

## **Gimlet Media, Inc. Privacy Policy**

This Privacy Policy describes the policies and procedures of Gimlet Media, Inc. (“we”, “our” or “us”) on the collection, use and disclosure of your information on [www.gimletmedia.com](http://www.gimletmedia.com) (the “Site”) and the services, features, content or applications we offer (collectively with the Site, the “Services”). We receive information about you from various sources, including: (i) if you register for the Site and the Services, through your user account on the Services (your “Account”); (ii) your use of the Services generally; and (iii) from third party websites and services. When you use the Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy.

### **What Does This Privacy Policy Cover?**

This Privacy Policy covers the treatment of personally identifiable information (“Personal Information”) gathered when you are using or accessing the Services. This Privacy Policy also covers our treatment of any Personal Information that our business partners share with us or that we share with our business partners.

This Privacy Policy does not apply to the practices of third parties that we do not own or control, including but not limited to any third party websites, services and applications (“Third Party Services”) that you elect to access through the Service or to individuals that we do not manage or employ. While we attempt to facilitate access only to those Third Party Services that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.

### **What Information Do We Collect?**

The information we gather enables us to personalize, improve and continue to operate the Services. In connection with certain aspects of the Services, we may request, collect and/or display some of your Personal Information. We collect the following types of information from our users.

#### *Account Information:*

If you create an Account or sign up to receive newsletters, you will provide information that could be Personal Information, such as your username, password and email address. You acknowledge that this information may be personal to you, and by creating an account on the Services and providing Personal Information to us, you allow others, including us, to identify you and therefore may not be anonymous. In addition to using your contact information to send you any newsletters you have signed up to receive, we may also use your contact information to send you information about our Services, but only rarely when we feel such information is important. You may unsubscribe from these messages through your Account settings and may opt out of newsletters using the opt-out buttons in the emails, although, regardless, we reserve the right to contact you when we believe it is necessary, such as for Account recovery purposes.

#### *User Content:*

Some features of the Services may allow you to provide content to the Services, such as written comments. All content submitted by you to the Services may be retained by us indefinitely, even after you terminate your Account. We may continue to disclose such content to third parties in a manner that does not reveal Personal Information, as described in this Privacy Policy.

#### *Financial Information:*

We do not currently collect financial information, such as your payment method (valid credit card number, type, expiration date or other financial information); that information is collected and stored by our third party payment processing company (the “Payment Processor”), and use and storage of that information is governed by the Payment Processor’s applicable terms of service and privacy policy.

*IP Address Information and Other Information Collected Automatically:*

- We automatically receive and record information from your web browser when you interact with the Services, including your IP address and cookie information. This information is used for fighting spam/malware and also to facilitate collection of data concerning your interaction with the Services (e.g., what links you have clicked on).
- Generally, the Services automatically collect usage information, such as the number and frequency of visitors to the Site. We may use this data in aggregate form, that is, as a statistical measure, but not in a manner that would identify you personally. This type of aggregate data enables us and third parties authorized by us to figure out how often individuals use parts of the Services so that we can analyze and improve them.

*Email Communications:*

We may receive a confirmation when you open an email from us. We use this confirmation to improve our customer service.

*Information Collected Using Cookies:*

- Cookies are pieces of text that may be provided to your computer through your web browser when you access a website. Your browser stores cookies in a manner associated with each website you visit. We use cookies to enable our servers to recognize your web browser and tell us how and when you visit the Site and otherwise use the Services through the Internet.
- Our cookies do not, by themselves, contain Personal Information, and we do not combine the general information collected through cookies with other Personal Information to tell us who you are. As noted, however, we do use cookies to identify that your web browser has accessed aspects of the Services and may associate that information with your Account if you have one.
- Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave cookies active, because they enable you to take advantage the most attractive features of the Services.
- This Privacy Policy covers our use of cookies only and does not cover the use of cookies by third parties. We do not control when or how third parties place cookies on your computer. For example, third party websites to which a link points may set cookies on your computer.

*Information Related to Advertising:*

To support and enhance the Services, we may now or in the future serve advertisements, and also allow third parties advertisements, through the Site or other Services. These advertisements are sometimes targeted and served to particular users and may come from third party companies called “ad networks.” Ad networks include third party ad servers, ad agencies, ad technology vendors and research firms.

Advertisements served through the Services may be targeted to users who fit a certain general profile category and may be based on anonymized information inferred from information provided to us by a user, including Personal Information (e.g., gender or age), may be based on the Services usage patterns of particular users, or may be based on your activity on Third Party Services. We do not provide Personal Information to any ad networks for use outside of the Services.

*Aggregate Information:*

We collect statistical information about how both unregistered and registered users, collectively, use the Services (“Aggregate Information”). Some of this information is derived from Personal Information. This statistical information is not Personal Information and cannot be tied back to you, your Account or your web browser.

**How, and With Whom, Is My Information Shared?**

The Services are designed to help you share information with others. As a result, some of the information generated through the Services is shared publicly or with third parties.

*Public Information About Your Activity on the Services:*

Some of your activity on and through the Services is public by default. This may include, but is not limited to, content you have posted publicly on the Site or otherwise through the Services.

Registered users may have some of this information associated with their Accounts. Unregistered users will not have this association, but information concerning their use of the Services (such as what pages they have visited) may be tracked anonymously through the use of cookies and stored by us.

Please also remember that if you choose to provide Personal Information using certain public features of the Services, then that information may be publicly available. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information. We therefore urge you to think carefully about including any specific information you may deem private in content that you create or information that you submit through the Services.

*IP Address Information:*

While we collect and store IP address information, that information is not made public. We do at times, however, share this information with our partners, service providers and other persons with whom we conduct business, and as otherwise specified in this Privacy Policy.

*Information You Elect to Share:*

You may access other Third Party Services in connection with using the Services, for example by clicking on links to those Third Party Services from within the Site or by accessing, downloading, or subscribing to Content through Third Party Services. We are not responsible for the privacy policies and/or practices of these Third Party Services, and you are responsible for reading and understanding those Third Party Services' privacy policies. This Privacy Policy only governs information collected on the Services.

*Aggregate Information:*

We share Aggregate Information with our partners, service providers and other persons with whom we conduct business. We share this type of statistical data so that our partners can understand how and how often people use our Services and their services or websites, which facilitates improving both their services and how our Services interface with them. In addition, these third parties may share with us non-private, aggregated or otherwise non Personal Information about you that they have independently developed or acquired.

*Email Communications with Us:*

As part of the Services, you may occasionally receive email and other communications from us, such as communications relating to your Account. Communications relating to your Account will only be sent for purposes important to the Services, such as password recovery or in relation to the newsletters you have signed up to receive.

*User Profile Information:*

User profile information including your username and other information you enter may be displayed to other users to facilitate user interaction within the Services. We will not directly reveal user email addresses to other users.

*Financial Information:*

As stated above, we do not currently collect financial information, as that information is collected and stored by our Payment Processor. However, we may from time to time request and receive some of your financial information from our Payment Processor for the purposes of completing transactions you have initiated through the Services, enrolling you in discount, rebate, and other programs in which you elect to participate, protecting against or identifying possible fraudulent transactions, and otherwise as needed to manage our business.

*Information Shared with Our Agents:*

We employ and contract with people and other entities that perform certain tasks on our behalf and who are under our

control (our “Agents”). We may need to share Personal Information with our Agents in order to provide products or services to you. Unless we tell you differently, our Agents do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Information with our Agents.

*Information Disclosed Pursuant to Business Transfers:*

In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

*Information Disclosed for Our Protection and the Protection of Others:*

We also reserve the right to access, read, preserve, and disclose any information as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce this Privacy Policy and our Terms of Service, including investigation of potential violations hereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

*Information We Share With Your Consent:*

Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to prevent the sharing of this information.

**Is Information About Me Secure?**

Your Account information will be protected by a password for your privacy and security. You need to prevent unauthorized access to your Account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing off after you have finished accessing your Account.

We seek to protect Account information to ensure that it is kept private; however, we cannot guarantee the security of any Account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

We otherwise store all of our information, including your IP address information, using industry-standard techniques. We do not guarantee or warrant that such techniques will prevent unauthorized access to information about you that we store, Personal Information or otherwise.

**What Information of Mine Can I Access?**

If you are a registered user, you can access information associated with your Account by logging into the Services. Registered and unregistered users can access and delete cookies through their web browser settings.

*California Privacy Rights:* Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: Gimlet Media Inc., 33 Flatbush Avenue, Fifth Floor, Brooklyn, NY 11217.

**How Can I Delete My Account?**

Should you ever decide to delete your Account, you may do so by following the instructions on the Site or through the Services, or by emailing [membership@gimletmedia.com](mailto:membership@gimletmedia.com). If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, given the nature of sharing on the Services, any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public.

**What Choices Do I Have Regarding My Information?**

- You can use many of the features of the Services without registering, thereby limiting the type of information that we collect.
- You can always opt not to disclose certain information to us, even though it may be needed to take advantage of some of our features.
- You can delete your Account. Please note that we will need to verify that you have the authority to delete the Account, and activity generated prior to deletion will remain stored by us and may be publicly accessible.

### **What Happens When There Are Changes to this Privacy Policy?**

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we collect or use information, we will notify you by posting an announcement on the Services or sending you an email. A user is bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted.

### **What If I Have Questions or Concerns?**

If you have any questions or concerns regarding privacy using the Services, please send us a detailed message to [contact@gimletmedia.com](mailto:contact@gimletmedia.com). We will make every effort to resolve your concerns.

**Effective Date:** July \_\_, 2015