

# Privacy Policy

Revised 12/23/2022, and effective January 1, 2023

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## Welcome!

We take your privacy seriously and know you do too. This Privacy Policy is here to help you understand how we [collect](#), [process](#), and [share](#) your Personal Data (defined below). We also describe your [Rights & Choices](#) with respect to how we process your Personal Data. Please read this Privacy Policy carefully.

## Who We Are

This is the Privacy Policy of The Washington Examiner, which is owned by The Washington Newspaper Publishing Co. LLC (“Examiner,” “us,” “our,” or “we”). You can contact us [here](#).

## Scope of This Privacy Policy

This Privacy Policy applies to our “Services” which include our:

“Digital Services” including:

- websites that link to/post this Privacy Policy, including any subdomains (including but not limited to washingtonexaminer.com, mediadc.com, restoringamerica.com) or mobile versions (the “Site(s)”); and
- mobile applications (“Mobile App(s)”).

“Offline Services” including:

- print publications (“Publications”) and data you may provide in connection with your subscription to and receipt of our Publications.
- offline events we may host or in which we may participate (“Events”); and
- customer service telephone lines, and other offline means of providing Personal Data to us.

This Privacy Policy does not apply to information collected by third parties, for example, when you visit a third-party website or interact with online advertisements, unless and until we receive your information from those parties. Please review those third parties’ privacy policies before disclosing information to them.

## Contact Us/Controller

The controller of your Personal Data under this Policy is The Washington Newspaper Publishing Co. LLC. You may contact our Data Privacy Team as follows:

Physical address:	MediaDC, Attn: Privacy 1015 15th St. NW, Suite 500 Washington, DC, 20005
Data Requests (where available under applicable law):	Visit our <a href="#">Data Request Portal</a> or call 844-423-0003

Opt-Out of Data Sales or Sharing; Limit uses of Sensitive Personal Data:	Visit our <a href="#">Privacy Rights Portal</a> or call 844-423-0003
General Inquiries, Marketing Choices, Direct Marketing Disclosure Requests, and Data Updates:	<a href="mailto:privacy@mediadc.com">privacy@mediadc.com</a>

## Categories and Sources of Personal Data

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The following describes how we process data relating to identified or identifiable individuals and households (“Personal Data”).

### Categories of Personal Data We Process

The categories of Personal Data we process may include:

- Identity Data:** Personal Data about you and your identity, such as your name, and other Personal Data you may provide on various forms or in an account profile (e.g., biographical information), or during an interview with our reporters.
- Transaction Data:** Personal Data we collect in connection with a transaction or purchase, such as the item or subscription purchased, the price, the delivery location, what has been provided to you, and other similar information.
- Contact Data:** Personal Data used to contact an individual, e.g., email address, physical address, phone number, or social media or communications platform username, as well as a name or other salutation.
- General Location Data:** Non-precise location data, e.g., location information derived from social media tags/posts
- Device/Network Data:** Personal Data relating to your device, browser, or application e.g., IP addresses, MAC addresses, application ID/AdID/IDFA, session navigation history and similar browsing metadata, search history, and other data generated through applications and browsers, including cookies and similar technologies.
- Inference Data:** Personal Data used to create a profile about you reflecting your preferences, characteristics, aptitudes, market segments, likes, favorites and other data or analytics provided about you or your account by social media companies or data aggregators, including household data such as income, number of children, occupation, home ownership status, the products, and services you use or intend to use or purchase, and your interests.
- User Content:** Unstructured/free-form data that may include any category of Personal Data, e.g. data that you give us in free text fields such as comment boxes, answers you provide when you participate in sweepstakes, contests, votes and surveys, including any other Personal Data which you may provide through or in connection with our Services.

<b>Audio/Visual Data:</b>	Audio files and records, such as voicemails and call recordings; audio-visual recordings of interviews or events by our reporters or staff, and the like.
<b>Sensitive Personal Data</b>	Personal Data deemed “sensitive” under California or other laws, such as social security, driver’s license, state identification card, or passport number; account log-in and password, financial account, debit card, or credit card number; precise location data; racial or ethnic origin, religious or philosophical beliefs, etc. We collect the following categories of Sensitive Personal Data:
<b>Government ID Data:</b>	Information relating to official government identification, such as driver’s license or passport numbers, including similar Identity Data protected as Sensitive Data under applicable law.
<b>Payment Data:</b>	Information such as bank account details, payment card information, including similar data protected as Sensitive Data under applicable law
<b>Precise Location Data:</b>	Information from GPS, WIFI triangulation, or technologies used to locate you at a precise location and time.

[Limit the Use of My Sensitive Personal Data](#)

## Sources of Personal Data We Process

We collect Personal Data from various sources, which include:

<b>Data you provide us</b>	We will receive your Personal Data when you provide it to us, when you subscribe to our Publications, complete a transaction via our Services, or when you otherwise use our Services, or when you communicate with our reporters or other staff.
<b>Data we collect automatically</b>	We collect Personal Data about or generated by any device you have used to access our Services.
<b>Data we receive from service providers</b>	We receive Personal Data from service providers performing services on our behalf.
<b>Data we receive from aggregators and advertisers</b>	We receive Personal Data from ad networks, behavioral advertising vendors, market research, and social media companies or similar companies that provide us with additional Personal Data such as Inference Data.
<b>Data we receive from social media companies</b>	We receive Personal Data from Facebook and other social media companies who may transfer Personal Data to us when you register for one of our Services or interact with that social media company on or in connection with our Services.

***Data we create and infer***

We, certain partners, social media companies, and third parties operating on our behalf create and infer Personal Data such as Inference Data based on our observations or analysis of other Personal Data processed under this Privacy Policy, and we may correlate this data with other data we process about you. We may combine any Personal Data about you that we receive from you, and from third parties.

## **Data Processing Contexts / Notice at Collections**

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Note: please click the following links to view information on [Data Retention](#) or [Regional Data Rights](#) for any of the processing contexts listed below.

### **Account Registration**

We process Identity Data, Preference Data, and Contact Data when you register and create an account for our Services. We process Payment Data if you associate payment information with that account.

We use this Personal Data to create and maintain your account, to provide the products and services you request, and for our [Business Purposes](#). We may process Identity Data, Preference Data, and Contact Data for [Commercial Purposes](#) (which may include data sales/sharing). We do not sell or “share” Payment Data or use it for Business Purposes not permitted under applicable law.

### **Purchases and Transactions**

We process Identity Data, Payment Data, Transaction Data, and Contact Data you complete a purchase or sale transaction or charity donation. We do not permanently store your Payment Data, except at your request.

We process this Personal Data as necessary to perform or initiate a transaction with you, process your order, payment, or refund, carry out fulfillment and delivery, document transactions, and for our [Business Purposes](#). We may process Identity Data, Transaction Data, Contact Data, and Device/Network Data for [Commercial Purposes](#) (which may include data sales/sharing). We do not sell or “share” Payment Data or use it for Business Purposes not permitted under applicable law.

### **Marketing Communications**

We process Device/Network Data, Contact Data, Identity Data, and Inference Data in connection with marketing emails, SMS, push notifications, telemarketing, or similar communications, and when you open or interact with those communications. You may receive marketing communications if you consent and, in some jurisdictions, as a result of account registration or a purchase.

We process this Personal Data to contact you about relevant products or services and for our [Business Purposes](#). We may use this data for our [Commercial Purposes](#) (which may include data sales/sharing). Marketing communications may also be personalized as permitted by applicable law, but will not involve Targeted Advertising or the processing of Race or Ethnic Origin where users have opted out or not provided necessary consents. See your [Rights & Choices](#) to limit or opt out of this processing.

### **Digital Services**

### **Generally**

We process Device/Network Data, Contact Data, Identity Data, General Location Data, and Preference Data. You may also be able to [complete purchases](#), [register for an account](#), or enroll in [marketing communications](#) through our Digital Services.

We use this Personal Data as necessary to operate our Digital Services, such as keeping you logged in, delivering pages, etc., for our [Business Purposes](#), and our other legitimate interests, such as:

- ensuring the security of our websites, mobile applications and other technology systems; and
- analyzing the use of our Services, including navigation patterns, clicks, etc. to help understand and make improvements to the Services.

We may process this Personal Data for our [Commercial Purposes](#) (which may include data sales/sharing).

### **Mobile Apps**

If you use our mobile apps, we may process Identity Data, Device/Network Data, Inference Data, and General Location Data.

We process this Personal Data to provide our mobile apps, for our [Business Purposes](#), and our other legitimate interests, such as:

- to optimize the display and functionality of the Mobile App on your device.
- provide contextual information to you.
- deliver features that require the use of Location Data.
- creating aggregate information about users' location and patterns, which we use to help improve our Services.

We may process this Personal Data for our [Commercial Purposes](#) (which may include data sales/sharing).

### **Cookies and other tracking technologies**

We process Identity Data, Device/Network Data, Contact Data, Preference Data, and General Location Data, in connection with our use of cookies and similar technologies on our Digital Services. We may collect this data automatically.

We and authorized third parties may use cookies and similar technologies for the following purposes:

- for “essential” purposes necessary for our Digital Services to operate (such as maintaining user sessions, content delivery networks, and the like);
- for “functional” purposes, such as to enable certain features of our Digital Services (for example, to allow a customer to maintain an online shopping cart);
- for “analytics” purposes and to improve our Digital Services, such as to analyze the traffic to and on our Digital Services (for example, we can count how many people have looked at a specific page, or see how visitors move around the website when they use it, to distinguish unique visits/visitors to our Digital Services, and what website they visited prior to visiting our website, and use this information to understand user behaviors and improve the design and functionality of the website);

- for “retargeting,” [Targeted Advertising](#), or other advertising and marketing purposes, including technologies that process Preference Data or other data so that we can deliver, buy, or target advertisements which are more likely to be of interest to you; and
- for “social media” e.g. via third-party social media cookies, or when you share information using a social media sharing button or “like” button on our Services or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter.

We may also process this Personal Data for our [Business Purposes](#) and [Commercial Purposes](#) (which may include data sales/sharing). See your [Rights & Choices](#) for information regarding opt-out rights for cookies and similar technologies.

Third parties may view, edit, or set their own cookies or place web beacons on our websites. We, or third-party providers, may be able to use these technologies to identify you across platforms, devices, sites, and services. Third parties may engage in [Targeted Advertising](#) using this data. Third parties have their own privacy policies, and their processing is not subject to this Policy.

## Contests and Promotions

We may collect and process Identity Data, Preference Data, certain Contact Data, and User Content when you enter a contest/sweepstakes or take part in a promotion.

We process this Personal Data as necessary to provide the contest/promotion, notify you if you have won, or to process delivery of a prize, for our [Business Purposes](#), and other legitimate interests, such as:

- verifying your identity for authentication, anti-fraud, and security purposes (in which case we may process Government ID Data to complete verification);
- to improve our Services and to create a personalized user experience; and
- to contact you about relevant products or services, and in connection with marketing communications and Targeted Advertising.

We may process Identity Data, Contact Data, and User Content information for our [Commercial Purposes](#) (which may include data sales/sharing).

**Some programs and offers are operated/controlled by our third-party partners or their affiliates or partners.** We may receive this data from third parties to the extent allowed by the applicable partner; otherwise, this Privacy Policy will not apply to data processed by third parties.

**Your Personal Data may be public.** If you win a contest/sweepstakes, we may publicly post some of your data. We do not post Personal Information without consent where required by law. See any program agreement(s) for additional details and terms.

## Contact Us, Support

We collect and process Identity Data, Contact Data, and User Content when you contact us, e.g., through a contact us form, or for support. If you call us via phone, we may collect Audio/Visual data from the call recording.

We process this Personal Data to respond to your request, and communicate with you, as appropriate, and for our [Business Purposes](#). If you consent or if permitted by law, we may use Identity Data and

Contact Data to send you marketing communications and for our [Commercial Purposes](#) (which may include data sales/sharing). We may also share Personal Data collected in connection with a support request with our Service Providers.

## **Feedback and Surveys**

We process Identity Data, Contact Data, Inference Data, Preference Data, and User Content collected in connection with feedback you provide to us, surveys or questionnaires.

We process this Personal Data as necessary to respond to your requests/concerns, for our [Business Purposes](#), and other legitimate interests, such as analyzing customer satisfaction. We may process this Personal Data for our [Commercial Purposes](#) (which may include data sales/sharing). We may share Feedback/Survey data relating to third party partners with those partners, who may use it for their own purposes.

## **Processing Purposes**

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### **Business Purposes**

We and our Service Providers process Personal Data we hold for numerous business purposes, depending on the context of collection, your [Rights & Choices](#), and our legitimate interests. We generally process Personal Data for the following “Business Purposes.”

#### ***Service Delivery***

We process Personal Data as is necessary to develop and provide our Services, and the products and services you purchase or request, including to authenticate users and their rights to access the Services, or various data, features, or functionality, and as otherwise necessary to fulfill our contractual obligations to you, to provide you with the information, features, and Services you request, and for editorial purposes, including creating content for our Services. Additionally, we use information to authenticate your right to access our Services, deliver products and Services, and for other related matters. Similarly, we may use Personal Data as necessary to audit compliance, and log or measure aspects of service delivery (e.g. to document ad impressions).

#### ***Internal Processing and Service Improvement***

We may use any Personal Data we process through our Services as necessary in connection with our legitimate interests in improving the design of our Services, understanding how our Services are used or function, for customer service purposes, in connection with logs and metadata relating to service use, and for debugging and similar purposes relating our identification of errors and improving the stability of the Services. Additionally, we may use Personal Data to understand what parts of our Services are most relevant to users, how users interact with various aspects of our Services, how our Services perform, etc., or we may analyze use of the Services to determine if there are specific activities that might indicate an information security risk to the Services or our users.

#### ***Security and Incident Detection***

We may process Personal Data in connection with our legitimate interest in ensuring that our Services are secure, and identify and prevent fraud, detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns and

characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.

### ***Compliance, safety, public interest***

We may also process any Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law and make requests, for the establishment and defense of legal claims, or where we must comply with our legal obligations, lawful requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process Personal Data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent allowed under applicable law. Please see the data sharing section for more information about how we disclose Personal Data in extraordinary circumstances.

### ***Aggregated Data***

We process Personal Data in order to identify trends (to create aggregated and anonymized data, use of our Services, and other similar information (“Aggregated Data”). We may pass Aggregated Data to the third parties referred to in the section below to give them a better understanding of our business and to bring you a better service. Aggregated Data will not contain information from which you may be personally identified.

### ***Personalization***

We process certain Personal Data as necessary in connection with our legitimate business interest in personalizing our Digital Services. For example, aspects of the Digital Services may be customized to you, to display content that you have interacted with in the past, or to display content that we think may be of interest to you based on your interactions with our Digital Services and other content. This processing may involve the creation and use of Inference Data relating to your preferences.

## **Commercial Purposes**

We and certain third parties process Personal Data we hold for certain purposes, depending on the context of collection and your [Rights & Choices](#), including:

### ***Profiles***

In order to understand our customers’ preferences, and better recommend content and Services that are personalized to our customers, we may create a “Profile” by linking together and analyzing Personal Data collected in the following contexts:

- [Account Registration](#)
- [Purchases and Transactions](#)
- [Using our Digital Services](#)
- [Contest and promotions](#)
- [Contact Us; Support](#)
- [Feedback and Surveys](#)

We may also augment Profiles with Personal Data that we create (such as Inference Data) or that we receive from our affiliated companies or third parties and may include Personal Data such as information about Services you have used or purchased previously, and demographic data.



We use Profiles for our legitimate interests in market research and statistical analysis in connection with the improvement of our Services. For example, we may analyze the Personal Data of customers who have subscribed to our Publications in the past and compare them with other people in our database. If we identify customers in the database who have similar Personal Data to the subscribers, we may then target marketing to the new customers we have identified in our database, for example by sending marketing emails. We may conduct the profiling and send the direct marketing emails automatically. We may also use this information for other Commercial Purposes.

### ***Personalized Marketing Communications***

We may personalize [Marketing Communications](#) based on your [Profile](#). If consent to Consumer Profiling or Targeted Advertising is required by law, we will seek your consent.

### ***Targeted Advertising***

We, and certain third parties operating on or through our Services, may engage in targeted advertising. This form of advertising includes various parties and services providers, including third party data controllers, engaged in the processing of Personal Data in connection with advertising. These parties may be able to identify you across sites, devices, and over time.

The parties that control the processing of Personal Data for Targeted Advertising purposes may create or leverage information derived from [Personalization](#), [Profiles](#), and [Marketing Communications](#). In some cases, these parties may also develop and assess aspects of a Profile about you to determine whether you are a type of person a company wants to advertise to, and determine whether and how ads you see are effective. These third parties may augment your profile with demographic and other Preference Data, and may track whether you view, interact with, or how often you have seen an ad, or whether you purchased advertised goods or services.

We generally use Targeted Advertising for the purpose of marketing our Services and third-party goods and services, and to send marketing communications, including by creating custom marketing audiences on third-party websites or social media platforms.

### ***Data Sales and “Sharing”***

We may engage in “sales” or “sharing” of data as defined by applicable law. For example, we may “sell” certain Personal Data when we engage in marketing campaigns with or on behalf of sponsors, conduct Targeted Advertising, or we may sell, “share” for behavioral advertising purposes, or grant access to Personal Data to our marketing partners, and other advertisers in relation to Targeted Advertising as described below, joint promotions, and other marketing initiatives. See the [California Rights & Disclosures](#) section for a list of categories of Personal Data sold or shared.

## **Disclosure/Sharing of Personal Data**

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We may disclose Personal Data to the following categories of third-party recipients and/or for the following reasons:

***Service Providers:*** We may share your Personal Data with service providers who provide certain services or process data on our behalf in connection with our general business operations, product/service fulfillment and improvements, to

enable certain features, and in connection with our (or our Service Providers') [Business Purposes](#).

**Affiliates:** We will share your Personal Data with any of our current or future affiliated entities, subsidiaries, and parent companies in order to streamline certain business operations, and in support of our [Business Purposes](#), and [Commercial Purposes](#).

**Partners:** We may share your Personal Data with business or marketing partners in connection with promotions, events, products, and services that are promoted, managed, supported, or otherwise undertaken with that third party, and other [Commercial Purposes](#). If appropriate, these parties may engage in direct marketing or behavioral advertising.

**Sponsors, Advertisers, and Social Media Platforms:** We may share certain Personal Data with social media platforms, advertisers, ad exchanges, data management platforms, or sponsors in support of our [Business Purposes](#) and [Commercial Purposes](#). We may allow these third parties to operate through our Services.

**Data Aggregators:** We may share Personal Data with data aggregators in support of our [Commercial Purposes](#) and in connection with [Data Sales](#). These disclosures/sales can help better personalize our Services, the services of third parties, enrich [Profiles](#), and help ensure that you see advertisements that are more relevant to your interests.

**Successors:** Your Personal Data may be processed if we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

**Lawful Recipients:** In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use, or in the vital interests of us or any person. Note, these disclosures may be made to governments that do not ensure the same degree of protection of your Personal Data as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Data to such parties.

## Your Rights & Choices

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You may have certain rights and choices regarding the Personal Data we process. Please note, these rights may vary based on the country or state where you reside, and our obligations under applicable law. See the following sections for more information regarding your rights/choices in specific regions:

- [US States/California](#)
- [EEA/UK/Switzerland/Cayman Islands](#)

### Your Rights

You may have certain rights and choices regarding the Personal Data we process. See the “[Regional Supplement](#)” section below for rights available to you in your jurisdiction. To submit a request, contact our [Data Privacy Team](#). We verify your identity in connection with most requests, as described below.

## **Verification of Rights Requests**

If you submit a request, we typically must verify your identity to ensure that you have the right to make that request, reduce fraud, and to ensure the security of Personal Data. If an agent is submitting the request on your behalf, we reserve the right to validate the agent’s authority to act on your behalf. We may require that you match personal information we have on file in order to adequately verify your identity. If you have an account, we may require that you log into the account to submit the request as part of the verification process. We may not grant access to certain Personal Data to you if prohibited by law.

## **Your Choices**

### ***Marketing Communications***

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email. You can also withdraw your consent to receive marketing communications or any other consent you have previously provided to us by contacting us. To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

### ***Withdrawing Your Consent/Opt-Out***

Where we are processing your Personal Data based on your consent, you may change your mind and withdraw your consent at any time. The consequence of you withdrawing consent might be that we cannot perform certain services for you, such as location-based services, personalization or providing certain types of advertising, or other services conditioned on your consent or choice not to opt-out.

### ***Location Data***

You may control or limit Location Data that we collect through our Services by changing your preferences in your device’s location services preferences menu, or through your choices regarding the use of Bluetooth, WiFi, and other network interfaces you may use to interact with our Services.

### ***Cookies, Similar Technologies, and Targeted Advertising***

***General-*** If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser’s settings menu or our Manage Cookies page. You may need to opt out of third-party services directly via the third party. For example, to opt-out of Google’s analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Policy](#), or [Google Analytics Opt-out](#).

***Targeted Advertising-*** You may opt out or withdraw your consent to Targeted Advertising (including “sharing” for cross-context behavioral advertising) by visiting [Your Privacy Choices](#). In some cases, you may be able to opt-out by submitting requests to third party partners, including for the vendors listed below:

- [Google Ads](#)
- [DoubleClick](#)
- [Facebook Custom Audience Pixel](#)

- [Twitter Audience Pixel](#)
- [Digital Advertising Alliance's opt-out](#)
- [Network Advertising Initiative opt-out](#)

*Global Privacy Control (GPC)*- Our Digital Services may support certain automated opt-out controls, such as the [Global Privacy Control](#) ("GPC"). GPC is a specification designed to allow Internet users to notify businesses of their privacy preferences, such as opting-out of the sale/sharing of Personal Data. To activate GPC, users must enable a setting or use an extension in the user's browser or mobile device. Please review your browser or device settings for more information regarding how to enable GPC.

**Please note:** We may not be able to link GPC requests to your Personal Data in our systems, and as a result, some sales/sharing of your Personal Data may occur even if GPC is active. See the "**Error! Reference source not found.**" section below for more information regarding other opt-out rights.

*Do-Not-Track* - Our Services do not respond to your browser's do-not-track request.

## Data Security

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We implement and maintain commercially reasonable security measures to secure your Personal Data from unauthorized processing. While we endeavor to protect our Services and your Personal Data from unauthorized access, use, modification, and disclosure, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others.

## Data Retention

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We retain Personal Data for so long as it is reasonably necessary to achieve the relevant processing purposes described in this Privacy Policy, or for so long as is required by law. What is necessary may vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established under applicable law.
- Industry best practices.
- Whether the purpose of processing is reasonably likely to justify further processing.
- Risks to individual privacy in continued processing.
- Applicable data protection impact assessments.
- IT systems design considerations/limitations; and
- The costs associated with continued processing, retention, and deletion.

We will review retention periods periodically and may pseudonymize or anonymize data held for longer periods.

## Minors

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Our Services are neither directed at nor intended for use by persons under the age of 13 in the US, or under the age of 13 to 16 in the EEA, UK, Switzerland, Cayman Islands, or 15/16 in Australia. If we learn that we have inadvertently done so, we will promptly delete such Personal Data if required by law. Do

not access or use the Services if you are not of the age of majority in your jurisdiction unless you have the consent of your parent or guardian.

## Changes to Our Privacy Policy

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We may change this Privacy Policy from time to time. Changes will be posted on this page with the effective date. Please visit this page regularly so that you are aware of our latest updates. Your use of the Digital Service following notice of any changes indicates acceptance of any changes.

## Regional Supplement

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### US States/California

#### ***US State & California Privacy Rights & Choices***

Under the California Consumer Privacy Act (“CCPA”) and other state privacy laws, residents of certain US states may have the following rights, subject to regional requirements, exceptions, and limitations.

**Confirm**- Right to confirm whether we process your Personal Data.

**Access/Know**- Right to request any of following: (1) the categories of Personal Data we have collected, sold/shared, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the purposes for which we collected or sold/shared your Personal Data; (4) the categories of third parties to whom we have sold/shared your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.

**Portability**- Right to request that we provide certain Personal Data in a common, portable format.

**Deletion**- Right to delete certain Personal Data that we hold about you.

**Correction**- Right to correct certain Personal Data that we hold about you.

**Opt-Out (Sales, Sharing, Targeted Advertising, Profiling)**- Right to opt-out of the following:

- If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal Data.
- If we engage in Targeted Advertising (aka “sharing” of personal data or cross-context behavioral advertising,) you may opt-out of such processing.
- If we engage in certain forms of “profiling” (e.g., profiling that has legal or similarly significant effects), you may opt-out of such processing.

**Opt-out or Limit Use and Disclosure of Sensitive Personal Data**- right to opt-out of the processing of certain Sensitive Data, or request that we limit certain uses of Sensitive Personal Data. This right does not apply in cases where we only use Sensitive Personal Data where necessary, or for certain business purposes authorized by applicable law.

**Opt-in/Opt-out of Sale/Sharing of Minors’ Personal Data**- To the extent we have actual knowledge that we collect or maintain personal information of a minor under age 16 in California, those minors must opt in to any sales/sharing of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales/sharing of personal information. All minors have the right to opt-out later at any time.

**Non-Discrimination**- California residents have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.

**List of Direct Marketers**- California residents may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.

**Remove Minors' User Content**- Residents of California under the age of 18 can delete or remove posts using the same deletion or removal procedures described above, or otherwise made available through the Services. If you have questions about how to remove your posts or if you would like additional assistance with deletion, contact us using the information below. We will work to delete your information, but we cannot guarantee comprehensive removal of that content or information posted through the Services.

**Submission of Requests**

You may submit requests as follows (please our review [verification requirements](#) section). If you have any questions or wish to appeal any refusal to take action in response to a rights request, contact us at [privacy@mediadc.com](mailto:privacy@mediadc.com). We will respond to any request to appeal within the period required by law.

<p><u><i>Access/Know, Confirm Processing, Portability, Deletion, and Correction</i></u></p>	<ul style="list-style-type: none"> <li>You may visit our <a href="#">Data Request Portal</a>. You may call us at: 1-844-423-0003. You will be directed to leave a voicemail where you will provide your email address, phone number, and address we have on file, along with your request.</li> <li>You may send mail to our Contact Us address above with your email address, phone number and address we have on file, along with your request.</li> </ul>
<p><u><i>Opt-Out of Sales, Sharing, Targeted Advertising or Profiling, Opt-out/Limit Use and Disclosure of Sensitive Personal Data</i></u></p>	<ul style="list-style-type: none"> <li>You may visit our <a href="#">Privacy Rights Portal</a></li> <li>You may call us at: 1-844-423-0003. You will be directed to leave a voicemail where you will provide your email address, phone number or address, along with your request.</li> <li>You may send mail to our Contact Us address above with your email address, phone number or address on file, along with your request.</li> <li>You may enable <a href="#">Global Privacy Control</a> to opt out of Targeted Advertising/sharing. Digital Services supporting GPC (or similar standards) will treat the request as a request to opt-out of Targeted Advertising/sharing on the device where the GPC setting is active.</li> <li>To limit the use and disclosure of Precise Location Data, update your preferences for location data using your device's settings menu, or disable WiFi, Bluetooth, or other interfaces you use to interact with our Services.</li> </ul>
<p><u><i>List of Direct Marketers Remove Minors' User Content, Other Requests or Inquiries</i></u></p>	<ul style="list-style-type: none"> <li>Contact us via email to our privacy team at <a href="mailto:privacy@mediadc.com">privacy@mediadc.com</a></li> </ul>

**Categories of Personal Data Disclosed for Business Purposes**

For purposes of the CCPA, we have disclosed to Service Providers for “business purposes” in the preceding 12 months the following categories of Personal Data, to the following categories of recipients:

Category of Personal Data	Category of Recipients
Audio/Visual Data	Service Providers; Affiliates; Partners; Sponsors; Advertisers; and Social Media Platforms; Data Aggregators; Successors; Lawful Recipients
Biographical Data	
Transaction Data	
Contact Data	
Device/Network Data	
Identity Data	
Preference Data	
General Location Data	
User Content	
Payment Data; Precise Location Data; Government ID Data	Service Providers; Affiliates; Partners Successors; Lawful Recipients

***Categories of Personal Data Sold, Shared, or Disclosed for Commercial Purposes***

For purposes of the CCPA, we have “sold” or “shared” in the preceding 12 months the following categories of Personal Data in the, to the following categories of recipients:

Category of Personal Data	Category of Recipients
Transaction Data	Affiliates; Partners; Sponsors, Advertisers, and Social Media Platforms; Data Aggregators
Contact Data	
Device/Network Data	
Identity Data	
Inference Data	
General Location Data	
User Content	

***Categories of Sensitive Personal Data Used or Disclosed***

For purposes of CCPA, we may use or disclose the following categories of Sensitive Personal Data: Government ID Data; Payment Data; Precise Location Data. However, we do not sell or share Sensitive Personal Data, or use it for purposes other than those listed in CCPA section 7027(m).

**EEA/UK/Switzerland/Cayman Islands**

***Controller***

The controller of Personal Data relating to residents of the UK/EEA/Switzerland/Cayman Islands is: The Washington Newspaper Publishing Co. LLC., 1015 15th St. NW, Suite 500, Washington, DC, 20005

***Rights & Choices***

Residents of the EEA, UK, Switzerland, and the Cayman Islands have the following rights. Please our review [verification requirements](#). Applicable law may provide exceptions and limitations to all rights.

Access-You may have a right to access the Personal Data we process.

Rectification-You may correct any Personal Data that you believe is inaccurate.

Deletion-You may request that we delete your Personal Data. We may delete your data entirely, or we may anonymize or aggregate your information such that it no longer reasonably identifies you.

Data Export-You may request that we send you a copy of your Personal Data in a common portable format of our choice.

Restriction -You may request that we restrict the processing of personal data to what is necessary for a lawful basis.

Objection-You may have the right under applicable law to object to any processing of Personal Data based on our legitimate interests. We may not cease, or limit processing based solely on that objection, and we may continue processing where our interests in processing are appropriately balanced against individuals' privacy interests. In addition to the general objection right, you may have the right to object to processing:

- for Profiling purposes.
- for direct marketing purposes (we will cease processing upon your objection); and
- involving automated decision-making with legal or similarly significant effects (if any).

Regulator Contact-You have the right to file a complaint with regulators about our processing of Personal Data. To do so, please contact your local data protection or consumer protection authority.

**Submission of Requests**

<u>Access, Rectification, Data Export, Deletion, Restriction, or Correction</u>	<ul style="list-style-type: none"> <li>• Contact us via email to our privacy team at <a href="mailto:privacy@mediadc.com">privacy@mediadc.com</a></li> <li>• You may visit our <a href="#">Data Request Portal</a></li> <li>• You may send postal mail to our physical address (see <a href="#">Contact Us/Controller</a> section above) with your email address, phone number and address we have on file, along with your request.</li> </ul>
<u>Privacy Questions</u>	<ul style="list-style-type: none"> <li>• Contact us via email to our privacy team at <a href="mailto:privacy@mediadc.com">privacy@mediadc.com</a></li> </ul>

**Lawful Basis for Processing**

<b>Legal Basis</b>	<b>Description of Basis &amp; Relevant Purposes</b>	<b>Relevant Contexts / Purposes / Disclosures</b>
<i>Performance of a contract</i>	The processing of your Personal Data is strictly necessary in the context in which it was provided, e.g., to fulfill your subscription or perform an agreement you have with us, to provide products and services to you, to open and maintain your user accounts, or to process requests.	<u>Contexts</u> <ul style="list-style-type: none"> <li>• Contexts where Personal Data (excluding Sensitive Personal Data) is processed for purposes listed below</li> </ul>



		<ul style="list-style-type: none"> <li>• Cookies and other tracking technologies (strictly necessary)</li> </ul> <p><u>Purposes</u></p> <ul style="list-style-type: none"> <li>• Service Delivery</li> </ul> <p><u>Disclosures</u></p> <ul style="list-style-type: none"> <li>• <b>Error! Reference source not found.</b></li> <li>• Service Providers</li> </ul>
<p><i>Legitimate interests</i></p>	<p>This processing is based on our legitimate interests. For example, we rely on our legitimate interest to administer, analyze and improve our Services, to operate our business including through the use of service providers and subcontractors, to send you notifications about our Services or your subscriptions, for archiving, recordkeeping, statistical and analytical purposes, and to use your Personal Data for administrative, fraud detection, audit, training, security, or legal purposes. See the Business Purposes of Processing section above for more information regarding the nature of processing performed on the basis of our legitimate interests.</p>	<p><u>Contexts</u></p> <ul style="list-style-type: none"> <li>• Contexts where Personal Data (excluding Sensitive Personal Data) is processed for specified legitimate interests or purposes listed below</li> </ul> <p><u>Purposes</u></p> <ul style="list-style-type: none"> <li>• Internal Processing and Service Improvement</li> <li>• Security and Incident Detection</li> <li>• <b>Error! Reference source not found.</b></li> <li>• Personalization</li> <li>• Aggregated Data</li> <li>• Profiles</li> <li>• Personalized Marketing Communications</li> </ul> <p><u>Disclosures</u></p> <ul style="list-style-type: none"> <li>• Affiliates</li> <li>• <b>Error! Reference source not found.</b></li> <li>• Sponsors, Advertisers, and Social Media Platforms</li> <li>• <b>Error! Reference source not found.</b></li> </ul>

		<ul style="list-style-type: none"> <li>• <b>Error! Reference source not found.</b></li> <li>• <b>Error! Reference source not found.</b></li> </ul>
<i>Consent</i>	This processing is based on your consent. You are free to withdraw any consent you may have provided, at any time, subject to your rights/choices, and any right to continue processing on alternative or additional legal bases. Withdrawal of consent does not affect the lawfulness of processing undertaken prior to withdrawal.	<p><u>Contexts</u></p> <ul style="list-style-type: none"> <li>• Contexts where Personal Data is processed for purposes listed below</li> <li>• Cookies and other tracking technologies (except strictly necessary)</li> <li>• Processing of Sensitive Personal Data</li> <li>• Marketing Communications</li> </ul> <p><u>Purposes</u></p> <ul style="list-style-type: none"> <li>• Targeted Advertising</li> <li>• Data Sales</li> </ul> <p><u>Disclosures</u></p> <ul style="list-style-type: none"> <li>• Sponsors, Advertisers, and Social Media Platforms</li> </ul>
<i>Compliance with legal obligations</i>	This processing is based on our need to comply with legal obligations. We may use your Personal Data to comply with legal obligations to which we are subject, including to comply with legal process. See the Business Purposes of Processing section above for more information regarding the nature of processing performed for compliance purposes.	<p><u>Business Purposes</u></p> <ul style="list-style-type: none"> <li>• <b><u>Error! Reference source not found.</u></b></li> </ul> <p><u>Disclosures</u></p> <ul style="list-style-type: none"> <li>• <b>Error! Reference source not found.</b></li> </ul>
<i>Performance of a task carried out in the public interest</i>	This processing is based on our need to protect recognized public interests. We may use your Personal Data to perform a task in the public interest or that is in the vital interests of an individual. See the Business Purposes of Processing section above for more information regarding the nature of processing performed for such purposes.	<p><u>Business Purposes</u></p> <ul style="list-style-type: none"> <li>• <b><u>Error! Reference source not found.</u></b></li> </ul> <p><u>Disclosures</u></p> <ul style="list-style-type: none"> <li>• <b>Error! Reference source not found.</b></li> </ul>

**International Transfers**

We process data in the United States, and other countries where our sub processors are located. In cases where we transfer Personal Data to jurisdiction that have not been determined to provide “adequate” protections by your home jurisdiction, we will put in place appropriate safeguards to ensure

that your Personal Data are properly protected and processed only in accordance with applicable law. Those safeguards may include the use of EU standard contractual clauses, reliance on the recipient's Binding Corporate Rules program, or requiring the recipient to certify to a recognized adequacy framework. We make transfers among Affiliates pursuant to our intragroup Standard Contractual Clauses. You can obtain more information about transfer measures we use for specific transfers by contacting us using the information above.

## Australia

### ***Rights and Choices***

Residents of Australia have the right under the Privacy Act to request access or correct Personal Data we hold about you. If you wish to exercise your right under the Privacy Act to access or correct your Personal Data, you may visit [our Data Request Portal](#) or email us at [privacy@mediadc.com](mailto:privacy@mediadc.com). If you make a request, we will require you to verify your identity before we provide you with any access, as described in the [verification requirements](#) section.

### ***Purposes of Processing***

In certain cases, we may not automatically process your Personal Data for certain purposes. We rely on your consent to process Personal Data as follows:

#### Contexts

- [Cookies and other tracking technologies](#) for Targeted Advertising
- Any context where we process [Sensitive Personal Data](#)
- [Marketing communications](#)

#### Purposes

- Targeted Advertising
- Data Sales

#### Disclosures

- Sponsors, Advertisers, and Social Media Platforms

### ***Regulatory Contact***

You may contact the Office of the Australian Information Commissioner (OAIC) or you may [contact us](#) with any complaints regarding our privacy practices. We will respond to complaints we receive in a timely manner and ensure our processing aligns with your rights and our legal obligations.