

Gray Television, Inc. Privacy Policy

We at Gray Television, Inc. (“GTI”), along with our television stations (“Stations”), respect your privacy. We have adopted this Privacy Policy to explain what information about you we collect, how we use it, and how we share it. We provide a link to this Privacy Policy wherever it applies, such as on our Station web sites, our mobile apps, our social networking presence on Facebook and other platforms, and other online services that we provide and control (“Services”). By using our Services, you accept our practices as described in this Privacy Policy.

This Privacy Policy does not apply to services offered by other companies or individuals, even if a product or site is linked to our Services and even if a relationship exists between GTI and a third party (see [Your Choices](#) below).

This Privacy Policy is incorporated by reference into the [GTI Terms of Use Agreement](#), which also governs our Services.

Types of Data We Collect

When you use our Services, we may access or collect personal information about you and non-personal information. This information is accessed and collected in a variety of ways, including:

- You voluntarily submitting information to us via our Services for you to enjoy a particular Service, such as an email address in order to deliver news updates or a phone number to let you know that you won a contest; and
- Us automatically collecting information about how you use our Services, including through the operating system of your mobile device (in the case of our mobile apps) or through analytics tools to determine when you use our Services and how you interact with our content.

Our Services may access or collect the following data:

- Information that identifies you, including:
- Information you voluntarily provide, which may include account information, name, email address, user credentials, age, address, and/or phone number;
- Location Data such as GPS, WiFi, or carrier network location (see Location Data below); and

- User files stored on your device or system (for example, calendar, picture, and video files) that you voluntarily provide.
- What you do on your device, system, or software when you use our Services, including access to and information about:
 - Camera use
 - Local storage
 - Phone dialer
 - Use of screen, such as what points are touched, frequency, etc.
 - Patterns of app usage
 - Device or system information
 - Mobile Device Identifier, e.g., UDID, Android ID
 - Technical information about your device and system and application software, e.g., type of phone, operating System (OS), and IP address
 - Information drawn from other sources, such as social networks, mobile platforms, and our affiliates, vendors, advertisers, and various other providers of data.

We may collect personal information about other people when you submit it to us, such as by participating in a promotion or contest or when you submit news stories or nominations to us. By providing us with the personal information of others, you represent that you have the legal right to do so.

Location Data

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

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

Cookies and Similar Technologies; Do Not Track

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

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

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

You may configure your browser to reject cookies. But doing so could make it difficult to use and enjoy our Services. We do not honor a web browser's "do not track" signals.

How We Use Data

We use the information we collect to provide, protect, and improve our Services, to develop new ones, and to protect GTI, our Stations, and our users. For example, we and our vendors use your information to provide:

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

We may also use the data we collect to:

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

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

Disclosure of Your Information to Third Parties

We do not share your personal information with companies, organizations, or individuals outside of GTI and its Stations, except as described in this Privacy Policy, including:

- With your consent;
- To provide the Services that you access or request, complete transactions you initiate, or otherwise fulfill your requests;
- With GTI affiliates for business, operational, promotional or marketing purposes;
- With advertisers if you participate in a co-branded, co-sponsored, or jointly presented promotion, contest, or other Service;
- With advertisers, network advertising services, and/or other third parties as described in the section below (see Advertising and Personalized Content below);
- With our vendors or service providers, who are generally restricted from using your personal information for any purpose other than that for which we hire them;
- To protect the security of our Services or databases;
- To protect the rights or property of our users, GTI, its affiliates, our advertisers, or our vendors and service providers;

- To implement or enforce our company policies, the GTI Terms of Use Agreement, the GTI Copyright Complaint Procedures, or agreements that we may enter into with you;
- To respond to subpoenas, legal process or government requests, or investigations;
- To act in response to an emergency or situation that threatens the life, health, or security of an individual;
- To assist in the investigation of a violation (or presumed violation) of law, or if we believe in good faith that the law requires or authorizes such disclosure; or
- In connection with any proposed or actual sale, lease, merger, assignment, re-organization, or financing of all or any portion of GTI or our Stations.

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

Advertising and Personalized Content

Advertising is important to our provision of free and low-cost Services to you. We may share your personal information with our advertisers, advertising networks, or other third parties for direct marketing and promotional purposes. Additionally, GTI and its Stations, our advertisers, certain outside network advertising services, and other third-parties may place cookies, web beacons, and other similar technology on your device to personalize your experience, collect information about your preferences, collect location information, and/or deliver customized advertising content.

Advertisers and other third parties involved in the delivery of ads to you may offer you opportunities to choose what type of information about you is collected, used, and shared, and how that is done. We do not control outside parties or the choices they may offer you – please contact them directly to learn about your choices. For more information about your options for receiving personalized advertisements, see Your Choices below.

California “Shine the Light Act”

If you reside in California and have an established business relationship with us, you may have the right to receive information about how we share your personal information with our affiliates or third parties, such as our advertisers. If you wish to learn about our practices, please send a written request to the contact information identified below at the end of the Privacy Policy, including your full name, street address, city, state, and zip code; the name of the Service about which you are requesting information; and a statement that your request is pursuant to the California “Shine the

Light” Act. GTI is not able to provide information about how companies outside GTI might use or disclose your information.

Safeguarding Children’s Privacy

We do not knowingly collect personal information online from children under 13 years of age. If we discover that we have inadvertently collected personal information online from children under 13, we will endeavor promptly to destroy such information or remove any identifying details.

Accessing Account Information

Certain GTI Stations and Services may allow you to register for an account and update your account information. If these functions are available, you may view your user profile and related information, and request changes to such information. When you request a change to your personal information linked to an account, we try to honor your request subject to certain limitations. We will retain your personal information as needed to provide the Services, as required by our corporate policies or applicable law, and as needed to protect the rights and property of GTI and its users. Additionally, changes to account information may not occur in all copies or back-ups held by us or others, or if we determine that the change would be unduly expensive or burdensome. We may deny a request to access or change account information if we believe there is a question about the identity or authority of the requester.

Information Security

We take steps to protect the security of the information you provide us. Yet, no security is perfect, and transmissions over the Internet are potentially vulnerable. Please use caution when disclosing your personal information.

Your Choices

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

- **Other Websites and Platforms:** If you choose to use any of the links we provide to third-parties, you will be leaving our Services and going to a new site or platform. Our Privacy Policy does not apply to services offered by other companies or individuals, even if a product or site is linked to our Services and even if a relationship exists between GTI and a third party. Protection of your privacy at those other sites or platforms will be governed by the privacy policy at that site or platform. GTI and our Stations have no responsibility for the privacy policies or business practices of a third party we neither own nor control. Please take the time to read the privacy policies at these third-party sites or platforms. It is your choice whether or not to leave our Services and go to third-party sites or platforms.
- **Advertising and Personalized Content:** To opt-out of receiving personalized advertising, please visit the Network Advertising Initiative Consumer Opt-Out Page at <http://www.aboutads.info/choices>, the Digital Advertising Alliance Consumer Choice Page at <http://www.aboutads.info/choices>. Please be aware that opting out of a network advertising service doesn't mean that you won't receive online ads. It only means that the network from which you opted out should no longer deliver ads tailored to your preferences and interests.

Important Information for California Residents

This section applies only to California residents. It describes how we collect, use and share Personal Information of California residents in operating our business, and their rights with respect to that Personal Information. For purposes of this section, “**Personal Information**” has the meaning given in the California Consumer Privacy Act of 2018 (“**CCPA**”) but does not include information exempted from the scope of the CCPA.

Your California privacy rights. As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with whom we share Personal Information.

- The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
 - The business or commercial purpose for collecting and/or selling Personal Information.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales.** If we sell your Personal Information, you can opt-out. In addition, if you direct us not to sell your Personal Information, we will consider it a request pursuant to California's "Shine the Light" law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.
- **Opt-in.** If we know that you are younger than 16 years old, we will ask for your permission (or if you are younger than 13 years old, your parent's or guardian's permission) to sell your Personal Information before we do so.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination. This means that we will not penalize you for exercising your rights by taking actions such as denying you services; increasing the price/rate of services; decreasing service quality; or suggesting that we may penalize you as described above for exercising your rights.

How to exercise your rights

You may exercise your California privacy rights described above as follows:

- **Right to information, access and deletion.** You can request to exercise your information, access and deletion rights by:
 - Visiting <https://gray.tv/privacypolicy/optout>
 - calling us toll free at (888) 896-0662
 - emailing privacyrights@gray.tv
- **Right to opt-out of the "sale" of your Personal Information.** Like many companies, we use services that help deliver interest-based ads to you. California law classifies our use of these services as a "sale" of your Personal Information to the companies that provide the services. This is because we allow them to collect information from our website users (e.g.,

online identifiers and browsing activity) so they can help serve ads more likely to interest you. You can request to opt-out of this “sale” of your personal information here: [Do Not Sell My Personal Information](#).

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

We will need to verify your identity to process your information, access and deletion requests and reserve the right to confirm your California residency. To verify your identity, we may require you to log into your account (if applicable), provide government identification, give a declaration as to your identity under penalty of perjury and/or provide additional information. Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with written confirmation that you have given the authorized agent permission to submit the request. Authorized agents are required by California law to implement and maintain reasonable security procedures and practices to protect their clients’ information.

Personal information that we collect, use and share

The chart below summarizes how we collect, use and share Personal Information by reference to the statutory categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Policy. Categories in the chart refer to the categories described above in the general section of this Privacy Policy.

We describe the sources from which we collect this information in the section above entitled Types of Data We Collect, and the business and commercial purposes for which we collect this information in the section above entitled How We Use Data.

Changes to the Privacy Policy

We may change this Privacy Policy from time to time. We will post any changes to this page, and if the changes are significant, we will provide a more prominent notice. By using our Services following a change to this Privacy Policy, you accept our practices as described.

How to Contact Us

If you have questions or comments regarding this Privacy Policy, please e-mail us at privacyrights@gray.tv or via postal mail to:

Gray Television, Inc.

Attn: Privacy Policy

VP Digital Media

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