Privacy Statement

Effective on April 20, 2018

Privacy rights are a vital part of Briefing.com's relationship with our readership. Towards that goal this privacy statement is intended to communicate:

- 1. What personal information Briefing.com collects.
- 2. What personal information third parties collect through the Briefing.com website.
- 3. What organization collects the information.
- 4. How Briefing.com uses the information.
- 5. With whom Briefing.com may share user information.
- 6. What choices are available to users regarding collection, use and distribution of the information.
- 7. What types of security procedures are in place to protect the loss, misuse or alteration of information under Briefing.com's control.
- 8. How users can correct any inaccuracies in the information.

Please note specifics of our Privacy Statement may change from time to time. If readers have questions or concerns regarding this statement, please contact our Chief Privacy Officer, Travis Rath, at <u>cpo@briefing.com</u>.

Definitions

This Privacy Statement relates to information collected by Briefing.com, Inc. (referred to in this statement as "Briefing," "we," "us," or "our") through your use of our website and your direct contact with us.

"You" or "your" refers to the individual who uses this website, receives information from us, or directly contacts us.

As used in this Privacy Statement, the terms "using" and "processing" information include using cookies on a computer, subjecting the information to statistical or other analysis, and using or handling information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization.

Types of Information Collected

Briefing.com collects two types of information: "personal information" and "non-personal information."

"Personal information" identifies you or may be used in combination with other pieces of personal information to identify you. Examples of personal information include your name, company name, job title, address, e-mail address, telephone number, and billing and credit card information. Personal information can also include information that does not identify you but could be combined with other information in a way that enables you to be identified. This includes information such as age, gender, profession, zip code, IP address, and current location.

"Non-personal information" is information that cannot be used or combined with other information to identify or contact you, including browser types, domain names, and statistical data.

Sources of Information

Briefing.com collects information from the following types of individuals:

Visitors to our website and *users* of our website, who may have non-personal information collected through cookies on our website. For more information on how cookies work and how to disable them, see our <u>Cookie Policy</u>.

• Subscribers, and individuals who have expressed an interest in becoming subscribers, whose personal information is collected by Briefing.com during the signup process when voluntarily provided to us.

This policy first sets out how we collect, use, and store information obtained from subscribers. It then sets out how we collect, use, and store information obtained from visitors and users. Finally, we set out how information is shared and the rights you may have in your information.

Collection and Use of Subscriber Information

Briefing.com collects personal information from subscribers when such information is voluntarily provided to us, including through the Briefing.com registration process or through direct contact with Briefing.com staff. This information is used to provide subscribers with Briefing.com alerts, analysis, and promotional offers, or with support services the subscriber has requested. Our practices are described in more detail below.

Subscribers may also use cookies to enhance the functionality of the Briefing.com website in a variety of ways, such as by allowing the Briefing.com website to remember their login information. For more information on how cookies work and how to disable them, please see our <u>Cookie Policy</u>.

Registration

Briefing.com's free service, with limited access, does not require registration of any kind.

Portions of the free site require registration for access. We use the information collected during the registration process to contact the registrant about services on our site, including information provided as part of the subscription and special offers on other Briefing.com services.

When signing up for premium services from Briefing.com, we ask for contact information (such as name, email, and mailing address) and billing information (such as credit card number and expiration date). This information is used to provide subscribers with the requested services and for billing purposes. If we have trouble processing an order, the information is used to contact the subscriber.

Communications from the Site

Special Offers and Updates

Out of respect for the privacy of our subscribers, we present the option to not receive these types of communications. Please see the Account Settings sections of your particular subscription for more information.

Newsletter

If a subscriber wishes to receive our newsletters, they must opt-in to receive them. In order to provide our newsletters to subscribers who opt-in, we ask for contact information, such as name and email address. Out of respect for our users' privacy we also provide a way to opt-out of these communications. Please see the Account Settings sections of your particular subscription for more information.

Service Announcements

We send out service-related emails when it is necessary to do so. For instance, if we're experiencing technical difficulties or have implemented new enhancements to our service, we may send an email notification. Generally, subscribers may not opt-out of these communications. If you do not wish to receive them, you have the option to cancel your account.

Customer Service

We send all new subscribers a confirmation email to verify their password and username after registration. We also communicate with subscribers on a regular basis to provide requested services as well as to notify subscribers of issues relating to their account. We reply to communications from subscribers via email or phone, in accordance with the user's preferences. Generally, users may not opt-out of these communications. If you do not wish to receive them, you have the option to cancel your account.

We also may contact subscribers or potential subscribers via email who have not checked out, not completed registration, or abandoned forms to follow up and see if there was problem with the process. You may opt-out of these communications at any time by clicking the unsubscribe link at the bottom of the email.

Storage of Subscriber information

Briefing.com stores information it collects from subscribers for as long as the subscriber's account is active. Credit card information is not stored by Briefing.com at any time. Credit card information is stored and processed by a third party. We may also retain subscriber information after a subscriber deactivates their account as necessary to comply with our legal and regulatory obligations. We generally retain such information for five years to facilitate reactivation of subscriber accounts. If you would like your information to be deleted earlier, please contact Travis Rath at <u>cpo@briefing.com</u>.

Collection and Use of Visitor Information

We collect information from visitors to the Briefing.com website by using log files, clear gifs, and cookies. In some cases, these technologies are provided by third parties. This information is typically used for statistical analysis of our visitors, rather than being used in a way that links the information collected with you individually.

If you are a subscriber, some information collected by these technologies may be associated with your account to create a profile of your overall preferences when using our site. This profile is used only by Briefing.com to help us improve your experience with the Briefing.com website.

More detail is provided on our collection and use of visitor information in the sections that follow.

Tracking Technologies

Technologies such as cookies, beacons, scripts, and tags are used by Briefing.com and our partners, affiliates, or analytics or service providers. These technologies are used in analyzing trends, administering the website, tracking movements around the site, and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis. To the extent that they collect personal information, these companies will only use personal information for the purposes described in this section.

We use cookies for our shopping cart, to remember subscriber settings (e.g. username), and for authentication. You can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information about how cookies are used on our site and how you may turn them off, visit our <u>Cookie Policy</u>.

Log Files

Like most websites, we use log files, which collect information about visitors to our website for troubleshooting purposes only.

We do use third party providers to assist in analyzing usage of the site to better understand how features are used, pages are visited and to then improve the services. The data sent to our analytics partner includes internet protocol (IP) addresses, browser type, referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use.

Third parties with whom we partner to provide certain features on our site or to display advertising based upon your web browsing activity cookies to track preferences. You can disable ads and associated 3rd party cookies using various browser add-ins.

Do Not Track Requests

Briefing.com makes no response if a browser submits a "do not track" request. For more information about how to limit how cookies are used on Briefing.com, see our <u>Cookie Policy</u>.

Storage of Visitor Information

Much of the visitor information collected on Briefing.com is stored on the visitor's device, and Briefing.com does not control how long such information is stored. Visit our <u>Cookie</u> <u>Policy</u> for information on how to delete cookies from your device. Subscriber profile information is stored for as long as the subscriber's account is active, or as necessary to comply with our legal and regulatory obligations.

Sharing with Third Parties

We will share your personal information with third parties only in the ways that are described below. We share personal information in the following cases:

- When a third-party intermediary collects or uses personal information on our behalf to provide services to subscribers or to provide Briefing.com with necessary business services;
- When a third-party advertiser collects information from visitors relating to browsing activity;
- 3. When you share Briefing.com content on social media; and
- 4. When such disclosure is required by law or other legal process.

Additionally, we may share your personal information if the ownership or business structure of Briefing.com changes in the future.

Third Party Intermediaries

We use the following types of third-party intermediaries:

 an outside credit card processing company to bill subscribers for goods and services;

- marketing providers to provide visitors with information about our services and to notify potential subscribers who begin and then abandon the signup process that they may continue the process;
- a secure contract processor to ensure that any documents that require your signature are signed securely; and

These companies do not retain, share, store or use personal information for any purposes other than those listed above, and all these third parties are contractually obligated to treat your personal information with the same degree of care as Briefing.com.

Third Party Advertisers

We partner with a third party to either display advertising on our Website or to manage our advertising on other sites. Our third-party partner may use technologies such as cookies to gather information about your activities on this site and other sites to provide you advertising based upon your browsing activities and interests. For information about all the cookies used on our website, you may visit our <u>Cookie Policy</u>.

We also share aggregated demographic information with our advertisers. This information is not linked to any identifiable individual.

Social Media Widgets

Our Website includes Social Media Features, such as the Facebook and Twitter buttons and Widgets or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. Your interactions with these Features are governed by the privacy statement of the company providing it.

Required Disclosures

Though we make every effort to preserve subscriber privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a law, regulation, current judicial proceeding, court order, or legally binding request served on our Website.

Business Transitions

In the event Briefing.com goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, subscriber personal information will, in most instances, be part of the assets transferred. Subscribers will be notified via prominent notice on our Website for 30 days prior to a change of ownership or control of their personal information. If as a result of the business transition, personal information will be used in a manner different from that stated at the time of collection, subscribers will be given a choice consistent with our "Notification of Changes" section.

Links to Third Party Websites

This website contains links to other sites. Please be aware that we, Briefing.com, are not responsible for the privacy practices of such other sites. We encourage our visitors to be aware when they leave our site and to read the privacy statements of each and every website that collects personal information. This privacy statement applies solely to information collected by Briefing.com.

Choice/Opt-out

Subscribers who no longer wish to receive our newsletter and promotional communications may opt-out of receiving these communications by managing their email preferences within their service under Account Settings. Alternatively, all emails have a "remove me" or "unsubscribe" link at the very bottom of the email which will automatically remove the email address associated with that particular email offering or allow the subscriber to unsubscribe. The subscriber may also contact us at 800-752-3013 or 312-670-4463; service@briefing.com.

Correcting/Updating/Deleting/Deactivating Personal Information

If your information changes (such as zip code, phone, email or postal address), or if you no longer desire our services, we provide a way to correct, update or delete your personal information or deactivate your account. This can be done by emailing our Customer Support team at <u>service@briefing.com</u>. You may contact us by telephone at the contact information listed below. We will respond to your request to access within a reasonable timeframe. Subscribers and visitors may also contact us to receive all of the personal information Briefing.com holds about them. In some instances, such as when we have already deleted a subscriber's or visitor's personal information, we will be unable to provide a complete list of the personal information we have collected on a given individual. To receive all personal information we have collected, please contact Travis Rath at <u>cpo@briefing.com</u>.

Security

Briefing.com secures the personal information it stores using reasonable technical and organizational security measures. All personal information stored by Briefing.com is secured on remote servers provided by our third-party IT provider. Information regarding the security of our servers is available on request by contacting us at the email address listed below.

When we ask subscribers to enter financial information, that information is encrypted and transferred to our third-party payment processor through a secure connection

Only employees who need access to personal information to perform a specific job, for example, our billing clerk or a customer service representative, are granted access to personal information.

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it

If you have any questions about the security at our website, you can send an email to <u>cpo@briefing.com</u>.

Location of Data Storage

Briefing.com and its third-party providers store and process personal information in the United States. By providing personal information to Briefing.com you consent to have such personal information stored and processed in the United States.

For European Residents Under the General Data Protection Regulation (GDPR)

Briefing.com collects and processes personal information relating to European data subjects as prescribed in Regulation (EU) 2016/679 (also known as the General Data Protection Regulation or the GDPR). The following terms describe our commitment to our subscribers and visitors to process personal information consistent with the GDPR.

Briefing.com confirms that it transfers the data of European subscribers and visitors to the United States for processing. Because Briefing.com is based in the United States, this transfer is necessary in order for us to provide you with our website or services for which you have subscribed. If you do not consent to the transfer of your data to the United States, you must cease using the Briefing.com website and any services provided by Briefing.com. We will update this privacy statement if at any time we begin transferring data to another country.

In the event that you are unable to resolve a privacy-related complaint with us, you may lodge a complaint with the data protection authority in your country.

You have additional rights under the GDPR, include a right to correct, receive, and delete personal information we hold about you. Those rights are described above and have been extended to all Briefing.com subscribers and visitors as a courtesy.

The California Consumer Privacy Act

CACPA is a new data privacy law that applies to businesses which collect personal Information from California residents. The new law goes into effect on January 1, 2020.

California resident clients have the right to:

1) Request a disclosure of the categories and specific pieces of personal information that is collected about the consumer.

For specific information about the categories and specific pieces of personal information that we collect, please read "Collection and Use of Subscriber information" and "Collection and Use of Visitor Information."

2) Know whether their personal information is sold or disclosed and to whom. Briefing.com does not sell any client information. We use the following types of third party intermediaries: an outside credit card processing company to bill subscribers for goods and services; marketing providers to provide visitors with information about our services and to notify potential subscribers who begin and then abandon the signup process that they may continue that process; a secure contract processor to ensure that any documents that require your signature are signed securely, and third party advertisers. For additional disclosure information see SHARING WITH THIRD PARTIES, THIRD PARTY INTERMEDIARIES sections for more information.

3) Request the categories of sources from which that information is collected. Briefing.com collects personal information from subscribers when such information is voluntarily provided to us, including through the Briefing.com registration process or through direct contact with Briefing.com staff. This information is used to provide subscribers with Briefing.com alerts, analysis, and promotional offers, or with support services the subscriber has requested. Please see SOURCES OF INFORMATION for more information.

4) Request the business purposes for collecting the information. Please see section (2) above as well as REGISTRATION, COMMUNICATIONS FROM THE SITE, COLLECTION AND USE OF VISITOR INFORMATION, TRACKING TECHNOLOGIES, LOG FILES, and SHARING WITH THIRD PARTIES sections for more information.

5) Request the categories of third parties with which the information is shared. Please see section (2) above as well as SHARING WITH THIRD PARTIES, THIRD PARTY INTERMEDIARIES sections for more information.

6) The CACPA grants a CA consumer the right to request deletion of personal information. Briefing.com will accommodate all verifiable requests unless there is an exception provided by law. Please see

CORRECTING/UPDATING/DELETING/DEACTIVATING PERSONAL INFORMATION for more information.

Questions and/or requests? Please contact our Chief Privacy Officer at <u>CPO@briefing.com</u>, 1-800-752-3013, or contact <u>service@briefing.com</u>.

Notification of Changes

If we decide to change our privacy statement, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We will use information in accordance with the privacy statement under which the information was collected.

If, however, we are going to use users' personal information in a manner different from that stated at the time of collection we will notify users via email prior to the change becoming effective. Users will have a choice as to whether or not we use their information in this different manner. However, if users have opted out of all communication with the site, or deleted/ deactivated their account, then they will not be contacted, nor will their personal information be used in this new manner. In addition, if we make any material changes in our privacy practices that do not affect user information already stored in our database, we will post a prominent notice on our Website notifying users of the change. In some cases where we post a notice we will also email users, who have opted to receive communications from us, notifying them of the changes in our privacy practices prior to the change becoming effective.

Contact Information

If users have any questions or suggestions regarding our privacy statement, please contact us at:

Phone: 800-752-3013 or 312-670-4463 Email: <u>service@briefing.com</u> Postal Address: 2625 Butterfield Rd., Suite 138-S, Oak Brook, IL USA 60523 Website URL: <u>www.briefing.com</u>

If you are in the EU, then you may contact our designated representative at:

ATTN: Briefing.com Data Protection Representative c/o Achieved Compliance Advocacy Ltd.

Postal Address: 40 Oxford Road, High Wycombe, Buckinghamshire UK HP11 2EE Email: briefing@gdprrepresentative.eu

Applicable Law

This privacy statement is governed by the laws of the state of Illinois, without regard to its conflict of laws provisions.