

# THURSTON COMMUNITY TELEVISION

## PRIVACY POLICY

This Privacy Policy states the Thurston Community Television, Inc. dba Thurston Community Media (“TCMedia,” “we,” and “our”) privacy practices applying to licensed users (“licensed user,” “user,” “you,” and “your”) of TCMedia’s Application (the “Software”).

TCMedia and its licensors own, operate, and maintain the Software. TCMedia is a Washington nonprofit corporation with its principal office in Olympia WA, U.S.A. Our street address and contact information are provided at end of this Privacy Policy.

All users are required to affirmatively accept this Privacy Policy as a condition of using the Software.

WHEN YOU ACCEPT THIS PRIVACY POLICY, YOU AGREE TO THE INFORMATION COLLECTION AND USE TERMS STATED IN IT. TCMEDIA HAS THE RIGHT TO REVISE THIS PRIVACY POLICY ON THE TERMS STATED BELOW. WE URGE YOU TO REVIEW THIS PRIVACY POLICY IN ITS ENTIRETY AND CONTACT US IF YOU HAVE QUESTIONS.

### **1. Information We Collect**

#### (a) No Personal Information

TCMedia does not currently require users to provide it with any personal information to use the Software.

#### (b) No User Content

TCMedia does not currently collect any data files, images, or other content from users.

#### (c) Information About Your Electronic Devices

We collect the IP address of the computer or electronic device (“device”) you use to access and use the Software. We use this information to identify individual users anonymously. We do not use or combine this information with any other information to derive the personal information or the identity of individual users. We will not share this information with any third parties without your express consent. We do not attempt to track or identify individual users by combining IP addresses from multiple devices.

#### (d) Information About Your Use of the Software

We may collect information about what content is being displayed by your device and for how long such content is displayed. This information is associated with your IP address and not any other information.

### **2. Our Use and Disclosure of Your Information**

We may aggregate the IP addresses and viewing information we collect from users to analyze, measure, evaluate, and improve or change the features and functionality of the Software. We may also use this information for product marketing, promotion, and sales purposes in our business discretion. We may share this usage information with our customers and third parties for marketing, advertising, or other similar uses. We only share information in aggregate form, without any personal information.

Except for the third parties we disclosed aggregate IP information pursuant to the preceding paragraph, we will not voluntarily share your personal information with a third party without your prior authorization, except: (a) to enforce our privacy policy, to comply with law, regulation, or other legal processes or to protect the rights, property or safety of us or others; (b) to a government regulator, law enforcement agency, or other public authorities, including to meet national security standards; (c) in emergency situations; (d) to protect against misuse or unauthorized use of the Services; (e) to detect or prevent criminal activity or fraud; or (f) in the event that TCMedia or substantially all of its assets are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, in which case personal information may be one of the transferred assets.

### **3. Cookies**

We collect information about your use of the Software with cookies. Cookies are small files that a software application stores on your computer's hard drive or other memory for record-keeping or other administrative purposes. If you are concerned about the use of cookies, you can choose to enable a feature in your browser that will erase cookies, block all cookies, or warn you before cookies are stored or exchanged. If you reject cookies, you may not have access to all features or functionality offered by the Software.

### **4. Data Security**

Data security for the Software is implemented through physical, administrative, and technical safeguards we put in place and operational procedures we follow to protect personal information. We protect any transactions involving personal information over the Internet using Secure Socket Layer (SSL) technology. We restrict access to personal information in our database to our authorized employees, our agents, and certain of our authorized contractors.

### **5. Children and Minors' Privacy**

The Software is not intended for use by children or persons under the age of 18. We will not knowingly collect any personal information from minors through this Software. If you think that we have collected personal information from a minor, please contact us immediately using the information in Section 11, below.

### **6. State Privacy Rights**

U.S. state consumer privacy laws may provide their residents with certain rights regarding our collection and use of their personal information.

California Civil Code Section 1798.83 permits users who are California residents to request certain information regarding any disclosures of personal information we make to third parties for direct marketing purposes. To make such a request, please contact us using the information at the end of this Privacy Policy.

Colorado, Connecticut, Virginia, and Utah each currently or will provide their residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also currently or will provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

Nevada currently or will provide its residents with a limited right to opt-out of certain personal information sales.

Not all of the foregoing state rights apply to TCMedia's collection and processing of your personal information. If you believe any of the foregoing state rights do apply to us and you wish to exercise such rights, please contact us using the information at the end of this Privacy Policy.

## **7. International Users**

Users who are located outside of the United States ("International Users") are hereby notified that all information collected with the Software may be transferred to and stored in the United States. By accepting this Privacy Policy, International Users consent to the storage and use of their information in the United States for the purposes stated herein.

TCMedia is responsible for complying with all applicable international privacy or data security laws and regulations. You can contact the TCMedia regarding legal compliance questions or other privacy matters using the contact information provided in Section 11, below.

TCMedia makes no representations or warranties that its privacy practices will comply with the laws or regulations of any legal jurisdictions worldwide other than Washington and the United States, including the General Data Protection Regulation of the European Union.

## **8. Other Websites and Software**

The Software may contain links to third party websites or software applications. TCMedia is not responsible for the privacy practices of these websites or applications. This Privacy Policy only applies to information collected by TCMedia.

## **9. User Consent**

By affirmatively accepting this Privacy Policy, you acknowledge that you have reviewed and accept its terms, and you expressly consent to the use of your information as stated. You may withdraw your consent to the use of your information at any time, unless you are withdrawing your consent to avoid a legal obligation to TCMedia. TCMedia's continued use of your information after you withdraw your consent to its use may be required for TCMedia to comply with federal and state laws and regulations.

To withdraw your consent to our use of your information, contact us directly using the information in the last section of this Privacy Policy, below.

## **10. Changes**

We may change this Privacy Policy periodically. We will not reduce your rights without your consent. The date at the end of this Privacy Policy indicates when the most recent changes were posted. If you use the Software after we have issued a notice about changes to this Privacy Policy, then you are expressly consenting to the use of your information as stated in the revised Privacy Policy.

## **11. Contact Information**

If you have any other questions, comments or concerns about this Privacy Policy or your privacy please contact us via U.S. Mail or email to:

Thurston Community Television  
440 Yauger Way SW, Suite C  
Olympia WA 98502  
info@tcmedia.org