

# Privacy Policy

*Last Updated and Effective Date: March 31, 2019*

We are committed to protecting your privacy. We know that you care about how Personal Information about you is used and shared, and we appreciate your trust that we will use that information carefully and sensibly in accordance with this Privacy Policy.

This Privacy Policy governs the personally identifiable information (“Personal Information”) collected and used by the flagship website of Capitol Broadcasting Company, Inc. (“CBC,” “we,” “our,” “us”), WRAL.com, and other sites that have an authorized link to this Privacy Policy (“Sites”), the various online and offline services, mobile applications (“apps”), widgets, social networking platforms, and any other services owned, operated or provided by CBC (collectively, “Services”). By visiting or using our Services, you accept the practices described in this Privacy Policy. This Privacy Policy is incorporated into CBC’s [Terms of Use Agreement](#) (“TOU”) by reference, which also governs our Services. Any capitalized terms not defined in this Privacy Policy will have the same meaning as defined in the TOU.

This Privacy Policy does not apply to services offered by other companies or individuals, even if a product or site is linked to our Services and even if a relationship exists between us and a third party (see [Your AdChoices](#) below). Please see the separate privacy policy for each service provider.

Our Services are designed and targeted to audiences in the U.S. and are governed by and operated in accordance with the laws of the U.S. If you are not a U.S. citizen or do not reside in the U.S., by using these Services and/or providing us with your Personal Information, you voluntarily consent to our collection, transfer, use, and disclosure of your Personal Information to the U.S. You also agree to waive any claims that may arise under your own national laws.

Our Services are generally targeted to adults. Unless we indicate otherwise, you must be at least 18 years old to register and to use the Services.

## 1. Types of information we collect and use

We collect and/or use information in three (3) categories: (1) Personal Information that you voluntarily provide when you register or participate in any features or activities on the Sites or other Services online or offline, (2) information that we passively collect as you navigate or use our Services such as IP Address, unique device ID, or transaction and viewing history; and (3) non-personal information that cannot be used to identify or contact a specific individual, such as anonymous and aggregated information.

Our Services may access or collect the following data:

- Information that identifies you, including:
  - o Information you voluntarily provide, which may include account information, name, email address, user credentials, age, gender, address and/or phone number;

- Location Data such as GPS, WiFi, or carrier network location (see Location Data below); and
- User files stored on your device or system (for example, calendar, picture, and video files) that you voluntarily provide.
- What you do on your device, system, or software when you use our Services, including access to and information about:
  - Camera use
  - Local storage
  - Phone dialer
  - Use of screen, such as what points are touched, frequency, etc.
  - Patterns of app usage
- Device or system information
  - Mobile device identifier, e.g., UDID, Android ID
  - Technical information about your device and system and application software, e.g., type of phone, operating system, and IP address
- Information drawn from other sources, such as our advertisers, sponsors and promotional partners (collectively, "Advertisers"), and our affiliates, vendors, and various other providers of data.

We may also collect and use Personal Information about other people when you participate in certain programs or contests or when you submit news stories or nominations for community awards or recognition that involve other people. By providing us with the Personal Information of others, you represent that you have the legal right to do so.

## **Location Data**

We may obtain location data from your device to provide location-related services, for example, weather alerts or breaking news alerts. Your location information may be shared with third-parties with which we have contracted to perform the location-based features of our Services or collected by and/or shared with our third-party partners who help to provide you personalized advertisements.

We will ask for your permission before collecting this location data. You can withdraw consent to use precise, real-time or network location data at any time by turning off the location-based feature on your mobile device or by opting out of using any location-based features. If you withdraw consent, functionality associated with precise, real-time or network location may be limited. For more information about your choices regarding location data, see [Your AdChoices](#) below.

## **Mobile Apps**

You can access certain Services via various mobile apps. The privacy statement for the mobile apps can be reviewed at the applicable App Store prior to your download and in the "About" section within the apps.

## **Off-line**

We collect Personal Information via postal mail, telephone, over-the-air, and in-person for various purposes, including contests, sweepstakes, promotions, purchases and other transactions, special events, surveys, voting, public affairs, and news gathering.

We may combine your Personal Information collected online or offline with information obtained from our Facebook Fan pages or use of other Facebook features and services, other social network and mobile platforms, or our family of affiliated companies, operational service providers, or other companies, such as credit bureaus, background check firms, marketing research companies, and/or Advertisers.

## **2. Monitoring Technologies; Cookies and Web Beacons**

A “cookie” is a small text file stored on your device that helps us recognize repeat visitors, personalize your experience, deliver Services efficiently, monitor how our Services are used, deliver customized advertising, and for other purposes.

Web beacons are also known as “web bugs,” pixel tags, or clear GIFs. There are small, transparent graphic images that are placed on a web page or in an email and used to monitor the activity of the user accessing that web page or email. Web beacons are used for website traffic reporting, measuring advertising effectiveness, customizing users’ online experiences, and for other purposes.

Like most standard websites or online services, we use cookies, web beacons and other similar technology to collect information automatically, deliver Services, tailor your experience, monitor how our Services are used, improve them, and deliver customized advertising, as well as for other related purposes. We will continue to add new technology to our Services, which may collect information about you and your use of our Services.

You may configure your browser to reject cookies. If you do so, you might not be able to log-in to your account, access important functions, features and activities or enjoy certain conveniences or customized and personalized features of our Site and other Services. Additionally, we may block your access to content if you are running software that blocks ads and data collection unless you pay a monthly fee to browse our site using ad and data blocking software. We do this because we rely primarily on advertising revenue to deliver our Services.

If you leave our Sites to visit our Advertisers' websites, some of those Advertisers also may place cookies on your computer. We do not have access to those cookies or to any information they contain, and the use and collection of your Personal Information by Advertisers is governed by the Advertiser's Privacy Policy, which may be different from ours.

### **3. How We Use Data**

We use the information we collect to improve our Services, to develop new services, and to protect CBC, its affiliated businesses, and our users. For example, we and our vendors use your information to provide:

- Tailored content, features, and advertisements, including offers from us, our affiliates, and our Advertisers (see Customized Content and Advertising below);
- Automated updates about news, sports, weather or emergencies;
- Mobile apps and services;
- Polls and surveys;
- Contests, sweepstakes, and other promotions;
- Shopping and e-commerce;
- Chat features, blogs, message boards, comment boards, social networking, and other opportunities for you to submit your content; and
- Responses to your comments and questions.

We may also use the data we collect to:

- Perform analytics and improve our products and Services;
- Develop reports regarding usage, activity, and statistics;
- Comply with applicable laws, regulations, and legal process;
- Protect someone's health, safety, or welfare;
- Protect our rights, the rights of affiliates or related third-parties, or take appropriate legal action, such as to enforce our TOU;
- Keep a record of our transactions and communications;
- Facilitate the provision of software updates and product support;
- Improve products and other Services or provide Services or technologies to you;
- Connect non-personal information we automatically collect with personal information you provide to us or connect personal information about you from various sources; or
- Contact you through information you provide, including any email address or telephone number.

We will continue to incorporate new technology into our Services and our businesses for these purposes and related purposes.

### **4. Disclosure of Personal Information to Third Parties**

We do not share your Personal Information with companies, organizations, or individuals outside of CBC and its affiliated companies, except as described in this Privacy Policy, including:

- With your consent;
- To provide the Services that you access or request, complete transactions you initiate, or otherwise fulfill your requests;
- With CBC affiliates for business, operational, promotional or marketing purposes;

- With Advertisers if you participate in a co-branded, co-sponsored, or jointly present promotion, contest, or other Service;
- With Advertisers, network advertising services, and/or other third parties as described in the section below (see Customized Content and Advertising below);
- With our vendors or service providers, who are generally restricted from using your Personal Information for any purpose other than that for which we hire them;
- To protect the security of our Services or databases;
- To protect the rights or property of our users, CBC, its affiliates, our Advertisers, or our vendors and service providers;
- To implement or enforce our company policies, the TOU, the [CBC Copyright Complaint Procedures](#), or agreements that we may enter into with you;
- To respond to subpoenas, legal process or government requests or investigations;
- To act in response to an emergency or situation that threatens the life, health, or security of an individual;
- To assist in the investigation of a violation (or presumed violation) of law, of if we believe in good faith that the law requires or authorizes such disclosure; or
- In connection with any proposed or actual sale, lease, merger, assignment, reorganization, or financing of all or any portion of CBC or our businesses.

Non-personal information collected from you does not identify you personally, and we may disclose non-personal information to third parties for any purpose.

## **5. Customized Content & Advertising**

Advertising helps us to support the free Services, Internet and broadcast content we provide to you. We may share your Personal Information with our Advertisers or other third parties for direct marketing and promotional purposes. We use anonymous, aggregated information to serve customized ads. (For example, we are able to provide the age range, gender, and geographic location of the audience our Advertisers will be reaching.)

We, our operational service providers, and Advertisers use cookies, web beacons and other similar technology to enrich your experience on our Services by serving relevant, tailored and personalized advertising and/or content. Customized advertising and content is based on information you provide to us; your use of our content, features and activities; your visits, search, transaction and/or purchase history; visits to our Facebook Fan page or use of other Facebook features and services, or other social network platforms, and/or projections made about you based on all of these elements. We do not control Advertiser cookies or web beacons, and their use of such technology is not subject to this Privacy Policy; please contact them directly to learn about your choices. For more information about your options for receiving personalized advertisements, see Your AdChoices below.

## **6. Safeguarding Children's Privacy**

Protecting the privacy of children is especially important. Generally, we will not knowingly collect online Personal Information or any other identifying data from children under 13 years of age. Should we discover that a child under the age of 13 submitted Personal Information to our

Site, apps, or other Internet-based Services without first obtaining verifiable parental consent, we will immediately reject any such entry and delete that information from our database (to the extent technically feasible), unless such information meets an exception under the Children's Online Privacy Protection Act ("COPPA").

Comments that pertain to programming or operations of our Stations are subject to Federal Communications Commission ("FCC") regulations that require television licensees to post such comments in the applicable Station's FCC Public Inspection File. Except to meet FCC, or other regulatory and legal purposes, we will not knowingly use, distribute or disclose any child's Personal Information to unaffiliated third parties without prior parental consent. We will promptly remove such information from our database (to the extent technically feasible) if a parent withdraws his or her consent to our use of the child's Personal Information.

## **7. Your California Privacy Rights**

Under the California "Shine the Light Act," if you reside in California and have an established business relationship with us, you have the right to receive information about our online and offline opt-out/opt-in policies of sharing your Personal Information with affiliated entities or non-affiliated third parties, such as our Advertisers for direct marketing purposes. If you wish to learn about our opt-out/opt-in policies, please send your written request following the instructions below. We will not accept requests via the telephone or facsimile.

- We may not be able to respond to requests that are not labeled or sent properly, or do not have complete information.
- For all requests, include your full name, street address, city, state and zip code, and the name of the Services to which you are requesting the information.
- In your email request, you must state "Re: Your California Privacy Rights" in the subject line and send your email to [privacy\\_admin@capitolbroadcasting.com](mailto:privacy_admin@capitolbroadcasting.com).
- In your postal request, you must send a letter or post card to:  
Capitol Broadcasting Company, Inc.  
Attn: Privacy Administrator/Your California Privacy Rights  
2619 Western Boulevard  
Raleigh, NC 27606

Non-affiliated third parties are independent from CBC and if you wish to receive information about your disclosure choices or stop communications from such third parties, you will need to contact those non-affiliated third parties directly.

## **8. Accessing Account Information**

You can access and edit your registration information, including your e-mail address and options for receiving news and information and advertising emails. If you terminate your site registration, your email address will remain in our archived records after your account has been closed given the technical limitations of our system. However it will be moved to an inactive status.

For mobile apps, you may access and update or change your Personal Information via "Settings." You may also delete an app or disable a service according to your device settings. For other Services, please access your account or send an e-mail to our [Privacy Administrator](#).

We retain your Personal Information as long as it takes to provide the Services and as required by our corporate policies and laws. Upon your request, we also will remove your Personal Information from our active database(s) by using [this form](#). Given the limitations of our computer systems, corporate business policies, and the requirements of federal or state laws, we may not be able to delete all of your Personal Information from our internal or back-up files. We may deny a request to access or change account information if we believe there is a question about the identity or authority of the requester.

## **9. Information Security**

We take steps to protect the security of the Personal Information we collect and use. However, no physical or electronic security system is impenetrable, and we cannot guarantee the security of our servers or databases, nor can we guarantee that the information that you supply to us will not be intercepted during transmission over the Internet. Please use caution when disclosing your Personal Information.

## **10. Your AdChoices for the collection, use and sharing of your Personal Information**

**Location Information:** We will ask for your permission before collecting precise, real-time, or network location information. It is your choice whether or not to allow for the collection of this location information, and you can withdraw consent to use this location information at any time by turning off the location-based feature on your mobile device or by opting out of using any location-based features. If you withdraw consent, functionality associated with precise, real-time, or network location may be limited.

**Other Websites and Platforms:** If you choose to use any of the links we provide to third-parties, you will be leaving our Services and going to a new site or platform. Our Privacy Policy does not apply to services offered by other companies or individuals, even if a product or site is linked to our Services and even if a relationship exists between CBC and a third party. Protection of your privacy at those other sites or platforms will be governed by the privacy policy at that particular site or platform. CBC and our affiliates have no responsibility for the privacy policies or business practices of a third party we neither own nor control. Please take the time to read the privacy policies at these third party sites or platforms. It is your choice whether or not to leave our Services and go to third party sites or platforms.

**Customized Content and Advertising:** To opt-out of receiving customized content and/or advertising, please visit the Network Advertising Initiative Consumer Opt-Out Page at <http://optout.networkadvertising.org/> and the Digital Advertising Alliance Consumer Choice Page at <http://optout.aboutads.info>. Please be aware that opting out of a network advertising service does not mean that you will not receive online ads. It only means that the network from which you opted out should no longer deliver ads tailored to your preferences and interests.

Users who no longer wish to receive alerts, notifications, or promotional messages from us via email may choose to unsubscribe at any time. All emails and newsletters also include opt-out instructions, generally at the bottom of each email received. Alerts sent via text message also have an opt-out mechanism.

We may share your Personal Information directly with our Advertisers for their direct marketing and promotional purposes only if you have granted your permission to do so. Depending on the activity, event or feature, you will have an opportunity to either “opt-in” or “opt-out” of such sharing at the time of registration, delivery of the activity, event or feature, or by contacting the Service via [this feedback form](#).

You must use the designated method to notify us of your opt-out request, as we cannot guarantee that other methods of notification will be effective or timely. Please be aware that we may continue to contact you for administrative, transactional or informational purposes related to your use of our Services, including follow-up messages regarding contests you have entered or other transactions you have undertaken. By law, such messages are not considered to be unsolicited commercial messages.

## **11. Notification of changes to Privacy Policy**

We may change this Privacy Policy from time to time. When we update our Privacy Policy, we will post the changes to this page, and if the changes are significant, we will provide a more prominent notice. By continuing to use this Site or other Services after we post any such changes, you have accepted the Privacy Policy as modified.

## **12. Contacting Us / Report Misconduct**

For more information, or if you have questions about this Privacy Policy, please contact us via our [Privacy Administrator](#). Also, if you see behavior or communications on any of Services that you consider inappropriate or abusive, please let us know immediately.