

# BNP Media's Privacy Policy

Effective Date: December 11, 2023

BNP Media, Inc. and its affiliates, including BNP Media II, LLC, (“BNP Media”) have created this Privacy Policy in compliance with applicable laws and in order to demonstrate our firm commitment to privacy. This Privacy Policy describes how BNP Media collects, uses, discloses, transfers, stores, retains or otherwise processes your information when you (whether in your individual or business capacity) access or use, in any manner, any content, products, services or related activities (collectively “Services”), including through the Internet domain(s) owned or operated by BNP Media, **which include, but are not limited to, the websites listed in the following webpage: <https://www.bnpmedia.com/our-audiences/>.**

We refer to the above websites and all related websites as “sites” and to each of them as a “site.” When we refer to “we,” “us,” or “our,” we mean BNP Media, or the specific division, subsidiary, or affiliate that operates a site, provides its content, or processes information received through it, each as appropriate and applicable. When we refer to “you” or “your,” we mean the person accessing the site. If the person accessing the site does so on behalf of, or for the purposes of, another person, including a business or other organization, “you” or “your” also means that other person, including a business organization.

This Privacy Policy applies to your use of our Services and the collection, processing and disclosure of your information in the provision of Services to our customers. This privacy policy also covers information collected in connection with your access to and use of our Services and sites, including those Services provided through our sites and/or online. Please read this Privacy Policy carefully. By continuing to interact with our Services and sites, you are consenting to the practices described in this Privacy Policy.

## I. OUR PRIVACY POLICY INCLUDES:

- WHAT INFORMATION WE COLLECT
  - CATEGORIES OF PERSONAL INFORMATION THAT WE COLLECT DIRECTLY FROM YOU AND FOR WHAT PURPOSES
  - INFORMATION THAT WE RECEIVE FROM SELECT PARTNERS
  - COLLECTION OF TECHNICAL INFORMATION AND USAGE INFORMATION
  - WHEN AND WITH WHOM DO WE SHARE YOUR INFORMATION
  - WHEN WE MAY SELL INFORMATION
- COOKIES POLICY
- HOW TO RESTRICT COOKIES
- [EXTERNAL-PARTY ADVERTISING AND ANALYTICS](#)
- LINKING SITES
- [SOCIAL MEDIA](#)
- HOW LONG WE RETAIN YOUR INFORMATION
- MARKETING AND PROMOTIONAL COMMUNICATIONS

- CHILDREN’S ONLINE PRIVACY PROTECTION ACT (COPPA) COMPLIANCE AND RELATED INFORMATION
- SECURITY
- CHANGES TO THIS PRIVACY POLICY
- CONTACT US
- CONSUMER RIGHTS – UNITED STATES
  - CALIFORNIA
  - NEVADA
- INTERNATIONAL PRIVACY POLICY
  - CANADA
  - EUROPE
  - BRAZIL
  - AUSTRALIA

## II. GENERAL DISCLOSURES

Each of the sites is hosted in the United States and their intended use is business to business. The sites are not intended for use by consumers or private individuals. If you are visiting the sites from outside of the United States, please note that by providing your information it is being transferred to, stored or processed in the United States and other countries where our data center and servers are located and operated. The portion of the Privacy Policy sets forth the general privacy policy for the United States and other jurisdictions not otherwise specifically covered by the jurisdiction-specific policies in our International Privacy Policy. Depending on your U.S. state or country of residence, applicable privacy laws may provide you the ability to request access to, correction of or deletion of your information, as further outlined below.

If you are outside the United States please see the provisions in our [International Privacy Policy](#). If you are outside the United States and do not wish to allow the transfer of your personal information to the United States, you should not use these sites and you should opt-out of the collection of cookies. For more information about the cookies we collection, please view our [Cookies Policy](#).

We take your privacy and the protection of your personal information seriously. We will only store, process and disclose your personal information in accordance with applicable law. We will make it clear when we collect personal information and will explain what we intend to do with it. We do our best to protect your privacy through the appropriate use of information security measures.

## III. WHAT INFORMATION WE COLLECT

BNP Media may collect different from or about you either directly from you, or your mobile and/or other Internet connected devices (“Connected Devices”), or from select external sources. Detailed information regarding these practices can be found in the sections below.

**A. CATEGORIES OF PERSONAL INFORMATION THAT WE COLLECT DIRECTLY FROM YOU AND FOR WHAT PURPOSES**

The following disclosures are provided to help you better understand the information we may collect directly from you, either through your use of the sites (including from a Connected Device) or in the course of us providing our Services to our customers.

**1. BUSINESS CONSUMERS**

CATEGORY OF INFORMATION	EXAMPLES	PURPOSE OF COLLECTION
<p><b>Business Identifier Information</b></p>	<p>information we collect may include:</p> <ul style="list-style-type: none"> <li>• first and last name</li> <li>• personal mailing address</li> <li>• business address</li> <li>• e-mail address</li> <li>• telephone number</li> <li>• fax number</li> <li>• office location</li> </ul>	<p>we collect this information in order to:</p> <ul style="list-style-type: none"> <li>• respond to your questions or concerns</li> <li>• send you information we think you may find useful or that you have requested from us</li> <li>• communicate with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys and/or rewards offered by us and select partners</li> <li>• process contest and survey entries</li> <li>• resolve disputes, deliver information and provide assistance with our Services</li> <li>• provide our Services to our customers</li> <li>• market our Services</li> </ul>
<p><b>Demographic Information</b></p>	<p>information we collect may include:</p> <ul style="list-style-type: none"> <li>• date of birth</li> <li>• gender</li> <li>• ethnicity</li> <li>• marital status</li> <li>• home ownership</li> <li>• languages spoken</li> </ul>	<p>we collect this information in order to measure, track and analyze the trends in connection with your use of our Services and sites or the performance of our Services</p>
<p><b>Financial Information</b></p>	<p>information we collect may include:</p> <ul style="list-style-type: none"> <li>• bank account information</li> <li>• billing address</li> <li>• payment card details</li> </ul>	<p>we collect this information in order to:</p> <ul style="list-style-type: none"> <li>• process or record payment transactions or money transfers</li> <li>• display your historical transactions</li> </ul>
<p><b>Professional Information</b></p>	<p>information we collect may include:</p> <ul style="list-style-type: none"> <li>• education</li> <li>• employment/professional information</li> <li>• job history</li> <li>• professional purchasing influence</li> </ul>	<p>we collect this information in order to:</p> <ul style="list-style-type: none"> <li>• provide our Services to our customers</li> <li>• improve, personalize and facilitate your use of our Services</li> <li>• we collect this information to measure, track and analyze the trends in connection with your use of our Services and sites or the performance of our Services</li> </ul>
<p><b>Account Information</b></p>	<p>information we collect may include:</p> <ul style="list-style-type: none"> <li>• your username and password</li> <li>• encrypted customer ID</li> <li>• your account preferences</li> </ul>	<p>we collect this information in order to:</p> <ul style="list-style-type: none"> <li>• provide you with access to our sites and Services</li> <li>• respond to your questions or concerns</li> <li>• manage your account preferences, establish your profile and registration information</li> </ul>

<b>Commercial Information</b>	information we collect may include: <ul style="list-style-type: none"><li>• details about the products and services you have purchased from us and the corresponding transactions, including in which store the purchase occurred; event and webinar attendance and participation</li><li>• your preferences in receiving marketing from us and our third parties and your communication preferences</li></ul>	we collect this information in order to: <ul style="list-style-type: none"><li>• provide, maintain and improve our Services</li><li>• develop new products and Services</li><li>• provide you with Services and features you choose to use</li><li>• tailor the marketing of our Services, events, research and products</li><li>• communicate with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys and/or rewards offered by us and select partners</li></ul>
-------------------------------	--	--

## 2. WEBSITE VISITORS

CATEGORY OF INFORMATION	EXAMPLES	PURPOSE OF COLLECTION
<b>Identifier Information</b>	information we collect may include internet protocol (IP) addresses	we collect this information in order to: <ul style="list-style-type: none"> <li>• in order to perform non-personally identifiable metrics</li> <li>• track and analyze trends and usage in connection with your use of our sites as well as in the performance of our Services</li> <li>• see how we can better optimize our sites and Services</li> </ul>
<b>Computer Technical Information</b>	information we collect may include operating system and platform or other technology on the devices you use to access this website	we collect this information in order to: <ul style="list-style-type: none"> <li>• in order to perform non-personally identifiable metrics</li> <li>• track and analyze trends and usage in connection with your use of our sites as well as in the performance of our Services</li> <li>• see how we can better optimize our sites and Services</li> </ul>
<b>Internet and Electronic Network Activity</b>	information we collect may include: <ul style="list-style-type: none"> <li>• webpages viewed</li> <li>• events and page loads</li> <li>• time zone setting and location (geocodes)</li> <li>• information about how you use our website, products and services, including video usage, articles read and topics of interest</li> <li>• language preference</li> <li>• auth0 logs</li> </ul>	we collect this information in order to: <ul style="list-style-type: none"> <li>• measure, track and analyze trends and usage in connection with your use of our sites and application as well as the performance of our Services</li> <li>• see how customers are finding and accessing our sites and applications in order to gauge the effectiveness of our marketing campaigns</li> <li>• enforce any applicable terms of use or other applicable agreements or policies</li> <li>• maintain our services, sites and applications, including improving safety and quality controls, as well as to develop new products and services</li> </ul>

### B. INFORMATION THAT WE RECEIVE FROM SELECT PARTNERS

We may receive information about you when you access our sites through external platforms, such as Facebook. If you use our sites on or through an external platform, including your Connected Devices, or click on third-party links, the collection, use, and disclosure of your information and your use of the sites will also be subject to the privacy policies and other terms of such third parties or third-party platforms. You should review such privacy policies, terms and other agreements.

## 1. BUSINESS CONSUMERS

CATEGORY OF INFORMATION	EXAMPLES	SOURCE OF INFORMATION	PURPOSE OF COLLECTION
<b>Business Identifier Information</b>	information we collect may include: <ul style="list-style-type: none"> <li>• first and last name</li> <li>• personal mailing address</li> <li>• business address</li> <li>• e-mail address</li> <li>• telephone number</li> <li>• fax number</li> <li>• office location</li> </ul>	we collect this information from our marketing, advertising and business development partners	We collect this information to <ul style="list-style-type: none"> <li>• provide our services</li> <li>• explore providing our Services to new customers</li> </ul>
<b>Demographic Information</b>	information we collect may include: <ul style="list-style-type: none"> <li>• date of birth</li> <li>• gender</li> <li>• ethnicity</li> <li>• marital status</li> <li>• home ownership</li> <li>• languages spoken</li> </ul>	we collect this information from our marketing, advertising and business development partners	we collect this information in order to measure, track and analyze the trends in connection with your use of our Services and sites or the performance of our Services
<b>Professional Information</b>	information we collect may include: <ul style="list-style-type: none"> <li>• education</li> <li>• employment/professional information</li> <li>• job history</li> <li>• professional purchasing influence</li> </ul>	we collect this information from our marketing, advertising and business development partners	we collect this information in order to: <ul style="list-style-type: none"> <li>• provide our Services to our customers</li> <li>• improve, personalize and facilitate your use of our Services</li> <li>• we collect this information to measure, track and analyze the trends in connection with your use of our Services and sites or the performance of our Services</li> </ul>

## 2. EXTERNAL PARTNER ADVERTISING AND ANALYTICS

We use third-party service providers to provide site metrics and other analytics services. These third parties may use cookies, web beacons and other technologies to collect information, such as your IP address, identifiers associated with your device, other applications on your device, the browsers you use to access our sites and Services, webpages viewed, time spent on webpages,

links clicked and conversion information (e.g., transactions entered into). This information may be used by BNP Media and third-party service providers on behalf of BNP Media to analyze and track usage of our sites and Services, to determine the popularity of certain content and to better understand how you use our sites and Services.

This Privacy Policy does not apply to, and we are not responsible for, third-party cookies, web beacons or other tracking technologies, which are covered by such third-parties' privacy policies. For more information, we encourage you to check the privacy policies of these third-parties to learn about their privacy practices. For more information about targeted advertising specifically, please visit <http://www.aboutads.info/choices>.

### **3. SOCIAL MEDIA**

We may collect information from other sources, such as social media platforms that may share information about how you interact with our social media content. We do not control how your personal information is collected, stored or used by such third-party websites or to whom it is disclosed. You should review the privacy policies and settings on any social media website that you subscribe to so that you understand the information they collect and may be sharing. If you do not want your social media websites to share information about you, you must contact that website and determine whether it gives you the opportunity to opt-out of sharing such information. BNP Media is not responsible for how these third-party websites may use information collected from or about you.

Further, our sites may include social media features, such as the Facebook Like button. Our integration of these features may allow third-party social media to collect certain information, such as your IP address and which page(s) you are visiting when using our sites and Services, and to set a cookie to enable that feature to function properly. Your interactions with these features are governed by the privacy policy of the BNP Media providing it.

### **4. COLLECTION OF TECHNICAL INFORMATION AND USAGE INFORMATION**

When you access BNP Media's sites, we automatically collect certain information. This information may include without limitation, Computer Technical Information about your computer or Connected Device and Internet and Electronic Network Activity statistics about your interaction with BNP Media's sites.

This Computer Technical Information and Internet and Electronic Network Activity, which may be linked to your personal information, is collected through the use of server logs and tracking technologies, including: (i) cookies, which are small pieces of code that websites send to your computer or Connected Device to uniquely identify your browser or mobile device or to store information in your browser setting; and (ii) web beacons, which are small objects that allow us to measure the actions of visitors using the BNP Media's sites. For more detailed information regarding how we use cookies and other technology, please review the additional information in our [Cookies Policy](#).



#### IV. WHEN AND WITH WHOM DO WE SHARE YOUR INFORMATION

##### A. WHEN AND HOW WE MAY DISCLOSE YOUR INFORMATION WITH OUR SERVICE PROVIDERS

###### 1. BUSINESS CONSUMERS

CATEGORY OF INFORMATION	EXAMPLES	RECIPIENT OF DISCLOSURE	PURPOSE OF DISCLOSURE
<b>Business Identifier Information</b>	information we disclose may include: <ul style="list-style-type: none"><li>• first and last name</li><li>• personal mailing address</li><li>• business address</li><li>• e-mail address</li><li>• telephone number</li><li>• fax number office location</li></ul>	we may disclose this information to our marketing and advertising partners	we disclose this information in order to: <ul style="list-style-type: none"><li>• send you information we think you may find useful or which you have requested from us</li><li>• communicate with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys and/or rewards offered by us and select partners</li><li>• process contest and survey entries</li><li>• provide our Services to our customers</li></ul>
<b>Financial Information</b>	information we disclose may include: <ul style="list-style-type: none"><li>• bank account information</li><li>• billing address</li><li>• payment card details</li></ul>	we may disclose this information to our payment processing vendors and our or your financial institution	we disclose this information in order to process orders and payments.

## 2. WEBSITE VISITORS

CATEGORY OF INFORMATION	EXAMPLES	RECIPIENT OF DISCLOSURE	PURPOSE OF DISCLOSURE
<b>Internet and Electronic Network Activity</b>	The information we disclose may include <ul style="list-style-type: none"><li>• webpages accessed</li><li>• general interaction information</li><li>• time-spent on our sites</li><li>• date and time of your visit</li></ul>	We may disclose this information to our data analytics partners.	We disclose this information in order to <ul style="list-style-type: none"><li>• see how customers are finding and accessing our sites and applications in order to gauge the effectiveness of our marketing campaigns</li><li>• maintain our services, sites and applications, including improving safety and quality controls, as well as to develop new products and services</li></ul>

## 3. DATABASE HOSTING VENDOR

Like many businesses, we utilize cloud databases to host our business data, including your personal information, so that we can effectively and safely operate our business.

## 4. AUDITORS

Like many businesses, we are subject to audits from a number of entities, such as our regulators, enterprise customers and service providers, as well as due to our own internal auditing policies. In order to accomplish an effective audit, we must provide information, which may include your personal information, to external auditors. We always ensure that your information is safely disclosed and stored and that auditors can only use your information for the purposes of completing an audit.

## 5. CORPORATE TRANSACTIONS

We may share all or part of your personal information with other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of BNP Media's business or assets to such business entity (including due to a sale in connection with a bankruptcy). We will require any such purchaser, assignee or other successor business entity to honor the terms of this Privacy Policy.

## 6. DISCLOSURE OF INFORMATION FOR LEGAL PURPOSES

BNP Media may disclose all or part of your personal information when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against

someone who may be violating any agreement with BNP Media, or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of our sites, or anyone else that could be harmed by such activities. We may disclose information in response to a subpoena, search warrant, in connection with judicial proceedings, or pursuant to court orders, legal process or other law enforcement measures. BNP Media may disclose or access personal information when we believe in good faith that the law requires it, to establish our legal rights or to defend against legal claims, and for administrative and other purposes that we deem necessary to maintain, service and improve our Services.

## **7. AGGREGATED, ANONYMIZED OR DE-IDENTIFIED INFORMATION**

We may disclose or use aggregated, anonymized or de-identified information for any purpose. Aggregated, anonymized or de-identified information is information that can no longer reasonably identify a specific individual. Although such information may be derived from your personal information, it can no longer directly or indirectly reveal your identity.

### **B. WHEN WE MAY SELL INFORMATION**

In the past twelve (12) months, BNP Media has sold personal information to third-parties for commercial purposes. The categories of personal information that were sold for commercial purposes in the last twelve (12) months include:

- Business Identifier Information
- Demographic Information
- Commercial Information

BNP Media does not sell the personal information of minors under sixteen (16) years of age without affirmative authorization.

If you are resident of Nevada or California, please visit [Specific Consumer Rights – United States](#) to determine your rights regarding the sale of your information. If you are a resident of a non-U.S. country, please refer to our [International Privacy Policy](#).

## **V. COOKIES POLICY**

Like many online platforms, BNP Media and its analytics vendors use server logs and automated data collection tools, such as browser cookies, pixel tags, scripts and web beacons. These tools are used for analytics purposes to enable BNP Media to understand how users interact with the sites and Services. BNP Media and its analytics vendors may tie the information gathered by these means to the identity of users.

Cookies are small text files placed on a computer or device while browsing the Internet. Cookies are used to collect, store and share bits of information about user activities. BNP Media uses both session cookies and persistent cookies.

Session cookies are used to identify a particular visit to BNP Media's sites and collect information about your interaction with the sites. These cookies expire after a short time or when the user closes

their web browser after using the sites. BNP Media uses these cookies to identify a user during a single browsing session, such as when you log into the sites. This helps BNP Media improve the sites and Services as well as improve the users' browsing experience.

A persistent cookie will remain on a user's device for a set period of time specified in the cookie. BNP Media uses these cookies to identify and recognize a specific user over a longer period of time. They allow BNP Media to:

- analyze the usage of the sites (e.g. what links users click on) in order to improve our offering;
- test different versions of the sites to see which particular features or content users prefer to optimize the sites;
- provide a more personalized experience to users with more relevant content and course recommendations; and
- allow users to more easily log in to use the sites and Services.

Examples of persistent cookies include: (i) preferences cookies to remember information about a user's browser and settings preferences, such as preferred language – preference cookies make a user's experience more functional and customized, (ii) authentication and security cookies to enable a user to log in or stay logged in to access the sites and Services, to protect user accounts against fraudulent log-ins by others and to help detect and protect against abuse or unauthorized usage of user accounts and (iii) functional cookies to make the experience of using the sites and Services better, like remembering the sound volume level selected by the user.

BNP Media uses tracking technology to: (i) determine if a certain page was visited or whether an email sent by BNP Media was opened or clicked on by a user; and (ii) to customize the experience of individual users by recommending specific content.

We also use clear gifs in HTML-based emails sent to our users to track which emails are opened and clicked on by recipients. We may use the information we obtain from the cookie in the administration of the sites, to improve the usability of the sites and for marketing purposes. We may also use that information to recognize your computer when you visit our sites, and to personalize our sites for you.

Third parties may use cookies on your computer or mobile device to advertise through our sites. These third-party companies may use information about your visits to the sites to advertise goods and services that may be of interest to you. They may also employ technology that is used to measure the effectiveness of the advertisements. The third-party companies can accomplish this by using cookies or web beacons to collect information about your visits to the sites. The information collected through this process does not enable us or them to identify your name or contact details unless you choose to provide them. The cookies from these third-party companies vary based on which company is providing the advertisement, therefore they may not be captured in this Privacy Policy.

Cookies and information captured through our sites are stored for a certain retention period, however you can eliminate these cookies any time before the expiration date. Visit our [Table of Cookies](#).

## VI. HOW TO RESTRICT COOKIES

You can adjust the settings in your browser in order to restrict or block cookies that are set by the sites (or any other website on the Internet). Your browser may include information on how to adjust your settings. Alternatively, you may visit U.S. Federal Trade Commission's website [www.consumer.ftc.gov](http://www.consumer.ftc.gov) to obtain comprehensive general information about cookies and how to adjust the cookie settings on various browsers. This site also explains how to delete cookies from your computer.

You can control and delete these cookies through your browser settings through the following:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Safari](#)
- [Opera](#)
- [Microsoft Internet Explorer](#)
- [Microsoft Edge](#)
- [Safari for iOS \(iPhone and iPad\)](#)
- [Chrome for Android](#)

Or you can also use the following cookie management and disposal tool from Google Analytics by downloading and installing the browser plug-in from the following link:

<http://tools.google.com/dlpage/gaoptout>.

Please be aware that restricting cookies may impact the functionality of the Services. Most browsers allow you to refuse to accept cookies. Additional general information about cookies, including how to be notified about the placement of new cookies and how to disable cookies, can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## VII. LINKING SITES

The sites contain links to other websites. BNP Media is not responsible for the privacy practices or the content of such websites, including any websites that may indicate a special relationship or partnership with us (such as co-branded pages or “powered by” or “in cooperation with” relationships). We do not share information we gather with other websites or any other entities or individuals unless such sharing is disclosed to you in advance through this Privacy Policy. Other linked websites, however, may collect personal information from you that is not subject to our control. To ensure protection of your privacy, always review the privacy policy of the websites you may visit by linking from the sites. Please note that this Privacy Policy applies only to our sites, and not to other companies' or organizations' websites to which we link.

For instance, information collected through Google Analytics is shared with Google and its partners who may combine it with other information you provided to them or they collected from your use of their services. This information is stored in Google's servers according to their privacy practices.

## **VIII. HOW LONG WE RETAIN YOUR INFORMATION**

We may keep a record of your personal information, including correspondence or comments, in a file specific to you. We will utilize, disclose, or retain your personal information for as long as necessary to fulfill the purposes for which it was collected and for legal or business requirements. We will establish minimum and maximum retention periods and procedures for maintaining and destroying your personal information. When personal information is retained to make a decision about you, we will retain such information for the period required in order to comply with our internal compliance and data retention policies.

## **IX. MARKETING AND PROMOTIONAL COMMUNICATIONS**

You may opt-out of receiving marketing and promotional messages from BNP Media, if those messages are powered by BNP Media, by following the instructions in those messages. If you decide to opt-out, you will still receive non-promotional communications relevant to your use of our Services.

## **X. CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA) COMPLIANCE AND RELATED INFORMATION**

The Children's Online Privacy and Protection Act (COPPA) regulates online collection of information from persons under the age of 13. It is our policy to refrain from knowingly collecting or maintaining personal information relating to any person under the age of 18. If you are under the age of 18, please do not supply any personal information through the sites. If you are under the age of 18 and have already provided personal information through the sites, please have your parent or guardian contact us immediately using the information provided under [Contact Us](#) so that we can remove such information from our files.

## **XI. SECURITY**

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. We hold information about you both at our own premises and with the assistance of third-party service providers. Further public disclosure here of our security measures could aid those who might attempt to circumvent those security measures. If you have additional questions regarding security, please feel free to contact us directly using the information provided under [Contact Us](#). To ensure that our employees comply with our privacy policies, we have developed a training program that provides all employees with the tools and knowledge to protect your personal information in all aspects of their work.

## **XII. CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may be revised from time to time as we add new features and Services, as laws change and as industry privacy and security best practices evolve. We display an effective date on this Privacy Policy at the top of this Privacy Policy so that it will be easier for you to know when there has been a change. If we make any material change to this Privacy Policy regarding use or disclosure of personal information, we will provide notice on our sites. Changes will apply

to information collected after the change is effective. Please check this Privacy Policy periodically for changes. Small changes or changes that do not significantly affect individual privacy interests may be made at any time and without prior notice. Your use of the sites constitutes acceptance of the provisions of this Privacy Policy and your continued usage after such changes are posted constitutes acceptance of each revised Privacy Policy. If you do not agree to the terms of this Privacy Policy or any revised Privacy Policy, please exit the sites immediately. If you have any questions about this Privacy Policy, the practices of the sites or your dealings with the sites, you can contact us by using the information provided under [Contact Us](#).

### **XIII. CONTACT US**

Please contact BNP Media with any questions or concerns regarding this Privacy Policy.

Megan Neel  
Privacy Manager  
BNP Media  
550 W Merrill St  
Suite 200  
Birmingham, MI 48009  
U.S.A.  
Email: [privacy@BNPMedia.com](mailto:privacy@BNPMedia.com)  
Toll Free: 833-691-0257

If you have any questions or concerns regarding our Privacy Policy, or if you believe our Privacy Policy or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with BNP Media using the contact information listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We may keep records of your request and any resolution.

### **XIV. CONSUMER RIGHTS**

There are a number of U.S. states that provide specific consumer rights to residents of those jurisdictions regarding personal information. This section of this Privacy Policy describes the rights available to those individuals who are entitled to them. Not all individuals whom we possess information about will have access to these rights and BNP Media may not be able to provide these rights to everyone due to legal and jurisdictional limitations.

#### **A. CALIFORNIA**

The California Consumer Privacy Act (“CCPA”) permits residents of California to have the following additional rights. For more information, or if you have questions, you can contact us using the information provided under [Contact Us](#). For your protection, BNP Media is required to collect certain information from you to verify your identity before we respond to any request submitted by you. The information you provide to verify your identity will only be used for

verification purposes, and a record of your request, including certain information contained within it, will be maintained by BNP Media for its files.

**1. CALIFORNIA RESIDENTS HAVE THE RIGHT TO REQUEST BNP MEDIA DISCLOSE WHAT INFORMATION IT COLLECTS, USES AND DISCLOSES**

California residents have the right to request that BNP Media disclose what personal information BNP Media collects, uses and discloses about them. The general categories of personal information BNP Media collects about California residents are listed above under [What Information We Collect](#). If you are a California resident and would like to request we disclose what personal information we collect, use and disclose about you, please complete this [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#) or contact BNP Media at the toll-free number provided under [Contact Us](#).

**2. CALIFORNIA RESIDENTS HAVE THE RIGHT TO REQUEST THE DELETION OF THEIR PERSONAL INFORMATION MAINTAINED BY BNP MEDIA**

California residents have the right to request that BNP Media delete the personal information that we maintain about them. BNP Media will make every effort to comply with California residents' requests to delete their personal information, however, certain laws or other legal requirements might prevent some personal information from being deleted. If you are a California resident and would like to request the deletion of your personal information, please complete this [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#) or contact BNP Media at the toll-free number provided under [Contact Us](#). To verify any request to delete personal information, you will be required to provide the information contained in the request form. Failure to do so could result in BNP Media's inability to comply with your request.

**3. CALIFORNIA RESIDENTS HAVE THE RIGHT TO NON-DISCRIMINATION FOR THE EXERCISE OF THEIR PRIVACY RIGHTS UNDER THE CCPA**

Under the CCPA, California residents have the right not to receive discriminatory treatment by BNP Media for the exercise of their privacy rights. However, the exercise of certain privacy rights by California residents will make it so that BNP Media is no longer able to provide those residents with certain services. For example, if, at the request of a California resident, BNP Media deletes all of the California resident's personal information that it maintains, we will no longer be able to send marketing communications to that California resident.

**4. CALIFORNIA RESIDENTS HAVE THE RIGHT TO OPT-OUT OF THE SALE OF PERSONAL INFORMATION**

The CCPA provides California residents the right to opt-out of the sale of their personal information by BNP Media. If you are a California resident and would like to opt-out of the sale of your personal information, please complete this [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#) or contact BNP Media at the toll-free number provided under [Contact Us](#). California residents may choose to use an authorized agent to exercise their right to opt-out of the sale of their personal information, subject to the requirements in the below section on designating an authorized agent.



## **5. CALIFORNIA RESIDENTS CAN DESIGNATE AN AUTHORIZED AGENT TO MAKE A REQUEST UNDER THE CCPA ON THEIR BEHALF**

California residents can designate an authorized agent to make requests under the CCPA related to the residents' personal information. BNP Media can deny any request made by an agent who does not submit proof that he or she has been authorized by the California resident to act on the California resident's behalf. For more information on submitting a request on behalf of a California resident as an authorized agent, you can contact us using the information provided under [Contact Us](#).

## **6. CALIFORNIA RESIDENTS MUST RECEIVE NOTICE OF FINANCIAL INCENTIVE**

BNP Media may offer you certain financial incentive programs connected to the collection of your personal information that can result in different price, rate, or service levels available to you. We offer these financial incentive programs because the benefits you receive through our programs relate to your personal information's value to us. Participation in a financial incentive program is voluntary and requires your prior opt-in consent. The details and terms of our various programs will be presented to you in the respective documentation when you enroll in these programs.

You are only enrolled in these programs with your consent, which you may revoke at any time. We collect and use the information that we obtain through these programs to further our business in accordance with our Privacy Policy.

While we do not assign a monetary value to the data that we collect, based on our current estimate, we believe that the value you receive from our financial incentive programs is reasonably related to the value BNP Media receives from your personal information related to these programs. In determining the value of your information to BNP Media, we consider the value to our business, which is reasonably correlated to the value provided to you through both monetary and non-monetary rewards.

You can opt-out of participation in any of our financial incentive programs at any time. If you wish to opt-out, please utilize the disengagement or unenrollment mechanisms presented to you for the particular program. You may also wish to submit a "Do Not Sell My Personal Information Request" request or a personal information deletion request, as explained in this Policy. All California residents have a right to non-discrimination with regards to BNP Media's financial incentive programs if you choose to exercise one of your rights under the CCPA.

## **B. NEVADA**

Nevada law provides Nevada residents the ability to opt-out of the sale of their personally identifiable information collected by BNP Media. If you are a Nevada resident and would like to opt-out of the sale of your personally identifiable information, please complete this [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#).

For your protection, BNP Media is required to collect certain information from you to verify your identity before we respond to any request submitted by you. The information you provide to verify

your identity will only be used for verification purposes, and a record of your request, including certain information contained within it, will be maintained by BNP Media for its files.

## **XV. INTERNATIONAL PRIVACY POLICY**

This International Privacy Policy (the “International Privacy Policy”) apply to those visiting the site(s) or have interacted with our Services from Canada, Brazil, Australia and member states of the European Union except that, for such persons (and only for such persons), where the provisions of the general Privacy Policy and the International Policy cannot be construed consistently, the International Policy will govern.

The Canadian Personal Information Protection and Electronic Documents Act (“PIPEDA”), the European Union General Data Protection Regulation (“GDPR”), the Australian Privacy Act 1988 (“APA”), and the Brazil General Data Protection Law (Lei Geral de Protecao de Dados Pessoais “LGPD”) impose requirements regarding the collection, use, and disclosure of personal data in relation to our commercial activities, as does private-sector privacy legislation in their local jurisdictions, provinces and territories.

**THIS INTERNATIONAL POLICY APPLIES TO ALL PERSONAL DATA ABOUT YOU THAT WE COLLECT, HOLD, USE AND DISCLOSE, REGARDLESS OF THE WAY IN WHICH WE COLLECT IT (I.E. WHETHER THROUGH A SITE OR OTHERWISE).**

In this International Policy, “personal data” or “personal information” is as defined by applicable Canadian, European Union, Brazilian and Australian law. It generally means any information about an identifiable individual. It may include your name, age, mailing address, residential phone number, or e-mail address, personal history (including financial and credit information, donations, personal health information, billing history, personal family and relationship matters, and penal or criminal information), personal information related to corporate involvements, work experience (past and present), discipline, income and benefits, medical records, tax records and security clearances.

### **A. CANADA**

#### **1. COLLECTION OF PERSONAL DATA**

We collect the following categories of personal data about you:

- Business Identifier Information
- Demographic Information
- Financial Information
- Professional Information
- Account Information
- Commercial Information
- Computer Technical Information
- Internet and Electronic Network Activity

You can find more specific details about the personal data that we collect from you in the section titled [What Information We Collect](#) of our general Privacy Policy.

As appropriate, where we collect, use, or disclose your personal information in the course of our commercial activities or where we are the Data Controller with regard to that data you may exercise your rights as data subject.

## **2. HOW WE USE PERSONAL DATA**

We collect your personal data for the following reasons:

- to respond to your questions or concerns;
- to send you information we think you may find useful or which you have requested from us;
- provide our Services to our customers
- to communicate with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys and/or rewards offered by us and select partners;
- to process contest and survey entries;
- to resolve disputes, deliver information and provide assistance with our Services;
- to verify your identity and comply with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process;
- to process or record payment transactions or money transfers;
- to display your historical transactions;
- to manage your account preferences, establish your profile and registration information;
- to improve, personalize and facilitate your use of our Services;
- to provide our non-personally identifiable metrics to our customers;
- to see how we can better optimize our sites and Services;
- to measure, track and analyze trends and usage in connection with your use of our sites and application as well as the performance of our Services.
- to see how customers are finding and accessing our sites and applications in order to gauge the effectiveness of our marketing campaigns;
- to enforce any applicable terms of use or other applicable agreements or policies; and
- to maintain our services, sites and applications, including improving safety and quality controls, as well as to develop new products and services.

You can find more specific details about the purposes for which we collect your personal data as described above in the section titled [What Information We Collect](#) of our general Privacy Policy.

## **3. THE BASIS ON WHICH WE PROCESS YOUR PERSONAL DATA**

Where required by Canadian law, we will obtain your consent before processing your personal data. We will only collect, process and share your personal data appropriate to the type of consent that we have received from you. You may provide explicitly consent orally, in writing, by electronic communication or any other means reasonably capable of conveying your consent. You may provide your consent impliedly through the continued use of our sites or Services after being

presented with this International Privacy Policy or through our customers and partners who have lawfully obtained your consent. Your consent may also be intrinsic to the circumstances such as in the case where you have already provided personal data to us and you maintain your relationship with us or where you provide our representatives with your phone number so that we can contact you. Except when otherwise permitted by law, we will only use the data for the purpose for which it was given.

#### **4. WITHDRAWING YOUR CONSENT**

As a Canadian resident, you have the right to withdraw your consent to BNP Media processing your personal data, subject to certain limitations allowed by applicable law. You can withdraw your consent by filing out the [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#). However, the withdrawal of your consent may adversely affect our ability to provide services to you, keep sending you materials and e-mails or otherwise maintain our relationship.

When your consent is required, you may withdraw your consent at any time (unless withdrawing the consent would frustrate the performance of legal obligations) upon providing to us a 30-day notice. However, the withdrawal of your consent may adversely affect our ability to provide Services to you and to maintain our relationship.

#### **5. SHARING AND SALE OF PERSONAL DATA**

We may disclose your personal information:

- to our marketing and advertising partners
- to our payment processing vendors or relevant financial institutions
- to our data analytics partners
- to database hosting vendors
- to our auditors
- as part of a corporate transactions
- as required for legal purposes
- in aggregated, anonymized or de-identified format

You can find more specific details about who we disclose your personal data to the section titled [When and With Whom Do We Share Your Information](#) of our general Privacy Policy.

In the past twelve (12) months, BNP Media has sold personal information to third-parties for commercial purposes. The categories of personal information that were sold for commercial purposes in the last twelve (12) months include:

- Business Identifier Information
- Demographic Information
- Commercial Information

## **6. LIMITATIONS**

We only collect the personal data necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by law. We do not use or disclose your personal data, except for the purposes for which it was collected, or new purposes to which you have consented, or as required or otherwise permitted by applicable law.

We do not, as a condition of providing services to you or on your behalf, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal data beyond what is reasonably required for such purposes, or to comply with our obligations under applicable law.

## **7. CONSUMER RIGHTS**

We do not, as a condition of providing services to you or on your behalf, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal data beyond what is reasonably required for such purposes, or to comply with our obligations under applicable law.

As a Canadian resident, Canadian law provides you with the right, subject to certain exceptions:

- to access the personal data that we maintain about you
- to request that we rectify or correct incorrect personal data that we maintain about you
- to withdraw your consent to BNP Media using your personal data.

You can request to exercise these rights by filing out the [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#). Please be as specific as possible in your request so that we can meet the applicable time lines. We will have to collect additional personal data about you in order to process your request, but we will not use this data for any other purpose. We also may retain a record of your request, which will be linked to you, for as long as is required by applicable law. You also have the right to lodge a complaint to your Supervisory Authority.

## **8. RETENTION OF PERSONAL DATA**

We may keep a record of your personal data, including correspondence or comments, in a file specific to you. We will utilize, disclose, or retain your personal data only for as long as necessary to fulfill the purposes for which it was collected and for legal or business requirements. We will establish minimum and maximum retention periods and procedures for maintaining and destroying your personal data. When personal data is retained to make a decision about you, we will retain such information for the period required in order to comply with our internal data retention policies.

## **9. RESPONSE TIMES**

We will make every reasonable effort to respond to each of your written requests not later than 30 days after receipt of such requests. When applicable, we will advise you in writing if we cannot meet your requests within this time limit. When applicable, you have the right to make a complaint to the appropriate supervisory authority with respect to this time limit.

## **10. COSTS**

We expect to be able to respond to your request without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request for transcription, reproduction or transmission of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request.

## **B. EUROPEAN UNION**

### **1. COLLECTION OF PERSONAL DATA**

We collect the following categories of personal data about you:

- Business Identifier Information
- Demographic Information
- Financial Information
- Professional Information
- Account Information
- Commercial Information
- Computer Technical Information
- Internet and Electronic Network Activity

You can find more specific details about the personal data that we collect from you in the section titled [What Information We Collect](#) of our general Privacy Policy.

As appropriate, where we collect, use, or disclose your personal information in the course of our commercial activities or where we are the Data Controller with regard to that data you may exercise your rights as data subject, including the right to object to the processing of your personal data when it is processed based on legitimate interests as provided in this International Policy below.

### **2. HOW WE USE PERSONAL DATA**

We collect your personal data for the following reasons:

- to respond to your questions or concerns;
- to send you information we think you may find useful or which you have requested from us;
- provide our Services to our customers
- to communicate with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys and/or rewards offered by us and select partners;
- to process contest and survey entries;
- to resolve disputes, deliver information and provide assistance with our Services;
- to verify your identity and comply with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process;

- to process or record payment transactions or money transfers;
- to display your historical transactions;
- to manage your account preferences, establish your profile and registration information;
- to improve, personalize and facilitate your use of our Services;
- to provide our non-personally identifiable metrics to our customers;
- to see how we can better optimize our sites and Services;
- to measure, track and analyze trends and usage in connection with your use of our sites and application as well as the performance of our Services.
- to see how customers are finding and accessing our sites and applications in order to gauge the effectiveness of our marketing campaigns;
- to enforce any applicable terms of use or other applicable agreements or policies; and
- to maintain our services, sites and applications, including improving safety and quality controls, as well as to develop new products and services.

You can find more specific details about the purposes for which we collect your personal data as described above in the section titled [What Information We Collect](#) of our general Privacy Policy.

### **3. THE BASIS ON WHICH WE PROCESS YOUR PERSONAL DATA**

As allowed by European Law, we rely on the following legal grounds to process your personal data, namely:

- a) Performance of a contract: We may need to collect and use your personal data to enter into a contract or to perform a contract that you or your company has with us.
- b) Consent: Where required by European Law, we will obtain your explicit consent for collecting and processing of your personal data.
- c) Legitimate interests: We may use your personal data for our legitimate interests of internal marketing and for improving our services.

We will only process personal data for a specific purpose or for any other purposes specifically permitted by applicable data protection legislation.

### **4. WITHDRAWING YOUR CONSENT**

As a European resident, you have the right to withdraw your consent to BNP Media processing your personal data, subject to certain limitations allowed by applicable law, where BNP Media is relying on your consent to process your information. You can withdraw your consent by filing out the [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#). However, the withdrawal of your consent may adversely affect our ability to provide services to you, keep sending you materials and e-mails or otherwise maintain our relationship.

### **5. SHARING AND SALE OF PERSONAL DATA**

We may disclose your personal information:

- to our marketing and advertising partners
- to our payment processing vendors and our bank

- to our data analytics partners.
- to database hosting vendors
- to our auditors
- as part of a corporate transactions
- as required for legal purposes
- in aggregated, anonymized or de-identified format

You can find more specific details about who we disclose your personal data to the section titled [When and With Whom Do We Share Your Information](#) of our general Privacy Policy.

In the past twelve (12) months, BNP Media has sold personal information to third-parties for commercial purposes. The categories of personal information that were sold for commercial purposes in the last twelve (12) months include:

- Business Identifier Information
- Demographic Information
- Commercial Information

## 6. LIMITATIONS

We only collect the personal data necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by law. We do not use or disclose your personal data, except for the purposes for which it was collected, or new purposes to which you have consented, or as required or otherwise permitted by applicable law.

## 7. CONSUMER DATA RIGHTS

We do not, as a condition of providing services to you or on your behalf, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal data beyond what is reasonably required for such purposes, or to comply with our obligations under applicable law.

Under the GDPR, if you are a citizen or resident of a European Economic Area (“EEA”) country or Switzerland, you may have certain rights regarding your personal information, including:

- The right to access information maintained about you;
- The right to ensure your data is accurate and complete;
- The right to erasure, or the right to be forgotten;
- The right to restriction or suppression of personal data;
- The right to data portability;
- The right to withdraw consent if consent was previously provided; and
- The right to raise a complaint to the Information Commissioner’s Office.

We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes and using an alternative format, if required.



You can request to exercise these rights by filing out the [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#). Please be as specific as possible in your request so that we can meet the applicable time lines. We will have to collect additional personal data about you in order to process your request, but we will not use this data for any other purpose. We also may retain a record of your request, which will be linked to you, for as long as is required by applicable law.

## **8. RETENTION OF PERSONAL DATA**

We may keep a record of your personal data, including correspondence or comments, in a file specific to you. We will utilize, disclose, or retain your personal data only for as long as necessary to fulfill the purposes for which it was collected and for legal or business requirements. We will establish minimum and maximum retention periods and procedures for maintaining and destroying your personal data. When personal data is retained to make a decision about you, we will retain such information for the period required in order to comply with our internal data retention policies.

## **9. RESPONSE TIMES**

We will make every reasonable effort to respond to each of your written requests not later than 30 days after receipt of such requests. When applicable, we will advise you in writing if we cannot meet your requests within this time limit. When applicable, you have the right to make a complaint to the appropriate supervisory authority with respect to this time limit.

## **10. COSTS**

We expect to be able to respond to your request without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request for transcription, reproduction or transmission of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request.

## **C. BRAZIL**

### **1. COLLECTION OF PERSONAL DATA**

We collect the following categories of personal data about you:

- Business Identifier Information
- Demographic Information
- Financial Information
- Professional Information
- Account Information
- Commercial Information
- Computer Technical Information
- Internet and Electronic Network Activity

You can find more specific details about the personal data that we collect from you in the section titled [What Information We Collect](#) of our general Privacy Policy.

As appropriate, where we collect, use, or disclose your personal information in the course of our commercial activities or where we are the Data Controller with regard to that data you may exercise your rights as data subject, including the right to object to the processing of your personal data when it is processed based on legitimate interests as provided in this International Policy below.

## **2. HOW WE USE PERSONAL DATA**

We collect your personal data for the following reasons:

- to respond to your questions or concerns;
- to send you information we think you may find useful or which you have requested from us;
- provide our Services to our customers
- to communicate with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys and/or rewards offered by us and select partners;
- to process contest and survey entries;
- to resolve disputes, deliver information and provide assistance with our Services;
- to verify your identity and comply with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process;
- to process or record payment transactions or money transfers;
- to display your historical transactions;
- to manage your account preferences, establish your profile and registration information;
- to improve, personalize and facilitate your use of our Services;
- to provide our non-personally identifiable metrics to our customers;
- to see how we can better optimize our sites and Services;
- to measure, track and analyze trends and usage in connection with your use of our sites and application as well as the performance of our Services.
- to see how customers are finding and accessing our sites and applications in order to gauge the effectiveness of our marketing campaigns;
- to enforce any applicable terms of use or other applicable agreements or policies; and
- to maintain our services, sites and applications, including improving safety and quality controls, as well as to develop new products and services.

You can find more specific details about the purposes for which we collect your personal data as described above in the section titled [What Information We Collect](#) of our general Privacy Policy.

## **3. THE BASIS ON WHICH WE PROCESS YOUR PERSONAL DATA**

As allowed by Brazilian law, we rely on the following legal grounds to process your personal data, namely:

- a) Performance of a contract: We may need to collect and use your personal data to enter into a contract or to perform a contract that you or your company has with us.
- b) Consent: Where required by Brazilian Law, we will obtain your explicit consent for collecting and processing of your personal data.
- c) Legitimate interests: We may use your personal data for our legitimate interests of internal marketing and for improving our services.

We will only process personal data for a specific purpose or for any other purposes specifically permitted by applicable data protection legislation.

#### **4. WITHDRAWING YOUR CONSENT**

As a Brazilian resident, you have the right to withdraw your consent to BNP Media processing your personal data, subject to certain limitations allowed by applicable law, where BNP Media is relying on your consent to process your information. You can withdraw your consent by filing out the [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#). However, the withdrawal of your consent may adversely affect our ability to provide services to you, keep sending you materials and e-mails or otherwise maintain our relationship.

#### **5. SHARING AND SALE OF PERSONAL DATA**

We may disclose your personal information:

- to our marketing and advertising partners
- to our payment processing vendors and our bank
- to our data analytics partners.
- to database hosting vendors
- to our auditors
- as part of a corporate transactions
- as required for legal purposes
- in aggregated, anonymized or de-identified format

You can find more specific details about who we disclose your personal data to the section titled [When and With Whom Do We Share Your Information](#) of our general Privacy Policy.

In the past twelve (12) months, BNP Media has sold personal information to third-parties for commercial purposes. The categories of personal information that were sold for commercial purposes in the last twelve (12) months include:

- Business Identifier Information
- Demographic Information
- Commercial Information

#### **6. LIMITATIONS**

We only collect the personal data necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by law. We do not use or disclose your personal data, except for the purposes for which it was collected, or

new purposes to which you have consented, or as required or otherwise permitted by applicable law.

We do not, as a condition of providing services to you or on your behalf, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal data beyond what is reasonably required for such purposes, or to comply with our obligations under applicable law.

## **7. CONSUMER DATA RIGHTS**

Subject to the exceptions provided by the applicable law, we will make available to you any of your personal data that we have collected, utilized or disclosed, upon your written request. We will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes and using an alternative format, if required.

Under the LGPD, if you are a Brazilian resident, you may have additional rights regarding your personal data, subject to certain restrictions, including:

- The right to confirmation of the existence of the processing of your personal data;
- The right to access your personal data;
- The right to correct incomplete, inaccurate or out-of-date personal data;
- The right to anonymize, block, or delete unnecessary or excessive personal data or personal data that is not being processed in compliance with the LGPD;
- The right to the portability of personal data to another service or product provider if you make an express request;
- The right to delete your personal data being processed;
- The right to information about public and private entities with which we have shared your personal data;
- The right to refuse consent for processing of your personal data and information regarding the consequences if you refuse to give such consent; and
- The right to revoke consent previously given for the processing of your personal data.

You can request to exercise these rights by filing out the [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#). Please be as specific as possible in your request so that we can meet the applicable time lines. We will have to collect additional personal data about you in order to process your request, but we will not use this data for any other purpose. We also may retain a record of your request, which will be linked to you, for as long as is required by applicable law.

## **8. RETENTION OF PERSONAL DATA**

We may keep a record of your personal data, including correspondence or comments, in a file specific to you. We will utilize, disclose, or retain your personal data only for as long as necessary to fulfill the purposes for which it was collected and for legal or business requirements. We will establish minimum and maximum retention periods and procedures for maintaining and destroying your personal data. When personal data is retained to make a decision about you, we will retain

such information for the period required in order to comply with our internal data retention policies.

## **9. RESPONSE TIMES**

We will make every reasonable effort to respond to each of your written requests not later than 30 days after receipt of such requests. When applicable, we will advise you in writing if we cannot meet your requests within this time limit. When applicable, you have the right to make a complaint to the appropriate supervisory authority with respect to this time limit.

## **10. COSTS**

We expect to be able to respond to your request without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request for transcription, reproduction or transmission of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request.

## **11. SAFEGUARDS**

We use security safeguards appropriate to the sensitivity of personal data to protect it from loss or theft, as well as unauthorized access, disclosure, copying, use or modification. These safeguards include physical measures, such as restricted access to offices and equipment, organizational measures, such as security clearances and publishing this policy to appropriate personnel with instructions to act in accordance with its principles (for example, limiting access on a “need to know” basis), and technological measures, such as the use of passwords and/or encryption.

Personal data is generally located at our corporate or divisional offices or with our customer database provider. A list of and affiliates to which this Privacy Policy and International Policy apply is available upon request.

## **D. AUSTRALIA**

### **1. COLLECTION OF PERSONAL DATA**

We collect the following categories of personal data about you:

- Business Identifier Information
- Demographic Information
- Financial Information
- Professional Information
- Account Information
- Commercial Information
- Computer Technical Information
- Internet and Electronic Network Activity

You can find more specific details about the personal data that we collect from you in the section titled [What Information We Collect](#) of our general Privacy Policy.

As appropriate, where we collect, use, or disclose your personal information in the course of our commercial activities or where we are the Data Controller with regard to that data you may exercise your rights as data subject, including the right to object to the processing of your personal data when it is processed based on legitimate interests as provided in this International Policy below.

## **2. HOW WE USE PERSONAL DATA**

We collect your personal data for the following reasons:

- to respond to your questions or concerns;
- to send you information we think you may find useful or which you have requested from us;
- provide our Services to our customers
- to communicate with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys and/or rewards offered by us and select partners;
- to process contest and survey entries;
- to resolve disputes, deliver information and provide assistance with our Services;
- to verify your identity and comply with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process;
- to process or record payment transactions or money transfers;
- to display your historical transactions;
- to manage your account preferences, establish your profile and registration information;
- to improve, personalize and facilitate your use of our Services;
- to provide our non-personally identifiable metrics to our customers;
- to see how we can better optimize our sites and Services;
- to measure, track and analyze trends and usage in connection with your use of our sites and application as well as the performance of our Services.
- to see how customers are finding and accessing our sites and applications in order to gauge the effectiveness of our marketing campaigns;
- to enforce any applicable terms of use or other applicable agreements or policies; and
- to maintain our services, sites and applications, including improving safety and quality controls, as well as to develop new products and services.

You can find more specific details about the purposes for which we collect your personal data as described above in the section titled [What Information We Collect](#) of our general Privacy Policy.

## **3. THE BASIS ON WHICH WE PROCESS YOUR PERSONAL DATA**

As allowed by Australian law, we will only collect and process your personal data as is reasonably necessary for, or directly related to, one or more of BNP Media's functions or activities.

#### **4. WITHDRAWING YOUR CONSENT**

As a Australian resident, you have the right to withdraw your consent to BNP Media processing your personal data, subject to certain limitations allowed by applicable law, where BNP Media is relying on your consent to process your information. You can withdraw your consent by filing out the [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#). However, the withdrawal of your consent may adversely affect our ability to provide services to you, keep sending you materials and e-mails or otherwise maintain our relationship.

#### **5. SHARING AND SALE OF PERSONAL DATA**

We may disclose your personal information:

- to our marketing and advertising partners
- to our payment processing vendors and our bank
- to our data analytics partners.
- to database hosting vendors
- to our auditors
- as part of a corporate transactions
- as required for legal purposes
- in aggregated, anonymized or de-identified format

You can find more specific details about who we disclose your personal data to the section titled [When and With Whom Do We Share Your Information](#) of our general Privacy Policy.

In the past twelve (12) months, BNP Media has sold personal information to third-parties for commercial purposes. The categories of personal information that were sold for commercial purposes in the last twelve (12) months include:

- Business Identifier Information
- Demographic Information
- Commercial Information

#### **6. LIMITATIONS**

We only collect the personal data necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by law. We do not use or disclose your personal data, except for the purposes for which it was collected, or new purposes to which you have consented, or as required or otherwise permitted by applicable law.

We do not, as a condition of providing services to you or on your behalf, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal data beyond what is reasonably required for such purposes, or to comply with our obligations under applicable law.

#### **7. CONSUMER DATA RIGHTS**

Subject to the exceptions provided by the applicable law, we will make available to you any of your personal data that we have collected, utilized or disclosed, upon your written request. We

will make such information available to you in a form that is generally understandable, including explaining any abbreviations or codes and using an alternative format, if required.

Under the APA, if you are an Australian resident, you may have additional rights regarding personal data, including:

- The right to access your personal data;
- The right to correct incomplete, inaccurate or out-of-date personal data;
- The right to opt-out of any direct marketing communications received from BNP Media; and
- The right to raise a complaint with BNP Media stating how BNP Media's personal data practices violate the APA.

Additionally, as an Australian resident, you are entitled to know that BNP Media will likely disclose your personal data to a recipients in the United States.

If you are dissatisfied with how we have dealt with your personal information and wish to lodge a complaint, please contact us using the information under [Contact](#) so that we can try to find a solution. We will respond in compliance with "Response Times" Section and provide a course of action in responding to any complaints or inquiries. You also have the right to lodge a complaint to your Supervisory Authority.

You can request to exercise these rights by filing out the [Request Form](#) and send it to BNP Media using the information provided under [Contact Us](#). Please be as specific as possible in your request so that we can meet the applicable time lines. We will have to collect additional personal data about you in order to process your request, but we will not use this data for any other purpose. We also may retain a record of your request, which will be linked to you, for as long as is required by applicable law.

## **8. RETENTION OF PERSONAL DATA**

We may keep a record of your personal data, including correspondence or comments, in a file specific to you. We will utilize, disclose, or retain your personal data only for as long as necessary to fulfill the purposes for which it was collected and for legal or business requirements. We will establish minimum and maximum retention periods and procedures for maintaining and destroying your personal data. When personal data is retained to make a decision about you, we will retain such information for the period required in order to comply with our internal data retention policies.

## **9. RESPONSE TIMES**

We will make every reasonable effort to respond to each of your written requests not later than 30 days after receipt of such requests. When applicable, we will advise you in writing if we cannot meet your requests within this time limit. When applicable, you have the right to make a complaint to the appropriate supervisory authority with respect to this time limit.



## **10. COSTS**

We expect to be able to respond to your request without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request for transcription, reproduction or transmission of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request.