

OMG Privacy Notice

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Transparency 1, LLC (d/b/a O’Keefe Media Group or OMG) and organizations within the OMG families of business (collectively “**OMG**,” “**we**,” “**us**,” or “**our**”) provide this Privacy Notice to help you understand how we collect, use, process, and share your personal information and to help you understand and exercise your privacy rights.

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1. SCOPE AND UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice applies to personal information processed by us, including on our websites, mobile applications, and other online or offline offerings. To make this Privacy Notice easier to read, our websites, mobile applications, and other offerings are collectively called the “**Services**.”

Changes to our Privacy Notice. We may revise this Privacy Notice from time to time. If there are any material changes to this Privacy Notice, we will notify you in a manner consistent with applicable law. You understand and agree that you will be deemed to have accepted our Privacy Notice if you continue to use our Services now or after the new Privacy Notice takes effect.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us and our Services. We collect information that you provide to us; information we obtain automatically when you use our Services; and information from other sources such as third-party services and organizations, as described below. For residents of certain states, additional disclosures about the information we collect is available in our supplemental disclosure below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Account Creation.** We collect personal information when you create an OMG account that may include data such as email address, username, profile picture, social media handles, birth day and month.

- **Purchases & Subscription Payments.** We collect personal information and details associated with your purchases, including name and billing address. Any payments made via our Services are processed by third-party payment processors. We do not collect or store payment card number, CVV, or expiry entered through our Services.
- **Your Communications with Us.** We may collect personal information, such as email address, phone number, and mailing address when you request information about our Services, register for our newsletter, request customer or technical support, or otherwise communicate with us.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and our Service Providers who support our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat interactions, commenting and posting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein. Please exercise caution before revealing any information that may identify you in the real world to other users.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- **Automatic Collection of Personal Information.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Cookie Notice (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect information through your use of our Services.
 - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services.

The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies, including cross-device tracking, to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties.
- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services. These Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services.
- **Social Media Platforms.** Our Services may contain social media buttons, such as Instagram, Twitter, Signal, and Rumble, which might include widgets such as the “share this” button or other interactive mini programs. These features may collect personal information such as your IP address and which page you are visiting on our Services and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

C. Personal Information Collected from Other Sources

Third-Party Services and Sources. We may obtain personal information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect personal information about you from that third-party application that you have made available via your privacy settings.

Referrals and Sharing Features. Our Services may offer various tools and functionalities that allow you to provide personal information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information and other payment methods for products or Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Short-term, transient use, such as contextual customization of ads;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Notice;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

We may use your information for other legitimate business purposes as permitted by law.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we may market to you include email campaigns, text messages, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in [“Contact Us”](#) below.

D. With Your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

E. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- **Automated Decision Making.** We may engage in automated decision making, including profiling. For example, we may engage in automated decision making to [insert example based on Company's business, e.g., analyze and approve loan applications]. OMG's processing of your personal information will not result in a decision based solely on automated processing that significantly affects you unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to engage in such automated decision making. If you have questions about our automated decision making, you may contact us as set forth in "[Contact Us](#)" below.
- **De-identified and Aggregated Information.** We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our company affiliates for example: for our administrative purposes, IT management, or for them to provide services to you or support and supplement the Services we provide.
- **Other Users or Third Parties You Share or Interact With.** As described above in "[Personal Information We Collect](#)," our Services may allow you to share personal information or interact with other users and third parties (including individuals and third parties who do not use our Services and the public).
- **Advertising Partners.** Through our Services, we may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks.

This practice is commonly referred to as “interest-based advertising,” “cross-context behavioral advertising,” or “personalized advertising.”

- **APIs/SDKs.** We may use third-party application program interfaces (“**APIs**”) and software development kits (“**SDKs**”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in “[Contact Us](#)” below.

We may also share your information with third parties as appropriate and permitted by law. The privacy choices you may have about your personal information are determined by applicable law and are described in Section 5 below.

B. Disclosures to Protect Us or Others

Our subscribers’ confidentiality and privacy are critically important to OMG. We will not share or disclose your personal data, other than described in this policy, to any individuals, entities, or authorities unless compelled by law. If compelled by law, OMG will work diligently to limit any disclosure of subscriber information.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Notice).
- **Text Messages.** If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in “Contact Us” below.
- **Mobile Devices.** We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device.
- **“Do Not Track.”** Do Not Track (“**DNT**”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Personalized Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of

personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access to and Portability of Your Personal Information**, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the “right of data portability”);
- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information.
- **Request Restriction of or Object to** our processing of your personal information where the processing of your personal information is based on our legitimate interest or for direct marketing purposes, including (i) the right to opt-out of the sharing of personal information, (ii) object to or restrict our use of or your sensitive personal information, including the right to opt-out of the sharing of sensitive personal information, and (iii) opt out of the processing of your personal information for purposes of (a) targeted advertising, and (b) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you; and
- **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in “[Contact Us](#)” below or as otherwise instructed in the additional privacy notices provided at the time we collect your personal information. We will process such requests in accordance with applicable laws.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Notice. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

7. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

If we transfer personal information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the [EU Standard Contractual Clauses](#).

For more information about the safeguards we use for international transfers of your personal information, please “[Contact Us](#)” as set forth below.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Notice for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable law. Additionally, we endeavor to retain all such personal information in accordance with legal requirements.

De-Identified Information. If we create or receive de-identified information, we will not attempt to reidentify such information, except to comply with applicable law.

California Shine the Light. The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.¹” Shine the Light” requests may be made as set forth in “[Contact Us](#)” below.

Right for minors to remove posted content. Where required by law, California residents under the age of 18 may request to have their posted content or information removed from the publicly-viewable portions of the Services by contacting us directly as set forth in “[Contact Us](#)” below or [logging into their account and removing the content or information using our self-service tools].²

9. SUPPLEMENTAL NOTICE FOR CERTAIN INTERNATIONAL COUNTRIES

A. Supplemental Notice for Australia

This Supplemental Notice for Australia only applies to our processing of personal information that is subject to the applicable data protection laws of Australia.

- **Sensitive Personal Information.** We do not generally require you to disclose any sensitive personal information (e.g., details of race, religious belief, sexual orientation, or membership of a trade union) to us. If you do provide us with sensitive personal information for any reason, you consent to us collecting that information and using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the Australian Privacy Act 1988 (Cth) (“**Privacy Act**”).
- **Marketing.** We will only use and disclose your personal information for the purposes of marketing our Services or services of third-party organizations where you have consented to us doing so, or as otherwise permitted by law.
- **International Transfers.** Except in some cases where we may rely on an exception under the Privacy Act, we will take reasonable steps to ensure that any overseas recipients of personal information which originates in Australia do not breach the Australian Privacy Principles in the Privacy Act in relation to such information.

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- **Children's Information.** If an individual indicates they are under 15 and we are required to obtain the individual's consent (for example, for the collection of sensitive information), we will seek consent from the individual's parent or legal guardian.

B. Supplemental Notice for Canada

This Supplemental Notice for Canada only applies to our processing of personal information that is subject to the applicable data protection laws of Canada.

- **Security of Your Information.** The files and records containing your personal information will be kept in our offices and/or on our servers or those of our service providers, and only those employees that require it for the purposes of their duties will have access to these files.
- **International Transfers and Access.** Personal information may be accessible to the courts and the law enforcement and national security authorities of the United States. To obtain more information about [Company]'s policies and practices with respect to service providers outside of Canada, please contact us as set forth in "[Contact Us](#)" below.

10. CHILDREN'S INFORMATION

The Services are not directed to children under 13. We do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, wish to review information collected from your child, or have that information modified or deleted, you may contact us as described in "[Contact Us](#)" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account.

11. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

12. CONTACT US

OMG is the controller of the personal information we process under this Privacy Notice.

If you have any questions about our privacy practices or this Privacy Notice, or to exercise your rights as detailed in this Privacy Notice, please contact us at:

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