

Our Town Radio Privacy Policy

Last updated: April 14, 2017

This information and the Privacy Policy below apply to the provision of Our Town Radio, Inc. and its affiliate's (collectively "WCRL", "we", "us" or "our) products and services and will be of general interest to you and other Internet user(s) (the "End-User(s)" or "you") who connect to our clients' website, online or mobile players or applications (collectively the "Client Site") in order to listen to our clients' content, to use our client's engagement platforms or to participate in contests and/or sweepstakes organised and managed by us or by our clients (collectively the "Services"). If you have questions about this Privacy Policy, please contact us at robbie@alpineadvertising.com. The Client Site on which you connect in connection with the Services may contain specific privacy provisions which may also apply to your use of the Services and which may contain terms that are different from ours. We invite you to also review those privacy policy(ies).

We may collect PII and Non-PII about you when you connect to a Client Site. This Privacy Policy explains:

- What information we collect about you and why we collect it;
- How we use the information we collect about you; and
- The choices you have, including how to opt out from online behavioural targeting.

This Privacy Policy may evolve based on new technologies, business practices or our client's needs. Please check this page periodically for updates. If we make any material changes to this Privacy Policy, we will post the updated privacy policy here and notify you by means of a notice on our website.

1. GLOSSARY

In this Privacy Policy, the following terms shall be defined as follows:

Cookie: A cookie is a small text file that web servers typically send to a user's computer when they visit a website. A cookie is stored as text files on the user's Internet browser, and can be accessed by web servers when the user returns to a website or goes to another website. A cookie is used by companies to collect and send information about a user's website visit – for example, number of visits, average time spent, pages viewed, navigation history through the website, and other statistics.

PII: Personally Identifiable Information (PII) is information that by itself can be used to identify a specific individual person.

Non-PII: Non-Personally Identifiable Information (Non-PII) is information that cannot by itself be used to identify a specific individual person.

2. PERSONAL INFORMATION (PII)

a) What PII do we collect?

We may collect your name, address, email address or telephone number.

b) How do we collect PII?

You may provide us with your PII when you upload, register, subscribe, create an account or otherwise during your interaction with the Client Site or the Services. Registration is optional to use the Client Site. However, you may not be able to use some of the features offered by the Client Site or the Services unless you register with us. When you register with us, you generally provide us with your name, email address or telephone number.

You may also provide PII to us through the "Help" link displayed on the Client Site, which connects to our Support Ticket System. The information collected through the "Support Ticket System" consists in the name, e-mail address, phone number, and any comment you wish to add.

c) Purpose of Collection and Use of the PII

The PII you provide to us as detailed above is used for the purposes of:

- Providing some of our registration-based Services, (administer rewards, surveys, sweepstakes, contests or other promotional activities sponsored by us or by our client);
- Identify you and respond to the purpose for which you submitted a message through the support ticket system; or
- Monitoring and improving the use and features of our Services.

Except as expressly set out in this Privacy Policy, WCRL will not transfer, share, sell or otherwise disclose any of your PII to any third party, unless one of the following circumstances applies:

- We have your consent to do so;
- For legal reasons, if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
- Meet any applicable law, regulation, legal process or enforceable government request;
- Enforce applicable terms of service, including investigation of potential violations;
- Detect, prevent or otherwise address fraud, security or technical issues;
- Protect against harm to the rights, property or safety of us, our users or the public, as required or permitted by law.

In addition, PII may be disclosed or transferred to our subsidiaries, affiliates, or to another party in the event of an actual or potential change in ownership of, or a grant of a security interest in, all or part of our company through, for example, an asset or share sale, or some other form of business combination, merger or joint venture. Any use of your PII by such affiliate(s), subsidiary(ies) or assignee(s) will be consistent with the terms of this Privacy Policy.

d) Security

We will maintain your PII in secure data storage to safeguard it from unauthorized access, use or disclosure. We will maintain the strict confidentiality of all PII collected, and will only disclose such information on a confidential basis to employees, clients and third party contractors of WCRL who require such information for the purposes set out above. We will only keep your PII for as long as it remains necessary or relevant for the purposes stated above or as otherwise required by law.

Notwithstanding the foregoing, no data transmission over the Internet can be guaranteed to be secure. As a result, WCRL does not represent, warrant or guarantee that personal information will be protected against loss, misuse or alteration and does not accept any liability for personal information submitted by you, nor for your or third parties' use or misuse of personal information.

3. NON-PERSONALLY IDENTIFIABLE INFORMATION (NON-PII)

a) What Non-PII do we collect?

We may collect the following Non-PII about you:

- **Information about your computer or device:**
We may collect information about the computer, web browser, mobile or other devices you use to connect to the Client Site,

including your IP address, type of device, browser type, the unique identifier of the device, the mobile network information, as well as other software or hardware information.

- **Demographic or location information:**

We may collect general demographic or location information about you when you connect to a Client Site or register to our registration-based services. Such information may include your date of birth, gender, zip code, or country. Additionally, when you use a location-based service such as GPS signals sent by a mobile device, we are likely to collect and process data on your exact location. We may de-identify personally identifiable information and share it in a de-identified or aggregated form with third parties, advertisers and/or business partners in order to analyze Service usage, improve the Service and the listener experience, or for other similar purposes.

- **Listening Activity:**

We keep track and collect information about your listening activity, including the number of tracks you listened, the station you connected to and the duration of each connection to a Client Site.

- **Historical and Ad serving Data:**

We keep track and collect information about the ads delivered to you via the Client Site, such as, for example, which ad was shown to you, the number of times a particular ad was shown to you and the date and time it was shown to you.

b) How do we collect Non-PII?

To collect Non-PII about you and help us manage and track your interactions with the Client Site(s), we use Cookies and other tracking technologies, such as clear gifs, web beacons, web bugs, flash cookies or local shared objects (LSOs). For instance, when you connect to a Client Site, we send a Cookie to your web browser, which Cookie is stored within your computer (hereinafter referred to as the "WCRL Cookie"). The WCRL Cookie contains a unique randomly-generated value that enables us to identify you when you connect to a Client Site and connect your activity on the Client Site with other information we store about you in your user profile. The information we collect via the WCRL Cookie is used in non-identifiable ways and does not allow us to personally identify you. Your use of our Services indicates your consent to such use of Cookies and other tracking technologies.

c) Purpose of Collection and Use of the Non-PII

We use Non-PII to operate, maintain or improve our Services, collect, process and report on aggregate statistical information, administer accounts, identify traffic patterns, collect and process payments.

We may also use the Non-PII for advertising-related purposes, such as:

- Gathering data to help deliver advertising content relevant to your interests;
- Limiting the number of times you see a particular ad;
- Showing ads in a particular sequence;
- Determining when you respond to ads;
- Reporting aggregated statistics.

We may also share aggregated Non-PII publicly to show trends about the general use of our Services. We may also share your Non-PII with our partners- like publishers, advertisers or connected sites. We may partner with third-party services who may use various tracking technologies to provide certain services or features. These technologies allow a partner to recognize your computer or mobile device each time you visit a Client Site, but do not allow access to PII. WCRL does not have access or control over these third-party technologies, and they are not covered by this Privacy Policy.

4. TARGETED AND BEHAVIORAL ADVERTISING

The advertising networks and/or content providers that deliver ads on our online or audio services may use Cookies or other tracking technologies to uniquely distinguish your web browser and keep track of information relating to serving ads on your web browser, such as the type of ads shown and the web pages on which the ads appeared. Some of these companies may combine information they collect from our Services with other information they have independently collected relating to your web browser's activities across their network of websites. These companies collect and use the information under their own privacy policies.

5. DO NOT TRACK

California Business & Professions Code Section 22575(b)(as amended effective January 1, 2014) provides that California residents are entitled to know how WCRL responds to "Do Not Track" browser settings. WCRL does not currently take actions to respond to Do Not Track signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a standard once one is created.

6. CHILDREN

Our Services are not directed to persons under 13. If you become aware that your child has provided us with personal information without your consent, please contact us at robbie@alpineadvertising.com. We do not knowingly collect PII from children under 13. If we become aware that a child under 13 has provided us with personal information, we take steps to remove such information and terminate the child's account.

7. YOUR PRIVACY / OPT OUT CHOICES

We think that you benefit from a more personalized experience when we know more about you and the kind of ads that may be relevant to you. However, if you do not wish to receive interest-based advertising, you may either edit your privacy settings or opt out from this practice.

a) Web browser settings adjustment

You may manage how your browser handles cookies and related technologies by adjusting its privacy and security settings. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. However, it is important to remember that some of our Services may not function properly if your cookies are disabled. If you have questions about the security and privacy settings of your mobile device, please refer to instructions from your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

b) Advertising Partners Opt Out

You may opt-out of third-party advertising networks by going to the Network Advertising Initiative's website at www.networkadvertising.org/managing/opt_out.asp and following the directions there. The effect of opting out of third party advertising networks is explained on each opt-out page. Note that for some sites, the effect of opting out of third party advertising means that customized advertising will not be delivered to you. Information regarding your usage of the online services may still be collected for research, analytics or internal operations purposes. We are not responsible for the effectiveness of any such opt-out options. Please note that opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from whom you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

8. SOCIAL NETWORKS

We may offer users the opportunity to interact or share on social networks (for example, by clicking a “Like” or “Share” button) or to register to certain Services using a social network account. When interacting with or otherwise using social networks through our Service or Client Site, your login is made through and is subject to the social network’s terms of use. Be aware that those social networks may have their own privacy statements and personal information collection, use, and disclosure practices. We encourage you to familiarize yourself with the privacy statements provided by these social networks prior to providing them with information. Please refer to the privacy settings in your social network account to manage the data that is shared through your account. By registering to a Service using your social network login data, you grant us permission to access all of the elements of your social network profile information that you have made available to be shared and to use it in accordance with the social network’s terms of use and this Privacy Policy.

9. NOTICE TO RESIDENTS OF COUNTRIES OUTSIDE THE UNITED STATES OF AMERICA

WCRL is headquartered in the United States of America. If you live outside of the United States of America and you use the Services or provide us with personal information directly via the Client Site or otherwise, your information will be handled in accordance with this Privacy Policy. By using the Services or giving us your personal information, you are directly transferring your PII and Non-PII to us in the United States. The United States may not have the same level of data protection as your jurisdiction. However, you agree and consent to our collection, transfer, and processing of your PII and Non-PII in accordance with this Privacy Policy. You are solely responsible for compliance with any data protection or privacy obligations in your jurisdiction when you use the Services or provide us with [PII or Non-PII](#).

10. CALIFORNIA PRIVACY RIGHTS AND OTHER COUNTRIES

If you reside in Canada, you may have the right to be provided with access to PII that we have collected about you and written information about our policies and practices with respect to the transfer of your personal information to vendors outside Canada. E-mail us at robbie@alpineadvertising.com with questions.

Pursuant to Section 1798.83 of the California Civil Code, residents of California can obtain certain information about the types of personal information that companies with whom they have an established business relationship have shared with third parties for direct marketing purposes during the preceding calendar year. In particular, the law provides that companies must inform consumers about the categories of personal information that have been shared with third parties, the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. To request a copy of the information disclosure provided by us pursuant to Section 1798.83 of the California Civil Code, please contact us via the email or address stated above. Please allow 30 days for a response.

11. ACCESSING AND CORRECTING PERSONAL INFORMATION

If you want to request a modification or deletion of the PII we retain about you, please email your request to robbie@alpineadvertising.com. Note that we need to retain certain records for legal or internal business reasons (such as fraud prevention). Some of your information may remain on backup systems, in compliance with applicable law.

We will retain your personal information for as long as necessary to provide the services to our clients, or as needed to comply with our legal obligations or enforce our agreements.

MORE QUESTIONS?

Questions regarding our Privacy Policy should be directed to robbie@alpineadvertising.com