

NewsAmerica.com: Privacy Notice (U.S. and Canada)

Effective Date: October 16, 2020

We at CB Neptune Holdings, L.L.C. and CB Neptune Promotions Inc. (collectively, “Company”) respect your concerns about privacy. This Privacy Notice (“Notice”) applies to personal information obtained by the Company through the website newsamerica.com (the “Website”, or, the “Services”).

The Notice describes the types of personal information we obtain about visitors to the Website, how we use the information and with whom we share it. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices. The Services are for a general audience, are not targeted to children, and we do not knowingly collect personal information from children under 13 years of age.

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Information We Obtain

We obtain personal information about visitors to the Website through the Services. The types of personal information we may obtain include:

- Contact information (such as name, postal address, email address and telephone and/or mobile numbers);
- Profession/vocation/reason for visiting the Website;
- Geolocation data which may include IP address, country, region, city, postal/zip code and latitude / longitude; and
- Other information you may provide to us, such as through our “Contact Us” feature and/or through our “Comments” free-text box.

Information Obtained by Automated Means Through Our Services

We also may obtain certain information through our Services by automated means, such as cookies (including HTTP, HTML5 cookies), web beacons, web server logs, JavaScript and similar technologies, including technologies designed to obtain information regarding your use of our Services. The information we obtain in this manner may include IP address, mobile device advertising ID, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our Services, and dates and times you access or use the Services.

A “cookie” is a file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. Through these

automated collection methods, we obtain “clickstream data,” which is a log of the links and other content on which a visitor clicks while browsing a website. As the visitor clicks through the website, a record of the action may be collected and stored.

We may link certain data elements obtained through automated means, such as your browser or device information, with other information we have obtained about you to let us know, for example, whether you have opened an email we sent to you, what search queries you may have run and what advertisements you may have seen on our Services or on third-party websites and apps. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. You also may be able to delete your cookies or adjust your cookie settings through your browser settings (Chrome, Safari, Internet Explorer) Please note, however, that without cookies you may not be able to use all of the features of our Services.

The providers of third-party apps, tools, widgets and plug-ins on our Services, such as social media sharing tools, also may use automated means to collect information regarding your interactions with these features. This information is collected directly by the providers of those features and is subject to the privacy policies or notices of those providers. The Company is not responsible for those providers’ information practices.

How We Use the Information We Obtain

We may use the information collected from and about you to:

- Provide our products and services;
- Send promotional materials, alerts regarding available offers and other communications, including communications through the Services and outside of the Services, such as via email and through third-party websites and apps;
- Communicate about, and administer participation in, special events, promotions, programs, offers, surveys, contests and market research;
- Respond to inquiries from you and other third-parties, including inquiries from law enforcement agencies;
- Anonymize personal information to provide third parties with aggregated data reports showing anonymized information and other non-personal information;
- Supplement your personal information collected from you with additional information from publicly and commercially available sources, and/or information from Company affiliates and our business partners;
- Associate your browser and/or device with other browsers or devices you use for the purpose of providing relevant and easier access to content and other operational/business purposes.
- Operate, evaluate and improve our business (including developing, enhancing, analyzing and improving our Services; managing our communications; performing data analytics; and performing accounting, auditing and other internal functions);
- Protect against, identify and prevent fraud and other unlawful activity, claims and other liabilities; and
- Comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies.

In addition, we and our third-party service providers may use information collected through automated means including cookies, web beacons, web server logs, and similar technologies for purposes such as (1) customizing our users’ visits to and use of our Services, (2) delivering content (including advertising) tailored to our users’ interests and the manner in which our users use our Services, and (3) managing our Services and other aspects of our business.

We may use third-party analytics services on our Services, such as those of Google Analytics. The analytics providers that administer these services use technologies such as cookies, web beacons, web server logs and similar technologies to help us analyze your use of the Services. The information collected through these means may be disclosed to these analytics providers and other relevant third parties who use

the information, for example, to evaluate use of the Services. To learn more about how to opt out of Google Analytics services, please visit the link below:

Google Analytics: <https://tools.google.com/dlpage/gaoptout>

We also may use your personal information in other ways for which we provide specific notice at the time of collection.

Information We Share

We may share your personal information with

Service providers in the US and other jurisdictions who perform services on our behalf.

In addition, when the information collected from or about you does not identify you as a specific person, we may share it with third parties.

We may further disclose information about you (1) if we are required to do so by law or legal process, (2) to law enforcement authorities or other government officials, and (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal information we have about you in the event of a proposed or completed sale or transfer of all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

Your Choices

We offer you certain choices in connection with the personal information we obtain about you, such as how we communicate with you.

To update your preferences, ask us to remove your information from our mailing lists or submit a request, please contact us as at contactus@neptuneretailsolutions.com. To be removed from our marketing mailing lists, please email us at contactus@neptuneretailsolutions.com with subject line "Please remove my information from your mailing lists"). You can also contact us by emailing Unsubscribe@Smartsources.com, to specify you would like your information to be removed from our NewsAmerica.com mailing list(s).

Accessing, Reviewing, Updating and Modifying Personal Information

You may have the right to access, review, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. You may request access, updates to and corrections of inaccuracies in your personal information by emailing or writing to us at the contact information set out below. When you do so, we may request certain personal information for the purposes of verifying the identity of the individual seeking access to his/her personal information records.

Notice to California Residents

Subject to certain limitations, California residents may ask us to provide them with (1) a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (2) the identity of those third parties. To make this request, California residents may contact us as at contactus@neptuneretailsolutions.com.

How We Protect Personal Information

We maintain administrative, technical and physical safeguards designed to protect the personal information we have about you against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Transfers of Information

The Services may be hosted in and managed from a country outside the country in which you initially provided the information, including the United States. We may transfer the personal information we collect about you to the United States and/or another country, which may not be deemed to have the same data protection laws as the country in which you initially provided the information. When your personal information is in such countries, it may be accessed by the courts, law enforcement and national security authorities in accordance with applicable law. If you are a user located outside the United States or the country to which your information may be transferred, you understand and consent to having any personal information processed in the United States and/or such country. Your consent includes the use of cookies and other tracking technologies as described above. When we transfer your information, we will protect that information as described in this Notice.

Links to Third-Party Sites, Apps and Services

For your convenience and information, our Services may provide links to third-party sites (such as the “Careers” link to the jobvite.com website), apps and services that may be operated by companies not affiliated with Neptune Retail Solutions. These companies may have their own privacy notices or policies, which we strongly suggest you review. We are not responsible for the privacy practices of any non-Neptune Retail Solutions sites, apps or services.

Updates to Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. For significant changes, we will notify you by posting a prominent notice on our Services indicating at the top of the Notice when it was most recently updated.

How To Contact Us

If you have any questions or comments about this Privacy Notice or the manner in which we or our service providers treat your personal information, would like to exercise your choices, or would like us to update information we have about you or your preferences, please contact us as follows: opt-out@smartsource.com

You also may write to:

Neptune Retail Solutions
Attn: Privacy
20 Westport Road, First Floor S. Wilton, CT 06897

Canadian residents may also contact our Privacy Officer by email at canadaprivacy@newsmarketing.ca.