



Subtext Privacy Policy

Last Updated: January 24, 2024

Note for California Residents: This Policy describes how we collect, use, disclose, sell, share, and retain your personal information on our websites, in our apps, when you participate in one of our events, and your rights and choices over our processing of your personal information. The [Your Privacy Choices And Rights; Submitting Requests Under Applicable Local Laws](#) section below contains specific details related to your rights under California law, including your right to opt-out of "sales" and/or "sharing" of personal information and to limit the use and disclosure of your sensitive personal information.

This Privacy Policy ("Policy") describes how Alpha Group, a division of Advance Local Media LLC ("Alpha Group" "Advance Local" "we," "us," or "our") collect, use, disclose, and retain personal information about individuals that access, visit and/or use our proprietary text communication software-as-a-service known as Subtext ("Subtext") that links to or references this Policy (collectively, the "Services").

Alpha Group provides the Services to organizations who purchase Subtext ("Clients"). In providing the Service to our Clients, we collect, use, disclose, and retain information from Clients and individuals who register to be contacted by Client via text messages to individuals' mobile phones.

This Policy also describes the rights that you may have regarding our processing of your personal information under applicable local law.

By accessing or using any of our Services, you acknowledge and agree that your personal information will be handled as described in this Policy. Your use of the Services, and any dispute over privacy, is subject to this Policy and our User Agreement, including its applicable limitations of liability and the resolution of disputes. The Advance Local [User Agreement](#) is incorporated by reference into this Policy.

You may download a printable copy of this Policy (PDF): [here](#).

TABLE OF CONTENTS:

1. [Categories of Personal Information We Collect About You](#)
2. [How We Use Your Information And The Basis On Which We Use It](#)
3. [How We Disclose the Information We Collect](#)
4. [Our Use of Cookies and Related Technologies](#)
5. [Online Behavioral Advertising \(OBA\) and How to Opt-Out Of OBA](#)
6. [Your Privacy Choices And Rights; Submitting Requests Under Applicable Local Laws](#)
7. [Opt-Out of Marketing Communications](#)
8. [Security of My Information](#)
9. [Third Party Links](#)
10. [Be Careful Publicly Posting Personal Information](#)
11. [International Transfers](#)
12. [Children](#)
13. [Contact Us](#)

14. [Changes to this Policy](#)



1. Categories of Personal Information We Collect About You

Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to you. Depending on the Services you use, we may collect the following categories of personal information about you directly from you, automatically through your use of the Services, and from third parties.

- **Identifiers**, such as your name, signature, postal address, zip code, email address, telephone number, unique online identifier, IP address, user ID, device ID, or similar identifier.
- **Characteristics of protected classification under applicable law**, such as your gender, age (over 40), marital status, nationality, and country of origin.
- **Commercial information**, such as your purchase, registration, log-in and Services usage history.
- **Payment records**, such as your financial account information, credit card number, debit card number, or other payment card information, when necessary for the Services.
- **Internet or other electronic network activity**, such as your browser type and operating system; browsing history, clickstream data, search history on the Services, and information regarding your interaction with an internet website, application, email, newsletter, or advertisement, including access logs and other activity information related to your use of our Services; the length of time you visit our Services; and the referring URL, or the website or application that led you to our Services.
- **Geolocation data**, such as the general physical location of your device.
- **Audio, electronic, visual, thermal, olfactory, or similar information**, such as voice recordings, video recordings, physical characteristics or description, and photos.
- **Professional information**, such as occupation, employment history, professional contact information, education history, or other information provided by you in connection with the Services.
- **Inferences**, such as inferences drawn to create a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.
- **Sensitive personal information**, as defined under applicable local law, such as certain characteristics of protected classifications as defined above, account login credentials and passwords, and financial account information, credit card number, debit card number, or other payment card information.

Information We Collect Directly From You. We collect personal information directly from you when you use our Services, such as when you provide us with information online or at an in-person event (e.g., enter a contest, submit a survey, upload or otherwise provide content or comments). If you register for an account or set up a profile through our Services, we may collect your name, login credentials and password information, telephone number(s), postal address, email address, and information regarding your age, gender, or preferences (such as whether you want to receive newsletters). If you make a purchase through our Services, we may collect your financial account information, credit card number, debit card number, or other payment card information. If you contact us, we may collect information such as your name, email address, social media handles, the contents of a message or attachments that you may send to us, and other information that you choose to provide. We also may collect information that you provide about other people, for example, when you purchase one of our products as a gift.

Information We Collect From Other Sources. We collect personal information about you from other sources, such as third party consumer data suppliers/resellers, data enrichment providers and aggregators, advertising networks, data analytics providers, internet service providers, operating systems and platforms, data brokers, social networks, business contact databases, government entities, other users, and our parent, subsidiaries, affiliates and other related entities.



Social Network Integration. If you choose to interact with us on social networking services or use features, such as plugins, widgets, or other tools made available by third party social networking services in connection with our Service, we may collect personal information that has been made available to those services, including personal information about your contacts on those services. For example, some social networking services allow you to push content from our Service to your contacts or to pull information about your contacts so you can connect with them on or through our Service. Some social networking services also will facilitate your registration for our Service or enhance or personalize your experience on our Service.

Information We Collect Automatically. We, and our third party business partners, automatically collect personal information when you use our Services using cookies, pixel tags, clear GIFs, or similar technologies. This may include information such as your IP address and the types of personal information described above as "Internet or other electronic network activity." Please review our section below on "Our Use of Cookies and Related Technologies" for additional information regarding our use of cookies and related technologies.

2. How We Use Your Information

We use the categories of personal information described above for the following business and commercial purposes:

- **To Provide Our Services and Fulfill Your Requests.** We use your information to provide and maintain our Services, to process and fulfill your requests or orders, to communicate with you about your use of our Services, to respond to your inquiries, and for other customer service and business administration purposes.
- **To Improve Our Services.** We use your information to understand and analyze our user base and how you use the Services, to improve and enhance the Services, and to develop new products, services, features and functionality.
- **Identification and Authentication Purposes.** We may use your information for identification and authentication purposes. For example, when you enter your login ID and/or password to enter one of our registration or login portals, we use your credentials and password for authentication purposes.
- **Personalization.** We use your information to tailor the content and information that we may send or display to you, to offer location customization, to provide personalized offers, personalized help and instructions, and to otherwise personalize your experiences while using the Services.
- **Marketing and Promotional Purposes.** We may use your information to send you news and newsletters, event updates, and to communicate with you about new features, events, or products offered by us or our third party business partners, including our advertising, marketing, and sponsorship clients. We may also use your information to gather broad demographic information, to analyze trends, to seek compatible advertisers, sponsors, clients and customers, and to track users' movements around the Service and elsewhere on the internet or across apps or devices (including for "OBA" as described below). Your general geolocation data may specifically be used to show you content (including advertising and sponsored messaging) based on your general geographic location. Where required by applicable law, we will obtain your prior consent before using your personal information for marketing and promotional purposes.
- **Combining Information.** We (and our third party business partners) may merge, co-mingle, or otherwise combine information, including your personal information, in furtherance of the purposes described above.
- **To Comply With Legal Obligations.** We may use your information where we believe necessary to comply with our legal obligations or to exercise or defend our rights or the rights of a third party, including complying with law enforcement or government authority requests and participating in compliance audits.
- **To Protect Us and Others.** We may use your information where we believe necessary to investigate, prevent, or take action regarding suspected or actual illegal activities, fraud, situations involving potential threats to the safety of any person or to otherwise enforce this Policy or the integrity of the

Services.

- **Deidentified Data.** We may also deidentify or anonymize your data in such a way that you may not reasonably be re-identified by us or another party, and we may use this deidentified data for any purpose permitted under applicable law. To the extent we deidentify any data originally based on personal information, we will maintain and use such data in deidentified form and will not attempt to reidentify the data.

3. How We Disclose the Information We Collect

We may disclose each of the categories of personal information described above for our business and commercial purposes as follows:

- **Related Entities.** We may disclose the personal information we collect about you to our parent, subsidiaries, affiliates, and related entities, such as those listed at <https://www.advance.com/>.
- **Service Providers.** We may disclose the personal information we collect about you to service providers, contractors, and agents who perform functions and business operations on our behalf, for the purposes set out above. For example, we engage service providers to help us with technical maintenance, database management, fraud prevention, market research, community and forums management, auctions, e-commerce, list rental, data coop management, audience authentication, our products and product recommendations, and other advertising and marketing functionality, as well as credit/debit card or other payment processing, order fulfillment, credit pre-authorization, and address verification.
- **Third Parties.** We may disclose the personal information we collect about you through areas of the Services that may be managed or participated in by one or more of our third party business partners. This includes our Clients.

We may also disclose your personal information in the following circumstances:

- **Business Transfers.** If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected about you to the other company. As part of the business transfer process, we may disclose certain of your information to lenders, auditors, and third party advisors, including attorneys and consultants.
- **In Response to Legal Process.** We may disclose your personal information where we believe necessary to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We disclose your personal information where we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our User Agreement or this Policy, or as evidence in litigation in which we are involved.
- **Aggregate and Deidentified Information.** We may disclose aggregate, anonymized, or deidentified information about you for any purpose permitted under applicable law.
- **Consent.** We may disclose your personal information with your consent.

4. Our Use of Cookies and Related Technologies

Cookies/Local Device Storage. The Service will at times place and/or store code or other types of information and/or software on your device or within your browser, such as cookies, locally shared objects, and HTML5 (collectively, "Local Device Storage"). We and third party business partners may independently or in conjunction use Local Device Storage in connection with the Service in a way that



collects personal information for the purposes described in the respective privacy policies, including without limitation to determine whether you have seen a particular advertisement before on the same or different device and to otherwise control and tailor the display of ads to you based on your perceived preferences by collecting data to track the movements of individual users through the Service and elsewhere on the internet over time and across unaffiliated websites, apps, and devices, as well as to help diagnose problems with servers, to gather broad demographic information, to conduct research, to deliver editorial content, to record registration and personalization information, to inform offers that we may make to you, and to otherwise administer the Service. For example, if you register on any part of the Service and are given the option to save your username and password, we may provide this convenience to you via Local Device Storage.

- [You May Disable Local Device Storage](#). If you do not want Local Device Storage, your device, browser, or the settings menu within an application may include an option that allows you to not accept it. However, if you disable Local Device Storage, some portions of the Service may not function properly.
- [Tracking Technologies](#). In addition to Local Device Storage, we and/or our third party business partners may use web beacons, web bugs, internet or pixel tags, clear gifs, digital fingerprinting (aka "Machine Identification") and similar technologies (collectively, together with Local Device Storage, the "Tracking Technologies") on the Service, including in our communications with you, such as within e-mail and text messages, in-application push notifications, videos, and throughout your use of the Services. We and our third party business partners use Tracking Technologies to determine which messages have been opened by recipients, and for all or some of the same lawful purposes described above for use of Local Device Storage. For additional information see the Online Behavioral Advertising (OBA) section below.
- [Do Not Track \(DNT\)](#). Your browser setting may allow you to automatically transmit a "Do Not Track" (DNT) signal to websites and online services that you visit. There is no consensus as to what DNT means in this context, and since some browsers apply DNT signals by default it does not necessarily reflect our visitors' choice as to whether they wish to receive advertisements tailored to their interests. As a result, like many websites, we do not alter our practices when the Service receives a DNT signal from a visitor's browser. As discussed below, you may opt out of the use of your personal information for online behavioral advertising by third parties at any time. To find out more about DNT, please visit <http://allaboutdnt.com>.
- [Global Privacy Control \(GPC\) and similar privacy preference signals](#). Where required by applicable local law, and as further described in the [Your Privacy Choices and Rights; Submitting Requests Under Applicable Local Laws](#) section below, we honor user-initiated browser based opt-out preference signals recognized under applicable local law, such as the Global Privacy Control (GPC). To find out more about GPC, please visit <https://globalprivacycontrol.org/>.

5. Online Behavioral Advertising (OBA) and How to Opt-Out Of OBA

- [How OBA Works](#). We and our third party business partners, use Tracking Technologies on the Service for purposes of "online behavioral advertising" (OBA). OBA allows the serving of advertisements tailored to perceived interests inferred by your browsing on the Service and on other sites, applications, destinations, and services, over time and across unaffiliated websites, apps, and services, using the same or a different device. To enable OBA, we and our third party business partners, independently use Tracking Technologies to collect certain information, some of which may be deemed personal information, including for example the make, model, settings, specifications (e.g., CPU speed, connection speed, browser type, operating system, device identifier, online identifier) and geographic location of your device, as well as date/time stamp, IP address, pages visited, time of visits, content viewed, ads viewed, the site(s), application(s), destination(s), and/or service(s) you arrived from, and other clickstream data. Your email address may also be used by us, in coordination with third party audience authentication service providers to enable OBA.
- [Opt-Out of OBA](#). If you do not want OBA, you may be able to opt-out by visiting www.aboutads.info, www.networkadvertising.org, www.youronlinechoices.com, and/or by clicking the "Ad Choices" icon that appears in advertising served through OBA. Please note that these opt-out options only apply to tracking by third party business partners using cookie-based

OBA across this Service and other sites, applications, destinations, and services, and not tracking among pages within the Service itself. As may be required under applicable law, to opt-out of OBA enabled by use of your email address in coordination with audience authentication providers, visit https://optout.liveramp.com/opt_out, or see the [Your Privacy Choices and Rights; Submitting Requests Under Applicable Local Laws](#) section below.



6. Your Privacy Choices And Rights; Submitting Requests Under Applicable Local Laws

You may have certain rights regarding our processing of your personal information under applicable local law, including if you are a consumer in California, Colorado, Connecticut, or Virginia. If our processing of your personal information is governed by such laws, this section provides you with additional information regarding your rights and our processing of your personal information under applicable local law.

Our processing of your personal information

As may be required under applicable local law, below is a chart that describes our business and commercial purposes for processing your personal information, as well as the categories of third parties to whom we may disclose, "sell," or "share" the categories of personal information described above for our business and commercial purposes.

We shall **not** (i) collect, retain, use, or disclose personal information for any purpose other than to operate Subtext or as otherwise permitted under the CCPA; or (ii) sell, rent, lease, disclose, disseminate, make available, transfer, or otherwise communicate by any means personal information for monetary or other valuable consideration.

Category of personal information	Our business or commercial purposes for processing	Categories of third parties to whom we may disclose personal information for a business purpose	Categories of third parties to whom we may "sell" or "share" personal information

<p>Identifiers</p>	<ul style="list-style-type: none"> • To provide our services and fulfill your requests • To improve our services • Identification and authentication purposes • Personalization • Marketing and promotional purposes • To comply with legal obligations • To protect us and others 	<ul style="list-style-type: none"> • Data storage and security providers • Order fulfillment providers • Payment processors • Database management providers • Advertising, marketing, social media, subscription sales and advertising facilitating companies • List rental providers, data coops • Audience authentication providers • Community & forum management providers • Market research & data enrichment providers • E-commerce providers • Companies that help with our products and product recommendations • Related entities, such as our parent, subsidiaries and affiliates • Professional advisors (such as lawyers, accountants, and consultants) • Governmental and law enforcement officials, or parties to legal proceedings 	<p>None.</p>
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<p>Protected characteristics</p>	<ul style="list-style-type: none">• To provide our services and fulfill your requests• To improve our services• Identification and authentication purposes• Personalization• Marketing, advertising, and promotional purposes• To comply with legal obligations• To protect us and others	<ul style="list-style-type: none">• Data storage and security providers• Order fulfillment providers• Database management providers• Advertising, marketing, social media, subscription sales, and advertising facilitating companies• Community & forum management providers• Market research & data enrichment providers• Companies that help with our products and product recommendations• Related entities, such as our parent, subsidiaries and affiliates• Professional advisors (such as lawyers, accountants, and consultants)• Governmental and law enforcement officials, or parties to legal proceedings	<p>None.</p>
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<p>Commercial information</p>	<ul style="list-style-type: none"> • To provide our services and fulfill your requests • To improve our services • Identification and authentication purposes • Personalization • Marketing and promotional purposes • To comply with legal obligations • To protect us and others 	<ul style="list-style-type: none"> • Data storage and security providers • Order fulfillment providers • Payment processors • Database management providers • Advertising, marketing, social media, subscription sales, and advertising facilitating companies • List rental providers, data coops • Community & forum management providers • Market research & data enrichment providers • E-commerce providers • Companies that help with our products and product recommendations • Related entities, such as our parent, subsidiaries and affiliates • Professional advisors (such as lawyers, accountants, and consultants) • Governmental and law enforcement officials, or parties to legal proceedings 	<p>None.</p>
<p>Payment Records</p>	<ul style="list-style-type: none"> • To provide our services and fulfill your requests • To improve our services • Identification and authentication purposes • To comply with legal obligations • To protect us and others 	<ul style="list-style-type: none"> • Payment processors • Order fulfillment providers 	<p>None.</p>

<p>Internet or other electronic network activity</p>	<ul style="list-style-type: none"> • To provide our services and fulfill your requests • To improve our services • Identification and authentication purposes • Personalization • Marketing and promotional purposes \ • To comply with legal obligations • To protect us and others 	<ul style="list-style-type: none"> • Data storage and security providers • Order fulfillment providers • Payment processors • Database management providers • Advertising, marketing, social media, subscription sales, and advertising facilitating companies • List rental providers, data coops • Community & forum management providers • Market research & data enrichment providers • E-commerce providers • Companies that help with our products and product recommendations • Related entities, such as our parent, subsidiaries and affiliates • Professional advisors (such as lawyers, accountants, and consultants) • Governmental and law enforcement officials, or parties to legal proceedings 	<p>None.</p>
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<p>Geolocation data</p>	<ul style="list-style-type: none"> • To provide our services and fulfill your requests • To improve our services • Identification and authentication purposes • Personalization • Marketing and promotional purposes • To comply with legal obligations • To protect us and others 	<ul style="list-style-type: none"> • Data storage and security providers • Order fulfillment providers • Payment processors • Database management providers • Advertising, marketing, social media, subscription sales, and advertising facilitating companies • Community & forum management providers • Market research & data enrichment providers • E-commerce providers • Companies that help with our products and product recommendations • Related entities, such as our parent, subsidiaries and affiliates • Professional advisors (such as lawyers, accountants, and consultants) • Governmental and law enforcement officials, or parties to legal proceedings 	<p>None.</p>
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<p>Audio, electronic, visual, thermal, olfactory, or similar information</p>	<ul style="list-style-type: none"> • To provide our services and fulfill your requests • To improve our services • Identification and authentication purposes • Personalization • Marketing and promotional purposes • To comply with legal obligations • To protect us and others 	<ul style="list-style-type: none"> • Data storage and security providers • Order fulfillment providers • Payment processors • Database management providers • Companies that help with our products and product recommendations • Related entities, such as our parent, subsidiaries and affiliates • Professional advisors (such as lawyers, accountants, and consultants) • Governmental and law enforcement officials, or parties to legal proceedings 	<p>None.</p>
<p>Professional information</p>	<ul style="list-style-type: none"> • To provide our services and fulfill your requests • To improve our services • Identification and authentication purposes • Personalization • Marketing and promotional purposes • To comply with legal obligations • To protect us and others 	<ul style="list-style-type: none"> • Data storage and security providers • Order fulfillment providers • Advertising, marketing, social media, subscription sales, and advertising facilitating companies • Market research & data enrichment providers • E-commerce providers • Companies that help with our products and product recommendations • Related entities, such as our parent, subsidiaries and affiliates • Professional advisors (such as lawyers, accountants, and consultants) • Governmental and law enforcement officials, or parties to legal proceedings 	<p>None.</p>

Inferences	<ul style="list-style-type: none">• To provide our services and fulfill your requests• To improve our services• Identification and authentication purposes• Personalization• Marketing and promotional purposes• To comply with legal obligations• To protect us and others	<ul style="list-style-type: none">• Data storage and security providers• Order fulfillment providers• Database management providers• Advertising, marketing, social media, subscription sales, and advertising facilitating companies• Community & forum management providers• Market research & data enrichment providers• E-commerce providers• Companies that help with our products and product recommendations• Related entities, such as our parent, subsidiaries and affiliates• Professional advisors (such as lawyers, accountants, and consultants)• Governmental and law enforcement officials, or parties to legal proceedings	None.
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Information that may be treated as sensitive under applicable local law	<ul style="list-style-type: none"> • To provide our services and fulfill your requests • To improve our services • Identification and authentication purposes • Personalization • Marketing and promotional purposes • To comply with legal obligations • To protect us and others 	<ul style="list-style-type: none"> • Data storage and security providers • Order fulfillment providers • Payment processors • Database management providers • Advertising, marketing, social media, subscription sales, and advertising facilitating companies • Companies that help with our products and product recommendations • Related entities, such as our parent, subsidiaries and affiliates • Professional advisors (such as lawyers, accountants, and consultants) • Governmental and law enforcement officials, or parties to legal proceedings 	None.
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To opt-out of receiving text messages, you can text **STOP** at any time to unsubscribe or email subscribers@joinsubtext.com.

Please see our section below on Your Privacy Choices and Rights; Submitting Requests for additional details.

Retention

Your personal information will be held for only so long as it is necessary for the purpose for which it was originally collected, and in accordance with applicable local law. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy. When assessing retention periods, we first examine whether it is necessary to retain the personal information collected and, if retention is required, work to retain the personal information for the shortest possible period permissible under applicable law.

Your Privacy Choices and Rights; Submitting Requests Under Applicable Local Laws

Depending on the jurisdiction in which you live, including if you are a consumer in California, Colorado, Connecticut, or Virginia, you may have the following rights under applicable local law:

- request information about our processing of your personal information (right to know);
- request a copy of your personal information (right to access);
- rectify, correct, or update the personal information we hold about you (collectively right to correct);
- request deletion of your personal information;
- opt-out of "sales" of personal information or "sharing" of personal information for cross-contextual behavioral advertising purposes (as these terms are defined under applicable law);
- opt-out of targeted advertising;
- restrict or limit our use of your personal information or your sensitive personal information (right to restrict);
- object to our use of your personal information;



- where you have provided consent, withdraw such consent to our processing of your personal information at any time;
- ask that we transfer the personal information we maintain about you to another organization, or to you, in certain circumstances (right to portability);
- not be unlawfully discriminated against for exercising your rights;
- lodge a complaint.

These rights may be limited or denied in some circumstances. For example, we may retain your personal information where required or permitted by applicable law.

To learn more about your rights to limit our use and disclosure of sensitive personal information under applicable local law, please see the section below on Submitting Requests.

Submitting Requests

To exercise your rights under applicable local law or if you are an authorized agent or parent or guardian seeking to exercise rights on behalf of a minor in accordance with applicable local law (specifically, including California, Colorado, Connecticut, and Virginia) please follow the instructions provided below.

NOTE: Alpha Group does not (i) collect, retain, use, or disclose your personal information for any purpose other than to operate Subtext for our Clients or as otherwise permitted under the CCPA; or (ii) sell, rent, lease, disclose, disseminate, make available, transfer, or otherwise communicate by any means your personal information for monetary or other valuable consideration. In addition, any third party may not sell or share your personal information unless you have received explicit notice and is provided an opportunity to exercise the right to opt-out pursuant to CCPA and/or applicable law.

- To exercise your right to opt-out of our "sale" or "sharing" of your personal information, to opt out of the use of your personal information for targeted advertising purposes, or to limit our use of your sensitive personal information (collectively "Opt-Out"), as may be available to you under applicable local law please see the below.
 - To Opt-Out of such uses through online sales and shares on or in connection with the Services, click this [Your Privacy Choices](#) link (which can also generally be found in the Service's footer (if a website) or settings/about menu (if an application)). You will need to flip a toggle or take other action, such as submitting a form, as described in the Your Privacy Choices webpage. Toggle settings are generally browser-, Service-, and device-specific and may reset if cookies are cleared. If you have any questions or need assistance exercising your rights, please contact our Privacy Policy Coordinator by [email](#) or as described at the end of this document.
 - To Opt-Out of receiving text messages via Subtext, respond to any of our text messages with the following reply: **STOP**. In addition, you may also fill out this [form](#) or call 1-888-914-9661 and use PIN 981105.
- To exercise your rights to know, access, correct, delete, restrict, object, or portability, under applicable local law as described above, contact us at 1-888-914-9661, using the PIN 981105, or submit a request by completing this [form](#).

California residents may view metrics for California Consumer Privacy Act ("CCPA")-related requests we have received during calendar year 2021, by clicking [here](#).

Verification

We reserve the right to take reasonable steps to verify your identify before fulfilling your requests to know, correct, or delete. For example, we may seek to establish your identity to a reasonable or a reasonably high degree of certainty by matching information that you submit alongside your request with information that we have in our records. We may ask you or your authorized agent for supplemental information as needed to establish your identity. Authorized agents may also be required to provide a copy of the consumer's signed permission authorizing the agent to submit requests on the consumer's behalf under applicable local law.

Appeals

You may have a right to appeal a decision we make relating to requests to exercise your rights under applicable local law. To appeal a decision, please contact us our Privacy Policy Coordinator by email or as described at the end of this document.

California Online Erasure. California's "Online Erasure" law, Business and Professions Code §§ 22580-22582, requires operators of certain websites and online services to allow registered users who are under the age of 18 and residents of California to request removal of content they post. If you fit that description and posted content on a section of our Service that is directed to California residents at least 13 and younger than 18 years of age, you may request removal of the content by contacting our Privacy Policy Coordinator by [email](#) or as described at the end of this document. In response to your request, we may elect to make the content invisible to other users and the public (rather than deleting it entirely), in which case the content may remain on servers we control and/or may be publicly available elsewhere if a third party copied and reposted the content.



7. Opt-Out of Marketing Communications

If you do not wish to receive future marketing or other commercial messages from us, simply follow the unsubscribe instructions contained within the message you receive. Note, however, that you may continue to receive certain communications from us that are necessary for the Service, such as renewal notifications, invoices, technical notices, updates, security alerts, and support and administrative service bulletins.

8. Security of My Information

We implement physical, technical, and organizational security measures designed to safeguard personal information. These measures are aimed to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee security.

9. Third Party Links

When you opt-in to receive text messages from our Clients, you may receive text, links, images, GIFs, video, emojis, and other rich media as part of the Services. Therefore, our Services may contain links to third-party websites and applications, including our Clients websites and applications. . Any access to and use of such linked websites and applications is not governed by this Policy, but is instead governed by the privacy policies of those third-party websites and applications, including our Clients websites and applications. We are not responsible for the information practices of such third party websites and applications. We encourage you to review the privacy policies of any third-party websites or applications that you choose to visit.

10. Be Careful Publicly Posting Personal Information

Please be aware that content and personal information that you disclose in publicly accessible portions of the Service, including what you text to Clients, may be available to other users, and may also be made available outside the Service by third parties, so you should be mindful of all personal information, especially sensitive personal information, that you may wish to post. To the extent required by applicable local law, we may require that you obtain the consent of any individual whose personal information you post on our Services.



11. International Transfers

Your personal information may be processed, transferred to, and maintained on servers and databases located outside of the jurisdiction in which you are based and where the privacy laws may not be as protective as your jurisdiction. Where required by applicable law, we have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below in the "Contact Us" section of this Policy.

12. Children

Our Services are not designed for children under the age of 13. If we discover that a child under the age of 13 has provided us with personal information, we will delete such information from our systems.

13. Contact Us

If you have any questions about the privacy aspects of our Services or would like to make a complaint, request, or have a question about your rights under this policy please contact our Privacy Policy Coordinator:

Privacy Policy Coordinator
Advance Local Media LLC
30 Montgomery Street
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Make sure to include enough information for us to help you, including for example your name, contact information, and the specific website, mobile site, application, and/or other service you're contacting us about.



14. Changes to this Policy

This Policy is current as of the Last Updated date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Services. If we make any changes to this Policy that materially affect our practices with regard to the information we have previously collected about you, we will endeavor to provide you with notice in advance of such change by highlighting the change on the Service.

If you don't agree to the terms contained in this Policy, you must immediately exit Subtext.



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