# TN Marketing, LLC Privacy Policy

Last Updated: May 2023

# **About TN Marketing**

TN Marketing, LLC is a U.S.-based company that sells online streaming services and products relating to topics that enable people to pursue their passions.

# **Scope of this Policy**

This privacy policy applies to:

- TN Marketing, LLC and its affiliates ("TNM").
- TNM's online properties, including its websites, and websites that link to it, and our social media pages or handles ("Sites").
- TNM's products and services, sales or marketing activities or other services available on the website or offline.

Collectively, the entities, properties, products, and services listed above are our "Services."

This Policy applies when you interact with us through our Services. While you may browse and visit any of our Sites without providing any personal information about yourself, if you engage in any of our Services or otherwise set up an account with us, you are considered a "Member" for purposes of this Privacy Policy. This Policy also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

This Policy may change from time to time, and we will post updates here.

This Privacy Policy is subject to our Terms of Service found at <a href="http://www.tnmpolicies.com/terms">http://www.tnmpolicies.com/terms</a>. Each time that you access, register and/or use the Services you signify that you have read, understand, and agree to be bound by the Terms of Service and this Privacy Policy, where permitted by law.

# **Information We Collect**

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that do not single out a particular individual) or de-

identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

## Information you give us

You may provide the following information to us directly:

- Contact and professional information, including name, email address, telephone number, and job title, as well as company name and size.
- Personal information you provide when signing up for an account to access and use the Services, contact preferences, and account information (such as your username and password).
- Demographic information.
- Audiovisual information, including recordings of online events.
- Payment information, including card information, alternative payment method information, invoices, order information and transaction history
- Content you may include in survey responses.
- Information contained in your communications to us, including call recordings of customer service calls.
- Information you make available to us via a social media platform.
- Any information or data you provide by interacting in our online forums and chatrooms, or by commenting on content posted on our Services. Please note that these comments are also visible to other users of our Services.
- Information you submit to inquire about or apply for a job with us.
- Any other information you submit to us.

## Information we collect automatically

We and partners working on our behalf may collect the following information from the device you use to interact with our Services using log files, cookies, or other digital tracking technologies. We also create records when you make purchases or otherwise interact with the Services.

- *Device information,* including IP address, device identifiers, and details about your web browser, which we also use to collect information about your general location.
- *Analytical information*, including details about your interaction with our website, app, and electronic newsletters.
- *Diagnostic information,* including web traffic logs.
- Advertising information, including special advertising and other unique identifiers that enable us or third parties working on our behalf to target advertisements to you. Please be aware that our advertising partners may collect information about you when you visit third-party websites or use third-party apps. They may use that information to better target advertisements to you on our behalf.
- Business record information, including records of your purchases of our products and services.

We list our partners who collect the information described above in our **Cookie Notice**.

## Information We Collect From Other Sources

We may collect the following information about you from third-party sources.

- Contact information, demographic information, and information about your interests and purchases, from consumer data providers.
- Information about your credit history from credit reporting agencies.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.
- If you decide to invite others to the Services, we will collect your and the other person's names, email addresses, and/or phone numbers to send an email or text message and follow up with the other person. You agree that you will obtain the other person's consent before giving us his or her contact information. You also agree that you will not send us the contact information of a minor. We will inform any other person you invite that you gave us his or her information in the invitation email.

# **How We Use Your Information**

We may use any of the information we collect for the following purposes.

- **Service functionality:** To provide you with our products and services, including to take steps to enter a contract for sale or for services, process payments, fulfill orders, respond to any inquiry or feedback, send service communications (including renewal reminders, changes to our terms, conditions, and policies), provide information and materials regarding our products and services, and conduct general business operations, such as accounting, recordkeeping, and audits.
- **Service improvement:** To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- **Personalization:** To offer you recommendations and tailor the Services to your preferences.
- **Advertising and marketing:** To send you marketing communications, personalize the advertisements you see on our Services and third-party online properties, and measure the effectiveness of our advertising.
- **Security:** To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- **Legal compliance:** To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements, including laws outside your country of residence.

# **How We Share Your Information**

We may share any of the information we collect with the following recipients.

- **Affiliates:** We share information with other members of our group of companies.
- **Service providers:** We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include:
  - Supporting Service functionality, such as vendors that support customer service and customer relationship management, subscription fulfillment, postal mailings, and communications (email, fax).
  - Payment Processors, such as firms that assist us in the collection and processing of your payments.
  - Auditing and accounting firms, such as firms that assist us in the creation of our financial records.
  - Professional services consultants, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
  - Analytics and marketing services, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
  - *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
  - *Information technology vendors*, such as entities that assist with website design, hosting, and maintenance; data and software storage; and network operation.
  - Marketing vendors, such as entities that support distribution of marketing emails, and provide you with information about product or service offerings which may be of interest to you.
  - Fulfillment providers, such as entities that assist with sending you products or provide access to our Services.
- **Business partners:** From time to time, we may share your contact information with other organizations for marketing purposes.
- **Online advertising partners:** We partner with companies that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising. Please see our Cookie Notice for more information.
- **Social media platforms:** If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook "like" button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- **Government entities:** We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.

• Other businesses in the context of a commercial transaction: We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

# **Security**

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

# **Your Options and Rights Regarding Your Information**

**Your Account:** If you are a Member you can access, correct, update, and delete personal information you have provided to us by logging into your account and going to the preference center and your personal information. You can also contact us directly.

**Email Unsubscribe:** You can opt out of receiving marketing emails from us by clicking the "unsubscribe" or "preference center" link in the email, or if you are a Member by logging into your account and going to email preference communications. You can also contact us directly. If you choose to no longer receive marketing information, we may still communicate with you regarding such things as security updates, product functionality, responses to service requests, or other transactional, non-marketing purposes. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications.

**Ad Choices:** You have options to limit the information that we and our partners collect for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of our online properties. Please see our Cookie Notice for more information.
- The following industry organizations offer opt-out choices for companies that participate in them: the <u>Network Advertising Initiative</u>, <u>the Digital Advertising Alliance</u>, and the <u>European Interactive Digital Advertising Initiative</u>.
- You may use our cookie settings menu.
- You may contact us directly.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Moreover, exercising these options will not prevent other companies from displaying personalized ads to you.

If you delete your cookies, you may also delete your opt-out preferences.

**Do Not Track**: Your browser or device may include "Do Not Track" functionality. The information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy, even if a Do Not Track signal is received.

**Jurisdiction-specific rights**: You may have certain rights with respect to your personal information depending on your location or residency. Please see "privacy disclosures for specific jurisdictions" below. Please contact us to exercise your rights.

# **Special Information for Job Applicants**

When you apply for a job with us, we may collect information from you, including:

- Information you provide in connection with your application.
- Information that you make available in your social media accounts.
- Information about you that is available publicly.
- Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

# **Other Important Information**

#### Data retention

We may store information about you for as long as we have a legitimate business need for it.

#### Cross-border data transfer

We may collect, process, and store your information in the United States and other countries. The laws in the United States regarding the collection, use and retention of user information may be different from and not provide the same level of protections of your information as do the laws of your country. By using or providing any personal information on or through the Sites or using any Service, you understand and unambiguously agree to the collection and processing of your information in the United States and other jurisdictions.

#### Information about children

The Sites and Services are intended for users aged eighteen and older. You must be 18 years of age to use the Sites or Services. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 18, we will delete that information. Please contact us with any concerns.

# **Privacy Disclosures for Specific Jurisdictions**

## European Economic Area, United Kingdom, and Switzerland

We process "personal data," as that term is defined in the European Union's General Data Protection Regulation ("GDPR").

**Legal bases of processing**: We may process any of the personal data we collect for the purposes described in "how we use information" (1) with your consent, which you may withdraw at any time; (2) as necessary to perform our agreement with you to provide Services; and (3) as necessary for our legitimate interests, so long as those interests do not override your fundamental rights and freedoms related to data privacy.

**Your rights under the GDPR**: Persons residing in the European Economic Area ("EEA"), U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the applicable supervisory authority. Contact details for data protection authorities are available here: <a href="http://ec.europa.eu/justice/data-protection/bodies/authorities/index">http://ec.europa.eu/justice/data-protection/bodies/authorities/index</a> en.htm.

If you are located in the EEA, U.K., or Switzerland, you have the following rights.

- Access and Portability: Request access to personal data we hold about you or request transmission of your data to a third party.
- Correction: Request that we rectify inaccurate or incomplete personal data we store about you.
- Erasure: Request that we erase personal data when such data is no longer necessary for the purpose for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- Restriction of processing: Request that we restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.
- Objection to processing: Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- Withdrawal of Consent: If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Please contact us using the instructions below to exercise these rights.

#### **California**

## Your California Privacy Rights; "Shine the Light" Law

California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure of certain categories of personal information to third parties for their own direct marketing purposes in the preceding calendar year. California residents may opt-out of such disclosures by contacting us at <a href="mailto:ShineTheLightPrivacyRequest@tnmarketing.com">ShineTheLightPrivacyRequest@tnmarketing.com</a>.

## **California Consumer Privacy Act**

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, delete, and limit "sales" of personal information. The CCPA defines "Personal Information" to mean "information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household." 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 Regarding the Categories of Personal Information Collected

You have the right to receive notice of the categories of personal information we collect and the purposes for which we use personal information. The following table summarizes the categories of personal information we collect, the categories of sources of that information, and whether we disclose or sell that information to service providers or third parties, respectively. The categories we use to describe personal information are those enumerated in the CCPA. We collect this personal information for the purposes described in "how we use information."

CATEGORY	INFORMATION TYPE	SOURCE
Identifiers	<ul> <li>Contact information or personal characteristics (name; email address;</li> <li>postal address; telephone number; signature)</li> <li>Social media handles</li> </ul>	You; our social media pages; this party subscription service provide
Financial Information	<ul> <li>Payment card data</li> <li>Bank account information</li> <li>Credit information</li> </ul>	You

CATEGORY	INFORMATION TYPE	SOURCE
Protected Classifications and Other	Date of Birth	
Sensitive Data	• Gender	You
	Transaction information	
	Billing and payment records	
Commercial Information	Order history	You
	Precise (information that describes location with more precision than	
	ZIP code, e.g., GPS data)	
	Non-Precise (information that describes location at ZIP code-level or	You; our analytics and advertisin
Geolocation Information	less precision)	partners
	• IP address	
	• Device identifier (e.g., MAC)	
	Advertising identifier (e.g., IDFA, AAID)	
	• Information provided in URL string (e.g., search keywords)	
	Cookie or tracking pixel information	
	• Information about your interaction with our website, app, email	
	correspondence, or products	
	Browsing history	
Internet or Electronic Network	Search history	You; our analytics and advertisin
Activity Information	Diagnostic information (e.g., crash logs, performance data)	partners
	Call recordings	
Audio, Electronic, Visual, Thermal,	• Photographs	
Olfactory, or Similar Information	• Video	You
Professional or Employment-Related	Current employer	
Information	• Job title	You
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CATEGORY	INFORMATION TYPE	SOURCE
	Education history	
Education Information	Level of education	You
	User profile reflecting preferences, characteristics, psychological	
	trends, predispositions, behavior, attitudes, intelligence, abilities, and	You; our analytics and advertising
Inferences Drawn About You	aptitudes	partners
	• Contents of phone calls, emails, or text messages	
Content of Communications	• Photos	You
	List of contacts that you supply to us	
Contacts	List of contacts we collect from your device with your permission	You

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 with them.

Entities to whom we "sell" information are third parties. 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 we disclose personal information to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for purposes unrelated to the service it provides to us.

## Your rights under the CCPA

- Opt out of sale of personal information: You have the right to opt out of our sale of your personal information to third parties. To exercise this right, please visit our <u>Do Not Sell My Personal Information</u> webpage or contact us. Please be aware that your right to opt out does not apply to our disclosure of personal information to service providers.
- Know and request access to and deletion of personal information: You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers to whom we sell or disclose it. You also have the right to request in certain

circumstances that we delete personal information that we have collected directly from you. Please contact us to exercise these rights.

#### Financial incentives

We may offer you the opportunity to participate in contests or sweepstakes. We will provide you with more information about these offerings when you sign up, and your participation is voluntary. We collect Personal Identifiers when you participate in one of these offerings. If you change your mind, you may opt out at any time.

## Colorado, Connecticut, Virginia, Utah

Residents of Colorado, Connecticut, Virginia, and Utah have the following rights:

- Confirm whether we process their personal information;
- Access and delete certain personal information;
- Data portability; and
- Opt-out of personal data processing for targeted advertising and sales.

To exercise these rights, please contact us using the Contact information below.

## Colorado, Connecticut, Virginia

Residents of Colorado, Connecticut, Virginia may also:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose; and
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise these rights, please contact us using the Contact information below.

#### Nevada

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to other companies who will sell or license their information to others.

If you are a Nevada resident and would like to exercise this right or desire more information about our data sharing practices, please contact us using the Contact information below.

# Contact information, submitting requests, and our response procedures

#### Contact

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

Email: <a href="mailto:privacy@tnmarketing.com">privacy@tnmarketing.com</a>

Telephone: 877-329-9375

Mail:

TN Marketing, LLC, 2955 Xenium Lane N., Suite 10, Plymouth, MN 55441

#### Nevada Residents

Please submit your requests to NevadaPrivacyRequest@tnmarketing.com, with the subject line, "Nevada Do Not Sell Request" along with your first and last name, zip code, and whether you are a former or current Member of any of our Services so that we can match your information to your account.

#### California Residents

Email: ShineTheLightPrivacyRequest@tnmarketing.com

Telephone: 877-329-9375

Mail:

TN Marketing, LLC, 2955 Xenium Lane N., Suite 10, Plymouth, MN 55441

## **European Economic Area, United Kingdom, and Switzerland Residents**

<u>Please submit your requests to GDPRDataRequest@tnmarketing.com.</u>

## Making a request to exercise your rights

**Submitting requests:** You may request to exercise your rights by making a request using the contact information above.

If you are a California resident, you may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**Verification:** We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.