

Beasley Broadcast Group, Inc.  
Privacy Policy

Last Updated and Effective – December 31, 2015

This Privacy Policy has been updated to include a section regarding your California privacy rights if you are a resident of California, broaden the definition of Personal Information to include Internet Protocol (“IP”) Address and other persistent identifiers under certain circumstances, and to add a statement in compliance with amendments to the California Online Privacy Protection Act regarding disclosures how we will honor browser Do Not Track settings that restrict serving targeted advertising across various third party websites. We have not materially changed our use or disclosure of your Personal Information.

**Privacy Policy**

The following discloses the privacy policy (“Privacy Policy”) related to information collected from users through the Platforms owned and operated Beasley Broadcast Group, Inc. and its subsidiaries (collectively “Beasley,” “we”, “us”, or “our”), including, web properties, web pages, interactive features, iRadioNow, Apps, widgets, blogs, text message promotions, in addition to Twitter, Facebook or other social networking sites, and any other website or online service that includes an authorized link to this Privacy Policy, whether accessed via computer, mobile device or other technology platforms.

This Privacy Policy has been incorporated by reference into our Terms of Service (“TOS”). Any capitalized terms not defined in this Privacy Policy will have the same meaning as defined in our [TOS](#) or [Text Message Promotions Terms & Conditions](#).

By visiting and using our Platforms, you accept the practices described in this Privacy Policy. If you do not want your Personal Information collected or used, please do not use our Platforms.

**1. YOUR CALIFORNIA PRIVACY RIGHTS**

If you are a California resident and have an established business relationship with Beasley and want to receive information about our online opt-out/opt-in policies of sharing your Personal Information with affiliated or non-affiliated third parties, and how to exercise your disclosure choices, please send your written request following the instructions below. **We will not accept requests via the telephone or facsimile.**

- For all requests, include your full name, street address, city, state and zip code, and the name of the Beasley Platform to which you are requesting the information.
- In your email request, you must state **“Your California Privacy Rights”** in the subject line and send your email to: **privacy@bbgi.com**.
- In your postal request, you must send a letter or post card to:

Beasley Broadcast Group, Inc.  
3033 Riviera Drive, Suite 200  
Naples, FL 34103  
Attention: **Your California Privacy Rights c/o Privacy Coordinator**

**Beasley is not responsible for responding to notices that are not labeled, or not sent properly, or do not have complete information.** Non-affiliated third parties are independent from Beasley and if you wish to receive information about your disclosure choices or stop communications from such third parties after we have shared your Personal Information with them, you will need to contact those non-affiliated third parties directly.

## 2. INFORMATION WE COLLECT & HOW WE USE IT

The Platforms may ask you to provide information that could reasonably be used to contact you or to identify you personally (such as your name, email address, telephone number, text message ID, home address, gender, birth date, your interests or other profile-related information (“Personal Information”). For example, Beasley will collect Personal Information when you register on the Platforms, request information, submit comments or participate in a promotion, survey or other feature of the Platforms, or otherwise communicate or interact with us. Beasley, for purposes of this Privacy Policy, includes our Operational Service Providers, who provide internal support for our Platforms.

We work closely with certain third parties called Operational Service Providers who may perform functions on our behalf in order to carry out your requests, to make various features, services and materials available to you through the Platforms and to respond to your inquiries. Consequently, we will share your Personal Information with companies or individuals that host or operate our Platforms, analyze data or provide customer service; administer our promotions or provide marketing or promotional assistance (such as in connection with winner selection, prize fulfillment, and as required by law, such as on a winners list). Third parties that process credit card payments are independent third parties that handle your transaction without our control or access to your Personal Information. These companies are solely responsible for the financial transaction and the collection, use, and handling of your Personal Information.

We will also collect data that can be reasonably linked to a specific consumer, computer or device. For example, Beasley automatically collects your Internet protocol address (“IP Address”), or unique device identifiers for mobile devices (“UDID”) when you access our Platforms. Such information was traditionally classified as non-Personal Information because it did not identify a specific user. An IP Address and UDID are numbers or code that are automatically assigned to your computer or device, respectively, when you access a Platform. Our computers identify your computer or device by them. We will use this information to administer the Platforms, help diagnose problems with our servers, analyze trends, track users’ web page movements

to help improve our Platforms, help identify you and your shopping preferences, song history, and gather broad demographic information for aggregate use. We will also use such information to customize your experience on our Platforms by monitoring your usage, search and transaction history and using such information to offer targeted advertising. When IP Address or UDID are associated or linked with other Personal Information, or used to monitor usage, search and transaction history or build a user profile for the purposes of customizing your experience on our Platforms, such information will be classified as Personal Information to the extent required by applicable law.

Whenever you visit or interact with the Platforms, Beasley, as well as any third-party Advertisers, will automatically collect non-Personal Information, such as, browser type, device type, operating system, the preceding page views, and your use of features or applications on the Platforms. This information helps us to improve the design and content of our Platforms and our Advertisers use such information to measure your interaction and interest in a particular ad.

Beasley uses the Personal Information collected about and from you for a variety of business purposes, including internal business purposes and to: respond to your questions and requests; provide you with access to certain areas and features of the Platforms such as your favorite stations, your musical preferences, songs you have listened to, shared playlists and your interaction with other users; verify your identity; communicate with you; tailor content, provide advertisements and offers; process applications and transactions; and for purposes disclosed at the time you provide your Personal Information or otherwise with your consent. To the extent that you purchase a good, service or event through the Platforms, your payment transaction will be handled by an independent third party, such as PayPal. We do not collect, use or have any access to your credit card data, checking or other financial account information. By submitting your credit card and related personal information to the payment transaction provider, you understand, acknowledge and agree that we are not responsible for such transactions. We will use contact information from the order form to fulfill your orders. We may also combine your Personal Information with Non-Personal Information and combine your Personal Information collected offline with that collected online, and/or from other sources such as our Facebook, Twitter and other social network sites, our affiliates, and Operational Service Providers.

### **Cookies and Other Technology**

To enhance and customize your experience with our Platforms, many of our Platforms use cookies, pixel tags and other similar technology. If you would prefer not to accept cookies, you can change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; or set your browser to automatically not accept any cookies. However, please be aware that some features and services on our Platforms may not work properly because we may not be able to recognize and associate you with your Beasley account(s).

Cookies are data files placed on a device when it is used to visit the Platforms. Cookies by themselves, do not tell us your email address or other Personal Information unless you choose to provide this information to us, by, for example, registering at one of our Platforms. Once you choose to furnish the Platform with Personal Information this information may be linked to the data stored in the cookie. Beasley, or our third-party Operational Service Providers, may place cookies or similar files on your device for security purposes, to facilitate site navigation and to personalize your experience while visiting our Platforms. Cookies allow us to collect technical and navigational information, such as browser type, your time spent on our Platforms and the pages you have visited. Cookies also allow us to improve the content and offerings on our Platforms, and to store certain information about you so that you do not have to complete an entirely new registration process each time you visit or so that you can use a shopping cart.

A pixel tag is a transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a web page to monitor the behavior and collect data about the visitors viewing that page. In addition, a pixel tag may tell your browser to get content from another server.

The cookies and pixel tags on Beasley's Platforms are set only by us and by companies with whom we work, such as our Operational Service Providers and Advertisers. We do not control an Advertiser's cookies or business practices and only offer you access to the opt-out tools provided below. See "Our Advertising Practices" section for more information about the types of Advertising we provide.

### **3. SHARING OF INFORMATION**

Except as provided in this Privacy Policy, we will not disclose any of your Personal Information to any third parties without your specific consent. We will share your Personal Information under the following circumstances:

- To Beasley affiliates for business, operational, promotional and marketing purposes.
- To Advertisers if you participate in a co-branded, co-sponsored, or jointly presented promotion/contest, survey, voting feature, or service, and/or to serve personalized or targeted advertising.
- To our Operational Service Providers, who are prohibited from using your Personal Information for any purpose not authorized by us or required by law.
- To protect the security of our Platforms, servers, network systems, and databases.
- To protect our users, affiliates, Advertisers, and Operational Service Providers against liability and harm.
- To implement and enforce our TOS and any other legal document or contract related to our Services.

- To respond to subpoenas, judicial processes, or government requests and investigations.
- To act in response to an emergency or situation that threatens the life, health or security of an individual, and to assist in the investigation of a violation (or presumed violation) of law, or if we believe in good faith that the law requires or authorizes such disclosure.
- In connection with any proposed or actual purchase, sale, lease, merger, assignment, re-organization or financing of all or any portion of Beasley, our Platforms, Stations, or any of the business, assets or shares of our company(s) and affiliates.

We may also share your Personal Information as disclosed to you at the time you register, subscribe, or use a particular Platform, or participate in an activity or feature on a Platform. We will use, disclose and process any Non-Personal Information collected from you in any manner and any Personal Information you make public.


### **Our Advertising Practices**

Advertising supports the various free Platforms, features and activities that we provide. We license and/or utilize technology to serve targeted and non-targeted advertisements on our Platforms and within our content as that content is served across the Internet. Here's a description of the types of advertising that we may provide to you, Contextual, First-Party, and Third-Party.

In addition, we may also use third party ad network providers to help present advertisements on the Platforms, as well as third party analytics vendors to evaluate and provide us with information about the use of our Platforms and viewing of our content. For more information about how targeted Network Advertising works, please visit: <http://www.youradchoices.com/> or <http://www.networkadvertising.org/understanding-online-advertising>.

- **Contextual Advertising:** We may serve you an advertisement for brakes and shocks based on a used car dealer ad you just viewed or a search you've made about used cars on one of our Platforms; this type of relevant advertising based on particular content or search query is called "Contextual Advertising" because it is based on the context of how you used our Platforms. We do not collect any other information about you for Contextual Advertising.
- **First Party Advertising:** Advertising that is tailored or personalized based on a history of your use of content and participation in features and activities on our Platforms (and may be combined with information from our Facebook Fan page or our other social network sites) over time is based solely on a combination of information that Beasley or its Operational Service Providers collect from you – *not from your use of other websites or third parties*. We may share such information anonymously with our Advertisers in order to measure the effectiveness of ads on our Platforms, such as how many users opened or acted on a particular ad.

- **Network Advertising:** Information about your use of our Platforms combined with similar information about your overall Internet usage across different third party websites or online services used to serve tailored and personalized advertising is generally called “Network Advertising.” Multiple third party websites and online services are involved in this tailored or personalized advertising process, in essence a “network” of advertising providers. Such information about you could include information about your browser, computer, and/or mobile device and general information about your demographics (whether you have provided such information voluntarily or such information is estimated based on your usage history and interests), such as your gender, age, lifestyle, education, home ownership, geographic location, etc. See below for more information about how to identify a Network Advertising ad.

For advertising that is part of a Network Advertising service, you should see a small symbol  (also called an icon) attached to a banner ad or other targeted advertising on certain Platforms that can be clicked open for information about why and how you are receiving a particular ad. For more information see [www.aboutads.info](http://www.aboutads.info).

You may opt-out of third party targeted advertising served by Network Advertising service providers in two ways: 1) By directly notifying a Network Advertising service provider via its opt-out tools or 2) via your browser’s Do Not Track (“DNT”) settings to indicate that you do not wish to receive targeted advertising based on your overall internet usage. For more information about DNT and how it works, please visit the Future of Privacy Forum’s website: <http://www.allaboutdnt.com/>.

Beasley will make a good faith reasonable effort to honor your DNT browser settings for opting out of receiving targeted third party advertising based on your overall Internet usage. Please note that various browsers frequently update technology or change their settings and business practices without advance notice, and we may not have the latest information on how to honor your preferences. If you exercise either opt-out option – the cookie opt-out or the browser opt-out – you will continue to receive advertising, but such advertising may not relate to your specific interests, previous purchases or search history.

However, you cannot opt-out of our contextual or first party advertising, which is based on your usage of only our Platforms and may be combined with your usage of our social media sites. We will continue to serve you contextual and first party advertising. We will also continue to monitor your usage and search or transaction history to provide us with analytics on how well our Platforms, advertisements and features and activities are functioning and used. We will also share this information in an aggregated form (meaning that no one individual person can be identified) to our Advertisers or potential Advertisers.

Other Advertisers on our Platforms may also use cookies or other similar technology to determine your interest in particular products and services based on your internet usage, search and transaction history across third party sites and will serve targeted advertising based on such information. We control our own use of cookies and other

technology. This Privacy Policy does not govern cookies or other technology placed by Advertisers.

#### **4. COLLECTION OF INFORMATION RECEIVED FROM/BY THIRD PARTIES**

You may choose to participate in a third party application or feature (such as Facebook or Twitter applications or a similar application or feature on a third party website) through which you allow us to collect (or the third party to collect and/or share) information about you, including Personal Information such as lists of your friends, “Likes”, comments you have shared, groups and location. In addition, we may receive information about you if other users of a third party website give us access to their profiles and you are one of their “connections” or information about you is otherwise accessible through your profile page or similar page on a social networking or other third party website or interactive service.

The Platforms may make available to you public areas such as chat rooms, forums, message boards, and news groups and may contain links to other sites that we do not own or operate whose information practices may be different from ours. This includes links from Advertisers that may use our logo(s) as part of a co-branding or co-marketing agreement. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other websites may send their own cookies to your device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. Please remember that any information that you disclose in public areas becomes public information and is not subject to the protections and disclosure restrictions in this Privacy Policy. You should also independently assess the authenticity of any website which appears or claims that it is one of our Platforms (including those linked to through an email or social networking page).

Any Personal Information submitted directly to an independent payment transaction provider for purchase of goods, services and events on our Platforms is governed by the payment provider’s terms of service and privacy policy.

Visitors should consult all third party website privacy policies as Beasley has no control or responsibility over information that is submitted to, or collected by these third parties.

#### **5. CHANGING, DELETING OR VERIFYING PERSONAL INFORMATION.**

If you wish to modify, verify, correct, or delete any of your Personal Information collected through the Platforms, you may edit your registered user information. It is not always possible to completely remove or delete all of your information from our databases without some residual data due to technical limitations of our systems, or retention and/or record keeping requirements under federal and state law. Please be

aware that we do not control certain privacy settings and preferences maintained by social media partners like Facebook and Twitter. If you wish to make changes to those settings and preferences, you may do so by visiting the settings page of the appropriate social media site.

## **6. NOTE FOR PARENTS**

The Platforms are not directed to children under 13. Beasley adheres to the Children's Online

Privacy Protection Act. Generally, we do not knowingly solicit, collect, use or disclose personally identifiable information from anyone under 13 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the parent/guardian's consent, unless retaining such information is required by statute, rule or regulation. For example, we are required by the Federal Communications Commission to retain any correspondence received from a listener related to our programming and operations in a public inspection file, and that would include correspondence from a child. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 13 that does not qualify for a legal exception, we will make reasonable efforts to delete such information to the extent technically possible from our records.

## **7. UPDATES AND EFFECTIVE DATE.**

From time to time we may change, modify, add or remove information on the Platforms and/or this Privacy Policy, at any time without prior notice to you. Any changes will be effective immediately upon the posting of the revised Privacy Policy on the Platforms and we encourage you to check back from time to time.

## **8. SECURITY OF YOUR INFORMATION.**

Although we take appropriate and reasonable measures to help protect against the loss, misuse, unauthorized disclosure, or alteration of your Personal Information, we cannot guarantee the security of any information you transmit to us. If we collect sensitive Personal Information such as credit card data, we will do so via a secured transmission standard or protocol, or engage a third party to do so. Despite our best efforts, no security measures are impenetrable, and transmissions or transactions over the Internet are not 100% secure or error free. You use the Platforms and provide us with your information at your own risk.

## **9. HOW TO CONTACT US.**

If you have any questions or concerns about this Privacy Policy, the practices of the Platforms, or your experiences with the Platforms, please contact us at [privacy@bbgi.com](mailto:privacy@bbgi.com), or by mail to:

Beasley Broadcast Group, Inc.  
3033 Riviera Drive, Suite 200



Naples, FL 34103  
Attention: Privacy Coordinator

Copyright ©2009-2014 Beasley Broadcast Group, Inc.