

## CUMULUS BROADCASTING LLC

### INTERNET PRIVACY POLICY

Cumulus Broadcasting LLC and its radio stations (collectively “Cumulus”) respect the personal privacy of visitors to our websites (“Cumulus Radio Websites”). Please read this Internet Privacy Policy carefully so that you understand what information we collect through our websites, what we do with that information, and how to safeguard the personal information you provide to us. This Internet Privacy Policy applies only to information collected online through the Cumulus Radio Websites and does not describe the ways in which we may collect or use information obtained offline or through any means other than our Cumulus Radio Websites.

#### INTERNET PRIVACY POLICY

Your personal privacy is a principal concern to us at Cumulus. Our goal in outlining our policy on the collection and use of listener/customer information is to ensure the highest level of confidentiality and security. When you provide your personal information on any Cumulus Radio Website, we will not give or sell your personal information to any outside company for its use in marketing or solicitation without your permission, which may be express or implied. We will maintain the confidentiality of your personal information and it will be used only to support your customer relationship with our radio stations and to assist us in providing better and more targeted services to you. Additionally, internal practices are in place to help protect your privacy by limiting employee access to and use of customer information. When we ask customers/listeners to provide their personal information on a Cumulus Radio Website, it is done with the goal of improving the relationship between a Cumulus radio station and the listener. At Cumulus, we allow our listeners to maintain control over their personal information while attempting to provide a more interactive online experience. Our intention is to send e-mail only to listeners/customers who have chosen to receive such e-mails. At any time, you have the right to decline receiving future communications from Cumulus in any manner, including email, fax, telephone and postal mail.

#### HOW WE COLLECT INFORMATION

When you browse any Cumulus Radio Website, you do so anonymously. Personal information—including your e-mail address—is not collected. However, there are three (3) ways in which a Cumulus Radio Website may collect information about you.

1. Some Cumulus Radio Websites may request that you **voluntarily** provide personal information for purposes such as correspondence, site registration, membership, making a purchase, or participating in contests or online surveys. Information that we ask you to provide may include your name, e-mail address, telephone number, mailing address and birth date. We may also request that you provide listener/customer preference information, social security numbers, lifestyle interests, and other demographic information that may be needed to register or subscribe you to services or offers.

2. Like many other commercial websites, a Cumulus Radio Website may use a standard technology called a "cookie" to collect information about how our websites are used. Cookies are small text files on your system used for keeping track of settings or data for a particular website. You may turn them off through your browser or set your browser to notify you before accepting them. Some Cumulus Radio Websites use cookies to store information necessary to provide a service or access into a site. Any information that we may store in cookies is used for internal purposes only.

3. Each time a Cumulus Radio Website page is requested from your browser, we log your computer's IP address into our log files. Your computer has been pre-assigned a 12-digit number from your Internet Service Provider and may be static or dynamically assigned—this number is the IP address. Cumulus uses IP addresses to

analyze trends, administer the site, track movements on the site, and gather broad demographic information for aggregate use. IP addresses are not linked to any other personally identifiable information by Cumulus.

## **THE INFORMATION WE COLLECT**

We collect only information that is needed, and we tell listeners/customers how we use it. We limit the collection of information about our listeners/customers to what we need to know to manage their membership, to provide customer service, to offer new products and services, and to fulfill any legal and regulatory requirements. We tell our listeners/customers about the general uses of information we collect about them, and we will provide additional explanation if requested. A listener/customer may change, update or add additional information about themselves at any time through the Cumulus Radio Websites that offer this feature. If a Cumulus Radio Website does not currently provide this ability, listeners/customers can still change their data profile by contacting the local radio station. All Cumulus Radio Websites will provide this feature in the near future.

## **SECURITY**

Access to listener/customer information is limited to those who specifically need it to conduct their business responsibilities. We use security techniques designed to protect our listener/customer information—especially information that is used by employees and business partners to fulfill listener/customer services. In addition to providing listeners/customers with the opportunity to refuse marketing offers, we release information only at the listeners'/customers' requests, or when required to do so by law or other regulatory authority. When a court order or subpoena requires us to release information, we notify the listener/customer directly so that his/her legal rights can be exercised, if appropriate. The only exceptions to this policy are when we are prohibited by court order or law from notifying the listener/customer, or cases in which fraud and/or criminal activity is suspected. Finally, each Cumulus employee is personally responsible for maintaining listener and customer confidentiality. All Cumulus employees are required to sign an agreement that they will comply with these policies. Employees who violate these policies are subject to disciplinary action, up to and including termination of employment. Employees are expected to report violations—and may do so confidentially—to their managers or other supervisors. Each radio station has an employee who has been assigned the responsibility for assuring the adherence to Cumulus's privacy policy. Check your local Cumulus Radio Website for this contact.

## **USE AND DISCLOSURE OF INFORMATION**

As a result of providing your personal information to us, Cumulus radio stations can provide a more customized online experience, making your interaction with us more productive, helpful and fun, and will enhance the services and offers our radio stations bring to you. If you provide us with your e-mail address, or have done so in the past, we may send you e-mail offers or newsletters. These offers or newsletters are based on information you provided in your membership application, registration forms, surveys, or from information that may indicate purchasing preferences and lifestyle, as well as information available from external sources, such as census bureau data. These e-mail offers will come from a Cumulus radio station only. *Your information or email address is never sold to a third party.* All offers are carefully developed to guarantee that they meet our standards. Our goal is to target offers to listeners/customers who will find them of value. At any time, you may request to discontinue receiving these communications from us by simply replying to the e-mail address included in every e-mail message that you receive from a Cumulus radio station.

From time to time, we may offer contests or other promotions on a Cumulus Radio Website. If you enter a contest or participate in a promotional event, we will ask you to provide information about yourself (such as your name, address, and email address). Among other things, we will need this information to contact you if you win, and we may also use this information for marketing purposes. We may share this information with any co-sponsors of the contest or promotional event; co-sponsors will be identified in the contest rules. We may also share this

information with or other third-party service providers that help administer our contests and promotional events, such as by conducting drawings, and/or delivering prizes to winners. If you do not want to provide the requested information or have the information provided to co-sponsors or other third-party service providers, please do not enter the contest or participate in the promotional event.

At times, our clients might collect personal information from listeners on Cumulus Radio Websites or on-site at a retail location or other station events. The collection of this information is clearly marked as information being collected by or for a third party, and providing such information is strictly voluntary. The station may help facilitate the collection of the information by providing forms and collection boxes for the client. Sometimes this information is shared with the radio station, though the station will only market to you if you have given us permission. *Information gathered in this manner is shared with our client partners; and other information you may have previously provided to us remains private.*

We do monitor URL click-throughs found in our email messages. The click-through rate is reviewed in order to track (i) participation in contests to judge effectiveness and award prizes; (ii) listener interests; and/or (iii) response rates for station-marketing purposes or to report to a client in aggregate form only, the response of listeners. Individual activity is never shared with employees or third parties.

#### **PROTECTING THE PRIVACY OF CHILDREN**

Children should always get permission from their parents before sending any information about themselves (such as their names, email addresses, and phone numbers) over the Internet, to us or to anyone else. Cumulus Radio Websites are not directed at children under the age of 13 and we will not knowingly allow anyone under 13 to provide us any personal identifying information. If you are under the age of 13, please do not provide any information about yourself to any Cumulus Radio Website.

#### **OTHER DISCLOSURES**

Third-party Internet sites and services accessible through Cumulus Radio Websites have separate privacy and information collection practices, independent of us. Cumulus has no responsibility or liability for these independent policies or actions. You are solely responsible for maintaining the secrecy of your passwords, membership ID, or any account information. Please be careful and responsible whenever you are online. If you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return. While we aim to protect your personal information, Cumulus cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk.

While each Cumulus radio station puts forth its best efforts in adhering to these minimum privacy standards, additional restrictions may be imposed to comply with state and local laws, and/or station-specific programs, products and services.

#### **CHANGES TO THIS PRIVACY STATEMENT**

The Internet is an evolving medium. If we need to change this Internet Privacy Policy at some point in the future, we will post the changes to this Internet Privacy Policy on this website and update the reference to the effective date to reflect the date of the amendment. By visiting a Cumulus Radio Website, you agree that your visit, and any dispute over privacy, is governed by this Internet Privacy Policy.

Revised November 5, 2008.