

UPDATED AS OF: May 7, 2019

Steel City Media, Inc. ("Steel City Media", "we", "us", or "our") is dedicated to maintaining your trust and confidentiality as it relates to the privacy of your information. This document describes how we collect, protect, share and use your information as part of our technology platforms and contests, including, our websites, mobile Apps ("Platforms") and how you may access and control its use in connection with our marketing communications and business activities.

1. INFORMATION COLLECTED

When you use the Platforms to register to access a station app, sign up for station eBlasts, enter into promotions/contests, interact with us via third party applications or social media sites, we or our service providers or business partners may collect information that identifies you, including personal information, such as your name, e-mail address, telephone number, mobile phone number, credit card or debit card details, geographic location, mailing address, date of birth, demographic information (such as zip code, age and gender), photos, videos, social media account details and other information from your device.

Information Collected Automatically

Whenever you visit or interact with the Platforms, we, as well as any third-party advertisers and/or service providers, may use a variety of technologies that automatically or passively collect information about how the Platforms are accessed and used ("Usage Information"). Usage Information may include information collected in the following ways:

Log Files: Information is logged about your use of the Platforms, including your browser type, operating system, activations, content you purchase, access, or download, listening times, the page served and the preceding page views. This statistical usage data provides us with information about the use of the Platforms, such as how many visitors visit a specific page on the Platforms, how long they stay on that page, and which hyperlinks, if any, they "click" on. It also provides us with information about your interactions with songs, playlists, audiovisual content and other Steel City Media users, as well as advertising and products or services offered through or linked from the Platforms. This information helps us keep our Platforms fresh and interesting to our visitors and enables content to be tailored on and off the Platforms to a visitor's interests.

Device Identifiers: We or our service providers and partners may automatically collect your IP address or other unique identifier ("Device Identifier") for the computer, mobile device, tablet or other device ("Device") you use to access the Platforms, including the hardware model and mobile network information. A Device Identifier is a number such as a mobile advertising identifier (Android AAID or Apple IDFA) that is automatically assigned to your Device when you access a website or its servers or an application, and our computers identify your Device by its Device Identifier. We may use and share with third parties Device Identifiers to, among other things, administer the Platforms, help diagnose problems with our servers, analyze trends, provide attribution metrics to our advertisers and partners, track users' web page movements, help identify you, and gather broad demographic information for aggregate use.

Location Information: We may collect or infer information about the general location of your Device when you access or use the Platforms; or if you choose to turn on your Bluetooth, Wi-Fi or other geolocation functionality when you use the App, subject to your consent, the App may collect, infer, and use more precise geolocation information. We may use and share your location with certain third parties for analytics, attribution and advertising purposes (currently advertising use is restricted to Steel City Media properties only).

Cookies; Pixel Tags: The technologies used on the Platforms to collect Usage Information, including Device Identifiers, include but are not limited to: cookies (data files placed on a Device when it is used to visit the Platforms), mobile analytics software and pixel tags (transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a web page or in an email, which indicates that a page or email has been viewed). Cookies may also be used to associate you with social networking sites and, if you so choose, enable interaction between your activities on the Platforms and your activities on such social networking sites. We, or our vendors and partners, may place cookies or similar files on your Device for security purposes, to facilitate site navigation and to personalize your experience while visiting our Platforms or third-party sites (such as to select which ads or offers are most likely to appeal to you, based on your browsing behavior, interests, preferences, location, or demographic information), as well as for market research related purposes. Personalized content may also include content from the providers of goods and services that you may be able to purchase through the Platform or otherwise (who may pay us to show you such content). Note, however, that if a third party content provider asks us to show content to users with certain characteristics (for example, women ages 18-24) or a segment of that group (for example, women ages 18-24 who are located in a particular locality) and you respond to that content or click on links embedded in that content, the third-party content provider may conclude that you have the characteristics of the audience that they are trying to reach. Steel City Media does not have access to or control over cookies, web beacons, or other technologies that third parties who have asked us to show you content may use, and the privacy practices of these third parties are not covered by this Privacy Policy. Please contact these companies directly for information on their data collection and privacy practices. For more information on advertising using cookies and how to opt out of advertising cookies specifically, please see the sections on Advertising Services; and Your Privacy Rights, Choices, Access below.

Similarly, we may use analytics platforms and other tracking technologies to help us track and analyze usage of our Platforms, using cookies, pixels and other tracking technologies.

Information Received from Other Sources

We may obtain information from other sources and combine that with information we collect through the Platforms. For example, if you create an account using your credentials from a third-party social media site, we will have access to certain information from that site, such as your name, profile and account information, such as lists of your friends, "likes", comments you have shared, groups and location, in accordance with the authorization procedures determined by such third-party social media site. Services like Facebook Connect give you the option to post information about your activities on our Platforms to your profile page to share with others within your network. In addition, we may receive

information about you if other users of a third party application or website give us access to their profiles and you are one of their "connections" or information about you is otherwise accessible through your "connections" web page, profile page, or similar page on a social networking or other third party website or interactive service.

If given the opportunity, you may integrate your Steel City Media account with third party applications and sites. If you do, we may receive similar information related to your interactions with the Steel City Media service on the third party application, as well as information about your publicly available activity on the third party application or site.

We may also receive information about you from our partners and service providers, (including, for example, business partners, analytics vendors, advertising networks and search information providers) which we use to personalize your Steel City Media experience, to measure ad quality and responses, and to display ads that are more likely to be relevant to you.

2. HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect about and from you for a variety of business purposes such as to: respond to your questions and requests; provide customer service; provide you with access to certain areas and features of the Platforms such as your favorite stations, your musical preferences, songs you have listened to, shared playlists and your interaction with other users; verify your identity; communicate with you about your account and activities on the Platforms and, in our discretion, changes to any Steel City Media policy; market research; Platform analytics and operations; advertising attribution, analytics and reporting; curate content, personalize advertisements, and offers that are served to you on and off the Platforms by us or our partners and advertisers; (including for third party products and services) made available on or outside the Platform for example by providing personalized or localized radio stations, content, advertisements, recommendations, features that match your interests, browsing behavior and preferences; improve the Platforms; link or combine your information with information we receive from others to help understand your needs and to provide you with better service and offers; communicate with you, either directly or through one of our partners, for marketing and promotional purposes via emails, newsletters, notifications, or other messages, consistent with any permissions you may have communicated to us; comply with license obligations; and for purposes disclosed at the time you provide your information or otherwise with your consent.

3. SHARING OF INFORMATION

The information collected or generated through your use of the Platform may be shared by you or by us as described below.

Sharing of Information by You

Your Activities. Your activity on the Platform (e.g., music you listen to, music you share), playlists created or followed, and content you post to the Platform are made publicly available by default and can be accessed by users who follow you or view your Steel City Media profile and will also be displayed publicly in third-party search engine results and may appear together with other public profile information, such as your playlists, picture and name and/or username. Although this information is

made public by default, in the “Your Choices” section below, we describe the controls that you can use to limit the sharing of your information.

Third Party Platforms. If your Steel City Media account is connected to a third party application or social medial platform, Steel City Media may automatically share your activity with that service, including the content you use and such information may be attributed to your account on the third party platform and published on such service. Likewise, if you log into a third party application with your Steel City Media account, that third party application may have access to certain information such as your Steel City Media playlists and activity. A third party platform’s use of information collected from you (or as authorized by you) is governed by the third party platform’s privacy policies and your settings on the relevant service.

Sharing of Information by Us

We may share aggregate user statistics, demographic information, and Usage Information with third parties. We may also share your information as disclosed at the time you provide your information, as set forth in this Privacy & Cookie Notice and in the following circumstances:

Third Parties. In order to carry out your requests, to make various features, services and materials available to you through the Platforms, and to respond to your inquiries, we may share your information with third parties that perform functions on our behalf, such as companies that: host or operate our Platforms; payment processors; analyze data; provide customer service; sponsors or other third parties that participate in or administer our promotions. Your personal information may also be used by us or shared with our sponsors, partners, advertisers, advertising networks, advertising servers, and analytics companies or other third parties in connection with marketing, promotional, and other offers, as well as product information, and for such third party’s advertising, analytics, planning and market research. These advertisers, advertising networks, advertising servers, and analytics companies use various technologies to collect data in order to send (or serve) relevant ads to users on our Platforms, or on platforms or websites operated by third parties. These technologies may include the placement of cookies or web beacons, the use of unique or non-unique non-personal identifiers, or the use of other technologies on our Platforms, which may be used to track user behavior both on and off our Platforms, to track how our Platforms are being used, to link various Devices you may use, build consumer profiles and to serve you more relevant ads. This Privacy Policy does not cover the use of various technologies by third party advertisers, advertising networks, advertising servers, and analytics companies. We may also share your information with the rights holders that license content to Steel City Media to stream on the Platforms.

Your Agreement To Have Your Personal Information Shared.

While on our Platforms, you may have the opportunity to opt-in to receive information and/or marketing offers from someone else or to otherwise consent to the sharing of your information with a third party. If you use the social sharing features of the Platforms, your information may be shared with certain of your friends or groups. If you agree to have your information shared, your information will be disclosed to the third party and the information you disclose will be subject to the privacy policy and business practices of that third party.

Business Transfers. Your information may also be used by us or shared with our subsidiaries and affiliates for internal reasons, primarily for business and operational purposes. As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all or substantially all of our assets, or assets related to the Platforms, your information may be disclosed to such entity as part of the due diligence process and will be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

Legal Disclosure. Steel City Media may transfer and disclose your information to third parties to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our Terms of Use or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to our Platforms or the public.

Nielsen. Our Platforms may include Nielsen’s proprietary measurement software which may allow you to contribute to market research. To learn more about the information Nielsen’s software may collect and your choices with regard to it, please [click here](#).

4. ADVERTISING SERVICES

When you use the Platforms, we, our service providers and advertising partners may set and access cookies and similar tracking technologies on your computer or Device in order to collect information about your online web-browsing activities over time and across different online websites and services (including, but not limited to, online or cloud computing services, and online applications) or mobile applications in order to serve you ads or other content personalized to your interests. This form of advertising is referred to as Interest Based Advertising (“IBA”). In order to personalize these ads or content, we or our advertising partners or service providers may connect and/or share data about you either to data you provided to us, e.g., your email address, or to Usage Information collected from you, such as your Device Identifier or IP address. The use of cookies, pixel tags, or similar technologies by these third parties is subject to their own privacy policies, not ours. If you do not want your information collected and used by us or the companies we work with for IBA purposes, you can opt out of this form of advertising by following the instructions in the next section.

5. YOUR PRIVACY RIGHTS, CHOICE AND ACCESS

If you do not consent to the collection, use or sharing of your information in the manner described in this Privacy Policy, please do not provide us with such information. By providing such information, you are opting in to the collection, use and sharing of this information in accordance with this Privacy Policy.

Cookies, Tracking & IBA:

To learn how you may be able to reduce the number of cookies you receive from us or third parties, or delete cookies that have already been installed in your browser’s cookie folder, please refer to your

browser's help menu or other instructions related to your browser to see if you can reject or disable such cookies. You can also learn more about cookies by visiting www.allaboutcookies.org which includes additional useful information on cookies and how to block cookies using different types of browser. Removing or rejecting browser cookies does not necessarily affect third-party flash cookies used in connection with our Platform. To delete or disable flash cookies, please visit https://www.adobe.com/support/documentation/en/flashplayer/help/settings_manager.html for more information. If you do disable or opt out of receiving cookies, please be aware that some features and services on our Platform may not work properly because we may not be able to recognize and associate you with your account(s). In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

As described above, we, or other parties we do business with, may place or recognize unique cookies or other technologies on your browser and Device when you visit our Platform to collect information about your use of our Platforms and your other online activities over time and across different websites and apps, and may use that information to serve interest-based advertisements to you as you browse the Internet. To learn more about such interest-based advertising, please visit: <https://optout.aboutads.info>.

There are 2 ways that you can opt out of IBA practices from certain Steel City Media or third party ads on our Platforms and on third party sites and apps. One way is through the cross-industry Self-Regulatory Program for Online Behavioral Advertising managed by the Digital Advertising Alliance (DAA). To opt out of IBA, please click on the following link and follow the instructions: DAA AppChoices – <http://www.aboutads.info/appchoices/> and <http://optout.aboutads.info>. To opt out from the use of information about your online activities for IBA by NAI member companies, visit: <http://www.networkadvertising.org/choices/>.

Another way to opt out of IBA is by clicking on the Advertising Options Icon featured on certain Steel City Media ads on third-party websites. When clicked it (i) describes the collection and uses of data gathered at the relevant third-party website and (ii) provides a way for you to opt out of data collection and use by the third parties listed for the purposes of IBA. If you choose to opt out, our service provider will communicate your opt out election to the relevant third-party advertising partners and a cookie will be placed on your browser indicating your decision to opt out.

Bear in mind that because cookies are stored by your browser, if you use different browsers on your computer, or multiple computers and Devices that have browsers and you do not wish to have cookies collect information for IBA purposes, you will need to opt out of IBA from each browser on each of the computers and Devices that you use. Please note that even if you opt out of IBA, you may still receive advertisements from us; they just won't be customized based on your web-browsing activities on third-party websites. Please also note that if you opt-out of IBA, we may still track your visits to the Platforms for our own analytics, operations and security purposes.

To learn how to change your Device Identifier, please refer to your device's help menu or other instructions.

Some browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. These features are not yet uniform, so note that our systems are not configured to recognize Do Not Track headers or signals from some or all browsers.

Data Sharing and Communications: You may always direct us not to share your personal information with third parties, not to use your information to provide you with information or offers, or not to send you newsletters, e-mails or other communications by contacting us by mail at Steel City Media, 4050 Pennsylvania Ave, Suite 302, Kansas City, MO 64111, or

Please note that if you opt-out of various uses of your information the service we provide to you and relevant offers may be impacted. Also, if you opt out of receiving promotional offers, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.

Location Information: By downloading our App or using the Platforms, you consent to our collection and use of your Device location information and sharing of location information with third parties for analytics and advertising purposes (currently advertising use is exclusively within Steel City Media properties). If you initially consent to our collection of precise location information, you can subsequently stop the collection of precise location information at any time by going to the setting feature on your Device and changing your preferences. If you do so, certain features of our App may no longer function. You also may stop our collection of location information by following the standard uninstall process to remove our App from your device.

Access to Your Information: If you wish to verify, correct, or update any of your personal information collected through the Platforms, you may contact us at the above address or e-mail. In accordance with our routine record keeping, we may delete certain records that contain personal information you have submitted through the Platforms. We are under no obligation to store such personal information indefinitely and disclaim any liability arising out of, or related to, the destruction of such personal information. In addition, you should be aware that it is not always possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons.

6. CHILDREN

The Platform is not directed to children under 13. We do not knowingly collect, use or disclose personally identifiable information from anyone under 13 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the parent/guardian's consent. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 13, we will make reasonable efforts to delete such information from our records.

7. SECURITY OF YOUR INFORMATION

We use certain reasonable security measures to help protect your personal information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use the Platforms and provide us with your information at your own risk.

8. OTHER SITES

The Platforms may contain links to other sites that we do not own or operate. This includes links from service providers, advertisers, sponsors and/or partners that may use our logo(s) as part of a co-

branding or co-marketing agreement. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other websites may send their own cookies to your Device, they may independently collect data or solicit personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site which appears or claims that it is one of our Platforms (including those linked to through an email or social networking page).

The Platforms may make available chat rooms, forums, message boards, and news groups. Remember that any information that you disclose in these areas becomes public information and is not subject to the provisions of this Privacy Policy.

9. CONSENT TO PROCESSING AND TRANSFER OF INFORMATION

The Platforms are governed by and operated in, and in accordance with the laws of, the United States, and are intended for the enjoyment of residents of the United States. Steel City Media makes no representation that the Platforms are governed by or operated in accordance with the laws of any other nation.

10. CHANGES

Any changes we may make to our Privacy Policy will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy. If you do not agree or consent to these updates or changes, do not continue to use the Platform.

11. CONTACT US

If you have any questions or concerns about this Privacy Statement, the practices of the Platforms, or your experiences with the Platforms, please contact us at:

Attn: Privacy Questions

Steel City Media

4050 Pennsylvania Ave, Suite 302

Kansas City, MO 64111

Re: Steel City Media Privacy Statement