Glassbox Media, Inc.

California Consumer Privacy Act Disclosure

**Effective Date:** March 8, 2022

This California Consumer Privacy Act Disclosure (this “**CCPA Disclosure**”) supplements the information contained in Glassbox Media Inc.’s Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California (“**consumers**” or “**you**”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (the “**CCPA**”) and any terms defined in the CCPA have the same meaning when used in this CCPA Disclosure.

Where noted in this CCPA Disclosure, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication (“**B2B personal information**”) from some its requirements.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“**personal information**”). Personal information does not include:

* Publicly available information from government records.
* Deidentified or aggregated consumer information.
* Information excluded from the CCPA’s scope, like:
  + health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data; and
  + personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

|  |  |
| --- | --- |
| **CCPA Category** | **Illustrative Examples** |
| Identifiers | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers. |
| Personal information (as defined in the CCPA) | A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories. |
| Commercial information | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. |
| Internet or other similar network activity | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. |
| Geolocation data | Physical location or movements. |
| Inferences drawn from other personal information | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. |

We obtain the categories of personal information listed above from the following categories of sources:

* Directly from you. For example, from forms you complete or products and services you purchase.
* From third parties. For example, business partners, contractors, service providers and third parties with whom you authorize or direct to share your information with us.
* Indirectly from you. For example, from observing your actions on our Website.

Use of Personal Information

We may use, sell, or disclose the personal information we collect for one or more of the following purposes:

* To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
* To provide, support, personalize, and develop our Website, products, and services.
* To create, maintain, customize, and secure your account with us.
* To process your requests, purchases, transactions, and payments and prevent transactional fraud.
* To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
* For advertising and marketing.
* To verify your identity.
* Using aggregated and de-identified information.
* To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
* To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
* For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
* To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
* As described to you when collecting your personal information or as otherwise set forth in the CCPA.
* To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

In the past 12 months, we have disclosed each of the above-listed categories of personal information concerning California residents for our business purposes to one or more of the following categories of third parties:

|  |  |
| --- | --- |
| **Third Parties** | **Illustrative Examples** |
| Subsidiaries/Affiliates | Companies related by common ownership or control |
| Business partners | Podcast owners |
| Contractors/Service providers | Software providers, podcast hosting/content platforms, marketing companies, communication services, data analytics providers and data providers |
| Third parties with whom you authorize or direct us to share your information | Payment processors |
| Government entities and others, when we share information for legal or necessary purposes | Regulatory and law enforcement agencies |

In the past 12 months, we have not shared personal information relating to California residents in a manner that we consider a sale within the meaning of the CCPA.

*Deidentified Patient Information*

We do not sell or disclose deidentified personal information exempt from the CCPA to third parties.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

*Right to Know and Data Portability*

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the “***right to know***”). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#a585939)), we will disclose to you:

* The categories of personal information we collected about you.
* The categories of sources for the personal information we collected about you.
* Our business or commercial purpose for collecting or selling that personal information.
* The categories of third parties with whom we share that personal information.
* If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  + sales, identifying the personal information categories that each category of recipient purchased; and
  + disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
* The specific pieces of personal information we collected about you (also called a data portability request).

We do not provide a right to know or data portability disclosure for B2B personal information.

*Right to Delete*

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#a585939)), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

* Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
* Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
* Debug products to identify and repair errors that impair existing intended functionality.
* Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
* Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
* Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
* Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
* Comply with a legal obligation.
* Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

We do not provide these deletion rights for B2B personal information.

*Exercising Your Rights to Know or Delete*

To exercise your rights to know or delete described above, please submit a request by emailing us at support@glassboxmedia.com.

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.

You may also make a request to know or delete on behalf of your child by emailing us at support@glassboxmedia.com.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

* Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
* Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor’s identity or authority to make it.

For instructions on exercising your sale opt-out or opt-in rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#a794300).

*Personal Information Sales Opt-Out and Opt-In Rights*

If you are age 18 or older, you have the right to direct us to not sell your personal information at any time (the right to opt-out). We do not sell the personal information of consumers we actually know are less than 18 years old unless we receive affirmative authorization (the “right to opt-in”) from the parent or guardian of such consumer. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out or right to opt-in, you (or your authorized representative) may submit a request to us by emailing us at support@glassboxmedia.com.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by: You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

* Deny you goods or services.
* Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
* Provide you a different level or quality of goods or services.
* Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Changes to this CCPA Disclosure

We reserve the right to amend this CCPA Disclosure at our discretion and at any time. When we make changes to this CCPA Disclosure, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes**.

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information described here and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Address**: 15 Broad Street, #3810, New York, NY 10005

**Email**: support@glassboxmedia.com