









### **PRIVACY POLICY**

## **Effective Date: August 2018**

HeraldOnline.com ("HeraldOnline.com", "we", "our") is firmly committed to respecting your privacy in the course of offering you a high quality, interactive, and personalized experience. We take your privacy concerns seriously. Our Privacy Policy is designed to inform you about how we may collect, use, share, and store information about you and the choices available to you.

### PRIVACY POLICY HIGHLIGHTS

This Highlights section contains an overview of our privacy practices. The full Privacy Policy is available here.

Information We Collect - We collect various information about you when you use our services, including:

- information you provide to us;
- information about how you use our websites, mobile applications, and other online services;
- information about the computers and devices you use to access our services;
- information about your online activities and your interests;
- information about how you respond to our communications;
- information about the location of your mobile device based on the location of nearby WiFi networks or, subject to your consent, information accessed via the location functionality of your device; and
- information about you from publicly or commercially available sources.

## How We Use Information - We use information:

- to provide you with products and services, respond to your requests, manage contests, and to personalize the content on our services;
- for research purposes;
- to communicate with you about your account; learn about you; send you or provide you with ads, offers, or other content based on your interests;
- to resolve disputes; and
- to improve, maintain, and troubleshoot our services.

# **Sharing Information** - We share information:

- with third parties, including service providers that process information on our behalf, to facilitate transactions and provide you with services;
- with our affiliates;
- to facilitate interest-based advertising; and

• in association with a transfer of a business or related assets; when there is a legal obligation to disclose your information; or to protect our legal rights, the public, or others.

### **Your Choices**

You may update or delete the account information you provide us for any of our services in the account information page for that service.

You may indicate your preferences regarding marketing communications in the Newsletter Member Center of our services.

You can learn about your ability to register your "do not track" preferences in the Interest-Based Advertising section of the full Policy.

### **Other Information**

We use reasonable security measures to protect your information.

Our services are not intended for children under 18 years of age.

We are not responsible for any third-party products or services you access via our services.

We may notify you of material updates to our Privacy Policy via email and will post a notice at HeraldOnline.com. Your continued use of our services after notice constitutes your acceptance of the Privacy Policy.

### HERALDONLINE.COM PRIVACY POLICY

Please read this Privacy Policy carefully. You understand and agree that, by visiting or using any website, mobile application, or online service governed by this Privacy Policy, you consent to the processing of information as set forth in this Privacy Policy. Please note that this Privacy Policy is subject to change. We recommend that you review the Privacy Policy from time to time. If we make changes to this Privacy Policy, we will update the Effective Date at the top of this page. If you disagree with any portion of this Privacy Policy, now or as amended by us, your only option is to not use the websites, mobile applications, or online services governed by it. This Privacy Policy includes references to McClatchy, which directly or indirectly owns and operates the newspapers, websites and apps referenced in this Privacy Policy.

## WHAT IS IN THIS PRIVACY POLICY?

- What Information Does This Privacy Policy Cover?
- What Information Do We Collect?
- How We Use the Information We Collect
- How We Share the Information We Collect
- Third-Party Links and Content
- Children's Privacy
- Security
- Your Choices
- Notice to California Residents Your California Privacy Rights
- International Transfers of Information

- Changes to Our Privacy Policy
- Contact Information

### WHAT INFORMATION DOES THIS PRIVACY POLICY COVER?

This Privacy Policy applies to information collected through our websites, mobile applications, and online services ("our services") that link or otherwise refer to this Privacy Policy. If we combine this information with information from other sources, we will treat the combined information as being governed by this Privacy Policy. This Privacy Policy does not otherwise apply to information that we or our affiliates (including HeraldOnline.com) collect through other means (for example, at a live event, via telephone, or through the mail).

### WHAT INFORMATION DO WE COLLECT?

<u>Information that you provide to us:</u> We and our service providers collect information that you provide when you use our services. For example, to access certain parts of our services, you may have to register or subscribe for an account. During registration we may collect your name, address, username, password, and email address. You may also provide us with information when you post a message on our services; sign up to receive communications from us; register for contests; participate in surveys; purchase a subscription or classified ad; or contact us with a question, comment, or request. The information that you may provide us includes but is not limited to:

- Name
- Mailing address
- Email address
- Date of birth
- Telephone number
- Username
- Password
- Payment information, including account or card number
- Gender

When you use social media platforms, applications or tools that enable features like audio or video content (sometimes known as "plugins"), or other features that are operated or offered by other companies (sometimes known as "third parties") and are integrated into our services or allow you to connect to our services, we may collect information from those third parties. This may include payment services, login services or review platforms. Please refer to the privacy settings of the social media platforms or third-party features you use to manage how information is shared.

If you wish to forward an article or other information to a friend using our services, we will ask you to provide your friend's name and email address. We may collect statistics on which articles are forwarded. We do not sell, rent, or market information about the friends to whom you forward articles or information, and we use your friends' names and email addresses only for purposes of forwarding articles or other information subject to your request.

<u>Passive data collection:</u> Like most companies that offer services online, we and our service providers may automatically collect certain technical information from your computer, tablet or mobile device when you use our services or interact with us. The information we may collect includes:

- IP address
- Operating system
- Device type
- Device manufacturer
- Device identifier
- Browser type
- Content viewed on our services
- Pages viewed immediately before and after you access our websites
- Which ads or content from us or our affiliated companies you view, access, or click on
- Your activities over time and across websites and apps within the McClatchy network and within the network
  of websites and apps serviced by the ad networks, advertisers, service providers, and other companies with
  which we do business, following your use of one of our websites or apps
- Whether you open our electronic communications and where you click within them
- Features of our services that you use
- Name and location of your Internet Service Provider
- Amount of time spent on our pages and how many pages you viewed during your visit

For more information about how we collect this information, see Use of Web Beacons, Cookies and Other Technologies.

We, our service providers, and other third parties with whom we do business may collect information about you from publicly available sources (e.g., social media platforms) and commercially available resources. We may combine that information with the information described above and will handle the combined information as described in this Privacy Policy.

<u>Location Information</u> - Our mobile applications may collect precise information about the location of your mobile device via your device's GPS or cellular connectivity, but only with your express consent. Once you have consented to the collection of such precise location information via your mobile device, you may adjust this consent by managing your Location Services preferences through the settings of your mobile device. We may also be able to infer your location from other information that you provide or information that we collect passively, such as the known locations of nearby WiFi networks.

#### **HOW WE USE THE INFORMATION WE COLLECT**

We may use the information we collect for a number of purposes, including, but not limited to:

- providing you with and communicating with you about the products, services, or information you request or purchase;
- providing you with information and important updates about your account or subscription, our products and services;
- using your location information to deliver location-based services that you request or location-based offers that may be of interest to you;

- delivering information or offers for goods or services from our publications, our partners, or third parties that may be of interest to you (see the Interest-Based Advertising section for more information);
- personalizing your experience when using our services and providing content based on your interests or other demographics;
- allowing you to share content and information from our publication via social media, email, and other means;
- improving or troubleshooting our services;
- determining whether you are eligible for contests or promotions;
- generating and analyzing statistics about how you use our services and respond to our communications;
- linking your activities across the devices you use to access the services so that we can learn about how you
  use the services and the devices you use, contact you across devices, and provide you with a consistent
  experience across devices;
- creating compiled, aggregate, and anonymous information about the users' of our services and how our users interact with our services ("Aggregated Information");
- safeguarding your information;
- helping our advertisers and other companies better understand our users; and
- detecting, preventing, and responding to potential fraud, intellectual property infringement, violations of our Terms of Service, violations of law, or other misuse of our services.

We may combine or aggregate any of the information we collect from our services and elsewhere for any of these purposes.

We also participate in the Adobe Marketing Cloud Device Cooperative to better understand how you use certain websites and apps of ours across the various devices you use, and to deliver tailored promotions. Learn more about how Adobe does this and how you may opt-out of this program.

### HOW WE SHARE THE INFORMATION WE COLLECT

We may disclose information about you:

- to service providers that process payments, handle marketing communications, provide technical support, conduct surveys, or perform other services for us;
- to business partners when you have elected to receive communications from them;
- to business partners that engage in interest-based advertising;
- as required by law, such as to comply with a subpoena or other legal process;
- as necessary to process transactions and provide you with the services, products, or information you request or purchase;
- when we have a good faith belief that disclosure is necessary to protect the rights or property of our affiliates or us, or to protect the safety of you or others;
- to detect, prevent, or respond to potential fraud, intellectual property infringement, violations of our Terms of Service, violations of law, or other misuse of our services
- to proceed with the negotiation or completion of a merger, acquisition, sale, or other transfer of all or part of our assets; or

### subject to your consent.

We do not share your credit card information or other financial information to third parties for their marketing purposes or other independent use. When we share information with third parties for processing credit card or other payments, we require those third parties to comply with applicable Payment Card Industry standards.

We may share Aggregated Information with third parties that provide content and services for us. We may also share Aggregated Information with advertisers and others so that they can better understand our audience. For example, we might disclose the gender, age, or geographical breakdown of our user base.

Unless you have consented otherwise, we do not sell, rent, barter, or otherwise give away user lists, users' names, email addresses, or mailing addresses so that advertisers or other third parties may send you advertisements or other solicitations.

You should know that when you voluntarily disclose personal information publicly on our services (for example, when commenting on articles), that information may be collected and used by others and you may receive unsolicited communications from other people. When you share information via features offered on our services by other companies (sometimes known as "third-party plugins"), the privacy settings of the other companies for those features govern how the information will be shared. When you are logged into our services, depending on the service you are logged into, your name may be displayed, and your email address and contact information may be viewed. Be sure to logout of your account and take other steps to ensure that others cannot view that information without your knowledge.

#### THIRD-PARTY LINKS AND CONTENT

Our services and communications may contain links to or content from websites or other online services provided by third parties. We expect our partners and third-party providers to respect your privacy, but you acknowledge and agree that we are not responsible for the collection and use of your information by websites and other services that are not under our control. The privacy practices of third parties are governed by their privacy policies, and we encourage you to review the privacy policies of all websites and online services that you use, view, or visit.

# **USE OF COOKIES, WEB BEACONS AND OTHER TECHNOLOGIES**

We may use cookies, web beacons (also known as pixels), and other technologies to collect information when you use our services. These technologies help us remember you when you visit our services, personalize your experience on the services, learn about how you and others use the services, learn about the devices you use to access the services, and remember your preferences.

A cookie is a text-only string of information that a website stores on your computer or device in the cookie file associated with the browser that you use to access the website. Most major websites use cookies. Cookies alone generally cannot be used to identify you. But if you choose the "Remember Me" feature or similar features, a cookie will store information that helps remember you, such as your username.

Cookies help us recognize you when you return to our websites and hold information from one visit to the next for your ease of use. Cookies also help us better understand how people use our services through click-stream analysis, which allows us to design a better user experience. We may also share information that we collect with third parties, such as service providers, advertisers, and advertising companies as described in this Privacy Policy.

Certain third-party content providers, advertisers, and advertising companies may also place cookies on your computer or mobile device. Those cookies are controlled by the third parties and are not governed by this Privacy Policy. Further information on our use of cookies, including how to disable them or register your preferences

regarding their use, is contained in the Interest Based Advertising section of this Privacy Policy.

We and some of our advertisers work with ad networks and ad delivery platforms that place retargeting pixels on users' computers to gather information about users' online activities, such as browsing histories and demographic information. This information can be aggregated into audience segments, which help deliver relevant advertising to users visiting our websites and third-party websites that use the same pixels.

Some of our services and communications may contain tiny electronic images known as web beacons. We use web beacons to assist us in delivering cookies on our services and to allow us to count users who have visited those pages. We may include web beacons in promotional email messages in order to determine whether messages have been opened and acted upon.

We also participate in the Adobe Marketing Cloud Device Cooperative, which uses Device Identifiers (the unique number associated with a smartphone or similar device) to better understand how you use certain websites and apps across the various devices you use, and to deliver tailored promotions. Learn more about how Adobe does this and how you may opt-out of this program.

### INTEREST-BASED ADVERTISING

To help ensure that you receive ads that are relevant to your interests on our services, our advertisers' services, and elsewhere on the Internet, we and third-parties (including service providers, advertisers, and advertising companies) may collect information about your online activities over time and across different websites, apps, and devices. We and third parties may use that information to help understand audience segments. Advertisers may use the segments to determine the audience groups to which they wish to deliver particular ads. Through this process, we do not use information that directly identifies you.

You can opt out of receiving interest-based advertising on your computer or laptop from some companies, including us and our service providers, by visiting the following sites: //www.aboutads.info/choices/, //www.networkadvertising.org/choices/, //choices.ghosteryenterprise.com/global-opt-out.html, and //preferences-mgr.truste.com/. If you wish to opt out of receiving interest-based advertising on your mobile device, please see the advertising preferences information on support.apple.com for iOS devices or support.google.com for Android devices.

If you are accessing our services from Europe, please see www.youronlinechoices.com. If you are accessing our services from Canada, please see youradchoices.ca.

Opting out does not mean you will no longer receive advertising. It means that the company or companies from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

If you do not wish to allow cookies to be placed on your computer or device, you can configure your web browser (Chrome, Firefox, Internet Explorer, Safari, etc.) to control the use of cookies. Please note that the interest-based advertising opt outs provided in the links above may rely on the use of cookies. If you disable or delete cookies, you may remove your opt-out preferences. Deleting and/or controlling the use of cookies AND visiting the opt-out links above to register your preferences will help to ensure that you do not receive interest-based advertising. Again, this does not mean that you will not receive ads, it simply means that you will not receive ads that are tailored to your web preferences and usage patterns.

Except as otherwise disclosed in this Privacy Policy, we do not respond to browser Do Not Track signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate; if we do so in the future, we will describe how we do so here. For more information on Do Not Track, please visit //allaboutdnt.com.

### CHILDREN'S PRIVACY

We care about children's privacy. Our services are not directed to, nor do we knowingly collect information from, children under the age of 18. We will not knowingly allow children under 18 to register for or become members of our services. If we discover that we have received any information from a child under 18, we will take reasonable steps to promptly remove that information. If you believe we have collected information from anyone under 18 without parental consent, please contact us via any of the channels listed below.

### **YOUR CHOICES**

In general, if you register to use any of our services, you may update the information you have provided to us for any of our services by visiting the account information page of that service.

When you register for our services, you may be able to indicate your preferences regarding marketing communications. In the Newsletter Management page of our services, you may be able to change those preferences and select the categories of communications that interest you. When we or our affiliates send you emails containing offers that may be of interest of you, those emails may contain links via which you may opt out of receiving those communications.

You will not be able to opt-out of receiving certain service-related or transactional communications relating to our services unless you cancel your registration or subscription.

Even after your account is cancelled, we may retain your information for the purposes set forth in this Privacy Policy.

### **SECURITY**

While we strive to maintain reasonable administrative, technical, and physical safeguards to protect your information, no information system can be 100% secure. We cannot guarantee the absolute security of your information. Moreover, we cannot be responsible for information that you transmit over networks that we do not control or information that you choose to publicly disclose. You are solely responsible for maintaining the secrecy of any passwords or other account information.

We make reasonable efforts to secure the account information pages and other registration locations for our services, such that they can be accessed only by our authorized personnel or by logging in with your member name and password.

We endeavor to protect the security of your payment information during transmission by using technology that encrypts information you submit.

### NOTICE TO CALIFORNIA RESIDENTS - YOUR CALIFORNIA PRIVACY RIGHTS:

If you are a California resident, you have the right to receive: a) information identifying all third-party companies to which we may have disclosed, within the past year, personal information pertaining to you and your family for those companies' direct marketing purposes; and b) a description of the categories of personal information disclosed. To obtain such information, please email your request to customerservice@heraldonline.com.

### INTERNATIONAL TRANSFERS OF INFORMATION

By using any of our services, you agree that we may collect, use and transfer your personal information as described in this privacy policy, including transfers outside the country where you live. If you have any questions about our data practices, you may contact us as set forth below.

### **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to update this Privacy Policy from time to time by posting a new Privacy Policy on this page. You are advised to consult this Privacy Policy regularly for any changes, and your continued use of the Site after such changes have been made constitutes acceptance of those changes. If you are a registered user of our services and we make any revisions that materially change the ways in which we use or share the information previously collected from you through our services, we will notify you of those revisions by sending an email to the email address listed in your registration. We will also post a notice of any material change to this policy by posting a notice on HeraldOnline.com.

### **CONTACT INFORMATION**

If you have any questions or comments about our privacy practices, we may be reached at HeraldOnline.com,
132 West Main Street, Rock Hill, SC 29730,
803-329-4000
or at customerservice@heraldonline.com.

### **DEFINITION OF CERTAIN TERMS**

IP Address- the identifier assigned to facilitate communications over the Internet. Depending on how you connect to the Internet, your IP address may always be the same, or it may change each time you access the Internet. An IP address does not in and of itself disclose your name, email address, or home or work address.

Service Providers- unaffiliated companies that perform services on our behalf, such as printing, mailing, processing payments, managing the delivery of advertisements, collections, data processing, or communications. We strive to limit the amount of users' personally identifiable information shared with service providers. We ask these service providers to keep confidential the information that we provide to them, and we require them to not share, sell, or rent any information collected from our users that directly identifies our users.

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