

REALTIME MEDIA LLC

PRIVACY NOTICE

Introduction & Purposes

This Privacy Notice (“Notice”) explains how Realtime Media LLC (“Realtime Media”, “our”, “us”, “we”), a full-service promotion (e.g. sweepstakes, instant win, rebates) provider, collects, uses, and discloses personally identifiable information (“PII”) that individuals (“users,” “you,” or “your”) share with us, with our clients, other information we collect during your participation in various activities we manage, and that we collect through our website (the “Website”).

We are committed to protecting the privacy of your PII that you provide to us. This is your PII that (i) you choose to provide to us when you decide to engage in client promotions and marketing activities that we manage; (ii) we gather when you visit our Website at rtm.com or other websites we own or manage; (iii) we gather when you interact with Realtime Media directly (e.g., the Website, mailboxes, points of entry offline); or (iv) we possess and process. When we say “Services”, we mean our personal information collection practices to enroll you in a promotion, our management of those promotions, and the Website.

If you have any questions about this Notice, please email us at privacy@rtm.com or call (800) 209-8830. Additional contact information is provided in the Contacting Us section below.

This Notice consists of the following main sections:

Information We Collect

How We Use the Information We Collect

How We Share Information

Additional Services and Third-Parties

Security of PII

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1. Information We Collect

A. Personally Identifiable Information (“PII”)

Realtime Media, on behalf of our clients and for its own purposes, may collect PII. This information includes, but is not limited to: your name, date of birth, marital status, street address, e-mail address, credit card information, social security number, telephone number, and social media information. PII collected by Realtime Media, on a client’s behalf, will be used by the client in accordance with that particular client’s privacy policy.

B. Personal information that is not PII

Realtime Media, on behalf of our clients and for its own purposes, may also collect or generate non-personally identifiable information about your use of Realtime Media services or client

promotions. This information includes, but is not limited to, browser type and version, operating system, referral source, length of visit, page views, demographics, interests, online habits, geographical location, analytical data, receipts, images, social posts, video, audio, information collected by website visitor tracking tools such as “cookies,” “web beacons,” “pixels,” Internet tags and other navigational data. More information about our online activity tracking tools is provided below.

Please note that we occasionally use the term “information” to refer to both PII and non-PII.

C. Website Visitor Tracking Tools That We Use

“Cookies” are small pieces of information that are stored by your web browser on your computer’s hard drive or temporarily in your computer’s memory. The use of cookies is now an industry standard and you will find them on most major websites.

Realtime Media may place and store Internet cookies on your hard drive. The use of cookies provides benefits to you by saving your name, information supplied at registration, and other information that may make the use of our promotions easier. Although most web browsers are initially set up to accept cookies, if you prefer, you can decline the placement of a cookie on your hard drive by using the appropriate feature(s) of your web browser software (if available) to block or delete the cookie. Please note, however, that certain areas on a website may not function properly if your web browser does not accept cookies. When you visit the Website, engage in one of our promotions or open an email you have received from us, we may place or recognize a unique cookie on your browser. These cookies, which do not contain PII, enable us to customize our services and gather insight analytics about our client’s customers and consumers.

Additionally, emails we send to you may contain a bit of code known as engagement “pixel.” This code helps us understand the time and date that you opened an email and when you used a link within the email to visit a website, allowing us to collect analytics about our traffic, customize our services, and send you ads about our services. You can disable our web beacons by turning images “off” in your email client (e.g., Outlook, Outlook Express).

Realtime Media’s use of anonymized and de-identified information is not subject to this Notice.

2. How we Use the Information We Collect

Generally, we may use your information that we collect for: (i) analytical purposes, including the creation of fraud databases; creation of common event data databases; development and use of benchmarking, indexing, and analytics; product development, testing, analytics, modeling and algorithm development (e.g., fraud mitigation); (ii) providing and fulfilling services ordered by our clients (including SMS and email messaging); (iii) internal and third-party fraud detection, including, for example, matching to external services with third-party information and (iv) the promotions entered by you.

A. To Operate Promotions and Personalize Your Experience

Our promotions may include features that personalize your experience. To that end, we use your PII and non-personally identifiable information to operate and benchmark the promotions, including, without limitation, to process transactions with you and validate the information you provided. We may also use your email domain to ensure your eligibility or your affiliation with a particular organization or industry or to personalize the content and experience you receive.

Where you use multiple promotion platforms (such as, website, mobile website, or mobile app), we may combine information about you and your activities to provide an integrated experience, such as to allow you to seamlessly engage from the various platforms we make available.

B. For Development and Improvement of our Promotions and Services

We continually strive to improve our promotions and services to make them more engaging, secure, rewarding, and useful to you and our clients. We use the information we collect to better understand how our users engage with our promotions, to troubleshoot and to identify areas for improvement.

C. To Communicate With You About The Services

We use your PII to send transactional communications to you by email, text messages, mobile app messaging, and other means to access a promotion. We also remind you of promotion deadlines, respond to your comments, questions and requests, provide customer support, and may send you notices, updates, and administrative messages using your PII. We also provide personalized communications based on your activity and interactions with a promotion. For example, certain actions you take in a promotion may automatically trigger communications related to the promotion engagement, such as when earning more sweepstakes or instant win opportunities. Transactional communications are part of the promotion and in most cases, you cannot opt-out of them and continue to participate in the promotion. If an opt-out is available, you will find that option within the communication itself. Importantly, if you do enter into a promotion and opt-out of transactional communications, we will have no way to reach you if you are a potential winner or otherwise eligible for something of value. For more information about opting out, please see Sections 8 and 13.

D. Fraud Detection and Prevention; Safety and Security

We will use your information to detect and prevent fraud and as may be otherwise necessary to help ensure the integrity of our promotions and to identify violations of the promotion rules or the policies of Realtime Media or those of our clients.

E. To Protect our Legitimate Business Interests and Legal Rights

Where required by law or where we believe it is necessary to protect the legal rights and interests of Realtime Media, our clients, or others, we may use your PII in connection with legal claims, compliance, regulatory, and audit matters.

F. With Your Consent

We also use your PII where you have provided consent for Realtime Media or our client to do so for a specific purpose not listed above. For example, with your consent, we may post contest entries or other user generated content to social media platforms.

G. Customer Support

We use your PII and non-personally identifiable information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the promotions.

H. Legal Bases for Processing (for EEA Users)

If you are an individual in the European Economic Area (EEA), we collect and process your PII only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the promotions you enter, how they operate, and how you use them. This means we collect and use your PII only where:

- We need it to operate the promotion, provide customer support and personalized features, help prevent fraud, and to protect the safety and security of our platforms and promotion services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for our internal development of improved services, to market and promote the promotions, and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your PII to comply with a legal obligation or where the processing is necessary to the establishment, exercise or defense of legal claims.

If you consented to our use of your PII for a specific purpose, you have the right to change your mind at any time but note that this will not affect processing that has already taken place.

Where Realtime Media is using your PII because our client and/or Realtime Media have a legitimate interest to do so, you have the right to object to that use although this may mean no longer participating in a promotion. If we are unable to manage your participation in a promotion without the PII you provided (such as your registration information), you will no longer be able to participate in the applicable promotion. To learn how to opt-out of allowing use of your PII, please refer to Sections 8 and 13.

3. How We Share Information

A. At Your Direction.

We may disclose your PII to any third-party with your consent or at your direction.

B. Brand Clients and Agency Partners.

While providing the Services, we may provide our brand clients and agency partners with your personal information in connection with your entry into a particular promotion or sweepstakes.

C. Business Partners and Service Providers.

We may share PII with other companies to integrate our Services with theirs and improve the functionality of our Services. We may engage third-parties to perform certain functions on our behalf. To do so, we may disclose PII 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 PII with 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.

D. Affiliates.

We may disclose PII we collect from you to our affiliates or subsidiaries; however, if we do so, their use and disclosure of your PII will be subject to this Policy.

E. Advertising Providers.

In the course of using the Services, we may share PII with advertising providers, including social media.

F. Business Transfers.

If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the PII to the other company.

G. In Response to Legal Process.

To comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.

H. To Protect Us and Others.

Where we believe it is necessary to investigate, prevent, or take action regarding illegal activities.

I. To Protect Our Legitimate Business Interests.

Where required by law or where we believe it is necessary to protect our legal rights and interests, such as in connection with legal claims, compliance, regulatory, and audit matters.

J. Professional Service Firms.

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.

4. Additional Services and Third-Parties

Realtime Media may also offer social sign-on services that allow you to register for a promotion using a third-party social networking site such as Facebook, Twitter, Instagram, YouTube, etc. By using these services, we may share PII with that service about you and we will access the available PII from your third-party social network profile such as your name, age, gender, location, email address, and list of friends. This PII may be used by Realtime Media to administer the technical and operational aspects of the Website, or make your experience on our promotions and services more personal and social. Realtime Media does not control the privacy practices of these (or any other) third-party services. We encourage you to read the privacy policies of these services before connecting to them.

5. Security of PII

Realtime Media uses reasonable physical, electronic, and procedural security measures designed to protect your PII from unauthorized disclosure.

6. Special Note About Children

Unless otherwise specifically indicated, Realtime Media promotions are not available to anyone under the age of thirteen. Realtime Media does, however, operate some promotions and platform solutions on behalf of its clients that collect PII from children under the age of thirteen. In each such instance, Realtime Media complies with the Children's Online Privacy Protection Act ("COPPA") when operating the promotion, collecting the PII itself, and subsequently using the data collected. PII will not be collected from children under the age of thirteen without parental consent in compliance with the COPPA guidelines. If you have questions concerning Realtime Media's information collection and use practices with respect to children, or if you would like to review, have deleted, or stop the further collection of your child's PII, you may contact Realtime Media as set forth in Section 8 and 13.

7. Client Privacy Notices and Opting Out of Client use of PII

You should read the client's privacy policy to learn how that client uses, discloses, and limits disclosure of your PII, as well as to understand your choices for opting out of its collection, amend it for accuracy, or have it deleted. Your desire to opt-out of receiving marketing or other information from that client will be handled in accordance with that particular client's privacy notice. Please note that opting out of a client's marketing program will not opt you out of Realtime Media's marketing programs. To learn how to opt-out of Realtime Media's use of your PII, please see Section 8 and 13.

8. Opting Out of Realtime Media use of PII

In general, "opting out" means that you want Realtime Media to limit the PII it collects and stores about you and to not target ads that are based on your interests to your browser or device. Your opt-out is applicable only to Realtime Media marketing material and will not opt you out from platforms provided by third-party companies or client promotions. If you use multiple browsers, computers or mobile devices, and wish to limit the PII and non-personally identifiable information Realtime Media collects and stores or do not wish to receive Realtime Media interest-based advertising on any of them, you must opt-out from each browser, computer, and mobile device individually. Please note that if cookies are not enabled in your browser, or if you use certain ad-blocking tools, our opt-out mechanism may not work properly. Please also note that deleting your cookies does not opt you out. To opt-out of Realtime Media using your PII, you need to contact us using the contact information provided below.

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.

9. Third-Party Links

Hypertext links which redirect you to third-party websites may be encountered while browsing the Website. These hypertext links are maintained or operated by third-parties, not Realtime Media. These third-party websites are not under our control, and we are not responsible for the contents, links, or any changes or updates to these websites. Further, the inclusion of any hypertext links on the Website does not imply endorsement by us of the related third-party website, that website's contents or security, or any association or affiliation with its operators. Realtime Media is not responsible for data and information collected by these third-party websites.

10. International Users

Realtime Media is based in the United States, and, regardless of where you use Realtime Media solutions or otherwise provide PII and non-personally identifiable information, that information may be transferred to and maintained on servers located in the United States.

11. California Residents Privacy Policy

This California Resident Privacy Policy disclosure (“Disclosure”) is provided pursuant to the California Consumer Privacy Act (“CCPA”) as amended, and applies only to California residents. Any terms defined in the CCPA have the same meaning when used in this Disclosure. Terms defined in the Notice maintain the same meaning when used in this Disclosure.

This Disclosure is effective as of May 23, 2023.

The PII (defined in Cal. Civ. Code §§ 1798.140(o)) that we collect and the manner we use it is covered in sections 1 and 2 above.

A. Categories. Below is a summary for the preceding 12 months of the PII categories (as identified and defined by the CCPA) that we collected in the course of providing our clients with promotions and services:

Category	Examples	Identify if Processed
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license, or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	Yes

G. Geolocation data.	Physical location or movements.	Yes
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary codes.	Yes
K. Inferences drawn from other personal information.	Profile a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes

B. Categories Shared. We may use or disclose PII in the following categories in the course of providing our clients with promotions and services (the “Business Purpose Disclosures” in the table below).

Category	Category of Third-Party Recipients	
	Business Purpose Disclosures	Sales
A. Identifiers.	Yes	No
B. Personal information categories listed in the California Customer Records statute.	Yes	No
C. Protected classification characteristics under California or federal law.	Yes	No
D. Commercial information.	Yes	No
E. Biometric information.	No	No
F. Internet or similar network activity.	Yes	No
G. Geolocation data.	Yes	No
H. Sensory data.	No	No
I. Professional or employment-related information.	No	No
J. Non-public education information.	No	No

K. Inferences drawn from other personal information.	No	No
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- C. No Sale. In the 12 months prior to the effective date of this Disclosure, Realtime Media has not sold (as the term “sell” is defined in the CCPA) your PII.
- D. Right to Request Disclosure. You have the right to request, free of charge, that we disclose information about our collection and use of your PII over the past twelve (12) months, including:
- The categories of PII we collect about you;
 - What PII we collect, use, or disclose about you;
 - The categories of sources of the PII we collect about you;
 - Our business or commercial purpose for collecting the PII;
 - For each category of PII, the categories of third-parties with whom it was disclosed; and
 - The specific pieces of PII we collect about you.

For more information on how to request information about our collection, use, and disclosure of your PII, please see the **Submitting CCPA Requests** section below.

- E. Submitting CCPA Requests. Once we receive your request and verify your identity, we will review your request to see if an exception allowing us to retain the information applies. We will delete or de-identify PII not subject to an applicable exception from our records and will direct our service providers to take similar action.
- F. Requests to Know or Delete. To exercise your rights to know or delete described above, you may submit a request by visiting our California Consumer Rights form, available at privacy.rtm.com, or by contacting us through the Contacting Us section below.
- G. Verification of Requests. Only you, or an individual legally authorized to act on your behalf, may make a request to know, delete, or opt-out related to your PII. To designate an authorized agent, or to make a request on behalf of a consumer for whom you are an authorized agent, please submit verification documentation through our California Consumer Rights form, available at privacy.rtm.com.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must: (1) Provide sufficient information that allows us to reasonably verify you are the person about whom we collected PII, or that the requestor is your authorized representative; and (2) Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We may request information from you in order to verify your identity. Additionally, we may require that authorized agents provide proof of their authorization. We cannot respond to your request or provide you with PII if we are unable to verify your identity, your authority to make a request on behalf of another person, or if we cannot confirm that the PII relates to you. In general, we will verify your request and your identity by matching the information you provided with the information we have in our records.

We will only use PII provided in the request to verify the requestor's identity or authority to make it.

Please note, if we have received your request in our role as a Service Provider, we will refer your request to the client.

- H. Timing. We will use reasonable efforts to respond to your request within 45 days of receipt. If we require additional time, we will inform you of the reason and the extension period in writing.
- I. Exceptions. We may deny your deletion request if retaining the PII is necessary for us to:
- Complete the transaction for which we collected the PII;
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
 - Identify and/or repair errors that impair the functionality of our Services;
 - Make other lawful uses of the PII that are compatible with the context in which you provided it; and
 - Comply with a legal obligation.
- J. Content. Any PII we provide you with will only cover the 12-month period preceding our receipt of your request. Once we receive your request, validate your identity (and unless one of the exceptions above apply) we will disclose to you:
- The categories of PII we collected about you;
 - The categories of sources for the PII we collected about you;
 - Our business purpose for collecting that PII and whether it was sold;
 - The categories of third-parties with whom we shared the PII;
 - If we sold or disclosed your PII for a business purpose, we will provide you with information about those sales and disclosures along with the PII categories that were provided and each recipients category.
 - The specific pieces of PII we collected about you (also called a data portability request, as detailed below in Section K).
- K. Data Portability. For data portability requests, we will select a data format that is readily useable and should allow you to transfer PII to another entity without difficulty.
- L. No Charge. We do not charge a fee to process or respond to your PII request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.
- M. No Discrimination. Realtime Media will not discriminate against any person for exercising their rights under the CCPA.

12. Changes to this Notice

This Policy is current as of the Effective Date set above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on the Website, at <https://privacy.rtm.com/PrivacyPolicy.pdf>.

13. Contacting Us

It is Realtime Media's goal to keep all PII that you provide to us accurate. You may contact us to correct or update your PII, deactivate your PII or opt-out (if Realtime Media is holding on to your PII as explained above), and to ask general questions regarding this Notice or any other privacy related issues. Realtime Media can be reached at:

Realtime Media, Inc.
1001 Conshohocken State Road, Suite 2-100
West Conshohocken, PA 19428
Telephone: (800) 209-8830
or emailing the details of your request to:
Email: privacy@rtm.com

If you are based in the European Economic Area ("EEA"), you may contact our Data Protection Officer at privacy@rtm.com.