



## **90.5 WESA Privacy Policy**

*At WESA, we recognize the importance of privacy to visitors of WESA.fm, WESA's mobile sites and applications, any other WESA sites, applications and services, and any features of these sites, applications and services (the "WESA Services"). This Privacy Policy explains what type of information is collected from you when you visit the WESA Services and how that information may be used.*

*Please note that this Privacy Policy is separate and distinct from the privacy policies governing the web sites, applications and services of NPR and NPR member stations, and the web sites, applications and services that may link to or from the WESA Services.*

### **Gathering of Information**

WESA collects personally-identifying information (such as your name, e-mail address, address, telephone number, and credit card information) from the WESA Services for a variety of purposes.

WESA asks visitors to provide certain personal information when they register for certain features or services of the WESA Services (for example, the WESA Community, Application Programming Interface (API) Content access, and WESA e-mail newsletters), when they create a profile in the WESA Community, when they make a donation, when they e-mail, send via SMS (Short Message Service) or text message, or otherwise share a story from the WESA Services, when they make a purchase from the WESA Shop, when they post, upload, transmit and/or otherwise submit ("Submit") a comment, message, story idea, essay, photo, image, or other text, content or material ("User Materials"), and when they register for any online contests. In some cases, WESA records the telephone number of your mobile device when you access WESA's mobile sites and applications, interactive voice response service, or any features of these sites, applications and services ("WESA Mobile Services"). WESA also may ask visitors to provide personal information in other limited circumstances specified at the time the information is gathered. Any information that you Submit on or through the WESA Community or other social networking features, as part of story or blog comments, or otherwise Submit to the WESA Services, may become public, including the full name and nickname that you provide when registering for the WESA Community.

Like all other Web servers, WESA's Web server automatically creates log files for each visitor who accesses the WESA Services. These "access logs" allow us to make our site more useful to our visitors. For users of WESA Mobile Services, the access logs record the identifier provided for your mobile device by your wireless carrier ("carrier identifier"). Otherwise, the access logs do NOT record a visitor's name, address, e-mail address, credit card numbers, or any other personally-identifying information. Rather, they contain some or all of the following information:

The Internet Protocol Address (IP Address) of the machine which accessed the WESA Services.

General location information (based on IP Address)

The date of the visit.

The time of the visit.

The path taken through the WESA Services.

The browser being used.

A list of files downloaded or viewed.

The amount of time spent listening to/viewing media files.

Any errors encountered.

#### Cookies and Other Technologies

WESA also uses 'cookies' to collect information. A cookie is a string of characters that can be written to a file on the user's hard drive when the user visits a web site, application or service. Only the web site, application or service that set the cookie can read it, and it can only be used as a record keeping device to store user IDs and information that the site already has. It cannot be used to read other information from the user's hard drive.

WESA uses cookies to track users' activity through the WESA Services in order to improve the site/application/service architecture, to offer the user interactive features that would not be possible without them, to offer local station content, to recall specific information to save the user time during subsequent visits to the WESA Services, and to direct more relevant sponsorship or underwriting messages to the user while the user is on the WESA Services, based on the user's activity on the WESA Services. For example, cookies allow WESA to remember your registration information while you are logged in. Local station customization, the WESA Shop, and other interactive features also use cookies.

Third party vendors that measure and analyze the use of the WESA Services for WESA, provide WESA's discussion platform and serve sponsorship messages onto the WESA Services, also use their own cookies. In addition, WESA works with third party vendors which may serve sponsorship or other messages to you on other web sites after you visit the WESA Services. These third party vendors use their own cookies to recognize you as a WESA Services visitor and to serve you sponsorship or other messages on other web sites that they believe you will find most relevant.

WESA and its third party vendors also may use web beacons, alone or in conjunction with cookies. A web beacon is an electronic image, also known as a single-pixel (1x1) or clear .gif., which can be used to recognize certain information on your computer, such as cookies, the time and date a page is viewed, or a description of where API Content is placed. We may use web beacons on this site from time to time for these and other purposes.

#### **Opting Out of Cookies and Web Beacons**

If you wish to prevent certain or all cookies or web beacons from being set to your hard drive or device, or to clear existing cookies or web beacons from your browser's or device's cache, you may be able to disable them in your browser's preferences, although your browser might then be unable to accommodate certain functionalities on the WESA Services.

In addition, if you wish to opt out of receiving personalized or “interest-based” sponsorship or other messages from our third party vendors and other participating companies, please visit <http://networkadvertising.org/choices>. Please note that if you opt out, you will still receive other types of messages that are not personalized or interest-based. Opting out is cookie-based and will only affect the specific computer and browser on which the opt out is applied. If you subsequently delete your browser cookies, you will need to opt out again.

For more information about opting out of interest-based messages, visit [www.aboutads.info/choices](http://www.aboutads.info/choices).

### **Use of Information**

The use of personally-identifying information is limited to the following: managing and administering the WESA Services; responding to user messages; listing name and location (city, state and/or country) information provided by users when broadcasting or publishing User Materials; fulfillment of WESA Shop orders; processing donations; contest management; editorial purposes such as contacting users for an online survey; sending WESA e-mail newsletters and other communications, including marketing and promotional communications, from WESA to users who have 'opted in' to the receipt of such communications; other internal WESA purposes; and other purposes specified at the time the information is gathered. WESA may contact users regarding their submissions in certain circumstances.

Any information that you disclose when participating in the WESA Community (including creating a profile or submitting a comment to a story or blog or in a discussion thread), such as your full name and any nickname, is likely to become public. This information may be posted on the WESA Services and on the platform of WESA’s third party discussion services vendor. In addition, WESA and their licensees, may use, copy, sublicense, modify, transmit, publicly perform, display, create derivative works of, host, index, cache, tag, encode, and/or adapt any User Materials, and any information contained therein, in any and all media formats or channels, whether now known or hereafter devised, including, but not limited to, the WESA Services, other third party web sites and services, over the air (on radio or television), and on mobile platforms. Further, other users of the WESA Services may embed a widget or feed that allows your User Materials to appear on their personal, noncommercial web site, blog or other application, subject to conditions set forth in the Terms of Use. You also may opt in to sharing your WESA Services profile and comments with other websites and social media platforms, but only by taking action on the website for WESA’s third party discussion services vendor. Any such action is governed by the terms and privacy policy of WESA’s third party discussion services vendor, and not of WESA.

In addition, if you send User Materials to WESA through the WESA Services, we may print the User Materials, or an excerpt from the User Materials, on the WESA Services, read them on air, or otherwise publish them in any other medium, together with your name and location (city, state and/or country) if you provide that information to us.

Excluding information provided by the user when participating in the WESA Community or sending User Materials to WESA, which may become public as discussed above, personally-identifying information collected by WESA is not provided to outside parties except WESA service vendors (such as WESA Shop fulfillment service, WESA’s email list manager, and the provider of the tool that allows users to sign in using information from their account with a third party service), and other third parties when the user

specifically consents to such distribution (such as the disclosure of your name to a friend when you email, send via SMS or text message, or otherwise share a story to that friend). In these circumstances, the information is provided for the sole purpose of -- and only to the extent necessary for -- delivering the requested goods to the user, delivering communications from WESA to users who have 'opted in' to the receipt of these communications, providing services for and on behalf of WESA, or serving other internal WESA purposes.

WESA also may disclose personal information if required to do so by law or if it believes that such action is necessary to (a) comply with the law or with legal process, (b) protect against misuse or unauthorized use of the WESA Services, or (c) protect the personal safety or property of users of the WESA Services, the public or WESA and its employees.

If you do not want your personally-identifying information to be collected or used for any of these purposes, please do not provide it (although if you do not provide it, you may not be able to use or participate in certain features of the WESA Services). You can also 'opt out' according to the process described below.

WESA, with the assistance from time to time of its third party service vendors, uses non-identifying aggregate information to analyze use of and better design the WESA Services and to share with third parties in aggregate form only as appropriate. For example, we may tell a third party that a certain number of users accessed a particular audio stream on our Web site. We also may share non-identifying aggregate information with third party services that combine WESA's information with aggregate information from other sources to provide ratings and ranking data or other services of value to WESA. However, we will not disclose any information that could be used to identify those users.

## **Security**

WESA has in place what we believe to be appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. WESA is PCI Compliant. However, no Internet, e-mail or mobile transmission is ever fully secure or error free. Because most e-mail and mobile transmissions are not encrypted, you should take special care in deciding what information you send to us via e-mail, SMS or text message, or other mobile transmission.

## **Children**

**Under 13:** You must be at least 13 years old in order to register for e-mail newsletters or other features of the WESA Services. If you are under 13 years of age, please do not send any information about yourself, including your name, address or e-mail address. If we discover that we have collected any personally-identifying information from a child under the age of 13, we will remove that information from our database as soon as possible.

**13-18:** You must be at least 18 years old in order to Submit any User Materials on or through the WESA Services, create a profile in the WESA Community, participate in any online contests, or place an order on the WESA Shop. Visitors between the ages of 13 and 18 must obtain permission from their parents or

guardians before registering for e-mail newsletters or other features of the WESA Services (excluding the WESA Community, for which they cannot register) or otherwise sending any personally-identifying information.

### **Corrections to Personal Data; Opting Out**

Please Contact Us to a) correct or update any personal information in the WESA database that you state is erroneous, b) opt-out of future communications from WESA, or c) request WESA to make reasonable efforts to remove your personal information from WESA's database, thereby canceling your WESA Community profile, WESA newsletter registration and other WESA registrations. This will not necessarily remove previous public comments and other User Materials Submitted for public display on the WESA Services. The user understands that it may be impossible to delete personal information entirely because of backups and records of deletions.

### **Acceptance of Privacy Policy Terms**

WESA reserves the right to change this policy. Any changes to this policy will be posted to this page as soon as reasonably possible, so please check this page periodically. Use of the WESA Services constitutes consent to any policy then in effect. Please make sure that you read WESA's Terms of Use to understand additional terms and conditions which apply to the use of the WESA Services.

### **Links to other Sites and Services**

It is important to note that the WESA Services contain links to other sites, applications and services maintained by third parties that may not follow the same privacy policies as the WESA Services. For instance, clicking or tapping on a sponsorship notice or some third party logos on the WESA Services will take you to an entirely different site, application or service. These sites, applications and services may use cookies, collect data, and use the data in ways that the WESA Services would not. WESA is not responsible for the privacy practices or any information or materials on these other sites. Please visit these sites if you wish to review their privacy policies.

In some cases, the WESA Services may include certain embedded tools provided and controlled by third parties and governed by the terms and policies of the third parties. You should only use these third party tools if you agree to their respective terms and policies.

The WESA Services include a tool that allows you to sign in using information from your account with a third party service, such as Facebook, Twitter, Google, Yahoo, or LinkedIn. Please be aware that those third party services are unrelated to WESA, and that your use of the third party services is subject to the terms and policies of those services.

### **International User Notice**

For international users, please note that it may be necessary to transfer your information internationally and, in particular, your information may be transferred to and processed in the United States. For residents of the European Union: the data protection and other laws of other countries outside of the European Union may not be as comprehensive as those of the European Union. Please be assured that we take steps to ensure that your privacy is protected as described in this policy. By using this site, you agree to have your information used and transferred to the United States as set forth in this policy.

### **Questions**

If you have any questions or comments concerning our Privacy Policy, please contact us at 412-931-9131.