Privacy Policy
Effective as of December 15, 2019.

This “Privacy Policy” describes the privacy practices of Chicago Public Media, Inc., a nonprofit, tax-exempt organization, our subsidiaries and affiliates (collectively, “CPM”, “we”, “us”, or “our”) in connection with our websites (including www.chicagopublicmedia.org, www.wbez.org, www.vocalo.org, and www.soundopinions.org), mobile applications (including WBEZ and Vocalo), and other interactive services that we own or control and which post or link to this Privacy Policy (collectively, the “Services”), and the rights and choices available to individuals with respect to their information.

The Services are operated from the United States and governed exclusively by United States laws. Therefore, any information we obtain about you in connection with your use of the Services will be processed and stored in, and subject to the laws of, the United States.

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Personal Information We Collect

Information you provide to us. Personal information you provide to us through the Services or otherwise includes:

• Contact information, such as your name, phone number, and postal and email addresses.
• Profile information, such as your username and password that you may set to establish an online account with us and preferences.
• Registration information, such as information related to an event for which you sign up.
• Demographic information, such as your geographic area.
• **Transaction information**, such as payment information and information about your purchases, donations, and membership.

• **Usage information**, such as information about how you use the Services and interact with us.

• **Marketing information**, such as your preferences for receiving newsletters and communications about our activities, and details about how you engage with our communications.

• **Feedback or correspondence**, such as information you provide when you contact us with questions, respond to a survey, or otherwise correspond with us online.

• **Information provided by job or volunteer applicants**, such as professional credentials, educational and work history, and other forms of resume information.

• **Other information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

**Information we obtain from social media platforms.** We may maintain pages for CPM on social media platforms, such as Facebook, Twitter, and Flickr. When you visit or interact with our pages on those platforms, the platform provider’s privacy policy will apply to your interactions and their collection, use, and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

**Information we obtain from other third parties.** We may receive personal information about you from third-party sources. For example, NPR, a partner organization, may share your contact information with us if you have expressed interest in CPM Services or in Chicago radio stations broadly. We may also obtain your personal information from other third parties, such as marketing partners, publicly-available sources, and data providers.

**Cookies and other information collected automatically.** We, our service providers, and our partners may automatically log information about you, your computer or mobile device, and activity occurring on or through the Services. The information that may be collected automatically includes your computer operating system type, browser type, IP address, and information about your use of and actions on the Services, such as pages or screens you viewed, how long you spent on a page or screen, access times, and length of access. Our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

On our webpages, this information is collected using cookies, browser web storage (also known as locally stored objects, or “LSOs”), web beacons, and similar technologies, and our emails may also contain web beacons.

A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. Browser web storage or LSOs, are used for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. A “web beacon,” also known as a pixel tag or clear GIF, is typically used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of our websites.

We may use third-party software development kits (“SDKs”) in our mobile applications. An SDK is third-party computer code that may be used for a variety of purposes, including to provide us with analytics regarding the use of our mobile applications, to integrate with social media, add features or functionality to our app, or to facilitate online advertising. SDKs may enable third parties to collect information directly via our App.
How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

To operate the Services. We use your personal information to:

- provide, operate, and improve the Services
- communicate with you about the Services, including by sending you updates and administrative messages
- communicate with you about events and sweepstakes in which you participate
- understand your interests and personalize your experience with the Services
- provide support and maintenance for the Services
- to respond to your requests, questions, and feedback

For research and development. We analyze use of the Services to improve the Services and to develop new products and services.

To send you marketing and promotional communications. We may send you CPM marketing communications as permitted by law. You will have the ability to opt out of our marketing and promotional communications as described below.

For compliance, fraud prevention, and safety. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) comply with applicable laws, lawful requests, and legal process; (b) protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims); (c) enforce the terms and conditions that govern the Service; and (d) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

To manage our recruiting and process employment applications. We use personal information, such as information submitted to us in a job or volunteer application, to facilitate our recruitment activities and process applications, such as by evaluating a job candidate and monitoring recruitment statistics.

With your consent. In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create anonymous, aggregated, or de-identified data. We may create anonymous, aggregated, or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated, or de-identified data by removing information that makes the data personally identifiable to you. We may use this anonymous, aggregated, or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.

How We Share Your Personal Information

We do not share your personal information with nonaffiliated third parties and will only share your personal information with third parties with your consent or as described below. We will never exchange or share your personal information with any federal, state, or local candidate, political party, or political committee.

Affiliates. We may share your personal information with our parent entity, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.
**Service providers.** We may share your personal information with third-party companies and individuals that provide services on our behalf or help us operate the Services (such as for analytics, payment processing, or newsletter delivery). These third parties may use your personal information only as directed or authorized by us and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

**Third-party platforms and social media networks.** If you have enabled features or functionality that connect the Services to a third-party platform or social media network (such as by sharing CPM content via a third-party platform), we may disclose the personal information that you authorized us to share. We do not control the third party’s use of your personal information.

**Other users of the Services and the public.** We may provide functionality that enables you to disclose personal information to other users of the Services or the public. We do not control how other users or third parties use any personal information that you make available to other users or the public.

**Professional advisors.** We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

**For compliance, fraud prevention, and safety.** We may share your personal information for the compliance, fraud prevention and safety purposes described above.

**Business transfers.** We may sell, transfer, or otherwise share some or all of our business or assets, including your personal information, in connection with a (potential) business transaction such as a corporate divestiture, merger, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

**Your Choices**

In this section, we describe the rights and choices available to all users.

**Access or update your information.** If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into your account. Otherwise, you may contact us to request to access or update your information.

**Opt out of marketing communications.** You may opt out of marketing-related emails by following the unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails.

**Opt out of sharing with partners.** You may contact us to opt out of sharing any personal information with partners, such as for analytics.

**Cookies & Browser Web Storage.** We may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Service and third party websites. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Services may not work properly. Similarly, your browser settings may allow you to clear your browser web storage.

**Do Not Track.** Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit http://www.allaboutdnt.com.

**Choosing not to share your personal information.** Where we are required by law to collect your personal information, or where we need your personal information to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the
Services. We will tell you what information you must provide to receive the Services by designating it as required at the time of collection or through other appropriate means.

Third-party platforms or social media networks. If you choose to connect to the Services via a third-party platform or social media network, you may have the ability to limit the information that we may obtain from the third party at the time you connect your third-party account to the Services. Subsequently, you may be able to control your settings through the third-party platform. If you withdraw our ability to access certain information from a third-party platform or social media network, that choice will not apply to information that we have already received from that third party.

Testimonials. If you submitted a testimonial, but would like CPM to remove it from the Service, please contact us.

Other Sites and Services

The Services may contain links to other websites, mobile applications, and online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third-party websites, mobile applications, or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

Security Practices

The security of your personal information is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

Children

The Services are not directed to, and we do not knowingly collect personal information from, anyone under the age of 13. If a parent or guardian becomes aware that their child has provided us with information without their consent, please contact us. We will delete such information from our files as soon as reasonably practicable.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Services. We may, and if required by law will, also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or through the Services.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Services (or as otherwise indicated at the time of posting). In all cases, your continued use of the Services after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.
How to Contact Us

Please direct any questions or comments about this Policy or privacy practices to privacy@chicagopublicmedia.org. You may also write to us via postal mail at:

Chicago Public Media, Inc.
Attn: Legal – Privacy
848 East Grand Ave.
Chicago, IL 60611