

# Speed Shift Media Privacy Policy

Effective Date: September 1st, 2021

Media Management Technologies, Inc. dba Speed Shift Media and all associated companies and subsidiaries (“Speed Shift Media”) have created this privacy policy (“Privacy Policy”) in order to comprehensively inform consumers about our privacy practices and to demonstrate our firm commitment to privacy. This Privacy Policy describes how Speed Shift Media collects, uses, discloses, transfers, stores, retains or otherwise processes your information in the course of providing our products, services or related activities (collectively “Services”). We collect your personal information in a variety of ways, including through the Internet domains owned or operated by Speed Shift Media, which include, but are not limited to <https://www.speedshiftmedia.com/>, and through our partner websites.

We refer to the above Speed Shift Media website and all related websites as “sites” and to each of them as a “site.” When we refer to “we,” “us,” or “our,” we mean Speed Shift Media, or the specific division, subsidiary, or affiliate that operates a site, provides its content, or processes information received through it, each as appropriate and applicable. When we refer to “you” or “your,” we mean the person about whom we collect personal information or data. If the person accessing the site does so on behalf of, or for the purposes of, another person, including a business or other organization, “you” or “your” also means that other person, including a business organization, if applicable.

Please read this Privacy Policy carefully. By continuing to use our sites or our partner websites, you agree to have your personal information handled in the manner described in this Policy.

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## **II. GENERAL DISCLOSURES**

Each of the sites is hosted in the United States and their intended use is business to business. If you are visiting the sites from outside of the United States, please note that by providing your information it is being transferred to, stored or processed in the United States and other countries where our data center and servers are located and operated. This section sets forth the general Privacy Policy for the United States and other jurisdictions not otherwise specifically covered by the below jurisdiction-specific policies. Depending on your state or country of residence, applicable privacy laws may provide you right to additional disclosures as well as special consumer rights.

If you are outside the United States, please see the provisions in our [International Privacy Policy](#). If you are outside the United States and do not wish to allow the transfer of your personal information to the United States, you should not use these sites or our Services and you should opt-out of the collection of cookies by following the guidelines in our section titled [How To Restrict Cookies](#). For more information about how we utilize cookies, view our [Cookie Policy](#).

We take your privacy and the protection of your personal information seriously. We will only store, process and disclose your personal information in accordance with applicable law. We will make it clear when we collect personal information and will explain what we intend to do with it. We do our best to protect your privacy through the appropriate use of information security measures.

## **III. WHAT INFORMATION WE COLLECT**

Speed Shift Media may collect personal information about you either directly from you, your mobile and/or other Internet connected devices (“Connected Device”), and from select external sources. Detailed information regarding our practices can be found in the sections below.

### **A. CATEGORIES OF PERSONAL INFORMATION THAT WE COLLECT**

The following categories of personal information are provided to help you better understand the information we may collect directly from you, either through your use of the sites (including from Connected Device) or in the course of us providing our Services to our customers.

## Public Ad Serving and Third Party Websites

In relation to our public ad Services, we may directly collect, use, store and process different kinds of personal information about you, which we have grouped into the following categories:

<b>Category of Information</b>	<b>Examples</b>	<b>Purpose of Collection</b>
<b>Geolocation Information</b>	<ul style="list-style-type: none"><li>• ZIP code</li></ul>	<ul style="list-style-type: none"><li>• we collect this information in order to provide you with targeted advertisements that are geographically relevant to you.</li></ul>
<b>Computer Technical Information</b>	<ul style="list-style-type: none"><li>• internet protocol (IP) address</li><li>• browser plug-in types and versions</li><li>• operating system and platform and other technology on the Connected Devices that you use to access the sites</li></ul>	<ul style="list-style-type: none"><li>• we collect this information (IP) in order to provide you with targeted advertisements that are geographically relevant to you.</li><li>• we collect this information (browser and device type) in order to provide our non-personally identifiable metrics to our customers.</li><li>• we collect this information (browser and device type) in order to track and analyze trends and usage in connection with your use of our sites as well as in the performance of our Services.</li><li>• we also collect this information (browser and device type) in order to see how we can better optimize our sites and Services.</li></ul>
<b>Internet Activity Information</b>	<ul style="list-style-type: none"><li>• web pages accessed</li><li>• general interaction information</li><li>• time spent on our sites</li><li>• date and time of your visit</li></ul>	<ul style="list-style-type: none"><li>• we collect this information in order to provide our non-personally identifiable metrics to our customers.</li></ul>

## Private Analytics Portal

In relation to the administration of our customer dashboard and portal, we may directly collect, use, store and process different kinds of personal information about you if you are working for or with our customers, which we have grouped into the following categories:

<b>Category of Information</b>	<b>Examples</b>	<b>Purpose of Collection</b>
<b>Business Identifier Information</b>	<ul style="list-style-type: none"> <li>• first and last name</li> <li>• e-mail address</li> <li>• phone number</li> <li>• company information</li> </ul>	<ul style="list-style-type: none"> <li>• we collect this information in order to respond to your questions or concerns.</li> <li>• we also collect this information to send you information we think you may find useful or which you have requested from us.</li> </ul>
<b>Account Login Information</b>	<ul style="list-style-type: none"> <li>• user name</li> <li>• password</li> </ul>	<ul style="list-style-type: none"> <li>• we collect this information in order to provide you with access to our sites and Services.</li> </ul>
<b>Computer Technical Information</b>	<ul style="list-style-type: none"> <li>• internet protocol (IP) address</li> <li>• browser plug-in types and versions</li> <li>• operating system and platform and other technology on the Connected Devices that you use to access the sites</li> <li>• diagnostic information relating to your Connected Devices</li> </ul>	<ul style="list-style-type: none"> <li>• we collect this information in order to track and analyze trends and usage in connection with your use of our sites as well as in the performance of our Services.</li> <li>• we also collect this information in order to see how we can better optimize our sites and Services.</li> <li>• we also collect this information to maintain and improve our Services and sites, including improving safety and quality controls, as well as to develop new products and services.</li> <li>• we collect this information in order to provide our Services.</li> </ul>

**B. INFORMATION THAT WE RECEIVE FROM SELECT PARTNERS**

We may receive information about you indirectly through other parties. For example, if you use our sites on or through an external platform, including via your Connected Device, or click on external links, the collection, use, and disclosure of your information and your use of the sites will also be subject to the privacy policies and other terms of such external parties and platforms. Speed Shift Media has no control over the information collection and processing practices of

such external parties and you should review such privacy policies or terms of the websites or parties to which you give your information. We will not knowingly obtain or use personal information that was collected from you or disclosed to us in violation of law or through deceptive means.

We may indirectly collect, use, store and process different kinds of personal information about you, which we have grouped into the following categories:

**1. GENERAL DISCLOSURES**

<b>Category of Information</b>	<b>Examples</b>	<b>Source of Information</b>	<b>Purpose of Collection</b>
<b>Business Identifier Information</b>	<ul style="list-style-type: none"> <li>• first and last name</li> <li>• telephone number</li> <li>• physical address</li> <li>• email address</li> </ul>	<ul style="list-style-type: none"> <li>• our business development and marketing partners</li> </ul>	<ul style="list-style-type: none"> <li>• we collect this information to explore providing our Services to new customers.</li> </ul>
<b>Geolocation Information</b>	<ul style="list-style-type: none"> <li>• ZIP code</li> <li>• city, state and country</li> </ul>	<ul style="list-style-type: none"> <li>• our data matching and analytics service providers</li> </ul>	<ul style="list-style-type: none"> <li>• we collect this information in order to provide you with targeted advertisements that are relevant and useful to you.</li> </ul>
<b>Employment Reference Information</b>	<ul style="list-style-type: none"> <li>• first and last name</li> <li>• telephone number</li> <li>• physical address</li> <li>• email address</li> </ul>	<ul style="list-style-type: none"> <li>• perspective Speed Shift Media employees</li> </ul>	<ul style="list-style-type: none"> <li>• during our hiring process, prospective employees may designate you as a personal reference and provide us with your contact information.</li> </ul>

**2. EXTERNAL PARTNER ADVERTISING AND ANALYTICS**

We may use service providers to provide site metrics and other analytics services. These service providers may use cookies, web beacons and other technologies to collect information, such as your IP address, identifiers associated with your device, other applications on your device, the browsers you use to access our sites and Services, web pages viewed, time spent on webpages, links clicked and conversion information (e.g., transactions entered into). This information may be used by Speed Shift Media and service providers on behalf of Speed Shift Media to analyze and track usage of the sites and our customers’ websites to determine the popularity of certain content and to better understand how you use our sites or our customers’ websites.

This Privacy Policy does not apply to, and we are not responsible for, third-party cookies, web beacons or other tracking technologies, which are covered by such third-parties’ privacy policies. For more information, we encourage you to check the privacy policies of these third-parties to

learn about their privacy practices. For more information about targeted advertising specifically, please visit <https://youradchoices.com>.

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking across websites. Most modern web browsers give you the option to send a Do Not Track signal to the websites you visit, indicating that you do not wish to be tracked. However, there is no accepted standard for how a website should respond to this signal, so we do not take any action in response to this signal. Speed Shift Media does not have a mechanism in place to respond to DNT signals. Instead, in addition to publicly available external tools, we offer you the choices described in this Privacy Policy to manage the collection and use of information about you.

Speed Shift Media does track some activity across websites (including your interaction with our sites or our customers’ websites, the website you visited before you visited our customers’ websites and other clickstream data) and we may continue to collect information in the manner described in this Privacy Policy from web browsers that have enabled DNT signals or similar mechanisms. If you wish to opt-out of tracking, please use the [link](#) provided on our website.

### **3. SOCIAL MEDIA**

We may collect information from other sources, such as social media platforms that may share information about how you interact with our social media content. We do not control how your personal information is collected, stored or used by third-party websites or to whom those websites disclose your information. You should review the privacy policies and settings on any social media website that you subscribe to so that you understand the information they collect and may be sharing. If you do not want your social media websites to share information about you, you must contact that website and determine whether it gives you the opportunity to opt-out of sharing such information. Speed Shift Media is not responsible for how these third-party websites may use information collected from or about you.

Further, our sites may include social media features, such as the Facebook Like button. Our integration of these features may allow external social media to collect certain information, such as your IP address and which page(s) you are visiting when using our sites and Services, and to set a cookie to enable that feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing it.

### **C. COLLECTION OF TECHNICAL INFORMATION AND USAGE INFORMATION**

The Computer Technical Information and Website Usage Information that we collect, which may be linked to your personal information, is collected through the use of server logs and tracking technologies, including: (i) cookies, which are small pieces of code that websites send to your Connected Device to uniquely identify your browser or mobile device or to store information in your browser setting; (ii) web beacons, which are small objects that allow us to measure the actions of visitors using the Speed Shift Media’s sites. For more detailed information regarding how we use cookies and other technology, please review the additional information in our [Cookies Policy](#).

## **IV. WHEN AND WITH WHOM DO WE SHARE YOUR INFORMATION**

## A. WE DO NOT SELL YOUR INFORMATION

We do not sell your personal information.

## B. WHEN AND HOW WE MAY DISCLOSE YOUR INFORMATION WITH OUR SERVICE PROVIDERS AND CUSTOMERS

In the course of our business we may share your personal information with select and trusted entities that are engaged by Speed Shift Media to provide services that are deemed necessary for the function, operation or management of our business or as required by law. We will only share your information with the following service providers or other external entities under the circumstances described below.

### 1. DATA-SPECIFIC DISCLOSURES

Category of Information	Examples	Recipient of Disclosure	Purpose of Disclosure
Identifier Information	<ul style="list-style-type: none"><li>internet protocol (IP) address</li></ul>	<ul style="list-style-type: none"><li>our data matching and analytics partners</li></ul>	<ul style="list-style-type: none"><li>we collect this information in order to provide you with targeted advertisements that are relevant and useful to you.</li></ul>
Internet Activity Information	<ul style="list-style-type: none"><li>web pages accessed</li><li>general interaction information</li><li>time spent on our sites</li><li>date and time of your visit</li></ul>	<ul style="list-style-type: none"><li>our data matching and analytics partners</li></ul>	<ul style="list-style-type: none"><li>we collect this information in order to provide you with targeted advertisements that are relevant and useful to you.</li><li>we collect this information in order to provide our non-personally identifiable metrics to our customers.</li></ul>

### 2. DATABASE HOSTING VENDOR

Like many businesses, we utilize cloud databases to host our business data, including your personal information, so that we can effectively and safely operate our business.

### 3. AUDITORS

Like many businesses, we are subject to audits from a number of entities, such as our regulators, enterprise customers and service providers, as well as due to our own internal auditing policies. In order to accomplish an effective audit, we must provide information, which may include your

personal information, to external auditors. We always ensure that your information is safely disclosed and stored and that auditors can only use your information for the purposes of completing an audit.

#### **4. CORPORATE TRANSACTIONS**

We may share all or part of your personal information with other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of Speed Shift Media's business or assets to such business entity (including due to a sale in connection with a bankruptcy). We will require any such purchaser, assignee or other successor business entity to honor the terms of this Privacy Policy.

#### **5. DISCLOSURE OF INFORMATION FOR LEGAL PURPOSES**

Speed Shift Media may disclose all or part of your personal information when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating any agreement with Speed Shift Media, or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of our sites, or anyone else that could be harmed by such activities. We may disclose information in response to a subpoena, search warrant, in connection with judicial proceedings, or pursuant to court orders, legal process or other law enforcement measures. Speed Shift Media may disclose or access personal information when we believe in good faith that the law requires it, to establish our legal rights or to defend against legal claims, and for administrative and other purposes that we deem necessary to maintain, service and improve our Services.

#### **6. AGGREGATED, ANONYMIZED OR DE-IDENTIFIED INFORMATION**

We may disclose or use aggregated, anonymized or de-identified information for any purpose. Aggregated, anonymized or de-identified information is information that can no longer reasonably identify a specific individual. Although such information may be derived from your personal information, it can no longer directly or indirectly reveal your identity.

### **V. COOKIES POLICY**

Like many online platforms, Speed Shift Media and its analytics vendors use server logs and automated data collection tools, such as browser cookies, pixel tags, scripts and web beacons. These tools are used for analytics purposes to enable Speed Shift Media to understand how users interact with the sites and Services. Speed Shift Media and its analytics vendors may tie the information gathered by these means to the identity of users.

Cookies are small text files placed on a computer or device while browsing the Internet. Cookies are used to collect, store and share bits of information about user activities. Speed Shift Media uses both session cookies and persistent cookies.

Session cookies are used to identify a particular visit to Speed Shift Media's sites and collect information about your interaction with the sites. These cookies expire after a short time or when the user closes their web browser after using the sites. Speed Shift Media uses these cookies to identify a user during a single browsing session, such as when you log into the sites. This helps



Speed Shift Media improve the sites, application and Services as well as improve the users' browsing experience.

A persistent cookie will remain on a user's device for a set period of time specified in the cookie. Speed Shift Media uses these cookies to identify and recognize a specific user over a longer period of time. They allow Speed Shift Media to:

- analyze the usage of the sites (e.g. what links users click on) in order to improve our offering;
- test different versions of the sites to see which particular features or content users prefer to optimize the sites;
- provide a more personalized experience to users with more relevant content and course recommendations; and
- allow users to more easily log in to use the sites and Services.

Examples of persistent cookies include: (i) preferences cookies to remember information about a user's browser and settings preferences, such as preferred language – preference cookies make a user's experience more functional and customized, (ii) authentication and security cookies to enable a user to log in or stay logged in to access the sites and Services, to protect user accounts against fraudulent log-ins by others and to help detect and protect against abuse or unauthorized usage of user accounts and (iii) functional cookies to make the experience of using the sites and Services better, like remembering the sound volume level selected by the user.

Speed Shift Media uses tracking technology to: (i) determine if a certain page was visited or whether an email sent by Speed Shift Media was opened or clicked on by a user; and (ii) to customize the experience of individual users by recommending specific content.

We also use clear gifs in HTML-based emails sent to our users to track which emails are opened and clicked on by recipients. We may use the information we obtain from the cookie in the administration of the sites, to improve the usability of the sites and for marketing purposes. We may also use that information to recognize your computer when you visit our sites, and to personalize our sites for you.

Cookies and information captured through our sites are stored for a certain retention period, however you can eliminate these cookies any time before the expiration date. Below is our [Table of Cookies](#).

## **VI. HOW TO RESTRICT COOKIES**

You can adjust the settings in your browser in order to restrict or block cookies that are set by the sites (or any other website on the Internet). Your browser may include information on how to adjust your settings. Alternatively, you may visit [www.allaboutcookies.org](http://www.allaboutcookies.org) to obtain comprehensive general information about cookies and how to adjust the cookie settings on various browsers. This site also explains how to delete cookies from your computer.

You can control and delete these cookies through your browser settings through the following:

- [Google Chrome](#)
- [Mozilla Firefox](#)

- [Safari](#)
- [Opera](#)
- [Microsoft Internet Explorer](#)
- [Microsoft Edge](#)
- [Safari for iOS \(iPhone and iPad\)](#)
- [Chrome for Android](#)

Or you can also use the following cookie management and disposal tool from Google Analytics by downloading and installing the browser plug-in from the following link: <http://tools.google.com/dlpage/gaoptout>.

Please be aware that restricting cookies may impact the functionality of the Services. Most browsers allow you to refuse to accept cookies. Additional general information about cookies, including how to be notified about the placement of new cookies and how to disable cookies, can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **VII. LINKING SITES**

The sites contain links to other websites. Speed Shift Media is not responsible for the privacy practices or the content of such websites, including any websites that may indicate a special relationship or partnership with us (such as co-branded pages or “powered by” or “in cooperation with” relationships). We do not share information we gather with other websites or any other entities or individuals unless such sharing is disclosed to you in advance through this Privacy Policy. Other linked websites, however, may collect personal information from you that is not subject to our control. To ensure protection of your privacy, always review the privacy policy of the websites you may visit by linking from the sites. Please note that this Privacy Policy applies only to our sites, and not to other companies’ or organizations’ websites to which we link.

For instance, information collected through Google Analytics is shared with Google and its partners who may combine it with other information you provided to them or they collected from your use of their services. This information is stored in Google’s servers according to their privacy practices.

## **VIII. HOW LONG WE RETAIN YOUR INFORMATION**

We may retain your personal information for a period of time that is consistent with applicable law, applicable statute of limitations and our data retention policy. We may also retain your personal information as we believe is reasonably necessary to comply with applicable law, regulation, legal process or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce other applicable agreements or policies or to take any other actions consistent with applicable law.

## **IX. MARKETING AND PROMOTIONAL COMMUNICATIONS**

You may opt-out of receiving marketing and promotional messages from Speed Shift Media, if those messages are powered by Speed Shift Media, by following the instructions in those messages. If you decide to opt-out, you will still receive non-promotional communications relevant to your use of our Services.

## **X. CHILDREN’S ONLINE PRIVACY PROTECTION ACT (COPPA) COMPLIANCE AND RELATED INFORMATION**

The Children’s Online Privacy and Protection Act (COPPA) regulates online collection of information from persons under the age of 13. It is our policy to refrain from knowingly collecting or maintaining personal information relating to any person under the age of 18. If you are under the age of 18, please do not supply any personal information through the sites or application. If you are under the age of 18 and have already provided personal information through the sites or application, please have your parent or guardian contact us immediately using the information provided under [Contact Us](#) so that we can remove such information from our files.

## **XI. SECURITY**

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. We hold information about you both at our own premises and with the assistance of service providers. Further public disclosure here of our security measures could aid those who might attempt to circumvent those security measures. If you have additional questions regarding security, please feel free to contact us directly using the information provided under [Contact Us](#) .

## **XII. CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may be revised from time to time as we add new features and Services, as laws change and as industry privacy and security best practices evolve. We display an effective date on this Privacy Policy at the top of this Privacy Policy so that it will be easier for you to know when there has been a change. If we make any material change to this Privacy Policy regarding use or disclosure of personal information, we will provide notice on our sites. Changes will apply to information collected after the change is effective. Please check this Privacy Policy periodically for changes. Small changes or changes that do not significantly affect individual privacy interests may be made at any time and without prior notice. Your use of the sites constitutes acceptance of the provisions of this Privacy Policy and your continued usage after such changes are posted constitutes acceptance of each revised Privacy Policy. If you do not agree to the terms of this Privacy Policy or any revised Privacy Policy, please exit the sites immediately. If you have any questions about this Privacy Policy, the practices of the sites or your dealings with the sites, you can contact us by using the information provided below.

## **XIII. CONTACT US**

Please contact Speed Shift Media with any questions or concerns regarding this Privacy Policy.

Attention:

[support@speedshiftmedia.com](mailto:support@speedshiftmedia.com)

Toll Free: 1-855-520-9177

If you have any questions or concerns regarding our Privacy Policy, or if you believe our Privacy Policy or applicable laws relating to the protection of your personal information have not been

respected, you may file a complaint with Speed Shift Media using the contact information listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We may keep records of your request and any resolution.

#### **XIV. SPECIFIC CONSUMER RIGHTS – UNITED STATES**

There are a number of U.S. states that provide specific consumer rights to residents of those jurisdictions regarding personal information. This section of this Privacy Policy describes the rights available to those individuals who are entitled to them. Not all individuals whom we possess information about will have access to these rights and Speed Shift Media may not be able to provide these rights to everyone due to legal and jurisdictional limitations.

##### **A. CALIFORNIA**

The California Consumer Privacy Act (“CCPA”) permits residents of California to have the following additional rights. For more information, or if you have questions, you can contact us using the information provided under [Contact Us](#) . For your protection, before Speed Shift Media can respond to your request, Speed Shift Media may be required to collect certain information from you to verify your identity. This may include asking for your full name, aliases, current home addresses or alternative email address. The information you provide to verify your identity will only be used for verification purposes, and a record of your request, including certain information contained within it, will be maintained by Speed Shift Media for its files.

##### **1. CALIFORNIA RESIDENTS HAVE THE RIGHT TO REQUEST SPEED SHIFT MEDIA DISCLOSE WHAT INFORMATION IT COLLECTS, USES AND DISCLOSES**

California residents have the right to request that Speed Shift Media disclose what personal information Speed Shift Media collects, uses and discloses about them. The general categories of personal information Speed Shift Media collects about California residents are listed above under [What Information We Collect](#). If you are a California resident and would like to request the specific personal information that Speed Shift Media collects, uses and discloses about you, please contact Speed Shift Media using the information provided under [Contact Us](#).

##### **2. CALIFORNIA RESIDENTS HAVE THE RIGHT TO REQUEST THE DELETION OF THEIR PERSONAL INFORMATION MAINTAINED BY SPEED SHIFT MEDIA**

California residents have the right to request that Speed Shift Media delete the personal information Speed Shift Media maintains about them. Speed Shift Media will make every effort to comply with California residents’ requests to delete their personal information, however, certain laws or other legal requirements might prevent some personal information from being deleted. If you are a California resident and would like to request the deletion of your personal information, please contact Speed Shift Media using the information provided under [Contact Us](#). To verify any request to delete personal information, you will be required to provide additional

information. Failure to do so could result in Speed Shift Media's inability to comply with your request.

**3. CALIFORNIA RESIDENTS HAVE THE RIGHT TO NON-DISCRIMINATION FOR THE EXERCISE OF THEIR PRIVACY RIGHTS UNDER THE CCPA**

Under the CCPA, California residents have the right not to receive discriminatory treatment by Speed Shift Media for the exercise of their privacy rights. However, the exercise of certain privacy rights by California residents will make it so that Speed Shift Media is no longer able to provide those residents with certain services. For example, if, at the request of a California resident, Speed Shift Media deletes all of the California resident's personal information that it maintains, Speed Shift Media will no longer be able to send marketing communications to that resident.

**4. CALIFORNIA RESIDENTS HAVE THE RIGHT TO OPT-OUT OF THE SALE OF THE PERSONAL INFORMATION.**

Under the CCPA, California residents can request that a company stop selling their personal information. However, as described above, Speed Shift Media does not sell your personal information.

**5. CALIFORNIA RESIDENTS CAN DESIGNATE AN AUTHORIZED AGENT TO MAKE A REQUEST UNDER THE CCPA ON THEIR BEHALF**

California residents can designate an authorized agent to make requests under the CCPA related to the residents' personal information. Speed Shift Media can deny any request made by an agent who does not submit proof that he or she has been authorized by the California resident to act on the California resident's behalf. For more information on submitting a request on behalf of a California resident as an authorized agent, you can contact us using the information provided under [Contact Us](#).

**B. NEVADA**

If a business engages in the sale of personal information, Nevada law provides Nevada residents the ability to opt-out of the sale of their personal information. However, Speed Shift Media has not and does not sell your personal information.

**XV. INTERNATIONAL PRIVACY POLICY**

This International Privacy Policy (the "International Privacy Policy") applies to individuals residing in countries other than in the U.S. Residents of non-U.S. jurisdictions may be entitled to additional disclosures and notification of consumer rights. These disclosures and rights will be explained below on a per-country basis. If you reside in a country other than the U.S., please review the general Privacy Policy above as those disclosures also apply to you, other than where we specifically stated otherwise. If you find that there is an inconsistency between the disclosures of the general Privacy Policy and this International Privacy Policy, then please note that this International Privacy Policy will control.

If you reside in a non-U.S. country that does not have associated privacy disclosure below, SSM does not knowingly process your personal information and the sites and Services are not meant for you. You should leave the site and delete all of your cookies associated with the site. We provide some guidance regarding cookie management in our [Cookie Policy](#) and [How to Restrict Cookie](#) sections above.

**THIS INTERNATIONAL POLICY APPLIES TO ALL PERSONAL DATA ABOUT YOU THAT WE COLLECT, HOLD, USE AND DISCLOSE, REGARDLESS OF THE WAY IN WHICH WE COLLECT IT (I.E. WHETHER THROUGH A SITE OR OTHERWISE).**

## **A. CANADA**

The Canadian Personal Information Protection and Electronic Documents Act (“PIPEDA”) imposes requirements regarding the collection, use, and disclosure of personal data in relation to our commercial activities, as does private-sector privacy legislation in local jurisdictions, provinces and territories.

### **1. PERSONAL DATA**

For the purposes of this section of the International Privacy Policy, personal data is as defined by applicable Canadian law. It generally means any factual or subjective information, recorded or not, about an identifiable individual.

### **2. COLLECTION OF PERSONAL DATA**

We collect the following categories of personal data from you:

- Business Identity Information;
- Geolocation Information;
- Account Login Information;
- Computer Technical Information; and
- Website Usage Information.

You can find more specific details about the personal data that we collect from you in the section titled [What Information We Collect](#) of our general Privacy Policy.

### **3. HOW WE USE PERSONAL DATA**

We collect your personal data for the following reasons:

- to respond to your questions or concerns;
- to send information we think you may find useful or which you have requested from us;
- to provide you with access to our site;
- to provide you with targeted advertisements that are relevant and useful to you;
- to measure, track and analyze trends and usage in connection with your use of our sites, our customers’ websites as well as the performance of our Services;
- to see how we can better optimize our sites and Services;
- to maintain and improve our Services and sites, including improving safety and quality controls, as well as to develop new products and services; and
- to provide our Services to our customers.

You can find more specific details about how we use your personal data as described above in the section titled [What Information We Collect](#) of our general Privacy Policy.

#### **4. THE BASIS ON WHICH WE PROCESS YOUR PERSONAL DATA**

Where required by Canadian law, we will obtain your consent before processing your personal data. We will only collect, process and share your personal data appropriate to the type of consent that we have received from you. You may provide your consent impliedly through the continued use of our sites or our customers' websites after being presented with this International Privacy Policy or through our customers and partners who have lawfully obtained your consent to process your personal information in the manner described in the general Privacy Policy and this International Privacy Policy. Your consent may also be intrinsic to the circumstances such as in the case where you have already provided personal data to us and you maintain your relationship with us or where you provide our representatives with your phone number so that we can contact you.

You may provide explicit consent orally, in writing, by electronic communication or any other means reasonably capable of conveying your consent. Except when otherwise permitted by law, we will only use the data for the purpose for which it was given.

#### **5. WITHDRAWING YOUR CONSENT**

As a Canadian resident, you have the right to withdraw your consent to Speed Shift Media processing your personal data, subject to certain limitations allowed by applicable law. You withdraw your consent through our [User Choices & Opt-Out](#) page. If you decide to withdraw your consent, you will no longer receive personalized banner ads from Speed Shift Media. However, you may still be presented with non-targeted Speed Shift Media ad units.

#### **6. SHARING OF PERSONAL DATA**

We may disclose your personal information to:

- our data matching and analytics partners;
- database hosting vendors;
- our auditors; or
- as part of a corporate transaction (for example, if we get purchased by another company), or as required by law or court order.

You can find more specific details about who we disclose your personal data to in the section titled [When and With Whom Do We Share Your Information](#) of our general Privacy Policy.

We remain responsible for all personal data communicated to our service providers for processing related to our Services. As such, where appropriate, we ensure that our service providers that are engaged to provide products or services on our behalf and are provided with personal data are required to observe the intent of this International Policy by having comparable levels of security protection or, when required, by assuring us (through a confidentiality agreement) that they will not use or disclosure the personal data for any purpose other than the purpose for which the personal data was communicated.

#### **7. LIMITATIONS**

We only collect the personal data necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by law. We do not use or disclose your personal data, except for the purposes for which it was collected, or new purposes to which you have consented, or as required or otherwise permitted by applicable law.

We do not, as a condition of providing services to you or on your behalf, or as an administrative or management requirement, require consent to the collection, use or disclosure of personal data beyond what is reasonably required for such purposes, or to comply with our obligations under applicable law.

## **8. RETENTION OF PERSONAL DATA**

We may retain your personal data for a period of time that is consistent with applicable law, applicable statute of data and our data retention policy. We may also retain your personal information as we believe is reasonably necessary to comply with applicable law, regulation, legal process or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce other applicable agreements or policies or to take any other actions consistent with applicable law.

## **9. ACCESS AND RIGHTS TO YOUR PERSONAL DATA**

As a Canadian resident, Canadian law provides you with the right:

- to access the personal data that we maintain about you
- to request that we rectify or correct incorrect personal data that we maintain about you
- to withdraw your consent to Speed Shift Media using your personal data.

To exercise these rights, please contact us using the information provided under [Contact Us](#). We will have to collect additional personal data about you in order to process your request, but we will not use this data for any other purpose. We also may retain a record of your request, which will be linked to you, for as long as is required by applicable law.

## **10. RESPONSE TIMES**

We will make every reasonable effort to respond to each of your written requests not later than 30 days after receipt of such requests. When applicable, we will advise you in writing if we cannot meet your requests within this time limit. When applicable, you have the right to make a complaint to the appropriate supervisory authority with respect to this time limit.

## **11. COSTS**

We expect to be able to respond to your request without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request for transcription, reproduction or transmission of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request.

## **12. SAFEGUARDS**

We use security safeguards appropriate to the sensitivity of personal data to protect it from loss or theft, as well as unauthorized access, disclosure, copying, use or modification. These



safeguards include physical measures, such as restricted access to offices and equipment, organizational measures, such as security clearances and publishing this policy to appropriate personnel with instructions to act in accordance with its principles (for example, limiting access on a “need to know” basis), and technological measures, such as the use of passwords and/or encryption.

Personal data is generally located at our corporate or divisional offices. A list of corporations, divisions, subsidiaries and affiliates to which this Privacy Policy and International Policy apply is available upon request. Personal data may also be stored with our trusted service providers who are necessary to provide our Services. We ensure that all service providers who maintain or process personal data have security safeguards appropriate to the sensitivity of personal data in order to protect it from loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

### **13. CONTACT**

If you have any questions or concerns regarding our International Privacy Policy, or if you believe our Privacy Policy or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with Speed Shift Media using the contact information listed below, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We may keep records of your request and any resolution.

### **XVI. TABLE OF COOKIES**

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Cookie Key	Description
SSM_GFU	Anonymous user id
SSM_UTC	Anonymous user id
SSM_UTC_LS	Anonymous user id
SSM_OPT_OUT	Records when a user has opted out of being tracked