

**SPECIAL NOTE TO CALIFORNIA USERS**

A California privacy law that went into effect on January 1, 2005, the "Shine the Light" law, allows California residents to obtain a list of third parties to whom a business has disclosed Personal Data if it shares such information with third parties for their direct marketing purposes. However, if a business adopts and discloses in its privacy policy a policy of not disclosing customers' personal information to third parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, the business may comply with the law by notifying the customer of his or her right to prevent disclosure of personal information and by providing a cost-free means to exercise that right.

As stated earlier in this Privacy Policy, Personal Data is not used for marketing and promotional purposes without the particular User's permission. Whenever a User agrees to allow us to collect Personal Data that may be used for marketing or promotional purposes, we provide that User with an option to prevent such information from being shared for marketing and promotional purposes with third parties. Furthermore, you may exercise this cost-free option at any time by clicking on the link below: <https://share.hsforms.com/1VCURABe9Sq68OKjVCoN1nA3i1e>

Because BELIEVE has a comprehensive Privacy Policy and provides you with details on how you may opt-in or opt-out of the use of your Personal Data by third parties for direct marketing purposes, we are not required to provide you with the third party list contemplated under California's Shine the Light law.

In addition, if you are a resident of California you may have additional rights pursuant to the California Consumer Privacy Act that went into effect on January 1, 2020. Specifically:

**12.1 INFORMATION WE COLLECT:**

We have collected the following categories of Personal Data from Users within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, email address, unique personal or online identifier, IP address, account name, Social Security number, driver's license number, passport number or other similar identifiers.	YES
B. Personal Data categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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 Data included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual	NO

	orientation, veteran or military status, genetic information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Physiological, behavioral and biological characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity or other identifier or identifying information, such as, fingerprints, or and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other network activity.	Browsing history, search history, information on a User's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information or student disciplinary records.	NO
K. Inferences drawn from other Personal Data.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We obtain the categories of Personal Data listed above from the following categories of sources:

- **Contact Information:** When setting up a BELIEVE account.
- **Financial Information:** If you are paying for any Products or Services (for example, through one of our online check-out pages), we may require you to provide credit card or other financial information in order to process a payment from you. You should never provide detailed credit card information directly to BELIEVE via an unsecure form (such as email).
- **Transaction Information:** We will maintain a record of your transactional information, your Services history, and usage. We may also retain your communications with us and our responses.
- **Partner Products & Services Offered on the Services:** Third parties, such as our partners, vendors, sponsors, or advertisers whose services are promoted or advertised on the Site, may request that you provide Personal Data.

- **Research Surveys:** You may elect to provide information in connection with research surveys in which you voluntarily participate.
- **Emails to BELIEVE:** If you send us emails, you should be aware that any information provided in an email may not be secure or encrypted and therefore may be available to others. Please exercise caution if you decide to disclose any Personal Data or confidential information to us in any email.
- **Information we collect automatically.** When you use Services or buy Products offered on the Site, we may collect Personal Data and other information about your device and usage of the Services.

We may use a variety of technologies (collectively, “Tracking Technologies”) to collect some of this information. Our use of Tracking Technologies is discussed in more detail in Tracking Technologies and Advertising and Analytics Services in Section 4 below.

We may use Tracking Technologies to automatically collect Personal Data and other information described below:

- **Device Information:** We may collect certain information about the device you use to access the Services, including but not limited to IP addresses for your devices, unique device identifiers, browser types, and browser language.
- **User History:** We may log certain usage information about your use of the Services, which may include a history of the pages you view. If you download and use any BELIEVE software or application on your device, the log files will automatically be collected by the application and sent to our servers when your device syncs up for the latest content available.
- **Mobile/Location Information:** We may collect additional information from you if you access the Services through a mobile device, for example we may collect your unique device identifier, your device’s operating system, mobile carrier, or your location when you opt in for us to do so. However the degree to which your location can be identified depends on the device you are using (*e.g.* laptop, smartphone, tablet) and how you are connected to the internet (*e.g.* via cable broadband connection, Wi-Fi, etc.). If you enable location services for the Services we may collect your regional location data periodically as you use or leave open the Services. We may also collect your location information from your IP address or zip code.

We may also use location data internally or in conjunction with our third party service providers to customize your experience and provide offers that may be relevant to you. Depending on the device you use to access the Services (*e.g.* Apple™ iOS, Google™ Android, Windows, etc.) you may be able to control whether location data is collected from the settings on your wireless device.

- **Third Party Sources:** From time to time we may obtain personal information about you from third party sources, such as public databases, social networking services, third party data providers and our joint marketing partners. Examples of the information we may receive from third party sources include job title, company, location, updated contact information, and other demographic and professional information. We use this information, alone or in combination with other information (including Personal Data we collect), to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products, features, and services.

- **Social Networking Accounts:** When you choose to log into your BELIEVE account through your social networking accounts, link your social networking accounts with the Services, or engage with the Services through third party social media platforms, you may be allowing us ongoing access to certain information stored on those platforms. In addition, as you interact with the Services, you may also be providing information about your activities to third party social networking platforms. You should make sure that you are comfortable with the information such services may make available to us by visiting the applicable platforms' privacy policies and/or modifying your privacy settings directly with those platforms.

## **12.2 HOW WE USE THE INFORMATION WE COLLECT:**

We may use the Personal Data that we collect through the Services to:

- Provide the products and services you request, process transactions, and send you related information, including confirmations and receipts.
- Provide support and improve the Services and to manage system administration and security.
- Respond to your comments, inquiries, and requests and provide customer service.
- Link or combine information that we collect directly with information from third-party sources or multiple devices to help understand your needs, provide you with personalized content, and provide you with better service.
- Personalize and improve your experience and deliver content or features that match your profile and interests, including to show you targeted advertising as described in Tracking Technologies and Advertising and Analytics Services in Section 4 below. Please also review Sections 6 and 7 below for further information about Your Choices.
- Send you marketing and promotional communications (in accordance with your marketing preferences). Please see Your Choices in Sections 6 and 7 below.
- Send you e-mail newsletters and alerts (in accordance with your newsletter and alerts preferences). Please see Your Choices in Sections 6 and 7 below.
- Perform statistical and marketing analyses of User behavior.
- Manage your account(s) and send you technical privacy policy and service updates, security alerts, and other administrative messages.
- Send you push notifications. Please see Your Choices in Sections 6 and 7 below.
- Conduct surveys.
- Process and deliver sweepstakes and other promotions.
- Comply with or enforce legal requirements, agreements, and policies.
- Evaluate candidate submissions for job postings.
- Carry out any other purpose for which the information was collected.

- Perform other activities that are in our legitimate business interests and consistent with this Privacy Policy.

### 12.3. HOW WE SHARE INFORMATION:

We may share your Personal Data with the following types of third parties for the purposes described in this Privacy Policy:

- **Administrator Uses:** If your use of the Services is managed for you by an account administrator then your account administrator and resellers who provide User support to your organization may have access to your Personal Data (including your email and other data). Please refer to your account administrator's privacy policy for more information.
- **Partner Products & Services Offered on the BELIEVE Services:** If you provide Personal Data in order to access products or services of third parties, such as our partners, sponsors or advertisers, that are offered or promoted on or through the Services, you may be providing your information to both BELIEVE and the third party. Your Personal Data will be subject to this Privacy Policy as well as the privacy policy and practices of such third party. BELIEVE is not responsible for and this Privacy Policy does not cover such third party's use of your Personal Data.
- **Sharing Information with Marketing Partners:** BELIEVE selectively makes its postal mailing address list and email list, for customers in the United States, available to third party partners so that they may provide you with information about product or service offerings, events or promotions, which may be of interest to you. You may opt-out of having such information shared for this purpose. Please see Your Choices in Sections 6 and 7 below.
- **Third Parties Providing Functionality:** We also work with third parties to provide certain functionalities on the Services and to improve the effectiveness of the Services and its content. Separate and distinct from information BELIEVE shares with third parties, third party companies may also use Tracking Technologies to independently collect and store information about you and your usage of the Services and may combine this information with information they collect from other sources. Please note, we do not control Tracking Technologies used by third parties, and their use of such Tracking Technologies may be governed by their own privacy policies.
- **Third Party Event Sponsors:** When you register for a BELIEVE event we may share the information you provide, such as your name, company name, postal address and email address, with third parties who are sponsoring the event. You may opt-out of having such information shared for this purpose, as described in greater detail in Please see Your Choices in Sections 6 and 7 below.
- **Mobile Carriers:** If you access the Services through a device or app, we may share your information with mobile carriers, operating systems, and platforms.
- **Compliance with Law:** BELIEVE may release information if it is required to do so by law or in the good-faith belief that such action is necessary to: (1) comply with the law or comply with legal process served on BELIEVE; (2) protect and defend the legitimate business interests, rights or property of BELIEVE, its Users, advertisers, customers, sponsors, advertisers, or affiliates; and (3) if we believe your actions are inconsistent with our terms of service or policies.

- **Service Providers:** Sometimes we need to share your information with our third-party service providers, who help us provide and support the Services and other business functions. For example, we use service providers to assist with the following: analyzing data, hosting data, engaging technical support, processing payments, delivering content, mailing statements to subscribers, email distribution, and providing customer service.
- **Advertising Partners:** We may partner with third party advertising networks and exchanges to display advertising on our websites or to manage and serve our advertising on other sites and may share your Personal Data with them for this purpose. Please see Your Choices in Sections 6 and 7 below.
- **Organizational Changes:** Should BELIEVE undergo a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, BELIEVE's accumulated customer information will be treated as an asset and, like other business assets, subject to transfer to or acquisition by a third party. We may also disclose information about our Users in connection with a commercial transaction where we, or any one of our businesses, is seeking financing, investment, support, or funding.
- **With Your Consent or at Your Direction.**

#### 12.4. TRACKING TECHNOLOGIES AND ADVERTISING AND ANALYTICS SERVICES:

- **Targeted Advertising:** We and our third party partners and vendors may use Tracking Technologies, such as cookies, pixels, and web beacons and collect and store information about you when you use or interact with our Services, marketing communications, advertising content and/or third party websites, in order to provide you with targeted advertising based on your browsing activities and interests. These third parties automatically receive your IP address or mobile device identifier when you access the Services or third party websites. They may also use Tracking Technologies to measure the effectiveness of advertisements, to personalize the advertising content, and to serve you advertisements that are relevant to your regional location. We may also use information collected using third party cookies and beacons on the Services and in our emails to deliver advertising about our Services when you visit third party websites. To find out more about our use of Tracking Technologies as well as how to manage your preferences please see our Tracking Technologies Notice.
- **Analytics and Ad Serving:** Google, [ ] are some of the companies that we use to serve advertising and perform analytics on some of the Services. When you access the Services, our third-party vendors, including Google, use third-party cookies (such as the Google DoubleClick cookie) to serve you ads based on your previous visit to our website and other websites. To learn more about your choices and in particular Google's currently available opt-outs for the Web, please see Your Choices in Sections 6 and 7 below.
- **Cross Device Tracking:** We (and our third party service providers) also use Tracking Technologies that recognize and collect usage information and information about the devices you use to connect with our Services and third party websites. When these tools are enabled, the data that we and our third-party service providers collect about these devices is used to enable delivery of product recommendations, advertising, or other promotional materials across your devices that are more relevant information to you, or to measure the effectiveness of our Services and advertising. They automatically receive your IP address or mobile device identifier when you connect to the Services or third party websites. This data may be combined with the same information from another browser or device if you use

multiple browsers or devices. You may opt-out of this type of tracking/information collection by clicking [here]. This opt-out applies to the specific device/browser combination on which you are browsing, so you will need to opt-out on each device and browser separately. Please note opting out of targeted advertising does not opt you out of being served ads. You will continue to receive untargeted generic ads.

#### **12.5. ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS:**

You have the right to request that we disclose certain information to you about our collection and use of your Personal Data over the past 12 months. Once we receive and confirm your verifiable User request, we will disclose to you:

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

#### **12.6. DELETION REQUEST RIGHTS:**

You have the right to request that we delete any of your Personal Data that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable User request, we will delete (and direct our service providers to delete) your Personal Data from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the Personal Data, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another User to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. 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.
7. Enable solely internal uses that are reasonably aligned with User expectations based on your relationship with us.
8. Comply with a legal obligation.

9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

#### 12.7. EXERCISING ACCESS, DATA PORTABILITY AND DELETION RIGHTS:

To exercise the access, data portability, and deletion rights described above, please submit a verifiable User request to us by either:

- Calling us toll free at (646) 651-1060
- Emailing us at [copyright@tunecore.com](mailto:copyright@tunecore.com)

To opt out of specific products, please see below:

- **Email Newsletters:** You can view, change, or update any or all of your email newsletter subscriptions by going to your Newsletters preference center preference center [here].
- **Alerts:** You can view, change, or update any or all of your alerts subscriptions by going to your Alerts preference center [here].
- **Marketing Emails:** You can view, change, or update any or all of your marketing email preferences by going to your Email Marketing preference center [here].
- **Research Surveys Sent by Email:** You may elect not to receive research surveys conducted by BELIEVE's Intelligence division that are sent by email by using the opt-out link contained in such emails. In addition, you may elect not to receive surveys conducted in conjunction with BELIEVE's marketing partners by unsubscribing from third party partner emails on your email marketing preference center [here].
- **Push Notifications:** If you use our mobile apps, we may ask if you want to receive push notifications so that we can send you updates, communications, and other messages about the Services. To opt out of getting these push notifications or other messages, you must turn off the push notification function in your device settings.
- **Sharing with Third Party Partners:** BELIEVE selectively makes its postal mailing address list and email list of customers available to third parties whose products or service offerings may be of interest to you. If you do not wish for BELIEVE to provide either your postal mailing or email information (or both) to third parties for this purpose, please send us a notice using the contact details provided in Contact Us in Section 11. You can also specify that you do not want your email information shared with third party marketing partners by going to your preference center [here] and updating your third party email marketing preferences.
- **Third Party Event Sponsors:** If you do not wish for BELIEVE to share the information you supply when you register for an event (including any webinars and recognition dinners), such as your name, company name, postal address, or email address, with the event's sponsors, please specify this in an email to [                    ].
- **Turning Off Tracking Technologies:** You can choose to have your computer warn you each time a persistent or session cookie is being sent, or you can choose to turn off such cookies through your browser settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies.

However, cookie management tools provided by your browser will not remove Flash cookies and may not disable HTML5 storage. To learn how to manage privacy and storage settings for Flash cookies, please click [here]. To learn more about HTML5 storage, see our [Tracking Technologies Notice]. It is important to remember that many of BELIEVE's services may not function properly if your cookies are disabled. For example, BELIEVE needs first-party cookies to log you in to the Services that require registration or a subscription. In that case, you may set your browser to block third-party cookies and allow BELIEVE's first-party cookies only.

- **“Do Not Track” Signals:** Some third party browsers provide “do not track” machine readable signals for websites which are automatically applied by default and therefore do not necessarily reflect our visitor's choice as to whether they wish to receive advertisements tailored to their interests. As a result, at this time, BELIEVE does not respond to browser “do not track” signals or other similar mechanisms. Go to <http://www.networkadvertising.org> or <http://www.aboutads.info> if you wish to learn more about your options to not accept tracking cookies for the purpose of receiving targeted interest-based advertisements. Please note that the-opt out is cookie-based and will only affect the specific computer and browser on which the opt-out is applied.
- **Network Advertising Initiative:** Some of our advertising service providers may be members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. If you opt-out of receiving targeted ads in this manner, you will continue to receive advertising messages from us, but other members of the Network Advertising Initiative will not be able to target you based on your use of the Services and/or third party websites. If you would like more information about advertisers' use of tracking technologies and about your option not to accept these cookies, you can go [\[here\]](#). If you would like to learn more about how interest-based information is collected and to know your choices about not having your information used in this manner, you can go [\[here\]](#).
- **Google Opt-Outs:** Google is one of the companies that we use to serve advertising and perform analytics on some of the Services. To learn about Google Analytics' currently available opt-outs for the Web, click [\[here\]](#). To learn more about how Google uses cookies in advertising, you can visit the Google Advertising Privacy & Terms policy located [\[here\]](#). You can opt out of receiving interest-based Google ads, or customize the ads Google shows you, by clicking [\[here\]](#). BELIEVE also uses third party services for remarketing BELIEVE's products and services, such as Google's Customer Match via the Google platform, whereby we will deliver targeted ads to you based on your prior usage on the Services. If you want to opt-out of remarketing, please email us at <https://share.hsforms.com/1VCURABe9Sq68OKjVCoN1nA3i1e>

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf or pursuant to a valid Power of Attorney, may make a verifiable User request related to your Personal Data. You may also make a verifiable User request on behalf of your minor child.

You may only make a verifiable User request for access or data portability twice within a 12-month period. The verifiable User request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Data or an authorized representative (such as your email address and mailing address).
- 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 Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you. Making a verifiable User request does not require you to create an account with us. We will only use Personal Data provided in a verifiable User request to verify the requestor's identity or authority to make the request.

#### **12.8. RESPONSE TIMING AND FORMAT:**

We endeavor to respond to a verifiable User request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable User request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Data that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable User request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### **12.9. RIGHT TO OPT-OUT OF SALE OF PERSONAL DATA:**

You have the right to opt-out of the sale of your Personal Data. For more information about sales or to exercise your right to opt-out, please [\[click here\]](#).

#### **12.10. 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.