



This Privacy Policy (“Policy”) describes how Campus Multimedia, LLC, and its subsidiaries (collectively, “CM” or “we,” “our” or “us”) treats personal information we collect about you through our websites, mobile, and other online applications, product, services, and platforms (the “Platform”) where the Policy is located. **Please note that this Policy does not apply to personal information collected directly by the organizations to which we partner with or we provide our products and services, including high schools. If you have questions about the privacy practices of those organizations, please contact them directly.**

If you are a child (under 13 years old) and need help understanding this Privacy Policy, you should ask a grown-up to read it and explain it to you.

This Platform is operated in the United States and intended for use by individuals who are located in the United States and Canada. By using our Platform or by choosing to give us personal information, you signify your consent to this Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not use the Platform, and do not give us any personal information.

If you are a resident of California, see below for our California Privacy Notice. Additionally, if you’re a resident of Colorado, Connecticut, Virginia, or Utah, see below for our Your State Privacy Rights.

This Policy contains the following sections:

1. Types of Personal Information We Collect
2. How We Collect Personal Information
3. How We Use Personal Information
4. How We Share Your Personal Information
5. California Privacy Notice
6. Your State Privacy Rights
7. Children Under 18
8. Choices Regarding Your Information
9. Cookie Notice
10. How Long Your Personal Information Is Kept
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## 1. TYPES OF PERSONAL INFORMATION WE COLLECT

- **Identifying Information.** For example, we may collect your name, business or personal address, unique personal identifiers, online identifiers, telephone number, and email address. We may also collect your mobile phone number.
- **Account Information.** If you create an account on our Platform, we may collect your account log-in and password.
- **Social Media Information.** We may collect personal information and photographs you post on our social media pages. We may also collect your social media profile information and personal information posted on your page.
- **Billing Information.** For example, this may include your billing address and your preferred method of payment. Through our service providers, we may also collect your credit or debit card information.
- **Employment Information.** For example, this may include the name and address of your employer and your job title. If you apply for a job with us, we may also collect the personal information you include in your application and your employment history. We may also collect information about your education history.
- **School Information.** If you are a student, we may collect the name of your school, class year, and whether you play a sport.
- **Commercial Information.** We may collect personal information that could identify you and relates to the services in which you are interested or have considered. We may also collect personal information about your consuming history or tendencies.
- **Information You Post or Submit.** We may collect personal information you post in a public space on our Platform. We may collect personal information that you submit when you contact our customer service team or your account representative. We may also collect information when you enter a promotion or complete a survey.
- **Demographic Information.** We may collect demographic information, such as your birthdate, age, and zip/postal code. We may also collect your race and gender.
- **Device Information.** For example, we may collect the type of device you use to access our Platform. We may also collect your browser information, device identifier, IP address, or operating system type.
- **Location Information.** For example, we may collect information about the city or state where you are located. We may also collect geographic information based on your IP address.
- **Usage Information.** For example, we may collect information about how you use our products or services. This includes collecting information about your interactions with the Platform.
- **Internet Information.** If you use our website, we may collect information about the browser

you are using or your browsing or search history. We might look at what site you came from, or what site you visit when you leave us. We may also collect information about how you interact with an advertisement.

## 2. HOW WE COLLECT PERSONAL INFORMATION

- **Directly From You.** For example, when you:
  - Register for an account.
  - Request information about our products or services.
  - Sign up to receive promotional communications or a newsletter.
  - Complete a survey.
  - Participate in one of our promotional sweepstakes, contests, surveys, or focus groups.
  - Submit information to, or through, our Platform.
  - Submit a request to, or engage with, our customer service team.
  - Interact with our social media pages.
  - Apply for a job through our platform.
- Otherwise interact with us.
- **Passively.** For example, when you:
  - Visit and navigate our platforms on any device.
  - Enable location-based features on our platforms.
- **From Third Parties.** We may receive personal information about you from other sources. For example. This may include receiving personal information from:
  - Our business partners, including online advertising networks, analytics vendors, and third parties that promote our products via their own platforms.
  - Social media sites or job posting sites, including Facebook, Twitter, Snapchat, TikTok, LinkedIn, Pinterest, Glassdoor, YouTube, and Instagram.
  - Promotional sweepstakes, contests, surveys, or focus groups of our groups conducted in conjunction with us.
- **Combining Information.** For example, we may:
  - Combine personal information that we collect offline with personal information we collect through our Platform.
  - Combine personal information we collect about you from the different devices you use to access our Platform.
  - Combine personal information we get from third parties with information we already have about you.

### 3. HOW WE USE YOUR PERSONAL INFORMATION

Examples of how we may use your personal information include:

- **To Provide Our Products and Services.** This could include fulfilling your requests for products and services.
- **To Improve Our Products and Services.** We may use your personal information to make our Platform, products, and services better. We may also use your personal information to customize your experience with us.
- **To Understand Your Interests.** For example, we may use your personal information to better understand what interests you.
- **To Respond to Your Requests or Questions.** This may include responding to your feedback or notifying you if you win a promotion.
- **To Communicate with You.** We may communicate with you about your account or our relationship. We may also contact you about this Policy or our Platform terms and conditions.
- **To Determine Your Eligibility.** We may use your personal information to verify your identity or determine your eligibility for some of our services or promotions. For example, this may include verifying your age, date of birth, and state of residence. If you apply for a job through our Platform, we may use this personal information to evaluate your application.
- **For Marketing Purposes.** We may provide you with information about new products and special offers. We might use your personal information to serve you ads about our offers. We might tell you about new features or updates. These might be third-party offers or products we think you might find interesting. We may also use your personal information to send you electronic communications, including through email or text message. We and our partners may engage in interest-based advertising using information gathered across multiple websites, devices, or other platforms. For more information about your choices related to these communications, see the **Choices Regarding Your Information** section below.
- **For Security Purposes.** This could include protecting our company and consumers who use our services. It may also include protecting our Platform or investigating a potential fraud.
- **To Create De-Identified Information.** We may anonymize, aggregate, strip, or otherwise de-identify personal information of identifying characteristics and may use or share that data with third parties for any purpose we deem appropriate.
- **As Otherwise Permitted or Required By Law or As We May Notify You.** This includes using your information for our legitimate business needs.
- **Location Information.** For example, we may collect information about the city or state where you are located. We may also collect geographic information based on your IP address.
- **As Requested Or Directed By You.**

#### 4. HOW WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information in the following ways:

- **Internally.** We may share your personal information with our affiliates and subsidiaries for the purposes described in this Policy. This may include sharing information with other entities within the CM family of companies.
- **On Our Platform.** For example, we may publicly display personal information you post on our social media sites or submit through our customer reviews feature. We may also display information you submit in connection with a promotion.
- **With Our Service Providers.** We may share your personal information with third parties who perform services on our behalf. For example, this may include merchandise vendors. It may also include companies that send emails on our behalf or help us run our Platform.
- **With Our Business Partners.** For example, we may also share personal information with social media sites, advertisers, media buying agencies and advertising service providers for the purposes described in this Policy. We may also share personal information with companies that help us learn more about our customers.
- **With Third Parties for Marketing Purposes.** This may include third parties in whose products or services we believe you may be interested. These third parties may also share your personal information with others. These third parties may use your personal information for their own marketing purposes or the marketing purposes of others. This may include the delivery of interest-based advertising.
- **With Any Successors to All or Part of Our Business or One of Our Brands.** For example, this may occur if CM merges with, is acquired by, or sells a brand or part of its business to another business entity. This may include an asset sale, corporate reorganization or other change of control. We may sell or transfer our customer personal information as an asset or as part of a larger transaction action.
- **To Comply with the Law or To Protect Ourselves.** For example, this could include responding to a court order or subpoena. It could also include sharing personal information if a government agency or investigatory body requests. We might share personal information when we are investigating a potential fraud. This could include fraud we think has occurred during a sweepstakes or promotion. We may also share information if you are the winner of a sweepstakes or other contest with anyone who requests a winner's list.
- **For Security Purposes.** This could include protecting our company and consumers who use our services. It may also include protecting our Platform or investigating a potential fraud.
- **As Requested Or Directed By You.** This may include instances where you ask us to share your personal information with a third party, including a university or a marketing vendor.
- **For Other Reasons We May Describe to You at the Time of Collection.**

#### 5. CALIFORNIA PRIVACY NOTICE

The California Consumer Privacy Act (“CCPA”) requires us to make specific disclosures about how we collect, use, and share the personal information of California residents who are subject to CCPA. CCPA also grants such California residents certain rights related to their personal information. This section describes our personal information practices offline and online, and contains these required disclosures and instructions for California residents who wish to exercise their rights under CCPA.

Please note that, to the extent permitted under CCPA, this section does not apply to the personal information of California residents that we collect:

- From our workforce members for employment-related purposes
- In the course of certain business-to-business transactions
- For or on behalf of our business customers, including colleges and universities, in connection with our provision of our products and services to those customers. **If you have questions about the privacy practices of our customers or wish to exercise your privacy rights with respect to the personal information that we collect on their behalf, please contact them directly.**

**We are required under CCPA to tell you which categories of “personal information” we collect, and which of these categories we disclose for “business purposes” or for “sale” purposes as these terms are defined under CCPA.**

- In the past 12 months, we have collected the following categories of personal information from California residents: identifiers; categories of personal information described in subdivision (e) of Section 1798.80, including physical characteristics or description; commercial information; internet or other electronic network activity information; audio, electronic and visual information; geolocation information; professional or employment-related information; education information; and inferences drawn from the categories in this paragraph.
- **We may disclose any of the above categories of personal information for “business purposes” as this term is defined in CCPA.**
- We may collect personal information as described in the “**HOW WE COLLECT YOUR PERSONAL INFORMATION**” section of this Policy
- We may use personal information we collect for “business purposes” and “commercial purposes” as these terms are defined in CCPA. These purposes are as described in the “**HOW WE USE YOUR PERSONAL INFORMATION**” section of this Policy. .
- We may share personal information we collect with third parties as described in the “**HOW WE SHARE YOUR PERSONAL INFORMATION**” section of this Policy.

**California resident rights under CCPA.** Subject to certain exclusions included in CCPA, and as relevant to our operations, California residents have the rights listed below. We may take steps to verify your identity, as permitted or required under CCPA, before we process your request. Verification may include asking you to provide information about yourself that we can match

against information already in our possession.

- **Notice.** This means that you can request that we disclose the categories of personal information we have collected about you; the categories of sources from which such personal information is collected; the categories of personal information we have “sold” or disclosed for a business purpose; the categories of third parties to whom the personal information was “sold” or disclosed for a business purpose; and the specific pieces of personal information we have collected about you in the last 12 months.
- **Deletion.** This means that you can request that we delete personal information about you which we have collected from you.
- **Correction.** This means that you can request that we correct any of your personal information which we collected from you that is inaccurate.
- **Opt-Out.** CCPA provides a right to opt-out of the “sale” of personal information as that term is defined in CCPA. If you would like to opt out of allowing CM to “sell” your personal information, please follow the instructions below. In addition, if you would like to limit the cookies and other tracking tools used on Platform, please visit our [About Our Ads](#) policy. As stated in that policy, certain choices you make may be browser and device specific.
- **Limitation.** CCPA provides a right to limit the use and disclosure of sensitive information collected from you.
- **Equal prices and services.** This means that we are prohibited from discriminating against you if you exercise your rights under CCPA.

Agents that you have authorized to act on your behalf may also submit CCPA requests as instructed below. The agent must also provide evidence that they have your written permission to submit a request on your behalf. If we are unable to verify the authenticity of a request, we may ask you for more information or may deny the request.

**For minors who are under the age of 13 years of age and are California residents, our obligations to your data are consistent with those found under the Children Under 18 section below. For minors who are between the age of 13 and 16, we have the obligation to receive your consent to opt-in to the sale or sharing of your personal information.**

**California residents who wish to exercise their rights under this section can contact us at [hello@campusmultimedia.com](mailto:hello@campusmultimedia.com). Please include your name, email address and indicate you are a California resident making a “CCPA” request. Please also identify the relevant CM entity or entities to which your request relates.**

**Additional Information about your California Rights.** If you reside in California, you have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email

at [hello@campusmultimedia.com](mailto:hello@campusmultimedia.com) or write to us at the address listed below. Indicate in your email or letter that you are a California resident making a “California Shine the Light” inquiry. Please also identify the relevant CM entity or entities to which your request relates. **Note that this section does not apply to personal information that we collect for or on behalf of our business customers, including high schools, in connection with our provision of our products and services to those customers. If you have questions about the privacy practices of our customers or wish to exercise your privacy rights with respect to the personal information that we collect on their behalf, including high schools, please contact them directly.**

## 6. YOUR STATE PRIVACY RIGHTS

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the nature of the personal data and the purposes of the processing of the consumer’s personal data.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights or to appeal a decision regarding a consumer rights request, please email [hello@campusmultimedia.com](mailto:hello@campusmultimedia.com).

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: [hello@campusmultimedia.com](mailto:hello@campusmultimedia.com). However, please know we do not currently sell data triggering that statute's opt-out requirements.

## 7. CHILDREN UNDER 13

We operate online services that are general audience services and do not knowingly collect personal information as defined by the Children’s Online Privacy Protection Act (“**COPPA**”) from children under the age of 13 (“**child**” or “**children**”), except as may be permitted by COPPA and explained in this Children’s Privacy Policy. If you are a parent or guardian and believe that we have collected such personal information other than as permitted by COPPA, please contact us as noted below. Occasionally, we may have special sections of our services that are intended for children, in whole or in part. In such cases, this Children’s Privacy Policy shall apply.

This Children’s Privacy Policy explains our information collection, disclosure, and parental consent practices with respect to personal information provided by children. This Children’s Privacy Policy is in accordance with COPPA. For more information about COPPA and general tips about protecting children’s online privacy, please visit the Federal Trade Commission’s



website at [http://www.business.ftc.gov/documents/0493-Complying-with-COPPA-Frequently-Asked-Questions#General Questions](http://www.business.ftc.gov/documents/0493-Complying-with-COPPA-Frequently-Asked-Questions#General%20Questions).

## Children's and Mixed Use Sections of Our Services

Although we are a general audience service, we may from time-to-time have special sections intended, in whole or in part, for children. Where such section is directed to children, but not predominantly so, (a "Mixed-use" service) we may, consistent with COPPA, age-screen users and treat users based on their self-reported age. Sections directed predominantly to children will assume all users are children, absent verification otherwise using COPPA's verified parental consent methods. However, we need not use that process if our uses of the information we collect does not require verified parental consent under COPPA. In such cases, we still intend to comply with the other provisions of COPPA.

In the event that we become aware that we have collected personal information from any child, we will dispose of that information, or otherwise treat it in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of thirteen (13) has provided us with personal information, please contact us at [\*\*hello@campusmultimedia.com\*\*](mailto:hello@campusmultimedia.com).

## What About Contests and Sweepstakes?

From time to time, we may host promotions (such as contests or sweepstakes) that allow entry by children. In order to enter these contests, users may be asked to submit information such as their first name, e-mail address, gender, date of birth, and content submissions. On our Mixed-use services, we may use an age screening mechanism to determine whether users are under the age of 13 at the time of entry. Where a user indicates he or she is under the age of 13 at the time of entry on a Mixed-use service, or in all cases for a predominately child-directed portion of a service, we may use the child's online contact information to notify him or her as to what to give his or her parents to complete the promotion process. Or, we may set up a system for multiple contacts with the child regarding the promotion, in which case we will also obtain the parent's e-mail and give the parent notice and an opportunity to unsubscribe the child, as required by COPPA. In either case, we will not use such e-mails for other purposes not permitted by COPPA, such as marketing.

## Parental Choices and Controls

At any time, parents can refuse to permit us to collect further personal information from their children, and can request that we delete from our records the personal information we have collected in connection with those children. Parents can request access to, change, or delete their child's personal information by contacting us [here](#). To protect children's privacy and security, we will take reasonable steps to help verify a parent's identity before granting access to any personal information.

## When Information Collected From Children Is Available To Others

In addition, and notwithstanding anything to the contrary, we may share or disclose personal information collected from children in a limited number of instances as permitted by COPPA, including the following:

- We may share information with our service providers if necessary for them to perform

- certain “internal operations” (as defined by COPPA) functions for us.
- We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency’s (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.
- As otherwise permitted or required by COPPA or other applicable law.

## **8. CHOICES REGARDING YOUR INFORMATION**

You have certain choices about how we use your personal information. Certain choices you make are browser and device specific.

### **Marketing Communications:**

You can opt out of receiving our marketing communications. Note that you may still receive transactional messages from us, including information about your account and responses to your inquiries. To opt out of receiving our marketing communications, you can follow the instructions contained in the communication.

### **Cookies & Other Tracking Technologies:**

For information about our use of cookies and other tracking technologies and to read our “Do Not Track” policy, please review our Cookie policy below.

### **Canadian Resident Rights – Accessing and Correcting Your Information**

If you are a resident of Canada, you have a right to request access to your personal information and to request a correction to it if you believe it is inaccurate. If you would like to have access to the personal information we have about you, or if you would like to have it corrected, please contact us using the contact information provided below. In some cases, we may not be able to allow you to access certain personal information in certain circumstances, for example if it contains personal information of other persons, or for legal reasons. To help protect against fraudulent requests for access to your personal information, we may ask you for information to allow us to confirm that the person making the request is you or is authorized to access your information before granting access. For example, we may require you to verify your identity before you access your personal information.

## **9. COOKIE NOTICE**

Where permitted by law, non-personally identifiable information and data may be automatically collected through the standard operation of our internet service or through the use of “cookies” or “internet tags” or other similar techniques. We use technologies such as local storage and cookies to store an access token on your browser which enables us to recognize you and your preferences. We do this specifically to (i) ensure the website functions properly; (ii) track you

within the website; (iii) enhance user experience; (iv) conduct analytics to improve the website; (v) prevent fraudulent use of the website; and (iv) diagnose and repair technical errors within the website and, in case of abuse, track and mitigate the abuse. We use four types of cookies:

- **Essential (Necessary) Cookies:** These are placed on your computer to let our website function as intended, by allowing the pages to display correctly. Without these, our website would be prevented from working and would be unusable.
- **Preferences & Functionality Cookies:** These cookies allow our website to remember how our site behaves or looks based on your preferences (e.g. your preferred language or the region you are in). These cookies can also assist you in changing text size, font, and allow you to personalize the pages based on your preferences. These cookies help enhance your experience and disabling these may make our website less functional; disabling these cookies, however, should not prevent our website from working.
- **Marketing Cookies:** These cookies allow our website to collect data in order to track the effectiveness of advertisements placed on our website. These cookies help enhance your experience by allowing us to provide a more relevant service and deliver better advertisements that better suit to your interests and needs.
- **Third-Party Analytics Cookies:** The only third-party cookies we use are analytics cookies. The use of analytics cookies allows us to improve the website and enhance user experience. The analytics cookies set on your browser allow us to recognize and count the number of users to the website, see when users are using the website, and see how users interact with the website and its different functions. Analytics cookies show us which of the website pages are most frequently viewed and help us record any difficulties you have with the website. We use Google Analytics, also known as G4, with restricted data processing enabled, to collect information on your use of the Website to improve our website. Because we have enabled restricted data processing for Google Analytics, the use of this information for analytics is not considered a sale under any applicable state privacy act. Google Analytics may also receive information about you from applications you have downloaded that partner with Google. We do not combine the information collected through Google Analytics with any personally identifiable information that you may provide to us. Google's ability to use and share information collected by Google Analytics about your visits to our website or to another application that partners with Google is restricted by the Google Analytics Terms of Service, "How Google Use Your Information from Sites" and Google Privacy Policy. To prevent your data from being used by Google Analytics, you can download the Google Analytics opt-out browser add-on [here](#).

**How to restrict cookies:** You may restrict or block web browser cookies on your computer or device through your browser settings (usually found under "privacy" or "ads"). You may also limit cookies by clicking on the "Settings" button on the cookie banner and choosing cookies to be on or off, or reject all non-essential cookies by clicking on the X in the cookie banner. Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this on a wide variety of desktop browsers.

**Do Not Track Disclosure:** Some internet browsers allow you to limit or disable the use of tracking technologies that collect this data. We currently do not support Do Not Track signals.

## **10. HOW LONG YOUR PERSONAL INFORMATION IS KEPT**

We keep your Personal Information for as long as needed or legally permitted for the purpose(s) for which it was obtained, unless otherwise provided in agreements between you and Iovance or as required or authorized by law.

## **11. SECURITY**

The Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. We use physical, technical, and organizational means to help safeguard personal information under our control. A username and password are needed to access certain areas of the Platform. It is your responsibility to protect your username and password. Personal Information may be accessed by persons within our organization, or our third-party service providers, who require such access to carry out the purposes described in this Policy, or otherwise permitted or required by applicable law. Personal Information we collect is managed from our offices in the United States.

## **12. LINKS**

Our Platform may contain links to other third-party sites that are not governed by this Policy. This includes third-party sites that offer resources and content which you can access through our Platform. If you click on a link to a third-party site, you will be taken to a site we do not control. We are not responsible for the privacy practices used by third-party sites. We suggest that you read the privacy policies of those sites carefully.

## **13. HOW TO CONTACT US**

If you have any questions, comments or concerns with respect to our privacy practices or this Policy, or wish to update your information, please feel free to contact us at [\*\*hello@campusmultimedia.com\*\*](mailto:hello@campusmultimedia.com). You may also write to us at the following address:

Campus Multimedia, LLC  
408 Broadway 2nd Floor  
New York, NY 10013

## **14. CHANGES IN POLICY**

From time to time, we may change this Privacy Policy. We will notify you of any material changes to this Policy as required by law. We will also post an updated copy on our Platform.

Please check our Platform periodically for updates. Your continued access to and/or use of our Platform after any such changes constitutes your acceptance of, and agreement to this Privacy Policy, as revised.

## **15.     DISPUTES**

If you choose to visit the Platform, your visit and any dispute regarding privacy is subject to this Privacy Policy and our Terms of Service Agreement, including limitations on damages, resolution of disputes, and application of the law of the state of New York.