

# Privacy Policy

Effective 4/5/2023:

## Table of Contents:

1. INTRODUCTION
2. COLLECTION OF INFORMATION
3. USE AND DISCLOSURE
4. SECURITY
5. USER ACCESS AND CONTROL
6. OTHER IMPORTANT INFORMATION
7. STATE PRIVACY RIGHTS
8. CONTACT US

## 1. INTRODUCTION

Bright Road Productions, Inc. and its parents and affiliates (collectively “BRP” or “we”), want you to be familiar with how we collect, use, and disclose information from and about you. This Privacy Policy describes our practices in connection with information about you collected through services such as this website, any other websites mobile sites, applications (“apps”), and widgets made available to the public by or on behalf of BRP (collectively, the “BRP Services”). By using the BRP Services, you agree to the terms and conditions of this Privacy Policy. A list of our affiliated companies (“BRP Affiliates”) can be found in the “Contact Us” section below.

The BRP Services are for a general audience and are not targeted to children.

This Privacy Policy applies to all “users,” including both those who use the BRP Services without being registered with or subscribing to an BRP Service and those who have registered with or subscribed to an BRP Service. This Privacy Policy applies to BRP’s collection and use of your personal information (i.e., information that identifies a specific person, such as full name or email address as well as any health information). Please note we would only collect health-related information where necessary in order for us to provide the BRP Services. It also describes generally BRP’s practices for handling non-personal information (for example, interests, demographics, and services usage).

## 2. COLLECTION OF INFORMATION

BRP and our service providers, affiliates and business partners may collect the following information from and about you:

**Registration Information** is the information you submit to register for an BRP Service, for example, to apply to take part in a television program, to register for a service, to create an account, post comments, receive a newsletter, or enter a contest or sweepstakes. Registration Information may include, for example, name, email address, gender, zip code and birthday.

**Public Information and Posts** consist of comments, content or registration details that you post to the BRP Services and the information about you that accompanies those posts, content or forms, which may include a name, email, user name, comments, likes, status, profile information and picture. Public Information and Posts are always public, which means they are available to everyone and may be displayed in search results on external search engines.

**Information from Social Media.** If you access or log-in to an BRP Service through a social media service or connect an BRP Service to a social media service, the information we collect may also include your user ID and/or user name associated with that social media service, any information or content you have permitted the social media service to share with us, such as your profile picture, email address or friends lists, and any information you have made public in connection with that social media service. When you access the BRP Services through social media services or when you connect an BRP Service to social media services, you are authorizing BRP to collect, store, and use such information and content in accordance with this Privacy Policy.

**Activity Information.** When you access and interact with the BRP Services, BRP and its service providers may collect certain information about those visits. For example, in order to permit your connection to the BRP Services, our servers receive and record information about your computer, device, and browser, including potentially your IP address, browser type, and other software or hardware information. If you access the BRP Services from a mobile or other device, we may collect a unique device

identifier assigned to that device, geolocation data, or other transactional information for that device. At this time, we do not respond to browser “Do Not Track” signals, as we await the work of interested stakeholders and others to develop standards for how such signals should be interpreted.

Cookies and other tracking technologies (such as browser cookies, pixels, beacons, and Adobe Flash technology including cookies) are comprised of small bits of data that often include a de-identified or anonymous unique identifier. BRP’s websites, apps and other services send this data to your browser when you first request a web page and then store the data on your computer or other device so the website or app can access information when you make subsequent requests for pages from that service. These technologies may also be used to collect and store information about your usage of the BRP Services, such as pages you have visited, the video and other content you have viewed, search queries you have run and advertisements you have seen.

Third parties that support the BRP Services by serving advertisements or providing services, such as allowing you to share content or tracking aggregate BRP Services usage statistics, may also use these technologies to collect similar information when you use the BRP Services or third-party services. BRP does not control these third-party technologies and their use is governed by the privacy policies of third parties using such technologies. For more information about third-party advertising networks and similar entities that use these technologies, see <http://www.aboutads.info/consumers>, and to opt-out of such ad networks’ and services’ advertising practices, go to <http://www.aboutads.info/choices>.

Most browsers are initially set to accept cookies, but you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information. Users can manage the use of Flash technologies, with the Flash management tools available at Adobe’s website, see <https://www.adobe.com/devnet/security.html>. Please note that by blocking any or all cookies you may not have access to certain features, content or personalization available through the BRP Services.

**Information from Other Sources.** We may supplement the information we collect with information from other sources, such as publicly available information from social media services, commercially available sources and information from our BRP Affiliates or business partners.

### 3. USE AND DISCLOSURE

We may use the information we collect from and about you to provide the BRP Services and features to you, including: to measure and improve those BRP Services and features; to improve your experience with both online and off-line BRP Services by delivering content you will find relevant and interesting, including advertising and marketing messages; to allow you to comment on content, and participate in online games, contests, or rewards programs; to provide you with customer support and to respond to inquiries. In order to provide you with content and advertising that is more interesting and relevant to you, we may use the information from and about you to make inferences and predictions about your potential areas of interest. When the information collected from or about you does not identify you as a specific person, we may use that information for any purpose or share it with third parties.

We may use the information we collect from and about you for these additional purposes:

**To allow service providers to assist us in providing and managing the BRP Services.** The information we collect from and about you may be made available to certain third party service providers, such as contractors, analytics and other measurement companies, agents or sponsors, who help us analyze and understand your use of the BRP Services, and manage and/or provide the BRP Services.

**To allow social sharing functionality.** If you log in with or connect a social media service account with an BRP Service, we may share your user name, picture, and likes, as well as your activities and comments with other users of that BRP Services and with your friends associated with your social media service. We may also share the same information with the social media service provider. By logging in with or connecting an BRP Service account with a social media service, you are authorizing us to share information we collect from and about you with the social media service provider, other users and your friends and you understand that the social media service’s use of the shared information will be governed by the social media service’s privacy policy. If you do not want your personal information shared in this way, please do not connect your social media service account with an BRP Service account and do not participate in social sharing on BRP Services.

**To provide co-branded services and features.** We may offer co-branded services or features, such as contests, sweepstakes, or other promotions together with a third party (“Co-Branded Services”). These Co-Branded Services may be hosted on BRP Services or on the third party’s service. By virtue of these relationships, we may share the information you submit in connection

with the Co-Branded Service with the third party. The third party's use of your information will be governed by the third party's privacy policy.

**To deliver relevant advertisements.** BRP and our service providers may use the information we collect from and about you to deliver relevant ads to you when you use the BRP Services or another service. As noted above, third-party advertising networks and advertisers may use cookies and similar technologies to collect and track information such as demographic information, inferred interests, aggregated information, and activity to assist them in delivering advertising that is more relevant to your interests. To find out more about third-party advertising networks and similar entities that use these technologies, see <http://www.aboutads.info>, and to opt-out of such advertising networks' and services' advertising practices, go to <http://www.aboutads.info/choices>.

**To contact you.** BRP may periodically send promotional materials or notifications related to the BRP Services. If you want to stop receiving promotional materials, you can follow the unsubscribe instructions at the bottom of each email. There are certain service notification emails that you may not opt-out of, such as notifications of changes to the BRP Services or policies. If you have installed a mobile app and you wish to stop receiving push notifications, you can change the settings either on your mobile device or through the app.

**To share with our BRP Affiliates and Business Partners.** BRP may share your information with BRP Affiliates for the purposes described in this Privacy Policy. A link to a website that lists BRP Affiliates can be found at the beginning of this policy. Users who visit BRP Affiliates' services should still refer to their separate privacy policies, which may differ in some respects from this Privacy Policy. BRP may share your information with networks and other third parties with your consent and at your direction.

**To share with business partners.** BRP may share your information with business partners to permit them to send you marketing communications consistent with your choices.

**To protect the rights of BRP and others.** There may be instances when BRP may use or disclose your information, including situations where BRP has a good faith belief that such use or disclosure is necessary in order to: (i) protect, enforce, or defend the legal rights, privacy, safety, or property of BRP, our BRP Affiliates or their employees, agents and contractors (including enforcement of our agreements and our terms of use); (ii) protect the safety, privacy, and security of users of the BRP Services or members of the public; (iii) protect against fraud or for risk management purposes; (iv) comply with the law or legal process; or (v) respond to requests from public and government authorities.

**To complete a merger or sale of assets.** If BRP sells all or part of its business or makes a sale or transfer of its assets or is otherwise involved in a merger or transfer of all or a material part of its business (including in connection with a bankruptcy or similar proceedings), BRP may transfer your information to the party or parties involved in the transaction as part of that transaction.

#### 4. SECURITY

BRP uses commercially reasonable administrative, technical, personnel and physical measures to safeguard information in its possession against loss, theft and unauthorized use, disclosure or modification. However, no one can and BRP does not guarantee the complete safety of your information.

#### 5. USER ACCESS AND CONTROL

If you would like to access, review, correct, update, suppress, or otherwise limit our use of your personal information you have previously provided directly to us, you may contact us as outlined in Section 7. In your request, please include your email address, name, address, and telephone number and specify clearly what information you would like to access, change, update, or suppress. We will try to comply with your request as soon as reasonably practicable.

You may request that we not share your personal information on a going-forward basis with BRP Affiliates or unaffiliated third parties for their direct marketing purposes by sending an email to [legal@all3a.com](mailto:legal@all3a.com) "BRP Disclosure Opt-out" in the subject line. Please include your full name, email address, and postal address in the body of the email. We will try to comply with your request(s) as soon as reasonably practicable.

## 6. OTHER IMPORTANT INFORMATION

**Updates to Privacy Policy.** BRP may modify this Privacy Policy. Please look at the Effective Date at the top of this Privacy Policy to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the BRP Services.

**Location of Data.** BRP is a global company with operations in several countries, including the United States. If you are a user located outside the United States, you understand and consent to having any personal information processed in the United States. United States data protection and other relevant laws may not be the same as those in your jurisdiction. This includes the use of cookies and other tracking technologies as described above. As a result, please read this Privacy Policy with care.

**Linked Services.** The BRP Services may also be linked to sites operated by unaffiliated companies, and may carry advertisements or offer content, functionality, games, newsletters, contests or sweepstakes, or applications developed and maintained by unaffiliated companies. BRP is not responsible for the privacy practices of unaffiliated companies, and once you leave the BRP Services or click an advertisement you should check the applicable privacy policy of the other service.

In addition, BRP is not responsible for the privacy or data security practices of other organizations, such as Facebook, Instagram, Tumblr, Twitter, Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including in connection with any information you disclose to other organizations through or in connection with the BRP Services.

**Collection of Personal Financial Information by a Payment Service.** In some cases, we may use an unaffiliated payment service to allow you to purchase a product or make payments ("Payment Service"). If you wish to purchase a product or make a payment using a Payment Service, you will be directed to a Payment Service webpage. Any information that you provide to a Payment Service will be subject to the applicable Payment Service's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, any Payment Service's use of information collected through any Payment Service.

**Data Retention.** We will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

Remember that even after you cancel your account, copies of some information from your account may remain viewable in some circumstances where, for example, you have shared information with social media or other services. Because of the nature of caching technology, your account may not be instantly inaccessible to others. We may also retain backup information related to your account on our servers for some time after cancelation for fraud detection or to comply with applicable law or our internal security policies. It is not always possible to completely remove or delete all of your information due to technical constraints, contractual, financial or legal requirements.

**Sensitive Information.** We ask that you not send us, and you not disclose, any sensitive personal information (such as social security numbers, criminal background, etc.) on or through the BRP Services or otherwise.

## 7. STATE PRIVACY RIGHTS

### *California*

**"Shine the Light" Law.** California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their own direct marketing purposes in the preceding calendar year. We do not share your personal information with third parties for those third parties' direct marketing purposes.

**California Consumer Privacy Act.** The California Consumer Privacy Act ("CCPA") gives California residents the rights to receive certain information regarding the collection, use, and disclosure of information about them, as well as rights to know/access, correct, delete, and limit the use and disclosure of sensitive personal information and opt out of the sale or sharing of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights. To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

*Notice at Collection.* You have the right to receive notice of certain information about our data collection, use, and disclosure. The following table summarizes the categories of personal information we collect; the categories of sources of that information; whether we disclose, sell, or share that information to service providers or third parties, respectively; and the criteria we use to determine the retention period for such information. The categories we use to describe personal information are those enumerated in the CCPA. We collect this personal information for the purposes described above in “Collection of Information.”

Category	Information Type	Source	We disclose to:	We sell to/share with:
Identifiers	<ul style="list-style-type: none"> <li>Contact information or personal characteristics (name; email address; postal address; telephone number; signature)</li> <li>Social media handles and information linked to your social media profile (picture; email address; friends lists)</li> </ul>	You; our social media pages;	Service Providers	Not sold/shared
Public Information and Posts	<ul style="list-style-type: none"> <li>Comments; content; registration details; other information you pose to the BRP Services and information that accompanies those posts, contents, or forms</li> </ul>	You; our social media pages;	Service Providers	Not sold/shared
Protected Classifications	<ul style="list-style-type: none"> <li>Date of Birth</li> <li>Gender</li> </ul>	You	Service Providers	Not sold/shared
Internet or Electronic Network Activity Information	<ul style="list-style-type: none"> <li>IP address</li> <li>Device identifier (e.g., MAC)</li> <li>Advertising identifier (e.g., IDFA, AAID)</li> <li>Information provided in URL string (e.g., search keywords)</li> <li>Cookie or tracking pixel information</li> <li>Information about your interaction with our website, app, email correspondence, or products</li> <li>Browsing history</li> <li>Search history</li> <li>Diagnostic information (e.g., crash logs, performance data)</li> </ul>	You	Service Providers	Not sold/shared

We determine the retention period for each of the categories of personal information listed above based on (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

Entities to whom we disclose information for business purposes are service providers, which are companies that we engage to conduct activities on our behalf. We prohibit service providers from using personal information for any purpose that is not related to our engagement.

Under the CCPA, a business “sells” personal information when it discloses personal information to a company for monetary or other benefit. A company may be considered a third party either because we disclose personal information to the company for something other than an enumerated business purpose under California law, or because its contract does not prohibit it from using personal information for purposes unrelated to the service it provides to us. A business “shares” personal information when it

discloses personal information to a company for purposes of cross-context behavioral advertising. We do not “sell” or “share” personal information at this time.

***Colorado, Connecticut, Utah, and Virginia***

Residents of the States of Colorado, Connecticut, Utah, and Virginia have the following rights: (1) Opt out of “sales” of personal information and use of their personal information for “targeted advertising,” as those terms are defined under applicable law; (2) Opt out of “profiling” under certain circumstances, as defined under applicable law (residents of Colorado, Connecticut, and Virginia only); (3) Confirm processing of and access to personal information under certain circumstances; (4) Correct personal information under certain circumstances. (Residents of Colorado, Connecticut, and Virginia only); and (5) Delete personal information under certain circumstances.

Residents of these states can exercise their rights by contacting us at using one of the methods listed below.

**8. CONTACT US**

If you have questions about this Privacy Policy or wish to exercise any of your privacy rights, please contact us at:

Email: [legal@all3a.com](mailto:legal@all3a.com)

Mail: All3Media America, LLC  
6060 Center Drive, Suite 400  
Los Angeles CA 90045

Phone: (800)-372-9420

Bright Road Productions, Inc.’s affiliates include, without limitation, All3Media America, LLC.