

## PRIVACY POLICY - COMMITMENT TO YOUR PRIVACY

The Effective Date of this Privacy Policy is January 1, 2020. This version replaces and supersedes any prior privacy policies applicable to this website.

### SUMMARY AND CONTACT INFORMATION

We at UNITED RADIO INCORPORATED dba BLUESTAR (referred to as “*Company*,” “we,” “our,” or “us”) recognize the importance of protecting the privacy of personally identifiable information (“*PII*”) collected about our customers, prospective customers, and end users (referred to as “*Customers*,” “*Users*,” “*you*” or “*your*”). We are committed to ensuring that your privacy is protected. It is our intention to give you as much control as possible over your privacy in regard to your PII and the use we make of it in the course of your use of our website(s) located at <http://www.bluestarinc.com/us-en/home.html> (referred to as “*Website*” or our “*Site*”), and the Company products and services offered through our Site. This Privacy Policy describes how we handle information we learn about you from our Site and in connection with our services. If you have questions about this policy or wish to contact us, we can be reached via any of the following:

Legal Department  
3345 Point Pleasant Road  
Hebron KY 41048, USA  
Phone: (800) 354-9776 ext. 3395  
Email: [legal@bluestarinc.com](mailto:legal@bluestarinc.com)

### COLLECTION AND USE OF INFORMATION

Company is the sole owner of the information collected on our Site. The information we collect depends on what you do when you visit or utilize the Site.

#### *Voluntary Submissions*

We collect PII from Users in a number of different ways including, but not limited to, when Users visit our site, register on the site, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. The PII we collect depends on what you do when you visit or utilize the Site or how you choose to communicate with us.

We may collect, use, store and transfer different kinds of PII about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, profile picture, username or similar identifier, marital status, title, date of birth and gender.

- **Contact Data** includes address, email address and telephone numbers.
- **Location** includes IP Addresses, geolocation, beacon based location, and GPS location. You may disable our use of certain location data through your device or browser settings, for example by disabling “Location Services” for any applicable application in iOS privacy settings.
- **User generated Content** include comments or messages provided in free text boxes.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also may collect, or direct one of our partners to collect, your financial information to facilitate payment by a third party sponsor.

Finally, we also receive information from our reseller customers which includes PII related to their end users (Identity Data, Contact Data, etc.)

Please note that we do not collect PII about you *unless you choose to provide such PII to us or our resellers by creating an account, purchasing or using our services, and/or contacting us regarding the Site or our products and services*. If at any time you or our resellers *do* provide us with such PII, we will collect it.

### ***Analytical Information and Anonymized Data***

For each User, we may automatically gather certain information and store it in log files. This information includes the following: web beacons, embedded web links, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

We may collect and store this information on an individual basis and in aggregate, or combined, form. We may also collect both User-specific and aggregate information on what pages Users access or visit. We use this information to analyze trends, to administer the Site, to track Users’ movements around the Site, and to gather demographic information about our user base as a whole. We also use this information to improve the content of our web pages, and to customize the content and layout of our pages. All of this is done with the intention of making our Site more useful to Users.

We may use one or more third-party tracking services to track anonymized and/or non-personally identifiable information in the aggregate about Users. These third-party services may use JavaScript, pixels, transparent GIF files, and other means to enable us to learn which advertisements bring Users to our Site. Any information we track in this manner is anonymous, limited to usage and volume statistics, and is used to provide insight into the effectiveness of our online marketing initiatives and strategies. We also reserve the right to provide anonymized data to third parties for the purpose of evaluating the performance of the Company products or services, or as part of a sales transaction.

Except as described in this Privacy Policy, we do not divulge any information about an individual User to a third party unless it is in connection with Company products or services.

### ***Cookies***

We use both session cookies and persistent cookies on the Site. A cookie is a small text file that is stored on a User's computer for record-keeping purposes. We may link the information we store in cookies to your PII in order to provide a faster and more pleasant online experience. You can refuse cookies by turning them off in your browser. You do not need to have cookies turned on to use the Site. If you reject cookies, you may still visit our Site, but your ability to use some areas of the Site will be limited.

We use session cookies to make it easier for you to navigate the Site. In particular, we use session cookies to record session information, such as which web pages a User has visited, and to track User activity on the Site. We also use session cookies to store any passwords used on the Site (such as a password associated with a User account), so you do not have to enter it more than once per session. Session cookies expire when you close your browser.

We use persistent cookies to track and target the interests of our Users to enhance the experience on our Site. Persistent cookies remain on your device for an extended period of time. You can remove persistent cookies by following directions provided in your browser's "help" file.

### ***Use of PII by Company***

We will use information in connection with the purpose for which you provided it (e.g., to contact you with a response to a request for information, to provide products or services, and/or to contribute to customer surveys). We will communicate with you by email, telephone, or social media, in accordance with your wishes.

Generally, the Company uses this information for internal record keeping however, Company may also use your PII to send you information on products, services, and special offers and promotions in which you might have an interest. From time to time, we may also use your information to contact you for market research purposes. The means by which Company will use to contact you with this information will depend on the type of PII you have provided. For example, if you provide us with your email address, you may receive periodic promotional emails from us.

If you do not wish to receive special offers and other promotional information from us, you may opt out of receiving such communications, as discussed below.

### ***Sharing Your PII***

As a general rule, the Company will not disclose any of your PII to third parties without your permission or as described below.

We may disclose any collected information, including PII, to upstream vendor and manufacturer partners in connection with sales reporting and related purposes.

We may also disclose any collected information, including PII, if: (1) the disclosure is necessary or useful to our provision of services; (2) we believe in good faith that disclosure is necessary to protect our rights, interests, or property; (3) we are acting in good faith to protect your safety or the safety of others, to investigate fraud, or to respond to a government request; (4) we believe in good faith the disclosure is required by law, such as to comply with a subpoena, search warrant, court order, or similar legal or administrative process; and (5) a third party purchases or otherwise acquires us or the Site, in which case your information will likely be among the assets transferred.

The Site may offer opportunities to request additional information from sponsors or partners of Company. By requesting more information, you give Company permission to transfer your PII to the sponsor or partner so they can fulfill your request. In many instances, only your e-mail address will be shared.

We do not rent or sell email addresses to third parties, or otherwise share any non-anonymized personally-identifying information we collect, with any third parties (other than our affiliated entities) except as set forth above.

If we do share PII with an entity working on our behalf, we will employ commercially-appropriate procedures to help ensure that the disclosed PII is used only for authorized purposes by authorized persons, and that safeguards are in place to help maintain the security, integrity, and privacy of the PII.

## **INFORMATION ACCESS**

Upon request we provide Site Users with access to their own contact PII (e.g., name, address, e-mail address, phone number) that we maintain about them. You can access this PII by sending your request to: Manager, Customer Relations and Ombudsman 3345 Point Pleasant Road, Hebron KY 41048, USA or by emailing [legal@bluestarinc.com](mailto:legal@bluestarinc.com). To help us process your request, please provide sufficient information to allow us to identify you in our records.

We reserve the right to ask for information verifying your identity prior to disclosing any information to you. Should we ask for verification, the information you provide to verify your identity will be used only for that purpose, and all copies of this information in our possession will be destroyed when the process is complete.

We also offer Users the opportunity to have inaccuracies corrected in all information we maintain about them. To begin the process, send your request to Legal Department, 3345 Point Pleasant Road, Hebron KY 41048, USA or [legal@bluestarinc.com](mailto:legal@bluestarinc.com). Please provide sufficient information to allow us to identify you in our records and help us process your request.

## **YOUR ABILITY TO CONTROL YOUR PII**

If you do not wish to receive promotional emails from us, please let us know by using the opt-out response device that can be found at the bottom of every email we deliver or by emailing us at [legal@bluestarinc.com](mailto:legal@bluestarinc.com). To help us process your request, please include sufficient information for us to identify you in our records (your email address will suffice). Please allow a reasonable time for us to process your request.

If you do not wish for us to share your PII with any third parties working on our behalf to serve our Customers, please let us know by sending your request to [legal@bluestarinc.com](mailto:legal@bluestarinc.com). To help us process your request, please provide sufficient information to allow us to identify you in our records. Please allow a reasonable time for us to process your request. Please note that exercising these opt-out rights may limit your ability to receive the full range of Company's products and services.

Please note that, although you can opt not to receive promotional messages, we reserve the right to send you informational email messages about any administrative notices regarding the Site, as permitted under the CAN-SPAM Act (15 U.S.C. §7701 et seq.).

If you are a resident of certain jurisdictions, you may also have the right to opt-out of any current or futures sale of your PII. To exercise this right in accordance with applicable law, please contact us at the following email address: [legal@bluestarinc.com](mailto:legal@bluestarinc.com) and write "Opt Out of the Sale of Personal Information" for the subject of your message. We reserve the right to ask for information verifying your identity and residency prior to disclosing any information to you or acting on your request. Should we ask for verification, the information you provide to verify your identity and residency will be used only for that purpose, and all copies of this information in our possession will be destroyed when the process is complete.

## **SECURITY**

The security of your PII is important to us. We follow generally accepted industry standards and have put in place suitable physical, electronic, and administrative procedures to protect the PII submitted to us, both during transmission and once we receive it, and to guard that PII against loss, misuse or alteration. When you enter sensitive information and/or PII on our registration or order forms, we encrypt that PII using secure socket layer technology (SSL).

Please note, however, that no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, while we use commercially-reasonable means to protect your PII, we cannot guarantee its absolute security.

## **CHILDREN**

Company does not offer its services or promote its Site to, nor does it intentionally collect or retain PII from, children who are younger than 18 years of age. Site Users are cautioned, however, that

the collection of PII submitted in an e-mail or through the Site will be treated as though it was submitted by an adult, and may, unless exempted from access by Federal or State law, be subject to public access. If you believe your child may have submitted PII to Company without indicating their actual age and would like it removed, please contact us at [legal@bluestarinc.com](mailto:legal@bluestarinc.com) and we will delete it immediately.

## **CALIFORNIA PRIVACY RIGHTS**

### ***California Residents***

Under the California Consumer Privacy Act (“CCPA”) signed into law June 28, 2018 and entering into effect Jan. 1, 2020, California residents have certain rights and privileges. You can exercise any of the following rights by notifying us as described below:

- **Disclosure Request.** Upon request and when possible, we will disclose the categories and specific pieces of personal information we have collected about you. Additionally, you may also obtain the categories of information about you that we have sold, the categories of third parties to whom the information was sold, and the categories of personal information that we disclosed about you for a business purpose. You may submit these requests by emailing us at [legal@bluestarinc.com](mailto:legal@bluestarinc.com) or by calling (800) 354-9776 ext. 3395. When such a request cannot be honored, we will advise you accordingly.
- **Deletion.** If you should wish to cease use of our Site and have your personal data deleted from our Site, then you may submit a request by emailing us at [legal@bluestarinc.com](mailto:legal@bluestarinc.com) or by calling (800) 354-9776 ext. 3395. Upon receipt of a verifiable request for deletion, we will confirm receipt and will confirm once your personal data has been deleted. To exercise this right via email, simply type the words “Personal Data Deletion” in the subject line of your email.
- **Do Not “Sell”.** Under CCPA, you have the right, at any time, to direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information. Certain transfers of personal information to our affiliates may be deemed a “Sale” under CCPA. If you wish to exercise your right to opt out, you may submit a request by emailing us at [legal@bluestarinc.com](mailto:legal@bluestarinc.com) or by calling (800) 354-9776 ext. 3395. Upon receipt of a verifiable opt out request, we will confirm receipt and limit the transfers of your data accordingly. To exercise this right via email, simply type the words “Sales Opt-Out” in the subject line of your email.
- **Right to Sue for Security Breaches.** You also have the right to sue in the event your nonencrypted or nonredacted personal information, is subject to an unauthorized access and exfiltration, theft, or disclosure as a result of our violation of the duty to implement and maintain reasonable security procedures and practices. Prior to exercising this right, you must provide us with 30 days’ written notice by emailing us at [legal@bluestarinc.com](mailto:legal@bluestarinc.com) and providing us with an opportunity fix this violation.

We reserve the right to ask for information verifying your identity and residency prior to disclosing any information to you or acting on your request. Should we ask for verification, the information you provide to verify your identity and residency will be used only for that purpose, and all copies of this information in our possession will be destroyed when the process is complete. We strive to respond to your request within 45 days of receiving a verifiable consumer request however, we reserve the right to respond within 90 days when reasonably necessary.

Under California's "Shine the Light" law, California residents who provide PII in obtaining products or services for personal, family or household use are entitled to request and obtain from us, once per calendar year, information about the Customer PII we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of Customer PII and the names and addresses of those businesses with which we shared Customer PII for the immediately prior calendar year (e.g. requests made in 2020 will receive information regarding 2019 sharing activities). To obtain this information from us, please contact us at the following email address: [legal@bluestarinc.com](mailto:legal@bluestarinc.com) and write "Request for California Privacy PII" for the subject of your message. We will send you a reply e-mail within 30 days containing the requested information once we confirm your request. Not all information sharing is covered by the "Shine the Light" requirements and only that information which is covered will be included in our response.

## **DO NOT TRACK DISCLOSURES**

Some web browsers may transmit "do-not-track" signals to websites with which the browser communicates. Our Site does not currently respond to these "do-not-track" signals.

## **INTERNATIONAL TRANSFER**

Your information, including PII, may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note we transfer your information, including PII, to the United States and process it there. Your submission of information to us represents your consent to that transfer. Please note the EU has not adopted an adequacy decision with respect to data transfers to the United States, nor are we a participant in the EU-US Privacy Shield; however, we value your privacy and protect your data using reasonable information security practices.

## **THIRD PARTY SITES**

This Privacy Policy applies only to information collected by Company through internal channels controlled by Company such as our Site.

From time to time, the Site may link you to other sites or applications (“*Linked Sites*”) that are not owned by Company. We do not control the collection or use of any information, including PII, which occurs during your visit to the Linked Sites. Further, we make no representations about the privacy policies or practices of the Linked Sites, and Company is not responsible for the privacy practices of these Linked Sites.

Be careful of disclosing any of your PII when leaving our Site. We encourage you to be aware when you leave our Site and to read the privacy statements of each and every website that collects PII.

## **QUESTIONS / CONCERNS**

If you believe that our Site is not following our stated information policy, you may contact us at the above address.

## **CONSENT**

By using our Site, or by otherwise communicating with us online, you consent to our collection and use of your information by Company. From time to time, we may use your PII for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change materially at some time in the future, we will post the policy changes to our Site. If we have collected PII from you, we will notify you about the changes prior to making use of your PII in new ways and will provide you with a reasonable opportunity to opt out of the new procedures before they are implemented. We will also honor opt out requests made following implementation of the new procedures, as discussed above.