**Streambed Media Inc. – Privacy Policy**

Effective Date: [DATE]

Streambed Media Inc. (“Streambed,” “we,” “our,” or “us”) is committed to protecting your privacy. This Privacy Policy describes how we collect, use, and disclose your information across the websites we operate and the services we provide. This Policy also describes how you can exercise your privacy rights.

This Policy applies to Streambed and our websites (collectively, the “Websites”) and services (the “Services”). It does not apply to non-Streambed websites or mobile applications that may link to our Websites or Services or be linked to by our Websites or Services; please review the privacy policies on those websites and applications directly to understand their privacy practices.

**Information We Collect**

***Information You Provide***

We collect, process, and retain information you enter when using our Websites or Services. We collect the following information from you:

* Your email address and username when you sign up for our Services.
* Your email address when you subscribe to our email newsletter.
* Your contact information and a record of any correspondence when you contact us.

***Information We Collect from Other Sources***

When you subscribe to our Services, we collect the following information from our social media partners (currently YouTube, Twitter, and Snapchat) on your behalf: views, likes, number of comments, commenter usernames, and substance of comments. We provide a summary of this information to you.

***Information We Collect Automatically***

When you interact with our Websites and Services, certain information about your use is automatically collected. This information is collected through cookies, web beacons, and other tracking technologies, as well as through your web browser or device. We collect:

* Details of your visits to our site and information generated in the course of the use of our site (including the timing, frequency and pattern of service use) including traffic data, weblogs and other communication data, the resources that you access, and how you reached our site.
* Information about how you interact with our ads and newsletters, including whether you open or click links in any correspondence.
* Information that you make available to us on a social media platform (such as by clicking on a social media icon linked from our Websites or Services), including your account ID or username and other information included in your posts.

Please see below for more information about how our automatic collection of information works.

**How We Use Your Information**

We use the information we collect from you for the following purposes:

* To provide you with our products and services, including to process payments, fulfill orders, and communicate with you regarding your orders.
* To provide you with the best service and improve and grow our business, including improving and optimizing our Websites and Services, understanding our subscriber and customer base, and understanding the effectiveness of our marketing.
* To detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal, including to screen orders for potential risk or fraud, and to comply with legal requirements regarding the provision of products and services.
* To provide you with information or advertising relating to our products and services, in accordance with the preferences you have shared with us.

Your browser or device may include “Do Not Track” functionality. At this time, we do not alter our sites’ data collection and use practices in response to Do Not Track signals.

**How We Secure Your Information**

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Websites and Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

**How We Share Your Information**

* **Outside Vendors**: We engage the following types of vendors to perform functions on our behalf: billing and collection providers; auditing and accounting firms; professional services consultants; providers of analytics services; security vendors; website hosting services; and IT vendors.
* **Social Media Platforms:** Where you choose to interact with us through social media, your interaction with these programs typically allows the social media company to collect some information about you through cookies they place on your device and other tracking mechanisms. In some cases, the social media company may recognize you through its digital cookies even when you do not interact with their application. Please visit the social media companies’ respective privacy policies to better understand their data collection practices and controls they make available to you.
* **Change of Ownership or Corporate Organization:**We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Policy.
* **Law Enforcement, Legal Process, and Emergency Situations:** We also use or disclose your personal information if required to do so by law or on the good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or our sites; (b) protect and defend our rights or property, the websites or our users; or (c) act to protect the personal safety of us, users of our websites, or the public.

**Children’s Information**

Our Websites and Services are intended for users age 16 and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 16, we will delete that information. If you believe that we have collected personal information from children, please contact us at the email address listed below.

**Additional Information About Our Use of Tracking Technologies**

Streambed uses cookies and similar tracking technologies for the following purposes:

* Site Operations: Enabling features that are necessary for providing you the services on our site, such as identifying you as being signed in, tracking content views, and remembering your preferences.
* Analytics: Allowing us to understand how our services are being used, track site performance and make improvements.
* Social Media: Enabling the sharing of content from our services through social networking and other sites.

Most web browsers automatically accept cookies but, if you prefer, you can usually modify your browser setting to disable or reject cookies. If you delete your cookies or if you set your browser to decline cookies, some features of the Services may not be available, work, or work as designed. You may also be able to opt out of or block tracking by interacting directly with the other companies who conduct tracking through our Services.

Information collected about you from a particular browser or device may be linked to information collected from another computer or device that we believe relates to you.

You can learn more about ad serving companies and the options available to limit their collection and use of your information by visiting the websites for the [Network Advertising Initiative](http://www.networkadvertising.org/choices/), the [Digital Advertising Alliance](http://www.aboutads.info/choices), and the [European Interactive Digital Advertising Initiative](http://www.youronlinechoices.eu/). Similarly, you can learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device.

Please note that opting out of advertising networks services does not mean that you will not receive advertising while using our Services or on other websites, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. If you delete your cookies, you may also delete your opt-out preferences.

**Users Outside of the United States**

If you use our Websites or Services outside of the United States, you understand that we may collect, process, and store your information in the United States. The laws in the United States regarding personal information may be different from the laws of your jurisdiction. Any such transfers will comply with safeguards as required by relevant law. By using the Websites or Services, you consent to the collection, international transfer, storage, and processing of your data, where permitted by law.

**Special Information for Nevada Residents**

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to other companies who will sell or license their information to others. If you are a Nevada resident and would like to make such a request, please email info@streambedmedia.com

**Your California Privacy Rights**

Persons with disabilities may obtain this notice in alternative format upon request by contacting us at info@streambedmedia.com or by calling us at +1-647-812-2036.

Residents of the State of California have the right to request information regarding third parties to whom companies have disclosed certain categories of personal information during the preceding year for the third parties’ direct marketing purposes. We do not share your personal information with third parties for direct marketing purposes at this time.

The California Consumer Privacy Act (“CCPA”) provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of “personal information,” as well as rights to access and control personal information. The CCPA defines “personal information” to mean “information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” Certain information we collect may be exempt from the CCPA because it is considered publicly available information (i.e., it is made available by a government entity) or covered by a federal privacy law, such as the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act, or the Fair Credit Reporting Act.

To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and our rights are described below.

**Right to Information Regarding the Categories of Personal Information Collected, Sold, and Disclosed**

The following is a description of our data collection practices, including the personal information we collect, the sources of that information, the purposes for which we collect information, and whether we disclose that information to external parties. We may use any and all of the information for any of the purposes described in this Policy, unless limitations are listed. The categories we use to describe the information are those enumerated in the CCPA.

* **Personal Identifiers:**
  + We collect your name, display name, and email address when you create an account or otherwise communicate with us. We collect your email address when you subscribe to our email list.
  + We collect your social media handle and basic account information when you interact with our Services through social media.
  + We collect a unique numerical identifier, assigned to you by a first-party cookie, automatically when you use our Services in order to identify you, provide the Services, keep you logged in to the Services, and prevent fraud.
  + We do not collect your Social Security number, Driver’s License number, or Passport number.
  + We do not collect your IP address or device identifier.
* **Protected Classifications:**  We do not collect your age, disability status, gender, race, ethnic origin, religious affiliation, or sexual orientation.
* **Commercial Information:** We do not collect information related to commercial transactions, records of goods or services purchased or considered, or your purchasing or consuming histories or tendencies.
* **Biometric Information**: We do not collect information about your physiological, biological, and behavioral characteristics.
* **Internet or Other Electronic Network Activity Information**: We do not collect information about your browsing history, search history, or information regarding your interaction with our websites.
* **Geolocation Data:** We do not collect information related to your geographic location.
* **Audio, electronic, visual, thermal, olfactory, or similar information**: We do not collect your audio, electronic, visual, thermal, olfactory, or similar information. [f you contact us via phone, we may record the call. We will notify you if a call is being recorded at the beginning of the call.
* **Professional or employment-related information**: We collect information related to your company name and job title if you choose to provide it to us. We do not otherwise collect your professional or employment-related information.
* **Education information**: We do not collect any information about the institutions you have attended or the level of education you have attained.
* **Inferences drawn to create a profile about a consumer reflecting the consumer’s preferences or characteristics**: We analyze or your actual or likely preferences through a series of computer processes and add our observations to your internal profile. We use this information to gauge and develop our marketing activities, and to measure the appeal and effectiveness of our services, applications, and tools.]

We may share any of the above-listed information with Service Providers, which are external parties that we engage for business purposes and are restricted from using Personal Information for any purpose that is not related to our engagement. The categories of Service Providers with whom we share information and the services they provide are described in this Policy.

Under the CCPA, to “sell” information means to disclose it to an external party for monetary or other benefit. We do not sell your personal information to third parties.

We may also disclose information to other external parties who are not listed here when required by law or to protect our company or other persons, as described in this policy.

**Right to Access Information**

You have the right to request access to Personal Information collected about you and information regarding the source of that information, the purposes for which we collect it, and the third parties and service providers with whom we share it. To protect your Personal Information, we will verify your identify before we can act on your request.

**Right to Request Deletion of Information**

You have the right to request in certain circumstances that we delete any Personal Information that we have collected directly from you. To protect our customers’ Personal Information, we will verify your identify before we can act on your request. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**Right to Information Regarding Participation in Data Sharing for Financial Incentives**

We may run promotions from time to time whereby we incentivize you to share certain pieces of information with us. Participation in these incentives is voluntary and you may opt out of the data sharing at any time.

**Right to Opt Out of Sale of Personal Information to Third Parties**

You have the right to opt out of the sale of personal information to third parties. We do not sell your personal information to third parties.

**Contact Us**

If you have questions or concerns related to this policy, or if you are a California resident and would like to exercise CCPA rights, please email us at [info@streambedmedia.com](mailto:info@streambedmedia.com) or call us at [647-812-2036]. We may ask you to provide certain information to us in order for us to verify the request.

**Consumer Data Request Form**

Residents of California may use this form to submit requests to exercise their legal rights for access to or erasure of personal information. While not all fields are required, please be advised that we can only search for your information using the details that you provide; if you decline to provide information, our search may be incomplete.

If you are completing this request on behalf of another person, please fill in the consumer’s information and add your information in the space provided.

**Nature of Request (i.e., what would you like us to do?)**: [required]

**Consumer Name**: [required]

**Consumer Email Address**: [required]

**Consumer Mailing Address**: [required to confirm California residency]

**Consumer Mobile Phone Number**: [opt.]

**Other Identifying Details We Should Search (IP Addresses, Device IDs, etc.)**: [opt.]

**Please describe the nature of your relationship with Streambed:**

User

Other

**Are you completing this request on behalf of another individual?**

Yes

If Yes, please provide your name, email address, mailing address, and phone number. Please attach documentation showing the Consumer’s authorization (if Consumer is over 18).

I am the legal parent/guardian and the Consumer is under 18.

I have legal authority to act on behalf of the Consumer.

The Consumer has authorized me to act on his/her behalf.

No

*For the protection of our customers, it may be necessary for us to request additional details, including a government-issued photo ID, to confirm your identity before we act on your request. We will contact you by email if this is necessary. We will not use personal information submitted for the purpose of a Consumer Data Request for any purpose other than to effectuate your request.*