



REALTIME MEDIA PRIVACY POLICY

Last Updated: 11/4/2020

Realtime Media, Inc. (“Realtime Media” or “we,” “us,” or “our”) respects your privacy. This Privacy Policy (the “Privacy Policy” or “Policy”) is intended to describe how Realtime Media collects, uses, and shares information that you submit to us and that we collect through our website and when you enter into sweepstakes and promotions managed by us. It also is intended to describe your rights in connection with that information. This Privacy Policy applies to our Services and where it is specifically adopted. When we say “Services”, we mean our personal information collection practices to enroll you in a promotion or sweepstakes, our management of those promotions or sweepstakes, and our website, rtm.com (the “Website”).

Please note that certain rights, requirements, and disclosures in this Privacy Policy may be subject to exemption or otherwise may not apply to you based, for example, on applicable law or regulations.

1. INFORMATION WE COLLECT

As described in this Privacy Policy, we may collect certain personal information from or about you in connection with your use of, or your submissions to, the Services, including your entry into the sweepstakes and promotions we manage. Personal information, for purposes of this Privacy Policy, generally includes information that may be used to identify you.

You are not required to provide all personal information identified in this Privacy Policy; however, please be advised that if you do not provide the personal information requested by us, for example in connection with a promotion or sweepstakes, we may be unable to provide some or all of the Services to you, and you may not be eligible for participation in the promotions and sweepstakes we manage.

1.1 Categories of Personal Information. We may collect the following categories of personal information:

Categories of Personal Information	Examples of Personal Information
Identifiers	Name, home and work address, phone number, email address, online identifiers (e.g., social media handle), in addition to information you choose to provide us that is related to our brand clients’ and agency partners’ sweepstakes and promotions, such as your favorite candy, pet’s name, or favorite sports team.
Protected classifications under applicable law	Age, date of birth, sex, gender, and marital status, if related to a particular sweepstakes or promotion.
Commercial information	Pictures of store receipts or other similar proofs of purchase.

Internet or similar network activity	Browsing history, search history, clickstream data, session information, browser and operating system type, navigation paths, date/time stamps, cookie identifiers, and other information about device characteristics and how you interact with our Services
Geolocation data	Physical location, if related to a particular sweepstakes or promotion.
Professional or employment-related information	Employer details and contact information, job title, and employment history, if related to a particular sweepstakes or promotion.
Education information	Degrees and educational history, if related to a particular sweepstakes or promotion.
Inferences from other personal information	Preferences, behaviors, characteristics, number of persons in household, income level, location, if related to a particular sweepstakes or promotion.

1.2 Cookies and Similar Technologies. We may collect certain personal information using cookies and other technologies, such as web beacons, device IDs, geolocation, HTML5 local storage, Flash cookies, and IP addresses. We specifically use browser cookies for different purposes, including cookies that are strictly necessary for functionality and cookies that are used for personalization, performance/analytics, and other purposes. When you visit the Website, we may also automatically collect certain data about your device, including information about your web browser, IP address, time zone, and geolocation. Additionally, as you browse the Website, we may collect information about the individual web pages that you view, what websites or search terms referred you to the Website, and information about how you interact with the Website. Our **Use of Cookies and Similar Technologies** section contains more information and options to control or opt-out of certain data collection or uses related to cookies and similar technologies.

1.3 Special Categories of Personal Information. We generally do not collect or require special categories of personal information (such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health information, biometric data, or sexual orientation) in order to access our Services or participate in our sweepstakes and promotions.

1.4 Anonymous Data. We may create de-identified or anonymous data from personal information by removing data components (such as your name, email address, or linkable tracking ID) that makes the data personally identifiable to you or through obfuscation or through other means. Our use of anonymized and de-identified data is not subject to this Privacy Policy.

2. SOURCES OF INFORMATION AND PURPOSES OF COLLECTION

The following is intended to describe the various sources through which we may collect personal information and the purposes for which we collect it:

Sources of Personal Information	Categories of Personal Information from Source	Purposes of Collection and Disclosure
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<p>Entry Forms</p> <p>We may collect personal information from you when you enter into the promotions and sweepstakes that we manage on behalf of our brand clients and agency partners.</p>	<ul style="list-style-type: none"> • Identifiers • Protected classifications under applicable law • Commercial information • Internet or similar network activity • Geolocation data • Professional or employment-related information • Education information • Inferences from other personal information 	<ul style="list-style-type: none"> • Provide and perform Services, including entering you into and managing the promotions and sweepstakes • Enhance the Services • Market, advertise, and promote the Services • Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity • Comply with legal and regulatory obligations
<p>Communications and Interactions with Us</p> <p>We may collect personal information from you when you submit inquiries or request information from us.</p>	<ul style="list-style-type: none"> • Identifiers • Protected classifications under applicable law • Internet or similar network activity • Geolocation data 	<ul style="list-style-type: none"> • Provide and perform Services • Enhance the Services • Market, advertise, and promote the Services • Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity • Comply with legal and regulatory obligations
<p>Social Media, Online Forums, and Advertisements</p> <p>We may collect personal information, in connection with a promotion or sweepstakes we manage, from third-party social media platforms and sites, when you engage with our social media pages, online communities and forums, and when you mention us on your own or other social media pages, online communities, or forums. Please note that online forums may be publicly accessible and other users may view information you post in the forums. We encourage you to exercise care in deciding what information and content you wish to disclose on the areas of the Services that are accessible to the general public.</p>	<ul style="list-style-type: none"> • Identifiers • Protected classifications under applicable law • Commercial information • Internet or similar network activity • Geolocation data • Professional or employment-related information • Education information • Inferences from other personal information 	<ul style="list-style-type: none"> • Provide and perform Services, including entering you into and managing the promotions and sweepstakes • Enhance the Services • Market, advertise, and promote the Services • Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity • Comply with legal and regulatory obligations

<p>Publicly-available Sources</p> <p>We may collect personal information from publicly-available sources.</p>	<ul style="list-style-type: none"> • Identifiers • Protected classifications under applicable law • Commercial information • Internet or similar network activity • Geolocation data • Professional or employment-related information • Education information • Inferences from other personal information 	<ul style="list-style-type: none"> • Provide and perform Services, including entering you into and managing the promotions and sweepstakes • Enhance the Services • Market, advertise, and promote the Services • Comply with legal and regulatory obligations
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3. HOW WE MAY SHARE INFORMATION

We may share personal information as described in this Privacy Policy, including with the following categories of third parties:

Categories of Third Parties with Whom We Share Personal Information	Categories of Personal Information We Share
<p>Brand Clients and Agency Partners</p> <p>We may provide our brand clients and agency partners with your personal information in connection with your entry into a particular promotion or sweepstakes.</p>	<ul style="list-style-type: none"> • Identifiers • Protected classifications under applicable law • Commercial information • Internet or similar network activity • Geolocation data • Professional or employment-related information • Education information • Inferences from other personal information
<p>Technical and Operational Service Providers and Business Partners</p> <p>We may engage third parties to perform certain functions on our behalf. To do so, we may disclose personal information to our third-party business partners and service providers in order to maintain and operate the Services and provide, improve, and personalize the Services, including to fulfill requests for the Services, and for other technical and processing functions, such as sending e-mails on our behalf, delivering prizes, and technical support. We may also share personal information to service providers or other third parties to detect, protect against, and respond to security incidents or other malicious, deceptive, illegal or fraudulent activity or other threats and for legal compliance purposes or pursuant to legal process.</p>	<ul style="list-style-type: none"> • Identifiers • Protected classifications under applicable law • Commercial information • Internet or similar network activity • Geolocation data • Professional or employment-related information • Education information • Inferences from other personal information

<p>Government Entities</p> <p>We may share personal information with government entities and agencies, regulators, law enforcement, and other third parties, including to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or pursuant to legal process, and to establish or exercise our legal rights or for fraud- or crime-prevention purposes.</p>	<ul style="list-style-type: none"> • Identifiers • Protected classifications under applicable law • Commercial information • Internet or similar network activity • Geolocation data • Professional or employment-related information • Education information • Inferences from other personal information
<p>Professional Service Firms</p> <p>We may share personal information with professional service firms in connection with our legal and regulatory obligations and to establish or exercise our rights and defend against claims, including, for example, auditors, law firms, and consultants.</p>	<ul style="list-style-type: none"> • Identifiers • Protected classifications under applicable law • Commercial information • Internet or similar network activity • Geolocation data • Professional or employment-related information • Education information • Inferences from other personal information
<p>Corporate Transactions</p> <p>Subject to applicable law, we reserve the right to transfer some or all personal information in our possession to a successor organization in the event of a merger, acquisition, bankruptcy, or other sale or transfer of all or a portion of our assets. If any such transaction occurs, the purchaser will be entitled to use and disclose the personal information collected by us in the same manner that we are able to, and the purchaser will assume the rights and obligations regarding personal information as described in this Privacy Policy.</p>	<ul style="list-style-type: none"> • Identifiers • Protected classifications under applicable law • Commercial information • Internet or similar network activity • Geolocation data • Professional or employment-related information • Education information • Inferences from other personal information

4. INTEREST-BASED ADVERTISING

Interest-based advertising is advertising that is targeted to you based on your web browsing and usage of certain apps over time and across websites or apps. You have the option to restrict the use of information for interest-based advertising and to opt-out of receiving interest-based ads. Depending on from where you access the Services, you may also be asked to consent to our use of cookies, including advertising cookies. Please note: we only utilize interest-based advertising in connection with the Website and not for any other part of the Services.

The opt-outs for interest-based advertising require that strictly necessary cookies are not blocked by the settings in your web browser. We support the Self-Regulatory Principles for Online Behavioral Advertising of the [Digital Advertising Alliance](#) in the U.S., the [Canadian Digital Advertising Alliance](#) in Canada, and the [European Digital Advertising Alliance](#) in the EU. If you live in the United States, Canada, or the European Union, you can visit [Ad Choices](#) (US), [Your Ad Choices](#) (Canada), or [Your Online Choices](#) (EU) to find a convenient place to opt-out of interest-based advertising with participating entities for each region. These websites also provide detailed information about how interest-based advertising works. Opting out does not mean that you will no longer receive advertising when you use the Internet. It just means that the data collected from our Website will not

be used for interest-based advertising and that the advertising you see displayed on websites will not be customized to your interests.

5. DO-NOT-TRACK

Do-Not-Track is a public-private initiative that has developed a “flag” or signal that an Internet user may activate in the user’s browser software to notify websites that the user does not wish to be “tracked” by third-parties as defined by the initiative. Please note that the Services do not alter their behavior or use practices when we receive a “Do-Not-Track” signal from browser software.

6. SOCIAL NETWORK SINGLE SIGN-ON

Our Services may utilize social network single sign-on functionalities that allow you to register for the promotions and sweepstakes we manage using your social network profile. This functionality typically provides us with limited personal information already associated with your social network profile, including your name, email address, and social network handle. If you use social network tools or visit social networking sites, we encourage you to read their privacy disclosures to learn what information they collect, use, and share.

7. LINKS TO OTHER SITES

Our Services may contain links or otherwise provide access to another website, mobile application, or Internet location (collectively “Third-Party Sites”). Please note that we have no control over and are not responsible for Third-Party Sites, their content, or any goods or services available through the Third-Party Sites. Our Privacy Policy does not apply to Third-Party Sites. We encourage you to read the privacy policies of any Third-Party Site with which you choose to interact.

8. USE OF COOKIES AND SIMILAR TECHNOLOGIES

a. Promotion and Sweepstakes Entry Forms

We do not use cookies in connection with the promotions and sweepstakes we manage, except to verify that a sweepstakes or promotion entrant has satisfied the criteria we use to determine that he or she is old enough to participate in the sweepstakes or promotion.

b. Realtime Media Website

A “cookie” is a small text file that a web server stores in browser software. A browser sends cookies to a server when the browser makes a connection to the server (for example, when requesting a web page from the same domain that created the cookie). The purpose of cookies is to remember the browser over time and distinguish one browser instance (or user) from all others. Some cookies and other technologies may serve to track personal information previously entered by a web user on the Website. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. Cookies can remember login information, preferences, and similar information.

Cookies, as well as other tracking technologies, such as HTML5 local storage, and Local Shared Objects (such as “Flash” cookies), and similar mechanisms, may record

information such as a unique identifier, information you enter in a form, IP address, and other categories of data.

The Website uses cookies and similar technologies to improve user experience, for performance and analytics, and to improve our content, products, and services. For example, the Website uses a tracking cookie from Pardot, one of our service providers, to collect anonymous session-based data on visitors to the Website. When you identify yourself and provide us with your personal information, we are able to match your anonymous session-based data with the personal information you provided to us. We only use this data in connection with your use of the Website and to contact you with offers, opportunities, and content we think may be of interest to you.

If you want to block the use and saving of cookies from the Site on to the computer's hard drive, you should take the necessary steps within your web browser's settings to block all cookies from the Services and external serving vendors, or use the cookie control system, if available upon first visit, which is available here. Please note that if you choose to erase or block your cookies, certain parts of our Services may not function correctly. For information on how to disable cookies, refer to your browser's documentation.

9. INFORMATION FROM CHILDREN UNDER 18 YEARS OF AGE

We do not knowingly collect information from individuals under the age of 18 years without parental consent. If you become aware that an individual under 18 years of age has provided us with personal information without parental consent, please contact us privacy@rtm.com or at 800-209-8830. If we become aware that an individual under 18 years has provided us with personal information without parental consent, we will take steps to remove the data as permitted by law.

10. REGION SPECIFIC DISCLOSURES

Depending on your jurisdiction of residence, you may be entitled by law to exercise the rights described below. For individuals whose jurisdiction does not afford these rights, we may offer them voluntarily and at our discretion, and we reserve the right to limit or revoke any such rights at any time, as may be permitted by applicable laws.

a. CALIFORNIA

Disclosures and Sales of Personal Information for Business or Commercial Purposes

We may disclose and sell the following types of personal information to third parties for a business or commercial purpose, as further described in the chart above:

- Identifiers
- Commercial information
- Internet or similar network activity
- Geolocation data
- Professional or employment-related information

- Education information
- Inferences from other personal information

Rights of California Residents

If you are a California resident, subject to applicable law, you have the following rights under California law with respect to your personal information:

Right to Know. You have the right to request what personal information we collect, use, disclose, and/or sell, as applicable.

Right to Delete. You have the right to request the deletion of your personal information that is collected or maintained by us.

Right to Non-Discrimination. You have the right not to receive discriminatory treatment by us for the exercise of the privacy rights described above.

Right to Opt-Out of Sale. You have the right to opt-out of the sale of your personal information by us.

You have the right to direct us not to “sell” your personal information, as that term is defined under the California Consumer Privacy Act, and to refrain from doing so in the future. In connection with “sales” of personal information, we share the personal information of sweepstakes and promotion entrants with the brand clients and agency partners that sponsor that and only that particular sweepstakes and/or promotion to let them know who has entered. We do not sell the personal information of consumers we actually know are less than 16 years of age. If you wish to opt-out of such sales, please do so in one of the following ways:

- By utilizing the webform accessible <https://privacy.rtm.com>
- By emailing us at privacy@rtm.com
- By calling us, toll-free, at 800-209-8830

Please note that if you opt-out of the such sales, you may be ineligible to participate in the promotions and sweepstakes that we manage.

Please consult the other sections of our Privacy Policy for further information on our practices regarding your personal information.

Under Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of personal information (as defined by California law) the business shares with third

parties for those third parties' direct marketing purposes, and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise your rights, you may make one request each year by emailing us at privacy@rtm.com with "Request for California Privacy Information" in the subject line and in the body of your message. Please be sure to provide in the request sufficient information to properly identify you and/or the members of your family.

You may also authorize someone to exercise the above rights on your behalf, provided that you provide that person with written signed permission to do so, verify the authorized person's identity with us, and directly confirm with us that the authorized person provided the written signed permission to submit your request. If we have collected information on your minor child, you may exercise the above rights on behalf of your minor child.

The above rights are subject to our being able to reasonably verify your identity and authority to make these requests. These rights are also subject to various exclusions and exceptions under applicable laws. We may ask you to verify your identity by answering certain questions.

If you are a California resident and wish to seek to exercise these rights, please reach us in one of the following ways:

For more information or if you have questions or concerns about our privacy practices, please contact us by email at privacy@rtm.com or by mail or phone using the details provided below:

- Nathan Steffy, Data Privacy Officer
- 200 Four Falls Corporate Center, Suite 100
West Conshohocken, PA 19460
- 800-209-8830

b. EUROPEAN UNION

These disclosures (the "EEA Disclosures") supplement the Privacy Policy and apply only to our processing of personal data (otherwise referred to as "personal information" in this Privacy Policy) within the scope of the General Data Protection Regulation ("GDPR") from one or more of the European Union Member States plus Iceland, Lichtenstein and Norway (together known as the "European Economic Area" or "EEA").

Realtime Media, Inc. is the data controller. Please refer to the Contact Us section below for ways to get in touch with us regarding your

Data Retention

We will retain your personal data for as long as is necessary to fulfill the purposes for which we obtained the personal data, including to provide the

Services, or for such longer period as may be required or permitted by applicable law. We will also retain your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and policies. We use the following criteria to set our retention periods: (i) the duration of our relationship with you; (ii) the purposes for processing your personal data and associated legal bases; (iii) the existence of a legal obligation as to the retention period; (iv) our contractual obligations; and (v) the advisability of retaining the data in light of our legal position (for example, in light of applicable statutes of limitations, litigation, or regulatory investigations).

Transfer of Data to the U.S.

Please note that if you are using the Services from outside of the United States, your personal data may be transferred to, stored, and/or processed in the United States. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. If you are located outside of the United States, the transfer of personal data may be necessary to provide you with the requested information, products, and Services and/or to perform any requested transaction.

Data Subject Rights

Individuals from the EEA whose personal data we process subject to the GDPR have certain rights as required by law, including the right of access, erasure and data portability, as well as the right to rectification, to restrict processing, to withdraw consent, and to object to processing as follows:

Right of Access. Individuals have the right to know if we are processing personal data about them and, if so, to access and obtain a copy of personal data about them, as well as information relating to the processing of that data.

Right of Rectification. Individuals have the right to have us correct or update any personal data about them that is inaccurate or incomplete without undue delay.

Right to Restrict Processing. Individuals have the right to restrict or limit the ways in which we process personal data about them where the accuracy of the personal data is contested by them, where data has been obtained by us unlawfully, where the individual has objected to our processing of the data (see right of objection below) and we are considering whether to cease processing, or where we no longer need to process the personal data.

Right to Object. Individuals have the right to object to our processing of their personal data where we are relying on legitimate interests as our legal basis and their rights override our legitimate interests in processing their personal data. Individuals also have the right to object to our processing of their personal data for direct marketing purposes.

Right to Withdraw Consent. Where we rely on consent as the basis for processing personal data, individuals have the right to withdraw their consent.

In most cases, we need to process certain of your personal data for our legitimate interests. Where the basis of processing is legitimate interests, you

have a right to object to the processing of your personal data. Please note that, subject to applicable law, we may continue to process your personal data even where you object if there are compelling legitimate grounds for processing that override your interests and rights, or where processing is necessary to establish, exercise, or defend legal claims.

Where consent is the basis of processing, you may at any time withdraw the consent you provided for the processing of your personal information for the purposes set forth in this Privacy Policy by contacting us at privacy@rtm.com or 800-209-8830, provided that we are not required by applicable law or professional standards to retain such information.

Please note that if you do not provide consent, if you withdraw your consent or object to processing, or if you choose not to provide certain personal data, we may be unable to provide some or all of the Services to you.

Right of Erasure. Individuals have the right to request deletion or erasure of their personal data in a number of circumstances where required by law. These include where we no longer require the personal data for the purposes for which it was collected, the individual has withdrawn consent or, where we are relying on legitimate interests as a legal basis, and the individual's rights override our legitimate interests.

Right of Portability. Individuals have the right to obtain a copy of the personal data we hold about you in a structured machine-readable format and to have it transmitted to another controller. This right only occurs where we are relying on your consent or performance of a contract as our legal basis and the processing is carried out automatically.

Make a Complaint. Individuals also have the right to make a complaint about our personal data handling practices to their local supervisory authority.

Bases for Processing	Examples
<p>Compliance with Legal Obligations</p> <p>We may process personal in in order to comply with our legal obligations.</p>	<ul style="list-style-type: none"> Comply with laws and legal obligations, law enforcement and regulatory requests, court orders, subpoenas, or pursuant to legal process

<p>Legitimate Interests</p> <p>We may use personal data in order to operate our organization and provide the Services, for our “legitimate interests” for the purposes of applicable law, except where our interests are overridden by the interests or fundamental rights and freedoms of the data subject.</p>	<ul style="list-style-type: none"> • To maintain and provide the Services, including the promotions and sweepstakes we manage. • To communicate with you regarding the Services, including to provide you important notices regarding this Privacy Policy • To address and respond to your requests, inquiries, and complaints • To protect the confidentiality or security of information • To develop, provide, and improve the Services, including to better tailor the features, performance, and support of the Services, and for statistical and analytics purposes • To provide technical support • For our direct marketing purposes • For fraud, loss, and other crime prevention purposes, to assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties • To enforce our Terms of Use, this Privacy Policy, or agreements, including for billing and collection purposes • To comply with laws, regulators, court orders, or other legal obligations, or pursuant to legal process
<p>Protection of Individuals’ Vital Interests</p> <p>We may use personal data where we believe it is necessary to protect the vital interests of you or of another person.</p>	<ul style="list-style-type: none"> • Fraud, loss, and other crime prevention purposes, to assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties
<p>Consent</p> <p>In some cases where we are not already authorized to process the personal data under applicable law, we may ask for your consent to process your personal data.</p>	<ul style="list-style-type: none"> • Marketing. Where we are not relying on our legitimate interests or another legal basis for processing personal data, we may ask for your consent to contact you by telephone, SMS, post and/or email about other offers, products, promotions, developments, or services which we think may be of interest to you and for other marketing purposes. • Cookies. We may also request consent for some cookies in accordance with our cookie policy.



To exercise your rights, please contact us by email at privacy@rtm.com or by phone at 800-209-8830. You may also exercise the above rights on behalf of your minor child, if applicable.

As permitted by law, certain data elements may not be subject to access, modification, portability, restriction, and/or deletion. Furthermore, where permissible, we may charge for this service. We will respond to reasonable requests as soon as practicable and as required by law. To protect your privacy and security, we may take steps to verify your identity in order to respond to your request.

These rights are also subject to various exclusions and exceptions under the law. Under certain circumstances, we may be unable to implement your request, pursuant to applicable law. We will advise you of any reason for denying or restricting a request to the extent permitted by law.

11. UPDATES TO THIS POLICY

We may update this Privacy Policy from time to time. The most recent version of the Privacy Policy is reflected by the version date located at the top of this Privacy Policy. We encourage you to review this Privacy Policy often to stay informed of how we may process your information.

12. CONTACT US

For more information or if you have questions or concerns about our privacy practices, please contact us by email at privacy@rtm.com or by mail or phone using the details provided below:

Nathan Steffy, Data Privacy Officer
200 Four Falls Corporate Center, Suite 100
West Conshohocken, PA 19460
800-209-8830