

## **UPDATED PRIVACY POLICY STATEMENT CHRISTIAN RADIO KDRY AM 1100**

Last updated: May 25, 2018

KDRY Radio, Inc. (hereafter as “KDRY” or “we”) recognizes that your privacy is very important and we take it seriously. This Privacy Policy (“Privacy Policy”) describes our policies and procedures on the collection, use, disclosure, and sharing of your personal information or personal data when you use the KDRY website and mobile/tablet applications (the “Platform”). This Privacy Policy applies to activities by KDRY and its affiliates and subsidiaries (collectively “KDRY,” “we” or “us”).

### **The Information We Collect**

When a user (hereinafter referred to as “you” or the “user”) browses any KDRY Platform, the user does so anonymously. At the KDRY website, you can contact us for support. If you do request support, we may request that you voluntarily supply us with personally identifiable information. The types of personally identifiable information that may be collected at these pages include: name, e-mail address, telephone number, and information about you provide regarding our products and services. In addition, the KDRY site offers the ability to integrate with third-party social media sites, in which case you may have an opportunity to voluntarily provide additional identifiable information, such as your third-party social network profile name. If you have any questions concerning the personally identifiable information KDRY has collected, please contact us at our contact information found below.

We also may collect certain non-personally identifiable information when you visit our site, such as the type of browser you are using (e.g., Firefox or Internet Explorer), the type of operating system you are using, (e.g., Windows XP or Mac OS), the type of mobile device you are using, the domain name of your Internet service provider (e.g., AT&T or Comcast) and the search engine from which you were directed (e.g., Google or Yahoo).

**Integrated Service Provider and Linked Networks.** You can elect to sign in or sign up to the KDRY Platform through a linked network (i.e., Facebook or Google), and you can connect your existing KDRY account with certain third-party networks like Facebook, Twitter and LinkedIn (each a “Linked Network”). If you elect to sign up through or connect with a Linked Network, we receive certain profile and account information about you from the Linked Network. The specific information provided to us by Linked Networks is determined by these third parties and may vary by network. In all cases, the permissions page for the Linked Network will describe the information being shared. You should consult their respective privacy policies for information about their practices. You may elect to use information from the Linked Network to populate your profile on the KDRY Platform and help you find and follow your contacts on the KDRY Platform. For information on your choices, including how to disconnect a Linked Network from your KDRY profile, see the “Your Choices” section below. You may also elect to connect and make and receive payments to and from use through third party networks (“Integrated Service Provider”); if you do so, you will be allowing us to pass to and receive from the Integrated Service Provider your login information and other user data for payment purposes.

**Automatically Collected Information About Your Activity.** We use cookies, log files, pixel tags, local storage objects, and other tracking technologies to automatically collect information about your activities, such as your searches, page views, date and time of your visit, and other information about your use of the KDRY Platform. We also collect and may store information that your computer or mobile device provides to us in connection with your use of the KDRY Platform such as your browser type, type of computer or mobile device, browser language, IP address, mobile carrier, unique device identifier, location, and requested and referring URLs. We also receive information when you view content on or otherwise interact with the KDRY Platform, even if you have not created an account. For more information, see the “Cookies, Pixels and Tracking” section below and our Cookie Policy.

### **How We Use Your Information**

NOTWITHSTANDING ANY PROVISION OF THIS PRIVACY POLICY TO THE CONTRARY, TO THE EXTENT YOU PROVIDE YOUR INFORMATION, WE WILL NOT SELL OR RENT SUCH INFORMATION TO ANY THIRD PARTY UNLESS YOU OTHERWISE SPECIFICALLY CONSENT. KDRY uses the information we collect for the following purposes:

**Provide our Services.** To provide you the services we offer on the KDRY Platform, communicate with you about your use of the KDRY Platform, respond to your inquiries, provide troubleshooting, and for other customer service purposes. We may use information generally to compile statistical and user profile data, and to perform research using the compiled data including disclosure of user information to research firms retained by KDRY to keep in contact with users and provide them with a better interactive experience. We may use your information specifically for the following purposes: to provide customer support; to meet legal requirements; to provide Internet security; and/or to analyze the collected information and use this data for contacts by research firms.

**Personalization.** To tailor the content and information that we may send or display to you in the KDRY Platform, to suggest content, to offer location customization, and personalized help and instructions, and to otherwise personalize your experiences while using the KDRY Platform.

**Advertising.** To display interest-based advertising to you in the KDRY Platform, to improve our advertising and measurement systems so we can show you relevant ads, and to measure the effectiveness and reach of ads and services. For more information, see the Ad Services section below about KDRY Ads and Personalization.

**Marketing and Promotions.** For marketing and promotional purposes, such as to send you news and newsletters, special offers, and promotions, or to otherwise contact you about products or information we think may interest you, including information about third party products and services.

**Analytics.** To gather metrics to better understand how users access and use the KDRY Platform; to evaluate and improve the KDRY Platform, including the Ad Services and personalization, and to develop new products and services.

**Comply with Law.** To comply with legal obligations, as part of our general business operations, and for other business administration purposes.

**Prevent Misuse.** Where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of our Terms of Service or this Privacy Policy.

### **How We Share Your Information**

We share information as set forth below, and where individuals have otherwise consented:

**Service Providers.** We may share your information with third party service providers who use this information to perform services for us, such as payment processors, hosting providers, auditors, advisors, consultants, customer service and support providers, as well as those who assist us in providing the Ad Services.

**Affiliates.** The information collected about you may be accessed by or shared with subsidiaries and affiliates of KDRY, Inc., whose use and disclosure of your personal information is subject to this Privacy Policy.

**Business Transfers.** We may disclose or transfer information, including personal information, as part of any merger, sale, and transfer of our assets, acquisition or restructuring of all or part of our business, bankruptcy, or similar event.

**Legally Required.** We may disclose your information if we are required to do so by law.

**Protection of Rights.** We may disclose information where we believe it necessary to respond to claims asserted against us or, comply with legal process (e.g., subpoenas or warrants), enforce or administer our agreements and terms, for fraud prevention, risk assessment, investigation, and protect the rights, property or safety of KDRY, its users, or others.

**Metrics.** We may share with users of our advertisers or publishers aggregate statistics, metrics and other reports about the performance of their ads or content in the KDRY Platform such as the number of unique user views, demographics about the users who saw their ads or content, conversion rates, and date and time information. We do not share IP addresses or personal information. We may also allow our advertisers or publishers to use Pixels on the KDRY Platform in order to collect information about the performance of their ads or content.

**Anonymized and Aggregated Data.** We may share aggregated or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual.

## **Cookies, Pixels and Tracking**

We and our third-party providers use cookies, clear GIFs/pixel tags, JavaScript, local storage, log files, and other mechanisms to automatically collect and record information about your usage and browsing activities on the KDRY Platform and across third party sites or online services. We may combine this information with other information we collect about users. Below, we provide a brief summary these activities. For more detailed information about these mechanisms and how we collect activity information, see our Cookie Policy.

**Cookies.** These are small files with a unique identifier that are transferred to your browser through our websites. They allow us to remember users who are logged in, to understand how users navigate through and use the KDRY Platform, and to display personalized content and targeted ads (including on third party sites and applications).

**Pixels, web beacons, clear GIFs.** These are tiny graphics with a unique identifier, similar in function to cookies, which we use to track the online movements of users of the KDRY Platform and the web pages of users of our Ad Services, and to personalize content. We also use these in our emails to let us know when they have been opened or forwarded, so we can gauge the effectiveness of our communications.

**Analytics Tools.** We may use internal and third party analytics tools, including Google Analytics. The third party analytics companies we work with may combine the information collected with other information they have independently collected from other websites and/or other online products and services. Their collection and use of information is subject to their own privacy policies.

**Do-Not-Track Signals.** Please note we do not change system behavior within the KDRY Platform in response to browser requests not to be tracked. You may, however, disable certain tracking by third-parties as discussed in the KDRY Ads and Personalization section below. You may also opt out of tracking by KDRY Pixels, as described below in KDRY Ads and Personalization.

## **KDRY Ads and Personalization**

We may display personalized content (including from third party publishers) and personalized ads (including sponsored content), based on information that we have collected via the KDRY Platform, and through our Pixels, widgets, and buttons embedded on third party sites. We also may report aggregated or de-identified information about the number of users that saw a particular ad or content and related audience engagement information to users of our Ad Services and to publishers of content on the KDRY Platform. See KDRY's Pixel Privacy Terms for more information about how our Pixels are used, and also see the "Your Choices" section below for information about opting out of tracking by our Pixels.

Users of our Ad Services may also provide us with information as part of their ad campaigns, including customer list information (e.g., email addresses and demographic or interest data) with us in order to create customized audiences for their ad campaigns; we only use this

information to facilitate the particular user's campaign (including ad metrics and reporting to that user) or for fraud detection and security purposes; and we do not disclose this information to third parties (other than our service providers) unless required by law. We also do not disclose to the users of our Ad Services the names or identities of their customers that were successfully reached as part of such campaigns.

As described in our Cookie Policy, we may also work with third parties such as network advertisers to serve ads on the KDRY Platform and on third-party websites or other media (e.g., social networking platforms). These third parties may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you.

In addition to opting out of tracking across sites by our Pixels (see "Your Choices" section below), you also may opt out of much interest-based advertising on third party sites and through third party ad networks (including Facebook Audience Network and Google AdSense). See "Your Choices" section below for more information about opting out of third-party ad networks.

### **How We Protect Your Information**

The security of your information is important to us. KDRY has implemented safeguards to protect the information we collect. However, no website or Internet transmission is completely secure. We urge you to take steps to keep your personal information safe, such as choosing a strong password and keeping it private, as well as logging out of your user account, and closing your web browser when finished using the KDRY Platform on a shared or unsecured device.

**Access and Amend Your Information.** You may update or correct your account information at any time by logging in to your account. You may also make a number of other adjustments to settings or the display of information about you as described in more detail in the following section about Your Choices.

**Your Choices.** You may, of course, decline to submit information through the KDRY Platform, in which case we may not be able to provide certain services to you. You may also control the types of notifications and communications we send, limit the information shared within the KDRY Platform about you, and otherwise amend certain privacy settings.

**Emails and Communications.** You can manage your email and notice preferences in your account profile settings, under your Emails and Notifications settings. If you opt out of receiving emails about recommendations or other information we think may interest you, we may still send you transactional e-mails about your account or any services you have requested or received from us.

**Credentials.** You can change your credentials that are displayed in your profile or in connection with a specific answer.

**Destruction of Personal Data.** At any time you may request that KDRY destroy all of your personal information collected through the KDRY Platform, and KDRY shall comply with your request to the extent allowed by applicable law.

**Deleted KDRY Platform.** If you choose Delete the KDRY Platform then you will no longer receive any communications from us.

**Security Breach Management and Notification.** KDRY maintains security incident management policies and procedures and shall notify you without undue delay after becoming aware of the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your Data, including Personal Data, transmitted, stored or otherwise Processed by KDRY (a “Customer Data Incident”). KDRY shall make reasonable endeavors to identify the cause of such Customer Data Incident and take those steps as KDRY deems necessary and reasonable in order to remediate the cause of such a Customer Data Incident to the extent the remediation is within KDRY’s reasonable control.

**Pixels.** To opt out of tracking via the KDRY Pixels, please visit this page. Opting out of Pixels tracking may impact our ability to personalize ads and content tailored to your interests. This setting is tied to your cookies, and, unless you are logged in to the KDRY Platform, will only be effective on the browser for which you have performed the opt-out.

**Third Party Ad Networks.** For information about and to opt out of interest-based ads from many ad networks, go to:

U.S.: [www.aboutads.info](http://www.aboutads.info) Internet Advertising Bureau

Canada: [www.youradchoices.ca](http://www.youradchoices.ca)

European Union: [www.youronlinechoices.eu/](http://www.youronlinechoices.eu/)

**Linked Networks.** You may connect or disconnect your Linked Networks, such as Facebook, through the Account Settings tab in your profile settings, and you may access, amend and delete much of your profile information through your profile settings. Once you disconnect a Linked Network, we will not receive information from that Linked Network going forward; unless you choose to reconnect it. You may also control whether the Linked Network is visible in your profile.

KDRY is headquartered in the United States, and has operations, entities and service providers in the United States and throughout the world. As such, we and our service providers may transfer your personal information to, or access it in, jurisdictions (including the United States) that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal information receives an adequate level of protection in the jurisdictions in which we process it.

### **Europe Specific Provisions**

**GDPR.** As of May 25<sup>th</sup>, 2018, KDRY will Process Personal Data in accordance with the GDPR requirements directly applicable to the KDRY Platform.

**Transfer Mechanisms for Data Transfers.** Subject to the terms of this Privacy Policy KDRY makes available the transfer mechanisms listed below which shall apply to any online transfers of personal data under this Privacy Policy from the European Union, the European Economic Area and/or their member states, Switzerland and the United Kingdom to countries which do not ensure an adequate level of data protection within the meaning of Data Protection Laws and Regulations of the foregoing territories, to the extent such transfers are subject to such Data Protection Laws and Regulations.

**Additional Terms for EU-US and Swiss-US Privacy Shield Services.** KDRY self-certifies to and complies with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, as administered by the US Department of Commerce, and KDRY shall ensure that it maintains its self-certification to and compliance with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks with respect to the Processing of Personal Data that is transferred from the European Economic Area and/or Switzerland to the United States.

### **Children's Privacy**

We do not knowingly collect or solicit personal information from anyone under the age of 16 or knowingly allow such persons to register. If we become aware that we have collected personal information from a child under the relevant age without parental consent, we take steps to delete that information.

### **Links to Other Websites**

The KDRY Platform may contain links to third party sites or online services. We are not responsible for the practices of such third parties, whose information practices are subject to their own policies and procedures, not to this Privacy Policy.

### **Your California Privacy Rights**

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the types of personal information disclosed to those parties. If you are a California resident and would like to request this information, please submit your request at our contact information below.

### **Contact Us**

If you have any questions about our practices or this Privacy Policy, please contact us at:

KDRY Radio, Inc.  
16414 San Pedro Ave., Ste. 575  
San Antonio, Texas 78232  
Attn: Management  
Or via email at [am1100@kdry.com](mailto:am1100@kdry.com)

## **Changes to Our Privacy Policy**

If we change our privacy policies and procedures, we will post those changes on this page. If we make any changes to this Privacy Policy that materially change how we treat your personal information, we will endeavor to provide you with reasonable notice of such changes, such as via prominent notice in the KDRY Platform or to your email address of record, and where required by law, we will obtain your consent or give you the opportunity to opt out of such changes.