

## *Hubbard Interactive Privacy Policy*

*Effective Date: February 22, 2023*

**Any users located within the European Economic Area (“EEA”) are prohibited from using our Platforms. For avoidance of doubt, the Hubbard Interactive, LLC Platforms (defined below) are not intended for users located within the EEA.**

This is the Privacy Policy for the websites and social media pages (“Platforms”) operated by Hubbard Interactive, LLC (collectively, “Hubbard” “our,” “us,” or “we”). Your privacy is important to us, and we provide this Privacy Policy regarding our collection, use and disclosure practices to help you to make informed decisions regarding use of our Platforms, and exercising choices regarding our collection, use and disclosure of your personal information on our Platforms.

This Privacy Policy is incorporated by reference into and is subject to the [Hubbard Interactive, LLC’s Terms of Use](#).

As set forth in our Terms of Use, our Platforms are for a general audience, are not targeted to children, and do not knowingly collect personal information from children under 16 years of age.

### **How Do We Collect Personal Information?**

- **From you.** This includes personal information we collect when you view or consume content, create a user profile, sign up to receive marketing information from us, post on our Platforms, link to, like, or follow our social media pages, enter our various sweepstakes and contests, or contact us.
- **From third parties and publicly available sources.** This includes personal information we collect from other public sources, including, but not limited to, websites that enable social sharing, social media sites, and websites from our service providers, vendors, our affiliates, or other individuals and businesses.
- **From devices you use when you interact with us online.** This includes information collected through our Platforms and automatically from devices you use to connect to our Platforms. For more information about this, please see our “Cookies and similar technologies” section below.
- **From you in person.**

### **The Types of Personal Information We May Collect From You**

Depending on how you interact with us, we may collect the following information:

- **User Information.** If you create an account with us, then we need certain information to create and manage any account you make on our Platforms, like your phone number, email address, and password.

- **Contact Information and Preferences.** Such as name, email address, mailing address, phone number, and listening preferences.
- **Biographical and Demographic Information.** Such as date of birth, age, other preferences.
- **Device Information.** Along with the information you give us directly, we collect a variety of information automatically as you use our Platforms. Like other websites and apps, we collect data about the browsers and devices you use to access our Platforms. The data we collect includes browser or device model and settings, operating system, unique identifiers, and the version of the app you're using.
- **Usage Data.** We also collect data about how your browsers and devices interact with our services, crash reports, system activity, and the date, time, and the URL of the site you visited before our Platforms. If you access our Platforms from a mobile or other device, we may also collect a unique device identifier assigned to that device, geolocation data (including your precise location), or other usage information for that device.
- **Other Personal Information.** Other information collected online or offline to help us better identify and offer services and information that we believe may be of interest to you, or help us better understand your experience with our Platforms.
- **Communications with us.** Such as including interactions with us on our Platforms and social media channels, including chatbot and live chat. By accessing or using any of these communications features, you agree that we may record and retain a transcript of all communications with you. We may also work with trusted service providers to analyze, store, and use this data on our behalf.
- **Fraud Prevention Information.** Data used to help identify and prevent fraud.
- **Inferences.** Inferences may be used to improve our Platforms and make them more useful to you, we use data about your activity to understand and infer your preferences.

### **How We Use Your Personal Information**

We may use your information for the following reasons, depending on your relationship with us:

- To allow us to make personalized recommendations of content you may be interested in.
- To offer you other programs, services or products that we believe may be of interest to you.

- To fulfill your requests for our products and services.
- To communicate with you, such as when we respond to your inquiries, send you communications, and contact you about your account with us.
- To provide, market, and develop our products and services, including to maintain our Platforms, troubleshoot, provide customer and technical support, conduct data analysis, test and research, and better understand the interests of our customers, listeners, and Platform visitors who use our services and products.
- To serve you targeted advertising or content.
- To conduct marketing research.
- To understand how you interact with our Platforms and to provide you with an interactive online experience, including through personalized or localized Platform experiences.
- To maintain the safety, security, and integrity of our Platforms, for example, by authenticating users and providing account security and fraud detection. We may also use your information to monitor, detect, and prevent fraud and improper or illegal activity.
- To debug our systems, to secure our online services, including our network and websites, and to debug our online services.
- To send you news and/or marketing communications (by email, phone, or text) subject to your marketing preferences and choices, including information about us or third-party offerings we think may be of interest to you.
- To conduct market research and develop quality assurance, including to study, develop, and improve our products and services. We may also aggregate, anonymize, and/or de-identify personal information we collect and use it for any purpose, including product development and improvement activities.
- To comply with legal requirements and/or to investigate or address claims or disputes relating to your use of the Platforms. This would include the use of your information to comply with our legal and regulatory obligations, to defend ourselves in litigation and investigations, and to prosecute litigations.
- To combine information we receive online from you with records from other sources.

#### **How We Disclose Personal Information:**

We may collect, use, retain, disclose, and store personal information collected from or about you with any of the following entities and for any of the following purposes:

- ***Service Providers and Advertising Partners.*** We may provide personal information to vendors, customer support vendors, payment processors, contractors, business and

service partners, or other third parties, such as advertising partners or other marketing partners who provide services to us, including analysis firms, advertisers, and others.

- **Collaborators.** We may share personal information with collaborators with whom we jointly develop or promote our services, including sponsorships and co-branded opportunities, contests, and promotions.
- **Government, regulatory, or law enforcement agencies.** We reserve the right to disclose your information to respond to valid information requests from government authorities and judicial requests, to investigate potential fraud, or where otherwise required by law. We may disclose your personal information where we believe the disclosure is necessary or appropriate to comply with regulatory or legal requirements, or to protect the safety, rights, or property of ourselves and others and to exercise, establish, or defend our legal rights.
- **In connection with a merger, acquisition, or business transfer.** If we sell all or a part of our company, are part of a merger, consolidation, restructuring, and/or sale of assets or other corporate change, your information may be transferred as part of that transaction.
- **At your direction.** We may disclose your personal information at your direction or with your consent.
- **The General Public.** We may share personal information with the general public if you choose to share personal information when contributing content to our Platforms through a forum, blog, social feature, or the like;
- **Device Sharers.** We may share personal information with others who share your device if you make your account available to them through that device.
- **Aggregate Data.** We may disclose your personal information in an aggregated or non-identifying form or otherwise in a form that cannot reasonably be used to identify you.

### Links to Third Party Websites

We may provide links to websites and other third-party content (e.g., social media platforms) that are not owned or operated by us. The websites and third-party content to which we link may have separate privacy notices or policies. We are not responsible for the privacy practices of these websites.

If you provide any personal information through a third-party site, your interaction and your personal information will be collected by and controlled by the privacy policy of that third party site. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties, which are not governed by this Privacy Policy.

## **Advertising and Opt-Out Disclosures**

When you use our Platforms, our third-party advertising partners, social media providers, and analytics providers may collect personal information about your online activity on our Platforms and on third party websites.

These providers may set web tracking tools (e.g., cookies and web beacons, as discussed further below) to collect information regarding your online activity. In addition, our advertising partners may use this information to deliver advertisements to you when you visit third party websites within their networks. If you would like more information about this practice, and to know your choices with respect to it, please either visit the Digital Advertising Alliance's opt-out page (currently available at <http://www.aboutads.info/choices/>) or the Network Advertising Initiative's opt-out page (currently available at <http://www.networkadvertising.org/choices/>). Please note that you may continue to receive generic ads that are not based on your preferences.

## **Information Security**

We use commercially reasonable administrative, technical, personnel, and physical measures designed to safeguard information in its possession against loss, theft, unauthorized use, disclosure, or modification. However, the confidentiality of information transmitted over the Internet cannot be guaranteed. We urge you to exercise caution when transmitting personal information over the internet. We cannot guarantee that unauthorized third parties will not gain access to your information; therefore, when submitting personal information to us, you do so at your own risk.

## **Cookies and Similar Technology**

We and our partners use various tools to collect data when you visit our sites and apps, including cookies, pixels, localStorage, and other similar technologies. Some of these technologies store data in the browser or on your device. Other technologies may use network-related or other information to recognize your device (e.g., IP address). Our Platforms use these technologies, for example, when you first request a web page and data is then stored on your computer or other device so the website or mobile application can access personal information when you make subsequent requests for pages from that Platform. These technologies may also be used to collect and store information about your usage of the Platforms, such as pages you have visited, other content you viewed, and search history.

We and our partners may also use these technologies to gather personal information about how you view and use our Platforms and content and to connect your activity with other data we store about you. We and our partners may collect your personally identifiable information about your online activities over time and across different websites when you use the Platforms. The use of these technologies helps us serve you better by understanding what you are interested in, tracking trends, measuring the effectiveness of ads, saving your preferences, and storing information you may want to retrieve on a regular basis. We also allow specific, approved partners to collect data from your browser or device for advertising and measurement purposes using their own similar tools.

Your web browser can be set to allow you to control these technologies, such as whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost. The Help section of your browser may tell you how to prevent your browser from accepting these technologies, such as cookies. To find out more about cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org). Depending on the make and model of your phone, you may be able to use device settings to opt out of the use of certain device IDs for targeted advertising.

Some browsers permit the user to send a “Do Not Track” (“DNT”) preference to websites that the user visits indicating that the user does not wish to be tracked over time and across websites. Because there is not yet a common understanding of how to interpret DNT, we do not currently respond to the DNT signal on our websites.

In addition, if you give your email address to us, we may use a scrambled form (called a “hashed” version) of your email address to deliver tailored ads to you on our Platforms or on other websites, including via Custom Audience Feature or other similar tools.

### **Your Marketing Preferences**

We may periodically send promotional materials or notifications related to our Platforms. If you no longer wish to receive promotional marketing materials from us, you may opt out of receiving such materials. You may unsubscribe from receiving marketing or other commercial emails from us by following the instructions included in the email. Please allow time for your request to be implemented.

You may unsubscribe from text messages you previously consented to by following the prompt provided on our messages. We will work to comply with your request promptly.

There are certain service notifications and other non-promotional emails that you may not opt out of, such as notifications of changes to our Platforms or policies.

### **Updates to the Policy**

We may update this policy from time to time. To the extent permitted by law, any changes to our privacy policy will be posted to the websites and will become effective upon posting. Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.

### **Contact Us**

If you have any questions or concerns about this Privacy Policy or its implementation you may write us at our postal address:

Hubbard Interactive, LLC  
3415 University Avenue  
St. Paul, MN 55114  
Attn: Legal