

PRESS DEMOCRAT PRIVACY POLICY

Effective Date: July 31, 2018.

Through this Privacy Policy we provide you with important information about our privacy practices. This Privacy Policy applies when you interact with our website and online services and mobile applications (the “Sites”), as well as with respect to our collection and processing of your information for our newspaper publication offline (altogether the “Services”).

For users in the European Economic Area (“EEA”) or Switzerland, please see the section below titled **Users in the EEA and Switzerland** for additional provisions applicable to your use of the Services.

This Privacy Policy explains:

- What information we gather about you;
- How we use and protect the information we gather about you;
- The types of information we may share with others and under what circumstances;
- The choices you have about the collection, use, and sharing of your information;
- Along with other administrative details like how to update your information with us.

WHEN THIS PRIVACY POLICY APPLIES:

Sites that are governed by this Policy will include a link to this Policy. This Policy applies also when you interact with us through social media and other websites or online services. Third party sites that are linked from our Sites are governed by their own privacy policies. When you interact with us through social media sites, the social media platforms’ privacy policy will apply to their collection of information. Please review the privacy policies of those websites and online services to understand their privacy practices. With respect to our print publication, this policy applies to our collection of your information for purposes of providing you with our Services and communications related to or promotion of those Services.

Changes to this Policy: We will amend this Privacy Policy from time to time, and when we do, we will post any changes to our Website. The changes will become effective when they are posted to this page. Please check the date at the top of this policy for reference. Registered users will be notified via email of any significant or material changes made to the way we use your information. Your continued use of our Sites and Services following the posting of any changes means you accept those changes.

INFORMATION WE COLLECT FROM OR ABOUT YOU

Below we describe the different types of information we collect from you at different points of engagement with us.

Information You Give Us: Some parts of our Sites allow you to enter contact information and other information about you. We collect and store any information you enter on our Sites,

including your name, mailing address, ZIP Code, phone number, email address, or other demographic information. This information may be collected during the registration process on our Sites and may be linked to an account number so that we can associate your preferences online and through our Services to your account.

Information Collected Automatically: As you interact with our Sites certain information is collected about you and your use of our Sites automatically. This information includes device information such as computer and network connection information, your IP address and device identifiers, your operating system and browser type; and usage information, such as your page views, traffic that brought you to our Sites and what pages you visited after our Sites, URLs that referred you to our Sites; and advertising data. We also collect transaction history on our Sites and web logs (which are aggregated and used to analyze usage of our Sites), websites you click on within emails that we send you or through pages you visit on our Sites.

Much of this information is collected and stored through your web browser or device, and using cookies, web beacons, mobile and advertising identifiers and similar tracking technologies. Most web browsers can usually be modified to disable or reject cookies. You may take steps to stop the automatic use and acceptance of web trackers, but understand that if you delete your cookies or decline cookies through your web browser, than you will not be able to access certain areas of our Sites. For more information about **Online Tracking and Advertising** see section below. For more detailed information about our use of cookies, please review our **Cookie Policy**.

Information Collected from Social Media: If you log onto our Sites through a social media platform, such as Facebook, Twitter, Instagram, and others, we and the social media service may share certain information about you and your activities. Your interaction with social media typically allows the social media platform to collect some information about you through cookies they place on your device and other tracking mechanisms. In some cases, the social media platform may recognize you through its cookies even when you do not interact with their application. Please visit the respective privacy policies of third party social media platforms to better understand their data collection practices and controls they make available to you.

Location Information: We log IP (Internet Protocol) addresses, and the location of your computer on the Internet, for systems administration, troubleshooting, and for the purpose of geotargeting our own advertisements. We use the IP address log in an aggregate fashion to track access to our Sites. Additionally, when you interact with our Sites, we may collect information about your location and your device. Some of this information may be general, such as the state or city associated with your zip code, while some of this information may be more precise, such as information associated with your mobile device. Location information allows us to provide location-based services, and to tailor promotions to your locality. Most mobile devices allow you to control or disable the use of precise location services in the device's settings menu.

Other Information We May Collect: Special Offers and Events are held from time to time in the form of contests, sweepstakes, through surveys and market research we conduct. In such

cases, we collect information voluntarily from you. Each special offer or event will be governed by its own privacy terms. We will notify you if we plan to share your information with third parties, except for in circumstances where the information is shared in the aggregate and cannot be attributed to a particular person or response. You can always decline to share your information by not participating in these special events or offers.

HOW WE USE INFORMATION WE COLLECT FROM OR ABOUT YOU

We may use information you give us or we collect about you to:

- Communicate with you in response to your inquiries, to fulfill your requests, or to provide you with offers and information about our Services or services of our affiliates and partners. With respect to your account with us, we may connect with you about news stories, features to which you may have access, surveys about our Services, and other important information like legal notices.
- To optimize, improve, and maintain our Sites including research and analytics regarding use of the Sites, identifiers that will allow us to remember you when you leave and return to our Sites.
- To provide and improve our products and services, both online and offline, to better understand and serve our users. We do so by collecting interest-based behavior information.
- To provide and manage the Services you request by processing your transactions at your request, authenticating your identity as our customer, sending you subscription material, electronic newsletters, and other features.
- Deliver interest-based advertising on our Sites as well as other websites and applications. We may use your information to deliver targeted advertisements, and offers or promotions tailored to you, on behalf of ourselves and other advertisers both as part of our Services and on other websites and mediums.
- Detect, investigate, and prevent activities that may violate our policies or be illegal or fraudulent. When we believe it is necessary, we will protect, enforce, and defend our legal rights, privacy, safety or property, or that of others. We comply with all applicable laws.

We may combine information collected on our Sites about you with: (1) information we obtain from our business records, (2) information provided by third parties, (3) information collected from your browser or device; or (4) other usage information collected on our Sites not specific to any one individual.

We may use information collected from or about you to create aggregated or de-identified data that does not identify you. Once the data is properly de-identified and aggregated we may share it with third parties for their purposes.

INTERNET-BASED ADVERTISING

The Sites use the information we collect about you, such as behavioral, demographic and preference information to provide you with advertising and offers that are more pertinent to you.

We partner with third party advertising companies to provide advertisements on our Sites, as well as on other websites and applications about our products and services that may be of interest to you.

Some of our Sites may also include advertisements or promotion content for unaffiliated products and services. All of this means users see advertising that is most likely to interest them, and advertisers send their messages to people who are most likely to be receptive, improving both the viewer's experience and the effectiveness of the advertisements.

The advertisements you see may be based on information collected through cookies, web beacons and other tracking technologies from our Sites and on other third-party websites you visit and mobile applications you use that participate in our advertising networks.

- *Our Cookies:* We may place a PressDemocrat.com cookie on your computer with a unique anonymous number to ensure that your browser does not see the same ad over and over again, to sequence ads in a series and to measure the number of unique visitors that have viewed a particular advertisement or visited a particular Web page.
- *Others' Cookies:* Third parties may use persistent identifiers to track your Internet usage across other websites and mobile applications in their networks beyond the Sites. We do not share information that personally identifies you with unaffiliated third parties for their own uses. But third parties, with sufficient data from other sources, may be able to identify you. The information we receive from online advertising trackers allows us to generally inform advertisers about the nature of our subscriber base.

You can learn more about advertising serving companies and the options available to limit their collection and use of your information by visiting the websites for the [Network Advertising Initiative](#) and the [Digital Advertising Alliance](#), and the webpages for [Facebook's ad preferences tool](#) and [privacy policy](#). Similarly, you can learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device. For more information about how to change these settings go to:

- Apple: <http://support.apple.com/kb/HT4228>
- Android: <http://www.google.com/policies/technologies/ads/>
- Windows: <http://choice.microsoft.com/en-US/opt-out>

Please note that opting-out of advertising networks services does not mean that you will not receive advertising while using our Sites or on other websites, nor will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. If you delete your cookies, you may also delete your opt-out preferences.

We use other websites analytics services, such as those provided by Google, Inc., to help us administer and constantly improve the quality of our Sites. Google Analytics uses cookies or other tracking technologies to help us analyze how users interact with and use the Sites, and provide us with services related to our Sites' activity and usage. Google Analytics may collect

information such as your IP address, time of visit, whether you are a return visitor, and any referring website. That information will be transmitted to and stored by Google and will be subject to Google's [privacy policies](#). To learn more about Google's partner services and to learn how to opt out of tracking of analytics by Google, click [here](#).

Your browser or device may include "Do Not Track" functionality. At this time, Press Democrat does not respond to browser "Do Not Track" signals.

OUR EMAIL POLICIES AND YOUR OPT-OUT OPTIONS

From time to time, we may provide subscribers with information and offers about other products and services, including subscriptions and other premium products and services. If you do not wish to receive emails about such offers, you may opt-out. Our email policy is the following:

- *Newsletters:* We offer email newsletters. If you no longer wish to receive a specific newsletter, follow the "unsubscribe" instructions located near the bottom of each newsletter.
- *Promotional Emails:* We periodically send emails with promotions about services we offer and services offered by our partners. We will not share, sell, rent, swap or authorize any third party to use your email address without your permission. From time to time, the Sites and Services may obtain email addresses from third party sources to be used for promotional emails. You can always opt-out of messages you do not want to receive. If you feel you have received an email from us in error, please contact info@pressdemocrat.com. If you would like to opt-out of receiving email promotions, please opt-out by clicking on the opt-out link at the bottom of the email you received.
- *Account and Service-Related Email:* Periodically we will send you emails related to your account with us that include information about order confirmations, renewal/expiration notices, notices of credit-card problems, other transactional emails and notifications about major changes to the Site and/or to our Privacy Policy. If you have registered for online discussions or other services, you may receive emails specific to your participation in those activities as well.
- *Survey Emails:* If you have not opted out, we may send you an email inviting you to participate in user surveys, asking for feedback on our Sites and existing or prospective products and services, as well as information to better understand our users. User surveys greatly help us to improve our Services, and any information we obtain in such surveys will not be shared with third parties, except in a de-identified or aggregate form.
- *Emails Communications with You:* If you send us emails, you should be aware that information disclosed in emails may not be secure or encrypted and thus may be available to others. We suggest that you exercise caution when deciding to disclose any confidential or sensitive information in emails. We will use your email address to respond directly to your questions or comments.
- *Email This Article Feature:* Our readers may use this feature to send links to articles to others through email. The email address(es) that you supply to this service will only be used to send the requested article.
- *EEA and Switzerland Residents:* We will only send you marketing emails if we have your prior consent to do so, or if you are an existing customer and our message relates

to products or services that are similar to those previously sold to you, and in such cases you will still be given the opportunity to opt-out of further marketing emails of that nature.

HOW WE SHARE INFORMATION WE COLLECT FROM OR ABOUT YOU

If you have registered to our Sites, we will not sell, rent, swap or authorize any third party to use your email address or any information that personally identifies you without your permission. We do, however, share information about our audience in a de-identified or aggregate form.

The Sites may publish summaries of statistical information regarding the Sites' visitors for promotional purposes and as a representative audience for advertisers. These summaries will provide broad insight at to the activities of our visitors and customers without identifying any specific individual.

The following provides information about the entities with which we may share your information, or the circumstances under which we may share information:

Service Providers: We contract with other companies to provide services on our behalf, including credit-card and billing processing, shipping, email distribution, online message processing, analytics or promotions management. We provide these companies only with the information they need to perform their services. These service providers are restricted from using this data in any way other than to provide us services, and they may not share or resell this data.

We must disclose your opt-out information to third parties so they can suppress your name from future solicitations, in accordance with applicable laws.

Other Parties as Required by Law or as Necessary to Protect Our Users, Employees, Property, and Services: We may occasionally release information that personally identifies you as required by law, for example, to comply with a court order or subpoena. We may disclose information that personally identifies you if we are required to do so by law or we in good faith believe that such action is necessary to (1) comply with the law or with legal process; (2) protect and defend our rights and property; (3) protect against misuse or unauthorized use of our Web sites; or (4) protect the personal safety or property of our users, our employees, or the public (among other things, this means that if you provide false information or attempt to pose as someone else, information about you may be disclosed as part of any investigation into your actions).

Other Parties in Connection with a Corporate Transaction: We reserve the right to transfer any information we have about you in connection with, or during negotiations of, any merger acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices as described in this Privacy Policy.

Otherwise with Your Consent or at Your Direction: We may share information about you with third parties when you consent or direct us to such sharing. We may also share information with third parties in an aggregate form that does not identify any users.

For Users in the EEA and Switzerland: Please see our Cookies Policy that provides a list of partners that provide certain features or functionality on the Services, including content, analytics, advertising and social medial plug-ins, that may use your data.

CHANGING OR UPDATING YOUR INFORMATION

If you have an account with us, you can manage your account at our “My Account” page, where you may review and update your account information and access your transaction history. You can logon to the “My Account” page anytime to ensure your account information is accurate and up to date. To gain access to your account, you will be asked to enter your password by following the instructions on the page. If you do not remember your password, you can reset your password. If you need further assistance, please contact Customer Service at 707-575-7500 or allaccess@pressdemocrat.com.

DATA SECURITY

To prevent unauthorized access, maintain data accuracy and ensure the appropriate use of information, we have put in place physical, electronic and managerial procedures to protect the information we collect online. While we take measures to safeguard your information, we cannot guarantee that the security of our databases or that the information you supply will not be intercepted while in transit over the Internet.

OTHER INFORMATION

Children's Privacy: We do not knowingly collect or store any personal information about children under the age of 13, unless permitted by law. If we learn that a child under the age of 13 has provided us with personal information, we will delete it in accordance with applicable law.

Your California Privacy Rights: If you are a California Resident, California Law permits you to once a year, free of charge, request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their direct marketing purposes in the preceding calendar year. Please send your inquiry to: Press Democrat, Attn: Website Services, 427 Mendocino Avenue, Santa Rosa, CA 95401, or at info@pressdemocrat.com.

Additionally, California residents who are registered users of the Services and are under the age of 18 are entitled, in accordance with California law, to request and obtain removal of content and information that they themselves post on the Services. You may request such removal by emailing us at info@pressdemocrat.com. To effectuate this request, please provide the following information: your name, email address or your website user name, year of birth, mailing address, and a description of the material you want removed including sufficient details to enable us to locate the material. In the subject line please note that this is a “California Removal Request.” Your request does not ensure the complete removal of the material on the

Internet, as some materials that you post may be republished by another user or third party entity.

Users Outside of the United States: Our Company is headquartered in the United States. If you use our Sites outside of the United States, please be aware that information you provide to us or that we obtain through your interaction with our Sites may be collected in your country and transferred to the United States or another country, in accordance with applicable law. By using our Services you consent to the collection, processing and storage of information about you in the United States.

Users in the EEA and Switzerland: If you are a resident of the EEA or Switzerland, the following information applies with respect to personal data collected through your use of our Services.

- *Purposes of processing and legal basis for processing:* We process personal data consistent with our disclosures in this Privacy Policy. We process personal data on the following legal bases: (1) with your consent; (2) as necessary to perform our agreement to provide Services (such as when you become a subscriber); and (3) as necessary for our legitimate interests in providing the Services where those interests do not override your fundamental rights and freedoms related to data privacy.
- *Transfers:* Personal data we collect may be transferred to, and stored and processed in, the United States or any other country in which we or our affiliates or processors maintain facilities. We will ensure that transfers of personal data to a third country or an international organization are subject to appropriate safeguards.
- *Individual Rights:* If you are a resident of the EEA or Switzerland, we respect your rights according to Chapter 3 of the EU General Data Protection Regulation. In order to verify your identity, we may require you to provide us with personal information prior to accessing any records containing information about you.

For More Information: please reach out to us at Press Democrat, 427 Mendocino Avenue, Santa Rosa, CA 95401, or at info@pressdemocrat.com.

Questions: Inquiries regarding our privacy practices may be sent to info@pressdemocrat.com or to our address at, 427 Mendocino Avenue, Santa Rosa, CA 95401.

PRESS DEMOCRAT COOKIE POLICY

The Sites rely on partners to provide many features of our sites and services using data about your use of our Sites. Below is a list of these partners with links to more information their use of your data and how to exercise your rights to opt-out.

Site Operations

Enabling features that are necessary for providing you the services on our site, such as identifying you as being signed in, tracking content views so that we can pay the content

owners, remembering your preferences, and the number of times you have been shown an advertisement.

Partner	Learn more about their use of data:
BlueConic	https://www.blueconic.com/privacy-policy/
Zeta Global (Boomtrain)	https://zetaglobal.com/privacy-policy/

Analytics

Allowing us to understand how our services are being used, track site performance and make improvements.

Partner	Learn more about their use of data:
Google Analytics	https://policies.google.com/privacy
Chartbeat	https://chartbeat.com/privacy/

Advertising

Delivering advertising, including tailored advertising based on your preferences or interests across services and devices; and measuring the effectiveness of advertisements on our platforms and elsewhere.

Partner	Learn more about their use of data, and how to Opt-out from data use:
Google Publisher Tag	https://policies.google.com/privacy https://adssettings.google.com/
DoubleClick for Publishers	https://delvedeeper.com/privacy-policy/ https://adssettings.google.com/
LiveIntent	https://liveintent.com/privacy-policy http://d.liadm.com/opt-out
Nativo	https://www.nativo.com/policies-and-guidelines https://www.nativo.com/about/adchoices/
Undertone	https://undertone.com/privacy/ https://www.undertone.com/opt-out-tool/
AdBlade	https://adblade.com/doc/privacy https://adblade.com/doc/opt-out-in
City Spark	https://www.cityspark.com/privacy-policy

Taboola	https://www.taboola.com/privacy-policy Please see Taboola's Privacy Policy under "User Choices and Opting Out" for more information.
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Social Media

Enabling the sharing of content from our services through social networking and other sites, and allow you to interact and connect with such social media sites while using our Sites and Services.

Partner	Learn more about their use of data, and how to Opt-out from data use:
True Anthem	http://www.trueanthem.com/privacy-policy/