contain links to third-party websites and applications, including our Clients websites and applications. Any access to and use of such linked websites and applications is not governed by this Policy, but is instead governed by the privacy policies of those third-party websites and applications, including our Clients websites and applications. We are not responsible for the information practices of such third party websites and applications. We encourage you to review the privacy policies of any third-party websites or applications that you choose to visit.

7. Be Careful Publicly Posting Personal Information

Please be aware that content and personal information that you disclose in publicly accessible portions of the Service, including what you text to Clients, may be available to other users, and may also be made available outside the Service by third parties, so you should be mindful of all personal information, especially sensitive personal information, that you may wish to post. To the extent required by applicable local law, we may require that you obtain the consent of any individual whose personal information you post on our Services.



8. International Transfers

Your personal information may be processed, transferred to, and maintained on servers and databases located outside of the jurisdiction in which you are based and where the privacy laws may not be as protective as your jurisdiction. Where required by applicable law, we have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below in the "Contact Us" section of this Policy.

9. Children

Our Services are not designed for children under the age of 13. If we discover that a child under the age of 13 has provided us with personal information, we will delete such information from our systems.

10. Contact Us

If you have any questions about the privacy aspects of our Services or would like to make a complaint, request, or have a question about your rights under this policy please contact our Customer Success Team: hello@joinsubtext.com. Make sure to include enough information for us to help you, including for example your name, contact information, and the specific Client's service you're contacting us about.

11. Changes to this Policy

This Policy is current as of the Last Updated date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Services. If we make any changes to this Policy that materially affect our practices with regard to the information we have previously collected about you, we will endeavor to provide you with notice in advance of such change by highlighting the change on the Service.

If you don't agree to the terms contained in this Policy, you must immediately opt-out of the Services and exit Subtext.

Ready to start texting?



Subtext was founded in 2019 in New York City by Advance Alpha Group.

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