

Your California Consumer Privacy Act Rights

Last Updated: June 30, 2021

1. Your rights under the California Consumer Privacy Act of 2018 (CCPA)

This page contains a description of your rights and specific disclosures required by CCPA. CCPA applies to California residents only. For additional information regarding our privacy practices, see our [Privacy Policy](#).

Right to Opt-Out : We may sell your personal information to third parties, as described on this page. You have the right, at any time, to direct us not to sell your personal information. To opt out, visit [Do Not Sell My Info](#). We will act upon opt-out requests within 15 days of receipt, and will notify you and/or your authorized agent when the request has been processed.

Right to Know

Right to Disclosure of Categories of Information: You have the right to request that we provide the following disclosures covering the 12-month period preceding our receipt of your request.

- The categories of personal information we have collected about you.
- The categories of sources from which personal information is collected.

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- The categories of third parties with whom we share personal information.
- The categories of personal information we have sold and the categories of third parties to whom the personal information was sold.
- The categories of personal information we have disclosed for a business purpose.

Right to Access Specific Pieces of Information: You also have the right to request access to the specific pieces of personal information we have collected about you in the preceding 12 months, which we will deliver to you electronically, in a portable format where feasible.

Right to Deletion

You have the right to request deletion of the personal information about you that we have collected from you. Please note that we are unable to delete information needed to:

- Continue to service your account if you maintain an active account with us, provide goods or services you've requested, or complete a transaction;
- Detect, prevent or prosecute security incidents, fraud, or other misuse;
- Identify, repair, and debug errors that impair our products, services, systems, or other functionality;
- Comply with legal or reporting obligations, including to pursue or defend legal claims, exercise or enable others to exercise any rights provided by law, enforce or comply with contractual obligations, respond to valid requests for information, and comply with or enforce applicable laws and regulations;
- Enable other internal uses consistent with your expectations based on your relationship with us or the context in which you provided the information; or
- Exercise or enforce any other exceptions provided by CCPA.

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plan.

Nondiscrimination

If you exercise any of your rights under CCPA, you have the additional right not to be discriminated against, including by our (a) denying you goods or services, (b) charging you different prices or rates, including through the use of discounts or imposing penalties, (c) providing you a different level or quality of goods or services, or (d) suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services. We may, however, offer you a different price, rate, level, or quality of goods or services if the differential treatment is reasonably related to value provided to us by your data.

2. How to submit requests

Submitting Requests

Requests to opt-out of sale, know, or delete must each be submitted separately. You can submit up to two requests to know and up to four requests to delete within a 12-month period. To submit a request, visit [this page](#).

Please note that if you have an active Pandora account when you request deletion, we will not close your account. We will retain such information as is necessary to allow you continued access to the Pandora Service and to service and manage your account. If you wish to close your account, please see this [Help Center article](#). Additionally, modifying your account while an access or delete request is pending could interfere with the processing of your request.

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simultaneously process requests for access and deletion. Please wait until your pending request for access or deletion has been completed before submitting a subsequent request.

Verification and Authorized Agents

For your protection, you must provide sufficient information to verify your identity in order for us to fulfill a request to access or delete personal information. Because Pandora collects limited information at registration, you must provide, and have access to, the email account associated with your Pandora account in order to complete the verification step. If you cannot receive email at the email address associated with your Pandora account, you will need to update the email address before submitting a request.

If you submit a request to opt-out of sale and we are unable to locate a current or former account using the information provided in your request, we will record your preference and comply with your request to the extent we are able to identify you.

You may authorize someone to act as your agent and submit a CCPA request on your behalf. You must supply your agent with written permission to act on your behalf, and your agent must provide proof of such authorization before we will act upon the request. If you are submitting a request to access or delete through an authorized agent, you must verify your identity directly with us through the process outlined above, unless your authorized agent is acting pursuant to a power of attorney under the California Probate Code.

3.Collection and Sharing of Personal Information

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the terms used in this notice, including “service provider” and “third party,” do not have the meanings set forth in CCPA.

These disclosures cover the 12-month period preceding the date of this notice and reflect our current or anticipated practice unless otherwise noted.

Categories of Personal Information We Collect

We collect the following categories of personal information. The information we collect is described further in Section 1 of our [Privacy Policy](#), which you should review in addition to this list.

1. **Identifiers and contact information**, including email address, zip code, account name or alias, password, device and other technological identifiers, unique personal identifiers, and IP address. We may collect the following additional information if you use these products or features:
 - a. Pandora Community: You may choose to provide your name, location (city, state, or country), instant messaging (IM) screen names, and a personal webpage.
 - b. Pandora profile: You may choose to provide your hometown.
 - c. Purchases: If you purchase a product or service from Pandora, we collect your name and billing zip code for the purposes of processing your payment.
 - d. Family plan: If you are the main account holder of a Family subscription, we collect the email addresses of any family members you add to your account.
 - e. Pandora Artist Marketing Platform (AMP): You may provide your name or the name of the artist whom you represent. If you apply to be a Pandora Stories curator, we collect your country. If you apply to Pandora for Podcasters, you may provide your name, social feeds, and the podcast owner’s email address and telephone number.

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- g. **Student and military discounts:** If you apply to receive these discounts, we may collect your name in order to verify your eligibility for the discount.
 - h. **Next Big Sound:** If you register for Next Big Sound, we collect email address and password. You may also choose to provide your name, and the names and email addresses of people you wish to add to your account.
 - i. **Other:** Except as stated above, we do not collect postal addresses or telephone numbers in the regular course of business, but we may collect this information if you've provided it to us in postal mail or email correspondence, to assist in resolving a customer support request, or in connection with a special offer or event.
- 2. **Payment information,** if you purchase a product or service directly from Pandora. If you pay with a credit card, this includes the first and last four digits of your payment card and card expiration date. If you pay with PayPal, we receive identifiers associated with your billing agreement and transactions.
 - 3. **Non-Inferred Characteristics,** including gender, age or birth year, music and content preferences, account status, and consumer interest segments.
 - 4. **Commercial information,** including products or services purchased, obtained, or considered from Pandora or others, or other purchasing or consuming histories or tendencies.
 - 5. **Internet or other activity information,** including listening history, bookmarked or thumbed content on our Service, browsing history, search history, interactions with our Services (including our websites and mobile applications), and interactions with advertisements.
 - 6. **Geolocation data,** defined as "device-based location information" in our [Privacy Policy](#). If you have permitted the Pandora app to access location services on your device, device-based location information may be derived from GPS and nearby wireless signals such as cell towers, Wi-Fi networks, and Bluetooth beacons.
 - 7. **Audio and visual information,** including "voice data" as described in our [Privacy Policy](#), pictures you upload to your Pandora profile or Pandora Community, and Your Content, as described in our [Terms of Use](#).
 - a. If you are an AMP user, we collect Your Content, as described in the [Artist Marketing Platform Terms of Use](#), including voice recordings you may provide, and a photo if you choose to provide one.

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employment information you choose to provide in connection with your registration for or submissions to the AMP Service, Pandora for Podcasters, Pandora Stories, and Pandora for Brands. If you apply to receive our military discount, we may collect your military affiliation (e.g. active duty, veteran) in order to verify your eligibility for the discount. If you use Next Big Sound, you may choose to provide your occupation, organization, and job role.

9. **Education information**, such as your current school (if you choose to provide it on your Pandora Profile). If you apply to receive our student discount, we may collect the name of your university (e.g. UCLA) in order to verify your eligibility for the discount.
10. **Inferences** drawn from any of the information we collect. We may infer your ethnicity, income, whether you are a parent, political affiliation, whether you are a traveler, and consumer interest segments. We may also infer your location within a geographic block using the IP address currently assigned to your device.
11. **Other personal information**, including any biographical or other personal information you choose to provide in profile, biography, or free-form fields if you use any of the following products or features: Pandora profile, Pandora Community, AMP profile, and Pandora Stories curator bio. If you opt to participate in consumer research panels or surveys, we may collect any personal information you elect to provide as a part of that research. If you are an artist, we may display biographical information from public sources on your Next Big Sound profile.

Business or Commercial Purposes for Collection, Use, and Sharing of Personal Information

Pandora collects, uses, and shares personal information for the following business and commercial purposes:

1. **Auditing**, including counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, performing advertising frequency capping, tracking advertising conversion events, and auditing compliance with laws and other standards. We also measure and analyze Service usage for things like mobile listening capping, estimating the number of unique users, and to determine how well pages and stations perform.

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security, concerning non-membership, and to otherwise protect the safety and security of Pandora users or members of the public.

3. **Debugging** to identify, prevent, and repair errors that impair or may impair the Pandora Service.
4. **Short-term, transient use**, including the contextual customization of ads shown as part of the same interaction.
5. **Performing services**, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of a business or service provider. Pandora collects, uses, and shares personal information for a number of purposes related to performing or obtaining services on Pandora's behalf, including:
 - a. To facilitate the creation of and secure your account on the Pandora Service.
 - b. To provide all aspects and features of the Pandora Service, as described in our [Privacy Policy](#).
 - c. To customize and personalize the content, including advertising, we deliver to you both on the Pandora Service and on other services offered by third parties.
 - d. To fulfill your requests for certain products and services, such as distributing electronic newsletters and enabling you to participate in and renew paid services, surveys, and public forums.
 - e. To send you information that you requested or agreed to receive.
 - f. To alert you to the latest developments and features on our Service and to notify you of administrative information, such as security or support and maintenance advisories.
 - g. To invite you to participate in events or special promotions related to artists or products we think you may like or in which you may be interested.
 - h. To pay artists and rights owners for tracks you hear, by reporting aggregated or deidentified listening information to copyright owners and licensing agencies.
 - i. To provide advertisements and related content.

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around the art and science of sound and music, and the connections they inspire, as well as other areas of technological advancement pertinent to our products and services.

7. **Improving and maintaining quality of service**, including undertaking activities to verify or maintain the quality or safety of the Pandora Service, improving the Pandora Service, upgrading our infrastructure, enhancing the listener experience, and developing new products and services.
8. **Commercial purposes**, such as marketing and promoting the use of and subscriptions to the Pandora Service.
9. **Legal purposes**, such as protecting or defending the legal rights or property of Pandora, or the legal rights of third parties, employees, agents, and contractors (including enforcement of our agreements), and complying with the law, legal process, or legal and government requests.

Categories of Sources of Personal Information

We collect the personal information listed above from the following categories of sources. Additional information about these categories is provided in our [Privacy Policy](#).

1. **Pandora users**, as disclosed in Section 1 of our [Privacy Policy](#).
2. **Service providers** that provide or make available advertising, features and functionality, and content on or through the Pandora Service.
3. **Advertising entities** such as advertisers and advertising agencies. These third parties may provide Pandora with certain information about their customers for the purposes of serving advertisements and/or marketing offers to their customers on the Pandora Service.
4. **Marketing companies and data providers** that create, maintain, and distribute professional marketing lists or segments, or maintain and distribute other marketing or similar data.
5. **Governmental or quasi-governmental agencies or organizations** that provide or make available, to the public, census and demographic data.

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...and services to provide personalized services to you in some cases, those websites, applications, or services may automatically provide us with information about you to facilitate personalization unless you use the controls available on those websites, applications, or services to opt-out of such sharing.

7. **Other users** who store or post information about you on the community features of the Pandora Service, or by your enabling connectivity with another website, application, or service where friends or other listeners store such information.
8. **Related Companies**, including our parent corporation, Sirius XM Radio Inc. ("Sirius XM"), and its subsidiaries.

Categories of Third Parties With Whom We Share Personal Information

- **Pandora users and other individuals** with whom you may share personal information using the Pandora Service.
- **Service providers** that provide specialized services, or provide or make available features, functionality, and content on or through the Pandora Service, such as those listed below.
 - a. Ad exchanges, ad servers, and other providers of advertising services
 - b. Measurement providers that measure how long and how frequently you are using the Pandora Service or the effectiveness of advertising campaigns on the Pandora Service
 - c. Payment processors
 - d. Customer verification providers
 - e. Customer support and community networking providers
 - f. Privacy, security and fraud detection providers
 - g. Platform technology providers
 - h. Manufacturers and distributors
 - i. Marketing providers and bulk email processors who send out communications on our behalf

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- **Advertising entities** such as advertisers and advertising agencies that serve advertisements and/or marketing offers to their customers on the Pandora Service.
- **Marketing companies and data providers** that create, maintain, and distribute professional marketing lists or advertising segments, or maintain and distribute other similar data.
- **Governmental or quasi-governmental agencies or organizations** that make valid legal requests for information or to whom Pandora shares information to protect or defend the legal rights or property of Pandora, or the legal rights of third parties, employees, agents, and contractors (including enforcement of our agreements).
- **Third-party social media websites, applications, or services** that you use, when we allow those websites, applications, or services to interact through the Pandora Service to provide personalized services to you. We may share certain information about you with those third parties for account authentication and management, and to enable the Pandora Service on their platforms. Examples are provided in Section 5 of our [Privacy Policy](#).
- **Related Companies**, including our parent corporation Sirius XM and its subsidiaries, or any successors in interest in the event of a corporate reorganization, merger, or sale of all or substantially all of our assets.
- **Litigants or other parties to legal proceedings** that make valid legal requests for information or to whom Pandora shares information to protect or defend the legal rights or property of Pandora, or the legal rights of third parties, employees, agents, and contractors (including enforcement of our agreements).
- **Other authorized third parties**, if you have given permission for us to share data about you with them. For example, if you participate as a panelist in a survey with an analytics company, you may, as part of your agreement with that company, have authorized that company to receive data from us about you.

Table 1: Collection and Sharing of PI

For each category of personal information (PI) we collect, this table lists the categories of sources from which that information is collected, the business or

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Category of PI	Sources of PI	Business Purposes	Third Parties
Identifiers and Contact Information	Pandora users; service providers; advertising entities; marketing companies and data providers; governmental or quasi-governmental agencies or organizations; third-party social media websites, applications, or services; other users; related companies	Auditing; security; debugging; short-term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; commercial purposes; legal purposes	Pandora users and other individuals; service providers; advertising entities; marketing companies and data providers; governmental or quasi-governmental agencies or organizations; third-party social media websites, applications, or services; related companies; litigants or other parties to legal proceedings; other authorized third parties
Payment information	Pandora users; service providers; related companies	Auditing; security; performing services; improving and	Service providers; related companies; other authorized third parties

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		service; legal purposes	
Non-inferred characteristics	Pandora users; service providers; advertising entities; marketing companies and data providers; governmental or quasi-governmental agencies or organizations; third-party social media websites, applications, or services; other users; related companies	Auditing; security; debugging; short-term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; commercial purposes; legal purposes	Pandora users and other individuals; service providers; advertising entities; marketing companies and data providers; governmental or quasi-governmental agencies or organizations; third-party social media websites, applications, or services; related companies; litigants or other parties to legal proceedings; other authorized third parties
Commercial information	Pandora users; service providers; advertising entities; marketing companies and	Auditing; security; debugging; short-term, transient use; performing	Service providers; advertising entities; marketing companies and data providers; related companies; litigants or other parties to

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	social media websites, applications, or services; other users; related companies	internal research; improving and maintaining quality of service; commercial purposes; legal purposes	third parties
Internet or other activity information	Pandora users; service providers; advertising entities; marketing companies and data providers; third-party social media websites, applications, or services; related companies	Auditing; security; debugging; short-term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; commercial purposes; legal purposes	Pandora users and other individuals; service providers; advertising entities; marketing companies and data providers; governmental or quasi-governmental agencies or organizations; third-party social media websites, applications, or services; related companies; litigants or other parties to legal proceedings; other authorized third parties

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Geolocation data	Pandora users	security; debugging; short-term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; legal purposes	Service providers; governmental or quasi-governmental agencies or organizations; related companies; litigants and other parties to legal proceedings; other authorized third parties
Audio and visual information	Pandora users; service providers; third-party social media websites, applications, or services; other users; related companies	Performing services; undertaking internal research; improving and maintaining quality of service; legal purposes	Pandora users and other individuals; service providers; advertising entities; third-party social media websites, applications, or services; related companies; litigants or other parties to legal proceedings; other authorized third parties

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employment-related information	providers	performing services; undertaking internal research; improving and maintaining quality of service; legal purposes	service providers; related companies; litigants or other parties to legal proceedings; other authorized third parties
Education information	Pandora users; service providers	Auditing; security; performing services; undertaking internal research; improving and maintaining quality of service; legal purposes	Pandora users and other individuals; service providers; related companies; litigants or other parties to legal proceedings; other authorized third parties
Inferences	Pandora users; service providers; advertising	Auditing; security; debugging; short-term,	Service providers; advertising entities; marketing companies and data

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	companies and data providers; other users; related companies	performing services; undertaking internal research; improving and maintaining quality of service; commercial purposes; legal purposes	authorized third parties
Other personal information	Pandora users; service providers; advertising entities; marketing companies and data providers; governmental or quasi-governmental agencies or organizations; third-party social media websites, applications, or	Auditing; security; debugging; short-term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; commercial	Pandora users and other individuals; service providers; advertising entities; marketing companies and data providers; governmental or quasi-governmental agencies or organizations; third-party social media websites, applications, or services; related companies; litigants or other parties to

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companies

purposes

third parties

4. Disclosure and Sale of Personal Information

Table 2: Disclosure of Personal Information

Pandora has disclosed personal information to third parties for a business or commercial purpose in the preceding 12 months, as those terms are defined in CCPA. For each category of personal information (PI) we collect, this table lists the categories of third parties to whom we disclose PI and the business or commercial purposes for doing so.

Category of PI	Business Purposes	Third Parties
Identifiers and Contact Information	Auditing; security; debugging; short-term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; commercial purposes; legal purposes	Pandora users and other individuals; service providers; advertising entities; marketing companies and data providers; governmental or quasi-governmental agencies or organizations; third-party social media websites, applications, or services; related companies; litigants or other parties to legal proceedings; other authorized third parties

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	services; improving and maintaining quality of service; legal purposes	parties
Non-inferred characteristics	Auditing; security; debugging; short- term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; commercial purposes; legal purposes	Pandora users and other individuals; service providers; advertising entities; marketing companies and data providers; governmental or quasi- governmental agencies or organizations; third-party social media websites, applications, or services; related companies; litigants or other parties to legal proceedings; other authorized third parties
Commercial information	Auditing; security; debugging; short- term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; commercial	Service providers; advertising entities; marketing companies and data providers; related companies; litigants or other parties to legal proceedings; other authorized third parties

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Internet or other activity information	Auditing; security; debugging; short-term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; commercial purposes; legal purposes	Pandora users and other individuals; service providers; advertising entities; marketing companies and data providers; governmental or quasi-governmental agencies or organizations; third-party social media websites, applications, or services; related companies; litigants or other parties to legal proceedings; other authorized third parties
Geolocation data	Auditing; security; debugging; short-term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; legal purposes	Service providers; governmental or quasi-governmental agencies or organizations; related companies; litigants and other parties to legal proceedings; other authorized third parties
Audio and visual information	Performing services; undertaking internal research;	Pandora users and other individuals; service providers; advertising entities; third-party social media websites,

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	quality of service; legal purposes	parties to legal proceedings; other authorized third parties
Professional or employment- related information	Auditing; security; performing services; undertaking internal research; improving and maintaining quality of service; legal purposes	Pandora users and other individuals; service providers; related companies; litigants or other parties to legal proceedings; other authorized third parties
Education information	Auditing; security; performing services; undertaking internal research; improving and maintaining quality of service; legal purposes	Pandora users and other individuals; service providers; related companies; litigants or other parties to legal proceedings; other authorized third parties
Inferences	Auditing; security; debugging; short- term, transient use; performing services; undertaking internal research; improving and	Service providers; advertising entities; marketing companies and data providers; related companies; other authorized third parties

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	commercial purposes; legal purposes	
Other personal information	Auditing; security; debugging; short- term, transient use; performing services; undertaking internal research; improving and maintaining quality of service; commercial purposes; legal purposes	Pandora users and other individuals; service providers; advertising entities; marketing companies and data providers; governmental or quasi- governmental agencies or organizations; third-party social media websites, applications, or services; related companies; litigants or other parties to legal proceedings; other authorized third parties

Table 3: Sale of Personal Information

Pandora has sold personal information to third parties for a business or commercial purpose in the preceding 12 months, as those terms are defined in CCPA. For each category of personal information (PI) we collect, this table lists the categories of third parties to whom have sold PI and the business or commercial purposes for doing so.

Category of PI	Business Purposes	Third Parties

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Information purposes

Pandora will not sell the personal information of minors under 16 years of age without affirmative authorization.

Table 4: CCPA Metrics Reporting

When required by §999.317(g) of the CCPA Regulations, by July 1 of each calendar year, Pandora will report metrics about valid California consumer requests it received in the previous calendar year. Metrics for the 2020 calendar year can be found in the chart below:

Request Type	Received	Compiled with in whole or in part	Denied	Mean Number of Days to Respond
Requests to Know	31	31	0	19
Requests to Delete	117	117	0	8
Requests to Opt-Out	6,720	6,720	0	2

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