Inside Radio

# **Privacy Policy**

UPDATED AS OF: APRIL 13, 2020

Inside Radio, a division of M Street Corporation (collectively "Inside Radio", "we", "us", or "our") are committed to maintaining your confidence and trust as it relates to the privacy of your information. This Privacy Policy describes how we collect, protect, share and use your information, both offline and online, including as part of our websites, interactive features, and Apps (collectively, "Platforms"), and your rights and choices in connection your information.

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### 1. WHAT INFORMATION WE COLLECT

We (and the vendors we hire to perform business functions on our behalf) may collect, receive, and develop several categories of personal information about you depending on the nature of your interactions with us:

**Identifiers:** We may collect your name, e-mail address, telephone number, mobile phone number, and mailing address, to add to our database for delivery of the Inside Radio daily news email.

**Payment Information:** We collect your credit card or debit card details when you make a purchase.

### 2. HOW WE USE INFORMATION

We may use personal information for the following purposes:

- To respond to your questions and requests;
- To provide customer service;
- To communicate with you about your account and activities on the Platforms, such as changes to any Inside Radio policy;
- To administer the Platforms; help diagnose problems with our servers; and facilitate site navigation
- To conduct Platform analytics and operations and to analyze trends;
- For market research;
- To track the effectiveness of our advertising (such as measuring how many people view or click an ad) and for advertising attribution, analytics and reporting;
- To send you (either directly or through one of our partners) marketing and promotional messages;
- For security and safety purposes, such as protecting against cyber threats; protecting our rights and the rights of our customers and subscribers; detecting, investigating, or preventing fraud and other illegal activities; and responding to legal and regulatory compliance obligations;
- To comply with our license obligations;
- To verify your identity; and
- For other lawful purposes disclosed at the time we collect your information or otherwise with your consent.

### 3. WE COLLECT INFORMATION FROM VARIOUS SOURCES

**Directly from you:** We, as well as our service providers, collect personal information directly from you when you use the Platforms, for example to register to create an account, update your information, sign up for a subscription, use certain features, complete a profile or otherwise tell us about your preferences, access or download content, purchase items or enter into promotions, post content to the Platforms, refer others to the Platforms, interact with us via third party applications or social media sites, request customer support or otherwise communicate with us.

**Automatically from your devices:** We, as well as advertisers and/or service providers, may use a variety of tracking tools and technologies that automatically or passively collect information like Browser/Usage/Device Information and Location Information any time you visit or interact with the Platforms, our emails, and our advertising and content on other websites and platforms.

**Vendors and service providers:** We receive personal information about you from our vendors and service providers we hire to help us run our business, including those companies that host, protect, or operate our Platforms; analyze data; collect debts for us; provide customer service; send emails for us; process payments; conduct surveys; fulfill orders; run our promotional activities and contests; or provide marketing, analytics, and advertising services.

**Social media:** If you create an account using your credentials from a social media site, we will have access to certain information from that site. Services like Facebook Connect give you the option to post information about your activities on our Platforms to your profile page

to share with others within your network. In addition, we may receive information about you if other users of a social media application or website give us access to their profiles and you are one of their "connections" or if information about you is otherwise accessible through your "connections" web page, profile page, or similar page on a social networking or other third party website or interactive service.

**Other users:** Other users may decide to provide us with your personal information (such as Identifiers) so that we may invite you to join Inside Radio or so that we may facilitate communication between users of the Platforms.

**We combine information:** When we get information from other sources, we may combine that with information we already have. We may combine information that we have collected offline with information we collect online or through the Platforms. We may also aggregate your information with other consumers' information to understand preferences and trends within your peer group over time.

### 4. WE SHARE INFORMATION WITH OTHERS

We may share personal information as described below:

**Affiliates:** We may share personal information with our affiliates, subsidiaries, and other companies under common control and ownership with Inside Radio.

**Vendors and service providers:** We may share personal information with vendors and service providers we hire to help us run our business, including those companies that host, protect, or operate our Platforms; analyze data; provide customer service, send emails for us; process payments; conduct surveys; fulfill orders; run our promotional activities and contests; or provide marketing, analytics, and advertising services.

**Business transfers:** As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all or substantially all of our assets, or assets related to the Platforms, your information may be disclosed to such entity as part of the due diligence process and may be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

**Legal compliance:** We may share personal information with third parties to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our <u>Terms of Use</u> or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of other parties, visitors to our Platforms, or the public.

**Other disclosures:** We may share personal information for other reasons we may describe to you from time to time as permitted by law.

**Non-personal information:** We may share information that has been de-identified or aggregated such that it does not identify or relate to you, with other parties for any purpose.

This may include aggregated user statistics about the Platforms or aggregated demographic information about our users.

### 5. YOUR CHOICES

#### Cookies:

To learn how you can reject or delete cookies from us or other companies, please refer to your browser's help menu. Deleting or rejecting browser cookies does not necessarily affect third-party flash cookies used in connection with our Platform. To delete or disable flash cookies, please click <u>here</u>. If you disable or opt out of receiving cookies, please be aware that some features and services on our Platform may not work properly because we may not be able to recognize and associate you with your account(s). In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

To learn how to change your device identifier or mobile advertising ID, please refer to your device's help menu or other instructions.

#### Interest-Based Advertising:

When you use the Platforms, we, our service providers, and advertising partners may place cookies and similar tracking technologies on your computer or Device in order to collect information about your online web-browsing activities over time and across different websites and online services or mobile applications, in order to serve you ads or other content personalized to your interests. This form of advertising is referred to as Interest Based Advertising ("IBA"). In order to personalize these ads or content, we or our advertising partners or service providers may connect and/or share personal information about you either to data you provided to us or to Browser/Usage/Device Information and Location Information collected about you.

You can opt out of being tracked online for IBA purposes by clicking <u>here</u> or <u>here</u>. You can opt out of being tracked for IBA purposes on mobile apps by clicking <u>here</u>. Another way to opt out of IBA is by clicking on the Advertising Options Icon featured on certain Inside Radio ads on third-party websites. When clicked it (i) describes the collection and uses of data gathered at the relevant party website and (ii) provides a way for you to opt out of data collection and use by the other parties listed for the purposes of IBA.

Choices you make are device-specific and browser-specific. If you use different browsers on your computer, or multiple computers and Devices, you will need to opt out of IBA from each browser on each of the computers and Devices that you use. Please note that even if you opt out of IBA, you may still receive advertisements from us; they just won't be customized based on your web-browsing activities on third-party websites. Please also note that if you opt-out of IBA, we may still track your visits to the Platforms for our own analytics, operations and security purposes.

Do Not Track:

Some browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. These features are not yet uniform, and our systems are not configured to recognize Do Not Track headers or signals from some or all browsers.

#### Marketing Communications:

If you don't want to receive promotional communications *from us, such as offers, newsletters, advertising e-mails or other marketing communications, you can unsubscribe by:* 

- following the removal instructions in the communication that you receive;
- sending us an e-mail at privacy@InsideRadio.com
- contacting us by mail at Inside Radio, Attn: Inside Radio Customer Service, PO Box 742263, Atlanta GA 30374

Please note that if you opt out of receiving promotional communications, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.

#### Location Information:

By downloading our Apps or using the Platforms, you consent to our collection, use, and sharing of your Location Information with other parties for analytics, advertising, and other purposes described herein. You can stop the collection of precise Location Information at any time by going to the setting feature on your Device and changing your preferences. If you do so, certain features of our Apps may no longer function as intended. You also may also uninstall or remove our Apps from your Device.

#### Push Notifications:

If you use our Apps, we may send you push notifications from time to time. If you no longer wish to receive push notifications, you can turn them off at the device level in your App settings.

#### Access to Your Information:

If you wish to verify, correct, or update any of your personal information we have collected or received, you may contact us at the address or e-mail provided below. In accordance with our routine record keeping, we may delete certain records that contain personal information about you. We are under no obligation to store such personal information indefinitely and disclaim any liability arising out of, or related to, the destruction of such personal information.

# 6. YOUR CALIFORNIA PRIVACY RIGHTS

California law permits residents of California to request certain details about how their personal information is shared with third parties for the third parties' direct marketing

*purposes. If you are a California resident and would like to make such a request, please contact us* using the methods described in the Contact Us section, and include "Shine the Light" in your inquiry.

As of January 1, 2020, we also want California residents to know the following:

- This Platform is for business use only.
- We collect and use the following categories of personal information as set forth in the California Consumer Privacy Act of 2018 for the business and commercial purposes described in this Privacy Policy: identifiers; personal information categories listed in Cal. Civ. Code § 1798.80(e), characteristics of protected classifications under California or federal law; commercial information; internet or other electronic network activity information; geolocation data; and inferences.
- We collect these categories of personal information from the categories of sources described above in this Privacy Policy.
- We disclose each of the foregoing categories of personal information to our service providers, business and advertising partners, advertising networks, data analytics providers, and social networks.
- We do not currently sell the personal information that is the subject of this Privacy Policy.

# 7. CHILDREN

The Platform is not directed to children under 13. We do not knowingly collect, use or disclose personal information from anyone under 13 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her personal information without the parent/guardian's consent. If we become aware that we have unknowingly collected personal information from a child under the age of 13, we will make reasonable efforts to delete such information from our records.

# 8. SECURITY OF YOUR INFORMATION

We use certain reasonable security measures designed to help protect your personal information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use the Platforms and provide us with your information at your own risk.

# 9. OTHER SITES

The Platforms may contain links to other sites that we do not own or operate. This includes links from service providers, advertisers, sponsors and/or partners that may use our logo(s) as part of a co-branding or co-marketing agreement. We do not control, recommend or endorse, and are not responsible for, these sites or their content, products, services or privacy policies or practices. These other websites may send their own cookies to your Device, they may independently collect data or solicit personal Information, and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site which appears or claims that it is one of our Platforms (including those linked to through an email or social networking page).

The Platforms may make available chat rooms, forums, message boards, and news groups. Remember that any information that you disclose in these areas becomes public information and is not subject to the provisions of this Privacy Policy.

# 10. UNITED STATES ONLY

The Platforms are governed by and operated in, and in accordance with the laws of, the United States, and are intended for the enjoyment of residents of the United States. Inside Radio makes no representation that the Platforms are governed by or operated in accordance with the laws of any other nation.

# 11. CHANGES

Any changes we may make to our Privacy Policy will be posted on this page and/or communicated to you in other ways if required by law. Please check back frequently to see any updates or changes to our Privacy Policy. If you do not agree or consent to these updates or changes, do not continue to use the Platform.

# 12. CONTACT US

If you have any questions or concerns about this Privacy Statement, the practices of the Platforms, or your experiences with the Platforms, please contact us at:

Inside Radio Attn: Inside Radio Privacy Statement PO Box 742263 Atlanta GA 30374 E-Mail: <u>privacy@InsideRadio.com</u>