

## ZENORADIO PRIVACY POLICY

Version Date: May 30, 2023

### GENERAL

ZenoRadio LLC (“Company” or “we” or “us” or “our”) respects the privacy of its users (“user” or “you”) whether you access our services via a telephone, wireless or wired device, a partner’s website, through a browser, website widget, player, a mobile application, or other media forms or media channels, related or connected thereto as may be available (collectively, the “ZenoRadio Service”). The following privacy policy (“Privacy Policy”) is designed to inform you, as a user of the ZenoRadio Service, about the types of information that Company may gather or collect from you in connection with your access to the ZenoRadio Service. It also is intended to explain the conditions under which Company uses and discloses that information, and your rights in relation to that information. Changes to this Privacy Policy are discussed at the end of this document. Each time you access the ZenoRadio Service, however, the current version of this Privacy Policy will apply.

For the ZenoRadio and broadcaster affiliated mobile app please continue by clicking here for the applicable privacy policy: <https://zeno.fm/privacy.policy.for.apps.May2023.html>

Accordingly, each time you access the ZenoRadio Service you should check the date of this Privacy Policy (which appears at the beginning of this document) and review any changes since the last time you accessed the ZenoRadio Service.

The ZenoRadio Service is hosted in the United States of America (“United States” or “U.S.”) and is subject to U.S. state and federal law. If you are accessing the ZenoRadio Service from other jurisdictions, please be advised that you are transferring your personal information to us in the United States, and by accessing the ZenoRadio Service, you consent to that transfer and use of your personal information in accordance with this Privacy Policy. You also agree to abide by the applicable laws of applicable states and U.S. federal law concerning your access to the ZenoRadio Service and your agreements with us. Any persons accessing the ZenoRadio Service from any jurisdiction with laws or regulations governing personal data collection, use and disclosure different from those of the jurisdictions mentioned above may only use the ZenoRadio Service in a manner lawful in their jurisdiction. If your access to the ZenoRadio Service would be unlawful in your jurisdiction, please do not access the ZenoRadio Service.

BY ACCESSING THE ZENORADIO SERVICE, YOU ARE ACCEPTING THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY.

### CHILDREN

The Children’s Online Privacy Protection Act (“COPPA”) protects the online privacy of children under 13 years of age. We do not knowingly collect or maintain personal information from anyone under the age of 13, unless or except as permitted by law. Any person who provides personal information through the ZenoRadio Service represents to us that he or she is 13 years of age or older. If we learn that personal information has been collected from a listener under 13 years of age through the ZenoRadio Service, then we will take the appropriate steps to cause this information to be deleted. If you are the parent or legal guardian of a child under 13 who has become a user of the ZenoRadio Service or has otherwise transferred personal information to us through the ZenoRadio Service, please contact the Company using our contact information below to have that child’s personal information deleted.

## **ZENORADIO SERVICES GENERALLY**

The ZenoRadio Service is an interactive service that allows users to access radio stations around the world through a wide variety of means such as telephones, browsers, website widgets, players, apps, and mobile devices. We collect and store both Non-Personally-Identifying Information and Personally Identifying Information (both defined below) about users and their habits, activities and preferences when listening to radio programming offered through the ZenoRadio Service. Such information is collected, retained and used as set forth in this Privacy Policy.

## **GATHERING, USE AND DISCLOSURE OF NON-PERSONALLY- IDENTIFYING INFORMATION**

“Non-Personally-Identifying Information” is information that, without the aid of additional information, cannot be directly associated with a specific person. “Personally-Identifying Information,” by contrast, is information such as a name, email address or telephone number that, without more, can be directly associated with a specific person. Company gathers from users of the ZenoRadio Service Non-Personally-Identifying Information of the sort that devices, depending on their settings, may make available. That information includes, for users accessing the ZenoRadio Service over the Internet, a user’s Internet Protocol (IP) address, operating system and browser type, and the locations of the web pages the user views right before arriving at, while navigating and immediately after leaving the ZenoRadio Service. If you use a mobile device to access the ZenoRadio Service or download any of our applications, we may collect device information (such as your mobile device ID, model and manufacturer), operating system and version information, and IP address. Company collects and analyzes Non-Personally-Identifying Information gathered from users of the ZenoRadio Service to help Company better understand how the ZenoRadio Service is being used, how to promote the ZenoRadio Service, and for the delivery of targeted advertising. By identifying patterns and trends in usage, including radio station listening habits and patterns, Company is able to better design the ZenoRadio Service to improve users’ experiences, both in terms of content, advertising and ease of use. From time to time, Company may also release the Non-Personally-Identifying Information gathered from the ZenoRadio Service users in the aggregate, such as by publishing a report on trends in the usage of the ZenoRadio Service.

## Lawful Bases of Processing

Where Company is acting as a data controller, that determines the purposes and means of processing your personal data, such as when we collect, use, and share personal data as described, we must have a lawful processing basis for doing so. Our lawful bases for processing personal data include:

- a. to conclude or perform a contract with you, for example to:
  - i. process your subscription to sign up as a broadcaster;
  - ii. complete your registration as a user or to communicate with you about your account;
  
- b. for our legitimate business purposes, including to:
  - i. respond to your customer service inquiries and requests for information;
  - ii. maintain, improve, and analyze our website, apps, advertisements, and the products and services we offer;
  - iii. detect, prevent, or investigate security breaches or fraud;
  - iv. facilitate the functionality of the ZenoRadio Service;
  - v. comply with our legal obligations, for example to maintain appropriate records for internal administrative purposes and as required by applicable law; and on the basis of your consent, for example to send you via email and other electronic means personalized promotions and special offers or informing you about our professional services, offerings, events, or other promotional purposes.

## Web Cookies

A “Web Cookie” is a string of information which assigns you a unique identification that a website stores on your computer or device, and that the user’s browser provides each time the user logs on to or submits a query to the ZenoRadio Service. We use cookies on the ZenoRadio Service to keep track of services you have used and activities you have performed, radio stations you have listened to and listening and call-in habits, to record, if applicable, registration information regarding your login name and password, to record your use preferences, if applicable, to keep you logged into the ZenoRadio Service, if applicable, and to facilitate purchase procedures, if applicable. Company also uses Web Cookies to track the pages that users visit and activities performed during each ZenoRadio Service session, both to help Company improve users’ experiences and to help Company understand how the ZenoRadio Service is being used. As with other Non-Personally-Identifying Information gathered from users of the ZenoRadio Service, Company analyzes and discloses in aggregated form information gathered using Web Cookies, so as to help Company, its partners and others better understand how the ZenoRadio Service is being used. **USERS WHO DO NOT WISH TO HAVE WEB COOKIES PLACED ON THEIR COMPUTERS OR DEVICES SHOULD SET THEIR BROWSERS TO REFUSE WEB COOKIES BEFORE ACCESSING THE ZENORADIO SERVICE, WITH THE UNDERSTANDING THAT CERTAIN FEATURES OF THE ZENORADIO SERVICE MAY NOT FUNCTION PROPERLY WITHOUT THE AID OF WEB COOKIES. USERS WHO REFUSE WEB COOKIES ASSUME ALL RESPONSIBILITY FOR ANY RESULTING LOSS OF FUNCTIONALITY.**

## **Flash Cookies**

“Flash Cookies” are a form of persistent cookies technically called “Local Shared Objects” (LSOs). Flash Cookies set an LSO to track your use of the ZenoRadio Service. This tracking and storage can occur even after you have deleted your Web Cookies or opted-out of network advertising. This tracking sets two cookies on your computer – a standard cookie and a Flash Cookie.

Flash Cookies can be considered to be equivalent to “normal” Web Cookies, except for a few minor differences. With Flash Cookies your data is stored in multiple places and it is restored once you delete it. Normal Web Cookies can be managed via the preferences dialog of most web browsers, but no similar utility for managing Flash Cookies is included in most web browsers. It is possible for Flash Cookies to remain on your computer indefinitely because an expiration date cannot be set for them. As with normal Web Cookies, a website that placed the Flash Cookie can only access data that it captured; it is not allowed to read Flash Cookies created by other websites.

## **Web Beacons**

A “Web Beacon” is an object that is embedded in a web page that is usually invisible to the user and allows website operators to check whether a user has viewed a particular web page or an email. Company may use Web Beacons on the ZenoRadio Service and in emails to count users who have visited particular pages, viewed emails, and to deliver co-branded services. Web Beacons are not used to access users’ Personally-Identifying Information; they are a technique Company may use to compile aggregated statistics about the ZenoRadio Service usage. Web Beacons collect only a limited set of information including a Web Cookie number, time and date of a page or email view, and a description of the page or email on which the Web Beacon resides. You may not decline Web Beacons, however, they can be rendered ineffective by declining all Web Cookies or modifying your browser setting to notify you each time a Web Cookie is tendered and permit you to accept or decline Web Cookies on an individual basis.

## **Telephone Access**

When you access the ZenoRadio Service via a telephone we obtain your telephone number (unless the caller ID is blocked), keep track of services you have used and activities you have performed, radio stations you have listened to and your listening and call-in habits.

## **Advertising**

We or broadcasters may either directly or through third-party companies serve ads to you when you access the ZenoRadio Service. Advertisers may use information about your visits to and use of the ZenoRadio Service (including, without limitation, stations accessed, listening habits, and location of accessing telephone number) that are contained in Web Cookies, Flash Cookies or that we gather when you access the ZenoRadio Service via a telephone (wireless or wired device) or other application or access method in order to provide advertisements about goods and services that may be of interest to you. We also allow advertisers to choose the characteristics of listeners who will be presented with their advertisements and we may use any of the non-personally identifiable attributes we have collected to select the appropriate audience for those advertisements. Advertisements may be served via SMS/text messages, voice messages, email, push messaging or other means from ZenoRadio or affiliated third parties. If you are accessing the ZenoRadio Service via the Internet, then using a tool created by the Network Advertising Initiative, you can opt out of several third party ad servers’ and networks’ Web Cookies simultaneously. If you would like more information about this practice and to know your choices about not having this information used by these companies, please follow the following link: [http://networkadvertising.org/managing/opt\\_out.asp](http://networkadvertising.org/managing/opt_out.asp). Please contact us if you would like to know the identity of the third-party advertising companies we are currently using to serve ads.

## **Analytics**

One of the third party services that we use to track activity related to our service, e.g., by placing cookies, is Google Analytics. We may use third-party vendors, including Google, who use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on your past activity on our websites and applications, including Google Analytics for Display Advertising. If you do not want any information to be collected and used by Google Analytics, you can install an opt-out in your web browser ([https:// tools.google.com/dlpage/gaoptout/](https://tools.google.com/dlpage/gaoptout/)) and/or opt out from Google Analytics for Display Advertising or the Google Display Network. You can do so by using Google's Ads Settings ([www.google.com/settings/ads](http://www.google.com/settings/ads)). Aggregated and Non-Personally-Identifying Information We may share aggregated and Non-Personally Identifying Information we collect under any of the above circumstances. We may also share it with third parties and our affiliate companies to develop and deliver targeted advertising on the ZenoRadio Service and on websites of third parties. We may combine Non-Personally Identifying Information we collect with additional Non-Personally Identifying Information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis. For example, we may tell our advertisers the number of visitors to the ZenoRadio Service and the most popular features or services accessed. This information does not contain any Personally-Identifying Information and may be used to develop website content and services that we hope you and other listeners will find of interest and to target content and advertising.

## **Mobile Device Additional Terms**

Geo-Location Information. Unless we have received your prior consent, we do not access or track any specific location-based information from your mobile device at any time while downloading or using our mobile applications or the ZenoRadio Services. However, based upon your IP address, the telephone number that you use to access the ZenoRadio Service, Wi Fi network data or cell tower triangulation, we may record general non-specific locations. However, we may also automatically collect anonymous information about you when you have geographical location tools on your Internet-enabled device which have not been disabled. We may also collect anonymous information about you whenever you deliberately interact with one of our ads containing a quick response code or follow instructions to send a text, or visit a URL. If you have geo-location tools on your Internet-enabled device which you have not disabled, we automatically receive information on your device's location and may use it to comply with our contractual arrangements which restrict our sending certain programming channels outside of defined areas, such as when you want to listen to the ZenoRadio service while in another country.

Push Notifications. We may send you push notifications if you choose to receive them for other service-related matters. If you wish to opt-out from receiving these types of communications you may request to have them stopped at any time via preferences on your mobile device. Mobile Analytics. We use mobile analytics software to allow us to better understand the functionality of our mobile software on your mobile device. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from.

## **COLLECTION, USE AND DISCLOSURE OF PERSONALLY- IDENTIFYING INFORMATION**

### **Information Collection**

As defined above, Personally-Identifying Information is information that can be directly associated with a specific person. Company may collect Personally Identifying Information from and about the ZenoRadio Service users. Much of the Personally-Identifying Information collected by Company about users is information provided by users themselves when (1) registering for the ZenoRadio Service, (2)dialing in to the ZenoRadio Service, (3) logging in with social network credentials, (4) participating in polls, contests, surveys or other features of the ZenoRadio Service, or responding to offers or advertisements on the ZenoRadio Service, (5) communicating with us, or (6) signing up to receive newsletters or other communications. That Personally Identifying Information may include each user's name, address, email address, and telephone number. We also may request information about your interests and activities, your gender, age, date of birth, language preference, hometown and other demographic information, and other relevant information as determined by Company from time to time. Additionally, when you access the ZenoRadio Service from a telephone or mobile device we may also obtain your telephone number which may also be used for tracking your use of the ZenoRadio Service.

Users of the ZenoRadio Service are under no obligation to provide Company with Personally-Identifying Information of any kind, though some information, like a telephone number, may be provided automatically when using the ZenoRadio Service. We may also use reverse look up functionality in order to obtain the name of a person associated with a particular phone number. We store Personally-Identifying Information and linked Non-Personally- Identifiable Information that we gather about you through the ZenoRadio Service, through social media, through linked social media applications, or that you give to us voluntarily in any other way, and we may use it in accordance with this Privacy Policy.

When signing up for a paid package, you will be required to submit your credit card number so our third party service provider can process payments related to the ZenoRadio Service. Please note that subscriptions may be a monthly recurring charge to your credit card or other means of payment depending on service selected.

**BY REGISTERING WITH OR USING THE ZENORADIO SERVICE, YOU CONSENT TO THE USE AND DISCLOSURE OF YOUR PERSONALLY IDENTIFYING INFORMATION AS DESCRIBED IN THIS "COLLECTION, USE AND DISCLOSURE OF PERSONALLY IDENTIFYING INFORMATION" SECTION.**

### **Online Postings**

We may provide areas or features on or via the ZenoRadio Service where you can post reviews, provide audio or other content during interactive sessions, and other information relating to your activities on or via the ZenoRadio Service. Such postings are governed by our Terms of Use. In addition, such postings may appear on other websites or when searches are executed on the subject of your posting. Also, whenever you voluntarily disclose personal information on publicly-viewable web pages, that information will be publicly available and can be collected and used by others. For example, if you post your email address, you may receive unsolicited messages. We cannot control who reads your posting or what other users may do with the information you voluntarily post, so we encourage you to exercise discretion and caution with respect to your personal information. **USERS ASSUME ALL RESPONSIBILITY FOR ANY LOSS OF PRIVACY OR OTHER HARM RESULTING FROM THEIR VOLUNTARY DISCLOSURE OF PERSONALLY IDENTIFYING INFORMATION.**

## **Company Communications**

We may occasionally use your name and email address to send you notifications regarding new services or products offered by Company that we think you may find valuable. If we have obtained proper authorization, we may also contact you via email, telephone, text or push notification. We may also send you service-related announcements from time to time through the general operation of the Service. Generally, you may opt out of receiving such communications, though we reserve the right to email you notices about your account even if you opt out of all voluntary email notifications.

Please note that "opt-out" and "unsubscribe" requests may not take effect immediately and may take a reasonable amount of time to receive, process and apply, during which time your information shall remain subject to the prior privacy settings.

## **Social Media**

We may provide you the option to connect your account, if applicable, on the ZenoRadio Service to your account on some social networking sites (such as via Facebook Connect) for the purpose of logging in, uploading information or enabling certain features on the ZenoRadio Service. When logging in using your social network credentials, such as your Facebook account, we may collect the Personally Identifying Information you have made publicly available in Facebook, such as your name, profile picture, cover photo, username, gender, friends network, age range, locale, friend list, and any other information you have made public. We may also obtain other non-public information from the social network website with your permission. Once connected, others may also be able to see information about your social network, such as the size of your network and your friends, including common friends. By connecting your account on the ZenoRadio Service to your account on any social networking site, you hereby consent to the continuous release of information about you to us. We will not send any of your account information to the connected social networking site without first disclosing that to you. Each social network may further allow you to set privacy controls around your information on their system, and our collection of information will always follow such controls and permissions. This feature is subject to continuous change and improvement by us and each social networking site involved, and therefore the available features and shared information are subject to change without notice to you.

## Company Disclosures

Company will disclose Personally-Identifying Information under the following circumstances:

**Broadcasters/Advertisers.** Through your access to the ZenoRadio Service, we collect a variety of information regarding how you use the ZenoRadio Service, and this information can be linked to Personally-Identifiable Information we have obtained about you. We may disclose this information to broadcasters of radio stations that you access via the ZenoRadio Service as well as to our advertisers. Broadcasters may use the information we disclose about you only for their internal purposes, such as improving programming, identifying you if you call in to a radio show, contacting you as a listener of their programming, in order to deliver advertising, and for related purposes.

**Marketing Communications.** Unless users opt-out from receiving Company marketing materials, Company may email, SMS/text, deliver recorded messages and otherwise communicate with users, or contact users via other means (all in compliance with applicable law), about products and services that Company believes may be of interest to them and Company also will provide users' email information (and other contact information) to third parties, so that those third parties may directly contact users about additional products and services. If a user wishes to opt-out of receiving marketing materials from Company, user may do so by following the unsubscribe link in email communications, by going to your account settings (if applicable) or contacting us using the contact information below. Similarly, to cease having your email or other contact information provided to third parties, you may do so by going to your account settings (if applicable) or contacting us using the contact information below. Even after opting-out, a user may continue to receive marketing emails or other communications from third parties to whom Company already has provided the user's email or other contact information. Users will be responsible for directly contacting such third parties to request cessation of further marketing communications.

**Disclosure to Trusted Third Parties at Your Request.** When using the ZenoRadio Service, we may provide you with advertisements, promotions, sweepstakes and offers from Company or third party providers. If you choose to accept any such offers, or agree to listen to or view additional information concerning the advertisement or promotion, or to be contacted by Company or a third-party, you may either (depending on the situation) be transferred to and directly provide your information in connection with the advertisement or promotion to such third party provider, or we will provide your information to the third party provider. Your information will not be transferred until you actually agree to listen to or view additional information, or agree to be contacted, or accept the offer, as the case may be. You may opt-out of such activities at any time up until this point. Please refer to the third party provider's own privacy policy if you have any questions regarding how your information is used by such providers.

Please be aware that these offers may be presented while using the ZenoRadio Service on your telephone (wired or wireless device), via a website or browser, website widget, player, application, or otherwise. We do this to provide a seamless experience. Although these offers may have the look and feel of the ZenoRadio Services, you will be submitting your information directly to the third-party advertiser. You agree that we will not be responsible or liable for any loss or damage of any sort incurred as the result of any such dealings, including the sharing of the information you supply to us with third party providers described here, or as the result of the presence of such providers on a Company website.



**By Law or to Protect Rights.** When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our Company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our Terms of Use or other agreements or policies, in response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.

**Affiliates.** We may share some or all of your personal information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates would include a parent company or any subsidiaries, joint venture partners, or other companies that we control or that is under common control with us. Such intercompany transfers may be to and from the United States and any other country in which we or our agents maintain facilities for the purposes identified in this Privacy Policy, as well as for storage, processing or other business use as permitted under this Agreement.

**Third Party Service Providers.** We may share your Personally- Identifying Information, which may include your name and contact information with our authorized service providers that perform certain services on our behalf. These services may include fulfilling orders, credit card processing, payment gateways, subscription processing providing customer service and marketing assistance, performing business and sales analysis, supporting our website functionality, supporting or maintaining our service platform or technologies, and supporting contests, sweepstakes, surveys and other features offered through the ZenoRadio Service. We may also share your name, contact information and credit card information with our authorized service providers who process credit card payments. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purpose.

**Business Transfers; Bankruptcy.** Company reserves the right to transfer all Personally-Identifying Information in its possession to a successor organization in the event of a merger, acquisition, or bankruptcy or other sale of all or a portion of Company's assets. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred Personally-Identifying Information will be subject to this Privacy Policy, or to a new privacy policy if you are given notice of that new privacy policy and are given an opportunity to affirmatively opt- out of it. Personally-Identifying Information submitted or collected after a transfer, however, may be subject to a new privacy policy adopted by the successor organization.

## **General Use**

We use the Personally-Identifying Information in the data we maintain about you, and other information we obtain from your current and past activities in connection with the ZenoRadio Service to: deliver the products and services that you have requested, manage your account, if applicable, and provide you with customer support, communicate with you by email, postal mail, telephone and/or mobile devices about products or services that may be of interest to you either from us, our affiliate companies or other third parties, develop and display content and advertising tailored to your interests on the ZenoRadio Service and other sites, resolve disputes, troubleshoot problems, measure consumer interest in our services, inform you of updates, customize your experience, detect and protect us against error, fraud and other criminal activity, enforce our Terms of Use, and as otherwise described to you at the time of collection. At times, we may look across multiple users to identify problems. In particular, we may examine your Personally Identifying Information to identify users using multiple listener IDs or aliases. We may compare and review your Personally-Identifying Information for accuracy and to detect errors and omissions. We may use financial information or payment method to process payment for any purchases made through the ZenoRadio Service, enroll you in the discount, rebate, and other programs in which you elect to participate, to protect against or identify possible fraudulent transactions, and otherwise as needed to manage our business.

## **CONTESTS, GIVEAWAYS AND SURVEYS**

From time to time, Company may offer users the opportunity to participate in contests, giveaways and other promotions. Any information submitted in connection with such activities will be treated in accordance with this Privacy Policy. From time to time, Company may also ask users to participate in surveys designed to help Company improve the ZenoRadio Service. Any Personally-Identifying Information provided to Company in connection with any survey will be used only in relation to that survey, and will be disclosed to third parties not bound by this Privacy Policy only in non-personally-identifying, aggregated form.

## **COLLECTION AND USE OF INFORMATION BY THIRD PARTIES GENERALLY**

Third parties are under no obligation to comply with this Privacy Policy, with respect to Personally-Identifying Information that users provide directly to those third parties or that those third parties collect for themselves. These third parties include advertisers, providers of games, utilities, widgets and a variety of other third party applications accessible through the ZenoRadio Service. Company neither owns nor controls the third-parties and applications accessible through the ZenoRadio Service. Thus, this Privacy Policy does not apply to information provided to or gathered by the third parties. Before visiting a third-party, or using a third party application, whether by means of a link on the ZenoRadio Service, directly through the ZenoRadio Service, or otherwise, and before providing any Personally- Identifying Information to any such third party, users should inform themselves of the privacy policies and practices (if any) of the third parties, and should take those steps necessary to, in those users' discretion, protect their privacy.

## **SECURITY**

We take security of your Personally-Identifying Information seriously and use reasonable electronic, personnel, and physical measures to protect it from loss, theft, alteration, or misuse. However, please be advised that even the best security measures cannot fully eliminate all risks. We cannot guarantee that only authorized persons will view your information. We are not responsible for third party circumvention of any privacy settings or security measures.

## **Wireless Consent Policy**

You authorize your wireless operator (AT&T, Sprint, T-Mobile, US Cellular, Verizon, or any other branded wireless operator) to use your mobile number, name, address, email, network status, customer type, customer role, billing type, mobile device identifiers (IMSI and IMEI) and other subscriber status details, if available, solely to allow verification of your identity and to compare information you have provided to ZenoRadio with your wireless operator account profile information for the duration of the business relationship.

## **PRIVACY POLICY CHANGES**

Company may, in its sole discretion, change this Privacy Policy from time to time. Any and all changes to Company's Privacy Policy will be reflected on this page and the date new versions are posted will be stated at the top of this Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account, if applicable. Users should regularly check this page for any changes to its Privacy Policy. Company will always post new versions of the Privacy Policy on the ZenoRadio website.

## **CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to our privacy officer as listed below.

## **DO NOT TRACK POLICY**

The ZenoRadio Service does not respond to "Do Not Track" signals or mechanisms.

## **GDPR**

Provisions for persons governed by the General Data Protection Regulation (GDPR) are found in GDPR Document on the website <https://zeno.fm/gdpr-privacy-policy/>

## **CONTACT**

If you have any questions regarding our Privacy Policy, please contact our privacy officer at:

Privacy Officer  
ZenoRadio LLC

Email:

[support@zenoradio.com](mailto:support@zenoradio.com)