Thank you for visiting the AD1 Media Group<sup>™</sup> website located at <u>www.AD1mg.com</u> (the "Website"). The Website is an Internet property of AD1 Media Group, LLC ("AD1 Media Group<sup>™</sup>," "AD1<sup>™</sup>," "we," or "us"). We understand the importance that Internet users place on privacy and have designed the Website with this in mind. AD1<sup>™</sup> believes in 100% permission-based marketing.

We have created this AD1 Media Group<sup>™</sup> Privacy Policy (the "Privacy Policy") in order to disclose our information gathering, use and dissemination practices and the choices you can make about the way your information is used on our Website.

You agree to this Privacy Policy, in its entirety, when you: (a) access or use the Website; (b) provide any personal information to us by and through various registration forms, surveys, web pages and/or other online media (collectively, "Online Media"); (c) agree to receive the AD1 Media Group<sup>TM</sup> newsletter (the "Newsletter"); and/or (d) request to contacted by AD1 Media Group<sup>TM</sup>, and/or attempt to contact AD1 Media Group<sup>TM</sup> by filling out and submitting any other applicable forms available on the Website. If you do not agree with any of the terms of this Privacy Policy, please do not use or access the Website or fill out any forms available on the Website.

### CHANGES TO THE PRIVACY POLICY

We reserve the right, in our sole discretion, to change, modify, add and/or remove portions of this Privacy Policy at any time. All Privacy Policy changes or modifications will be posted on the Website and shall take effect immediately upon their posting. AD1 Media Group<sup>™</sup> does not provide any other notice of such changes or modifications. Your continued access and/or use of the Website following the posting of any such changes or modifications to this Privacy Policy will constitute an affirmative acknowledgement and acceptance of the applicable changes or modifications. Please check back frequently for changes or modifications as it is your sole responsibility to be aware of any such changes. The Privacy Policy is incorporated into, and part of, the Performance-Based Ad Network Agreement (the "Terms and Conditions") which govern your use of the Website.

## **INFORMATION COLLECTION**

# The Basics

We collect Personally Identifiable Information ("PII") from the Website when you request to be contacted by AD1 Media Group<sup>TM</sup>, sign up for the Newsletter, attempt to contact AD1 Media Group<sup>TM</sup>, provide any PII to us by or through various Online Media or otherwise voluntarily choose to provide PII to us. For the purposes of this Privacy Policy, PII means any information that can be used to identify, locate or contact a particular person or entity. In particular, this includes, but shall not limited to: (a) first and last name; (b) home postal address; (c) business postal address; (d) business name; (e) home telephone number; (f) business telephone number; (g) mobile telephone number; (h) home fax number; (i) business fax number; (j) email address; and/or (k) any other PII submitted voluntarily to us. For example, you may choose to provide us with PII about yourself in an email or by completing an online form on our Website.

Please note that upon voluntarily providing your consent, we may use your PII to send you the Newsletter which contains information regarding AD1 Media Group<sup>™</sup> and various products and services that may be of interest to you. Additionally, your PII may also be used to reach you, when necessary, regarding issues concerning your use of the Website and/or the Newsletter. Once collected, we will store your PII for a commercially reasonable period of time for record keeping purposes. The information that we store is sometimes deleted as space requires or in the normal course of business. Finally, please be advised that while all PII that you submit is at your discretion and completely voluntary, it may be required for valid registration on the Website.

## Use of PII

Please be advised that other than the limited exceptions set forth herein below, AD1 Media Group<sup>TM</sup> will not share, sell, rent, lease or otherwise provide your PII with others. Your PII is not shared with any third parties, except: (a) where required by law, requested pursuant to a judicial or regulatory proceeding or inquiry, or requested by a court of competent jurisdiction; (b) in the event of AD1 Media Group<sup>TM</sup> bankruptcy, or if AD1 Media Group<sup>TM</sup> is sold or acquired; (c) where we believe that you are or have been in violation of this Privacy Policy or the <u>Terms and Conditions</u>; (d) where we believe that you are or have been using the Website and/or our products, services or Online Media to commit unlawful acts; or (d) where AD1 Media Group<sup>TM</sup> determines, in its sole discretion, that such disclosure is necessary to protect the rights of AD1 Media Group<sup>TM</sup> and/or a third party, or is otherwise necessary to protect AD1 Media Group<sup>TM</sup> from liability of any kind.

Please be advised that we may also employ other individuals, companies and/or entities (collectively, "Agents") to perform certain functions on our behalf. Examples include, but shall not be limited to, sending direct and electronic mail, removing duplicate information from our database(s), analyzing data and providing marketing analysis and otherwise helping us operate our business, the Website and/or the Online Media. The Agents performing these limited functions on our behalf shall have access to your PII as needed to perform their functions for us, but we do not permit them to use your PII for any other purposes.

Additionally, please be advised that we may also use your PII for customer service functions, to provide you with information that you may request, to customize your experience with the Website and/or other Online Media and/or to contact you when necessary in connection with transactions entered into by you through the Website and/or other Online Media, if any. We may also use your PII for internal business purposes, such as analyzing and managing our business. We may also combine the PII we have gathered about you with information from other sources.

Finally, please be advised that AD1 Media Group<sup>TM</sup> may, in the future, decide to sell, merge or otherwise reorganize its business. Accordingly, we reserve the right to transfer and/or disclose PII in this limited circumstance, provided however, that data collected by AD1 Media Group<sup>TM</sup> will be governed by the same privacy policy that existed prior to any change in business conditions unless and until you subsequently consent any new privacy policy that takes it place.

## Non-PII

Please be advised that we may collect certain Non-Personally Identifiable Information ("Non-PII") about you when you visit many of the pages throughout the Website. For the purposes of this Privacy Policy, Non-PII means any information collected in the normal course of AD1 Media Group<sup>™</sup> business operations which cannot be used to identify, locate or contact a particular person or entity and does not reveal your specific identity. In particular, this includes, but shall not limited to: (a) the type of browser you are using (e.g., Netscape, Internet Explorer); (b) the type of operating system you are using, (e.g., Windows '98 or Mac OS); (c) the domain name of your Internet service provider (e.g., Comcast, Earthlink, TimeWarner, etc.); (d) your IP address; and/or (e) click-stream data. We may use the Non-PII that we collect to improve the design and content of the Website and to enable us to personalize your Internet experience. Additionally, we may use this information in the aggregate to analyze Website usage.

## **IP Addresses**

AD1 Media Group<sup>™</sup> automatically tracks certain information based upon your behavior on the Website. In addition to using this information for registration and validation purposes, we may also use this information to help diagnose problems with our server(s), to administer the Website and other Online Media and/or to gather both broad and specific internal research on our Clients' demographics, interests, and behavior to better understand, protect and serve you. This information may include the URL that you just came from (whether this URL is on the Website or not), which URL you next go to (whether this URL is on the Website or not), your computer browser information, and your IP address. Your Internet Protocol ("IP") is a unique Internet "address" which is assigned to you by your Internet Service Provider ("ISP"). For local area network ("LAN"), DSL, or cable modem users, an IP address may be permanently assigned to a particular computer. IP addresses are automatically logged by Web servers, collecting information about a Member's traffic patterns. While the IP address does not identify an individual by name, it may, with the cooperation of the ISP, be used to locate and identify an individual using the Web. Your IP address can, however, reveal what geographic area you are connecting from, or which ISP you are using. Finally, other websites you visit have IP addresses, and we may collect the IP addresses of those websites and their pages.

#### ANTI-SPAM POLICY

AD1 Media Group<sup>™</sup> employs a strict Anti-SPAM policy. Accordingly, we only practice permission-based e-mail marketing techniques and do not practice, participate in or condone the sending of unsolicited commercial e-mail messages ("SPAM"). By accessing, registering and/or using the Website you understand, acknowledge and agree that SPAM will not be tolerated. Consequently, you are prohibited from sending out or otherwise forwarding any AD1 Media Group<sup>™</sup> messages in any manner, whatsoever.

See the Federal Trade Commission (the "FTC") website at <u>www.ftc.gov/spam</u> for updates on implementation of the CAN-SPAM Act of 2003, as amended. The FTC maintains a consumer complaint database of violations of the various laws that the FTC enforces. Consumers can submit complaints online at <u>www.ftc.gov</u> and forward unwanted and unsolicited commercial e-mail to the FTC at <u>spam@uce.gov</u>. The FTC works as a consumer advocate in order to prevent fraudulent, deceptive and unfair business practices. To file a complaint with the FTC or to request free information about consumer issues, please visit <u>www.ftc.gov</u> or call toll-free, 1-877-FTC-HELP.

If you have any other questions or comments about this Anti-SPAM Policy, please contact us via e-mail at <u>info@AD1mg.com</u>, or via direct (postal) mail at the address below.

### **COOKIES**

When you visit the Website and/or other Online Media, we may send a cookie and/or gif file ("Cookie") to assign an anonymous, unique identifier to the applicable end-user's Internet browser. A Cookie is a piece of data stored on your hard drive containing Non-PII about you. Cookies have many benefits to enhance your experience with the Website and other Online Media. Cookies are not designed to get data from your hard drive, your e-mail or any other personal data about you. Cookies are used to store information about a visitor's preferences and history in order to better serve the visitor and/or present the visitor with customized content. To protect your privacy we do not use cookies to store or transmit any personal information about you on the Internet. To find out more about Cookies, please visit <u>www.cookiecentral.com</u>.

To disable and reject certain Cookies, follow the instructions associated with your Internet browser. Even in the case where a user rejects a Cookie, he or she may still use the Website and other Online Media. Please note, however, that if you reject our cookies it is possible that some portions of the Website and/or other Online Media may not properly load, your access to certain information might be denied or you might have to enter information about yourself more than once. We reserve the right to retain Cookie data indefinitely.

#### TECHNOLOGICAL DEVELOPMENTS

Please be advised that the use of technology on the Internet, including Cookies, is rapidly developing. Accordingly, we strongly encourage you to revisit this Privacy Policy for any updates regarding our implementation and use of any such new technological developments.

### **SECURITY**

Please be advised that all collected information is stored in a technically and physically secure environment. More specifically, we take industry standard steps to protect all PII, and Non-PII, both online and off-line. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your PII, we cannot ensure or warrant the security of any information that you transmit to us, and you do so at your own risk.

Once we receive your transmission, we employ reasonable efforts to ensure its security on our systems. Access to this information is strictly limited, and not accessible to the public. Any and all PII submitted to AD1 Media Group<sup>TM</sup> is restricted in our offices. Only employees who need the information to perform a specific job (for example customer service representatives) are granted access to PII. Moreover, our employees are dedicated to ensuring the security and privacy of all

AD1 Media Group<sup>TM</sup> Client information. Employees not adhering to our firm policies are subject to disciplinary action up to, and including, termination.

Please be advised that any attempt to breach the security of the Website, the Network, our servers, databases or other hardware or software supporting the Website or the Network constitutes a crime punishable by law. Accordingly, we will turn over to the authorities, any and all evidence relating to a potential breach of security or other abuse against the Website, the Network, our servers, databases or any other such supporting equipment or software. In compliance with applicable federal and state laws, we shall notify you in the event that we learn of an information security breach with respect to your PII. You will be notified via e-mail in the event of such a breach. However, please note that the provision of such notice may be temporarily delayed in order to address the needs of law enforcement, determine the scope of network damage, and/or to engage in necessary remedial measures.

## THIRD-PARTY WEBSITES

Please be advised that the Website may contain links to other websites owned by other thirdparties ("Third-party Websites"). Such entities are independent third-parties and are not affiliated with AD1 Media Group<sup>TM</sup>. Moreover, these third-parties have separate privacy and data collection practices and policies and we have no responsibility or liability relating to them. Accordingly, this Privacy Policy does not cover the use of any information by such Third-Party Websites. And AD1 Media Group<sup>TM</sup> does not endorse, nor is AD1 Media Group<sup>TM</sup> responsible for, the accuracy of the privacy policies and/or terms and conditions of any Third-Party Websites. We strongly encourage you to review the privacy practices and policies and terms of use of any such Third-Party Websites.

## CHILDREN'S PRIVACY POLICY

AD1 Media Group<sup>TM</sup> encourages parents and guardians to spend time online with their children and to participate and monitor the interactive activities of their children. AD1 Media Group<sup>TM</sup> is very sensitive to the issue of children's privacy and, therefore, we endeavor to protect the privacy of children using the Internet. We do not knowingly solicit or collect any information whether PII or Non-PII from any persons under eighteen (18) years of age. If a child has already provided us with any PII or Non-PII, his or her parent or guardian may contact us for the purpose of deleting this information. AD1 Media Group<sup>TM</sup> has designed this policy in order to comply with the Children's Privacy Protection Act ("COPPA"). All such requests shall be handled by AD1 Media Group<sup>TM</sup> as expeditiously as possible.

## **REVIEWING, CORRECTING OR DELETING YOUR INFORMATION**

If you would like to know if we have any of your PII in our database, would like to review, correct or delete the PII that we have collected from you, or if you no longer wish to continue your service with us, simply send your request via certified mail to 106 East 19<sup>th</sup> Street, 8<sup>th</sup> Floor, New York, NY 10003. You may also send your request via e-mail to <u>info@AD1mg.com</u>. Please note that in order to protect your privacy and security we will take reasonable steps to help verify your identity before granting any access for purposes of review, making corrections or deletions.

## **UNSUBSCRIBING FROM THE NEWSLETTER**

If at any time, you wish to stop receiving the Newsletter, you may unsubscribe either via the link located at the end of each Newsletter, or by contacting us at <u>info@AD1mg.com</u>. Notwithstanding the foregoing, please note that we may continue to contact you for the purpose of communicating information relating to AD1 Media Group<sup>TM</sup>, as well as to facilitate, complete, or confirm any transaction that you may enter into or responding to your inquiry or request.

### **CALIFORNIA-CLIENT CONSUMER RIGHTS**

In accordance with California Civil Code Sec. 1789.3, California resident Clients are entitled to know that they may file grievances and complaints with California Department of Consumer Affairs, 400 R Street, STE 1080, Sacramento, CA 95814; or by phone at (916) 445-1254 or toll free at 1-800-952-5210; or by e-mail to <u>dca@dca.ca.org</u>.

For more information about protecting your privacy, you may wish to visit: www.ftc.gov.

#### CONTACT US

If you have any questions or comments about this Privacy Policy, desire not to receive information about Network or other products or services that we think may be of interest to you, or otherwise wish to review, correct or delete your information, please contact us via e-mail at <u>info@AD1mg.com</u>, or via direct (postal) mail at:

**AD1 Media Group, LLC** 106 East 19th Street. 8th Floor

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