### PRIVACY STATEMENT—ENCOURAGETV

This Privacy Statement applies to the EncourageTV application by Bridgestone Multimedia Group, LLC (collectively, "we", "our", or "us"). This Privacy Statement governs your use of our EncourageTV application ("App"), regardless of how you access or use it. This Privacy Statement detailed below applies only to information collected through the App and does not apply to information that we may collect outside the use of the App. By using this App, you are agreeing to the collection and use of information you provide through the App as described below.

### INFORMATION COLLECTED

We may collect personally identifiable information for purposes related to our business, to improve the content of the App and our services, or for any other commercial purpose. The only personally identifiable information collected from you has been voluntarily submitted and provided to us through your use of the App or in response to other requests for information. We may collect such data for processing that is necessary for providing our services as carried out in our legitimate interests.

#### Children

WE DO NOT KNOWINGLY COLLECT PERSONAL INFORMATION FROM CHILDREN UNDER 13. We take special precautions to protect the privacy of children under 13, and to comply with the Children's Online Privacy Protection Act (COPPA).

• EncourageTV does not collect personal contact information (like your name, birthdate, phone number, or home address).

• We do collect some information (like your IP address and your device's advertising ID), which we use to deliver ads to your device, to track usage of our apps in the aggregate, and to facilitate other internal operations.

- We only collect information necessary to ensure our channels, videos, and monetization are available and working smoothly.
- We do not store this information ourselves, and any information accessible to us via our third-party partners is pseudonymized and de-identified to protect user privacy.

• We do not provide any means by which children may post or publicly disclose personal contact information.

• We work with our advertising partners to ensure their compliance with applicable laws, especially with regards to children under 13 and other sensitive demographics.

• Parents or guardians have the right to review their child's personally identifiable information collected by us, request that their child's personally identifiable information collected by us be revised or deleted, or refuse to allow further personally identifiable information to be collected by us by contacting us at the address provided in the "Contact" section.

We require our advertising service partners to comply with self-regulatory guidelines on targeted advertising. We do not permit interest-based or behavioral advertising on the App directed to children under 13 or where we have actual knowledge that a child is under 13.

## **Adults and Teens**

We sometimes collect information from adults and teens to serve your needs, manage our content and advertising, operate efficiently, and improve our products and services.

• Certain information may be collected automatically on our App, like your IP address, your device's advertising ID, language preferences, device, internet service provider, general location (e.g., zip code, but not specific address) and other non-identifiable information.

• We may obtain information from commercial sources and combine it with information we have collected.

• Third parties may also collect certain information via the App. If information from other sources is combined or associated with personally identifiable information collected through the App, this combined information will be treated as personally identifiable information in accordance with this Privacy Statement.

# **ANALYTICS & TECHNOLOGY**

• Our App may use technology to store your settings and preferences, help us understand the features that appeal to visitors, and manage advertising, among other things.

• We work with third parties who offer analytics on our App. They use technology to collect device identifiers, such as your IP address or device advertising ID, and information on your usage of our services, to do so.

• In addition, we work with third parties to deliver ads in our App. They may have access to your IP address or device advertising ID to facilitate the delivery of relevant ads, including frequency capping and fraud detection.

• Tools are available to help you control some of these technologies.

• Bridgestone Multimedia Group, LLC and its agents or service providers or business partners may receive and store certain information automatically when you download or use the App. This may include information such as device IP addresses, or unique device identifiers associated with your OTT device. This information allows us to track the installation and frequency of use of our App.

• Third-party analytics and advertising networks may also use pixel tags, clear GIFs and other technology to collect certain limited, non-personally-identifiable information automatically. Advertising networks may use this information in connection with third-party data to serve you targeted ads for products and services that, based on your activities, are likely to be of interest to you ("interest-based advertising"). We do not permit interest-based advertising on the App directed to children under 13 or where we have actual knowledge that a child is under 13.

• We may use personally identifiable information to communicate with you for administrative purposes such as customer service, updates on policies or terms and communications relating to services.

### Web Beacons, Pixel tags or clear GIFs

Companies that advertise on our App may also place web beacons, tracking pixels, or clear GIFs in their ads to help develop statistics on the effectiveness of advertising on our App. The information collected may include your IP address or your device's advertising ID, as well as your interactions with, and/or progress in viewing, a particular advertisement. We do not control web beacons in third party ads.

#### **Location Information**

We do not collect precise location information, but we and our third party partners may gather some general location information (such as your zip code) by connecting your IP address with a third-party geolocation database. This information is used to deliver relevant ads, such as an ad for a local car dealership, and may also be used for aggregate demographic tracking by our third-party analytics partners.

#### **Targeted Advertising**

Bridgestone Multimedia Group, LLC may work with third party online or mobile network advertisers that attempt to associate your IP address or other identifiers with third–party data to help us improve the relevance of advertising made available to you on the App, as well as to measure ad effectiveness. The information that we collect and share in this fashion is deidentified and not personally identifiable. It does not contain your name, address, telephone number, or email address. In compliance with COPPA, we do not run targeted advertising on the App intended for children under the age of 13.

### SHARING

Except as described in this Privacy Statement, we will not intentionally disclose your personally identifiable information to third parties without your consent. We may disclose information to third parties with your consent, as well as in the following circumstances:

• Unrestricted Information. User generated content posted to the App is your sole and exclusive responsibility and we have no responsibility or liability for or association or involvement with such content. Any information you voluntarily display to the public through the App, or our social media sites will be available to anyone who has access to that content.

• Service Providers. In some events we may work with service providers who provide application development, hosting, maintenance, advertisements, and other services. These third parties may have access to, or process personally identifiable information as part of

providing such services. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions.

• Non Personally Identifiable Information. We may make certain automatically-collected, aggregated, or otherwise non personally identifiable information available to third parties for various purposes, including (i) compliance with reporting obligations; (ii) business or marketing purposes; or (iii) with interested parties to help them understand the usage patterns for certain programs, content, services, and/or functionality available through the App or our services.

• Legal Compliance. We may disclose personally identifiable information or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other government agencies. We also reserve the right to disclose personally identifiable information or other information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend against any third-party claims or allegations, (iv) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others.

• Change in Corporate Structure/Ownership. Information, including personally identifiable information, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the personally identifiable information commits to a Privacy Statement that has terms substantially consistent with this Privacy Statement.

• Within our family of companies, and with our agents and representatives.

### **USER RIGHTS**

We respect your privacy rights and provide you with reasonable access to the personally identifiable information that you may have provided through your use of the App or our services. If you wish to access or amend any information or personally identifiable information we hold about you, you may contact us as set forth in the "Contact" section. At your request, we will have any reference to you deleted or blocked from all our databases. We may retain some information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe there is a legitimate reason to do so.

You may, at any time, decline to share certain personally identifiable information with us, in which case we may not be able to provide to you some of the features and functionality of the App or our services.

At any time, you may object to the processing of your personally identifiable information, on legitimate grounds, except if otherwise permitted by applicable law. You always have a right to lodge a complaint with data protection authorities.

If you receive commercial emails from us, you may unsubscribe or opt-out at any time by contacting us at the address provided in the "Contact" section. Please be aware that it may take

up to 10 business days for us to process your request. Additionally, even after you opt-out from receiving commercial messages, you may continue to receive administrative messages regarding the App or our services.

### THIRD PARTY APPS OR SITES

When downloading an App (or using an App that relies on online features made available through your mobile platform), the app store may collect certain device and app-related information. We do not control the data collection or privacy practices of those stores. This Privacy Statement applies only to the App and not to the applications or websites of partners, affiliates, or third-parties. You may be required to accept additional policies prior to your use of links accessed through the App. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the App. We encourage you to learn about third parties' privacy and security policies before providing them with information.

# **OTHER IMPORTANT INFORMATION**

### **Data Security**

We strive to follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect personally identifiable information against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the personally identifiable information in our possession.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the App, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your personally identifiable information has been compromised, please contact us at the address provided in the "Contact" section.

If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

### **Data Retention**

We only retain the personally identifiable information collected from you for as long as your account is active or otherwise for a limited period of time as long as we need such data to fulfill the purposes for which it was initially collected, unless otherwise required by law. We will retain and use information as necessary to comply with legal obligations, resolution of disputes, and enforcement of our agreements as follows:

• Billing and accounting information is retained for a period of 5 years

• Information on legal transactions between you and us is retained for a period of 5 years

#### **OUR LOCATION; DATA TRANSFERS**

The servers which host the content made available in our Apps, as well as the third–party servers which provide our access to advertising and analytics functionality, may not be located in your country of residence and are governed by U.S. laws. By using our App, you agree to the transfer, collection, processing and use of data by our App. The servers used for the processing and storage of information by us and our third–party partners may not be located in your country of residence, and applicable privacy laws may differ. However, we take reasonable steps to safeguard personal information as outlined in this Privacy Statement. By using our App, you agree to the transfer, processing, collection, and use of data as set forth in our Privacy Statement, our Terms and Conditions, and any other terms provided at the time of collection. The servers hosting the App themselves at the time of download and installation are managed by the respective platform owners; we have no control over these servers, nor over their functionality, availability, uptime, or collection practices. Make sure you read the privacy policy of the platform owner and of the app store or channel store before downloading our App.

#### **EU-US PRIVACY**

We make all best reasonable efforts to comply with the EU General Data Protection Regulation framework as set forth by the European Union regarding the collection, use, and retention of personal data from European Union member countries. We adhere to the requirements of notice, choice, onward transfer, security, data integrity, access, and enforcement.

#### UPDATES

Please revisit this page periodically to stay aware of any changes to this Privacy Statement, which we may update from time to time. If we modify the Privacy Statement, we will provide notice to you, and indicate the date of the latest revision, and will comply with applicable law. Your continued use of the App after the revised Privacy Statement has become effective indicates that you have read, understood, and agreed to the current version of the Privacy Statement.

#### CONTACT

If you have any questions regarding this Privacy Policy, please contact: Bridgestone Multimedia Group, LLC 1204 E. Baseline Road Tempe, Arizona 85283 United States