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California Residents, please [click here](#)

## Privacy Policy

Updated: December 31, 2019

*Effective starting: January 1, 2020*

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### What this Privacy Policy covers

This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with us (for example, by registering for and receiving any of our print publications, digital e-mails and newsletters; accessing our website; enrolling in any of our membership products; attending our events, conferences, and webinars; downloading of Crain and sponsor research and content; viewing our video, podcasts, and other content; and using our mobile and digital applications and social media channels (collectively, we refer to all of these products as Crain's or our "Products" in this Privacy Policy), unless a different policy is displayed. Unless otherwise noted, our Products are provided by Crain in the United States and by Crain Communications Limited in the United Kingdom.

This policy also explains your choices about how we use information about you. Your choices include how you can modify your marketing preferences, object to certain uses of information about you and how you can access and update certain information about you.

**If you do not agree with this policy, do not access or use our Products or interact with any other aspect of our business.**

This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How to access and control your information
- How we transfer information we collect internationally
- Other important privacy information

Where we provide the Products under contract with an organization (for example your employer) that organization controls the information processed by the Products. For more information, please see Notice to End Users below.

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## What information we collect about you

We collect information about you when you provide it to us, when you use our Products, and when other sources provide it to us, as further described below.

### Information you provide to us

We collect information about you when you input it into the Products or otherwise provide it directly to us.

**Account and Profile Information:** We collect information about you when you register for an account, create or modify your profile, set preferences, sign-up for or make purchases through the Products. For example, you provide your contact information and, in some cases, billing information when you register for the Products. You also have the option of adding a display name, job title, industry, and other details to your profile information to be displayed in our Products. We keep track of your preferences when you select settings within the Products.

**Content you provide through our websites:** The Products also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking pages operated by us. For example, you provide content to us when you provide comments or feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.

**Information you provide through our support channels:** The Products also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Product. Whether you speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

**Payment Information:** We collect certain payment and billing information when you register for certain paid Products. You might also provide payment information, such as payment card details, which we collect via secure payment processing services.

### Information we collect automatically when you use the Products

We collect information about you when you use our Products, including browsing our websites and taking certain actions within the Products.

**Your use of the Products:** We keep track of certain information about you when you visit and interact with any of our Products. This information includes the features you use; the links you click on; the content you download from the Products; and how you interact with others on the Products.

**Device and Connection Information:** We collect information about your computer, phone, tablet, or other devices you use to access the Products. This device information includes your connection type and settings when you install, access, update, or use our Products. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, and device identifiers. We use your IP address and/or country preference in order to approximate your location to provide you with a better experience. How much of this information we collect depends on the type and settings of the device you use to access the Products. Server and

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data center service administrators can disable collection of this information via the settings or prevent this information from being shared with us by blocking transmission at the local network level.

### ***Cookies and Other Tracking Technologies:***

*What types of technologies do we use?*

We use cookies, web beacons and other technologies to improve and customize our Products and your experience; to allow you to access and use the Products without re-entering your username or password; to understand usage of our Products and the interests of our customers; to determine whether an email has been opened and acted upon; and to present you with advertising relevant to your interests. For each visitor to Crain's Products, our servers may automatically attempt to identify the user through a cookie set within your browser. This is done to provide applicable access to the Crain's Products. From time to time we may also track information, in aggregate, on pages and features that users access or view. The activity is collected and stored in our server's log files. We may log Internet Protocol (IP) addresses, or the location of your computer on the Internet required for systems administration and troubleshooting purposes.

*How do we use them?*

- **Where strictly necessary.** These cookies and other technologies are essential in order to enable the Products to provide the feature you have requested, such as remembering you have logged in.
- **For functionality.** These cookies and similar technologies remember choices you make such as language or search parameters. We use these cookies to provide you with an experience more appropriate with your selections and to make your use of the Products more tailored.
- **For performance and analytics.** These cookies and similar technologies collect information on how users interact with the Products and enable us to improve how the Products operate.
- **Targeting Cookies or Advertising Cookies.** These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. They remember the websites you have visited and that information is shared with other parties such as advertising technology service providers and advertisers.
- **Social media cookies.** These cookies are used when you share information using a social media sharing button or "like" button on our websites or you link your account or engage with our content on or through a social media site. The social network and related service providers will record that you have done this. This information may be used for targeting/advertising activities.

*How can you opt-out?*

To opt-out of our use of cookies, you can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Products. We and our third-party partners also collect information using web beacons (also known as "tracking pixels").

Many browsers include their own management tools for removing local storage objects and to manage "flash cookies". You may be able to opt out of receiving personalized advertisements as described below under "Your Choices."

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You will not be able to opt-out of any cookies or other technologies that are “strictly necessary” for the Products.

### **Information we receive from other sources**

We receive information about you from other users, from third-party services, from our related companies, and from our business and channel partners.

**Other users of the Products:** Other users of our Products may provide information about you when they submit content through the Products. We also receive your email address from other users when they provide it in order to forward you an article or to invite you to the Products. Similarly, your employer may provide your contact information when they designate you as a recipient of the Products.

**Other services you link to your account:** We receive information about you when you or your administrator integrate or link a third-party service with our Products. For example, if you create an account or log into the Products using your Facebook or Google credentials, we receive your name and email address as permitted by your Facebook Google profile settings in order to authenticate you. You or your employer may also integrate our Products with other services you use, such as to allow you to access, store, share and edit certain content from a third-party through our Products. The information we receive when you link or integrate our Products with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Products.

**Crain Companies:** We receive information about you from companies that are owned or operated by Crain, in accordance with their terms and policies.

**Crain Partners:** We work with global partners who provide consulting, implementation, training and other services around our products. Some of these partners also help us to market and promote our products, generate leads for us, and resell our products. We receive information from these partners, such as billing information, billing and technical contact information, company name, what Crain products you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.

**Other Partners:** We receive information about you and your activities on and off the Products from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Products and online advertisements.

### **How we use information we collect**

How we use the information we collect depends in part on which Products you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

**To provide the Products and personalize your experience:** We use information about you to provide the Products to you, including to process transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the Products. For example, we use the name and picture you provide in your account to identify you to tailor features that personalize your experience and provide notifications and recommendations that are most relevant for you. For

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example, we may use your stated job title and activity to provide information we think are relevant to your job function. We may use your email domain to infer your affiliation with a particular organization or industry to personalize the content and experience you receive on our websites. Where you use multiple Products, we combine information about you and your activities to provide an integrated experience, such as to allow you to find information from one Product while searching from another or to present relevant product information as you travel across our websites.

***For research and development:*** We are always looking for ways to make our Products more useful, relevant, faster, and secure to you. We use collective learnings about how people use our Products and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Products. We automatically analyze and aggregate frequently viewed articles to improve relevance of suggested topics that auto-populate when you use the search feature. In some cases, we apply these learnings across our Products to improve and develop similar features or to better integrate the services you use. We also test and analyze certain new features with some users before rolling the feature out to all users.

***To communicate with you about the Products:*** We use your contact information to send transactional communications via email and within the Products, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. We also provide tailored communications based on your activity and interactions with us. For example, certain actions you take in the Products may automatically provide you with the requested content. These communications are part of the Products and in most cases you can opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

***To market, promote and drive engagement with the Products:*** We use your contact information and information about how you use the Products to send promotional communications that may be of specific interest to you, including by email and by displaying Crain Product ads on other companies' websites and applications, as well as on other companies' platforms and websites. These communications are aimed at driving engagement and maximizing what you get out of the Products, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications as described below under "Opt-out of communications."

***Customer support:*** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Products.

***For safety and security:*** We use information about you and your use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Terms of Conditions of use policies.

***To protect our legitimate business interests and legal rights:*** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

***With your consent:*** We use information about you where you have given us consent to do so for a specific purpose not listed above.

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## **Legal basis for processing (for EEA users):**

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal basis for doing so under applicable EU laws. The legal basis depend on the Products you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Products, including to operate the Products, provide customer support and personalized features and to protect the safety and security of the Products;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as to market and promote the Products, for research and development and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third-party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean you no longer will have access to the Product.

## **How we share information we collect**

We share information we collect about you in the ways discussed below, including in connection with possible business transfers.

### **Sharing with other users**

When you use the Products, we share certain information about you with other users.

**For collaboration:** You can create content, which may contain information about you, for other users to see. For example, when you comment, we display your profile picture and name next to your comments so that other users with access to the page or issue understand who made the comment.

**Managed accounts:** If you register or access the Products using an email address with a domain that is owned by your employer or organization, and such organization requests, certain information about you including your name, contact info, content and past use of your account may become accessible to that organization's administrator. If you are an administrator for a particular site or group of users within the Products, we may share your contact information with current or past users, for the purpose of facilitating service-related requests.

**Community Forums:** Our websites may offer publicly accessible comment areas and blogs. You should be aware that any information you provide on these websites - including profile information associated with the account you use to post the information - may be read, collected, and used by any member of the public who accesses these websites. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you input into these Products. To request removal of your information from publicly accessible websites operated by us, please contact us as provided below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to do so and why.

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## Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Products.

**Service Providers:** We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

**Crain Partners:** We work with third parties who provide consulting, sales, and technical services to deliver and implement customer solutions around the Products. We may share your information with these third parties in connection with their services, such as to assist with billing and collections, to provide localized support, and to provide customizations. We may also share information with these third parties where you have agreed to that sharing.

**Links to Third-party Sites:** The Products may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third-party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

**Third-Party Widgets:** Some of our Products contain widgets and social media features, such as the Twitter "tweet" button. These widgets and features collect your IP address, which page you are visiting on the Products, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third-party or hosted directly on our Products. Your interactions with these features are governed by the privacy policy of the company providing it.

**With your consent:** We share information about you with third parties when you give us consent or we are allowed to do so under applicable laws.

**Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share information about you with a third-party if we believe that sharing is reasonably necessary to (a) comply with any applicable laws, legal process or governmental request, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Crain, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

## Sharing with affiliated companies

We share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances.

**Business Transfers:** We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a general notice on the Products if a transaction takes place, as well as any choices you may have regarding your information.

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## How we store and secure information we collect

### Information storage and security

We use data hosting service providers in the United States, UK and Denmark to host the information we collect, and we use technical measures to secure your data. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. Please refer to the Section below titled "**How we transfer information we collect internationally**" for information on the transfer of EU citizen's data outside of the EU.

### How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

**Account information:** We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Products. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Products.

**Managed accounts:** If the Products are made available to you through an organization (e.g., your employer), we retain your information as long as required by your employer. For more information, see "Managed accounts and administrators" above.

**Marketing information:** If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Products, such as when you last opened an email from us or ceased using your Crain account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

### How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

#### Your Choices:

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Products and using settings available within the Products or your account. Where the Products are administered for you by an employer (see "Notice to End Users" below), you may first need to contact your employer to assist with your request. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.



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Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

**Access and update your information:** Our Products give you the ability to access and update certain information about you from within the Product. For example, you can access your profile information from your account. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.

**Deactivate your account:** If you no longer wish to use our Products, you or your employer may be able to deactivate your account. If you can deactivate your own account, that setting is available to you in your account settings. Otherwise, please contact your employer. Please be aware that deactivating your account does not delete your information.

**Delete your information:** In some cases, you may ask us to delete accessing, storing, using and otherwise processing your information. You request by contacting customer service. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

**Request that we stop using your information:** In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe an account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your employer does not object (where applicable).

**Opt out of communications:** You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Product account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages (such as a receipt for a purchase) from us regarding our Products.

You may be able to opt out of receiving personalized advertisements from other companies who are members of the Network Advertising Initiative or who subscribe to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising. For more information about this practice and to understand your options, please visit: <http://www.aboutads.info>, <http://optout.networkadvertising.org/> and <http://www.youronlinechoices.eu>.

**Mobile Consents/Opt-Outs.** We may send you messages, including marketing, via your wireless email address or by short message service (SMS), wireless access protocol (WAP) services or

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mobile phone service. By providing us with your wireless email address or by signing up for any SMS, WAP or mobile phone service, you consent to receiving services and messages at the address or number you provide for such purposes, and understand that your wireless carrier's rates apply to these services/messages. You may opt-out of SMS, WAP or mobile services by following the instructions provided in the message.

**Send "Do Not Track" Signals:** Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Products do not currently respond to browser DNT signals. You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.

**Data portability:** Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information.

## **How we transfer information we collect internationally**

### **International transfers of information we collect**

We collect information globally and primarily store that information in the United States, the UK and Denmark. We transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Products. Whenever we transfer your information, we take steps to protect it.

**International transfers within the Crain Companies:** To facilitate our global operations, we transfer EU data information to the United States and allow access to that information from countries in which the Crain owned or operated companies have operations for the purposes described in this policy. These countries may not have equivalent privacy and data protection laws to the laws of many of the countries where our customers and users are based. When we share information about you within and among Crain corporate affiliates, we make use of standard contractual data protection clauses, which have been approved by the European Commission.

**International transfers to third parties:** Some of the third parties described in this privacy policy, which provide services to us under contract, are based in other countries that may not have equivalent privacy and data protection laws to the country in which you reside. When we share information of customers in the European Economic Area or Switzerland, we make use of the European Commission-approved standard contractual data protection clauses, or other appropriate legal mechanisms to safeguard the transfer.

## **Other important privacy information**

### **California Residents.**

Under California law, California resident users may opt-out of the disclosure of personal information to third parties for the third parties' direct marketing purposes. You may contact us for such information or to opt-out of the sharing of your personal information with third parties for marketing

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purposes as detailed above at any time by sending an e-mail stating this preference and including your full name and e-mail address to [customerservice@rubbernews.com](mailto:customerservice@rubbernews.com) or call 877-320-1716.

## **Notice to End Usersc**

Some of our products are provided to you for use by organizations, such as your employer. Where the Products are made available to you through an organization, that organization is the administrator of the Products and is responsible for the accounts and/or Products over which it has control. If this is the case, please direct your data privacy questions to your employer, as your use of the Products is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Administrators may be able to: restrict, suspend or terminate your access to the Products; access information in and about your account; and restrict your ability to edit, restrict, modify or delete information. Please contact your organization or refer to your administrator's organizational policies for more information.

## **Our policy towards children**

The Products are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact customer service.

## **Changes to our Privacy Policy**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Products homepages, login screens, or by sending you an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Products to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Products and contact us at Customer Service if you wish to delete your account(s), as outlined above.

## **Contact Us**

Your information is controlled by Crain Communications Inc. If you have questions or concerns about how your information is handled, please direct your inquiry to Crain Communications Inc, which we have appointed to be responsible for facilitating such inquiries or, if you are a resident of the European Economic Area, please contact our EU Representative.

General Counsel  
c/o Crain Communications Inc  
1155 Gratiot Avenue  
Detroit, MI 48207  
E-Mail: [privacyhelp@crain.com](mailto:privacyhelp@crain.com)

313-446-6000

EU Representative:

Crain Communications Limited  
c/o Crain Communications Inc  
1155 Gratiot Avenue  
Detroit, MI 48207  
E-Mail: [privacyhelp@crain.com](mailto:privacyhelp@crain.com)

## PRIVACY STATEMENT - CALIFORNIA

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Policy of Crain Communications Inc and its publications (collectively, “we,” “us,” or “our”) and applies solely to subscribers, website users, event attendees 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 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

### Information We Collect

We collect information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Personal information categories listed in California Civil Code sections 1798.80(e) and 1798.82(e).	Names, titles, addresses, telephone numbers, email addresses, and other contact information.	YES
B. Protected classification characteristics listed in California Civil Code section 1798.80(b).	Age, sex, race, ethnicity, marital status, and other characteristics.	YES
C. Commercial information.	Products and services purchased or considered, purchase or browsing history, and other commercial information.	YES
D. Commercial information.	Products and services purchased or considered, purchase or browsing history, and other commercial information.	YES
E. Biometric information.	Facial scans, fingerprints, and other biometric information.	NO
F. Internet or other similar network activity.	IP addresses, browser type, and other information collected from devices.	YES
G. Inferences drawn from other personal information.	Behavioral data and other information used to create profiles.	YES
H. Personal information from other sources.	Information from third parties, including social media and other sources.	YES

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and

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Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;

- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

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

- Directly and indirectly from our customers or their employers. For example, from information that our clients provide to us related to the services for which they engage us.
- Directly and indirectly from activity on our websites. For example, from website usage details collected automatically.
- From third parties that interact with us in connection with the services we perform.
- Directly from third parties.

### **Use of Personal Information**

We may use or disclose the personal information we collect in the manner provided in our Privacy Policy, including but not limited to the following:

- To provide you with information, products or services that you request from us. For example, we may use personal information to provide you with customer service, to process or fulfill orders and transactions, to verify customer information, to process payments, or to provide advertising or marketing services.
- To improve our websites and present their contents to you. For example, debugging to identify and repair errors that impair existing intended functionality.
- For testing, research, analysis and product development.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct [certain business transactions] 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 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 disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

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In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information

Category F: Internet or other similar network activity.

Category I: Professional or employment-related information.

## **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.

### *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 information over the past 12 months. Once we receive and verify your request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources of 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.
- The specific pieces of personal information we collected about you (also called a data portability request).
- 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.

### *Deletion Request Rights*

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 and verify your request, we will delete (and direct our service providers to delete) your personal information 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:

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1. Complete the transaction for which we collected the personal information, provide a product 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 consumer 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 consumer 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.

### *Exercising Your Privacy Rights*

To exercise your privacy rights described above, please submit a request to us by either filling out our Privacy Request Form (link below) or calling us at 1-877-860-9145.

You can submit a request to us to exercise the following privacy rights using the link below, which will take you to a form: Right to Know, Right to Delete, Shine the Light, and/or to submit a "Do Not Sell" request for any "sale" not related to interest-based advertising.

### **SUBMIT PRIVACY REQUEST**

Click this link to make a privacy request: <http://x.e.crainalerts.com/ats/show.aspx?cr=879&fm=44>

For your protection, we will take steps to verify your identity before granting access to your personal data or other information. For example, we may verify your Privacy Request by matching information you provide with our records, or you may be asked to log in to your online account (if applicable). We may request additional information to verify your identity depending on the nature of the Privacy Request and the sensitivity of the information sought. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may submit a Privacy Request to us. You may only submit a Privacy Request twice within a 12-month period.

We cannot respond to your Privacy Request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you. Submitting a Privacy Request does not require you to create an account with us. We will only use personal information provided in a Privacy Request to verify the requestor's identity or authority to make the request.

### *Response Timing and Format*

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require

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more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding our receipt of your verifiable Privacy Request. 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 information 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 consumer 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.

### **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.

We may offer webinars, white papers, events and other programs free of charge in exchange for your consent to share certain personal information, such as your name and contact information, with selected business partners. You may opt in by registering for one of these programs, but if you would like to register without providing your personal information, please fill out the Privacy Request form and you will be advised of the price difference.

### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you through a notice on our website homepage.

### **Contact Information**

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

Phone: 1-877-860-9145

Website: [crain.com](http://crain.com)

Email: [privacyhelp@crain.com](mailto:privacyhelp@crain.com)

Postal Address: Crain Communications Inc

Attn: Legal Department

1155 Gratiot Avenue

Detroit, MI 48207



