This Privacy Policy discloses the privacy practices for EMPYR LOCAL, our web sites and other applications (collectively referred to as the "EMPYR LOCAL Services"), and to any services that display this notice. For the purposes of this Privacy Policy, unless otherwise noted, all references to "EMPYR LOCAL" include empathiq.io and Expert-Reputation.

# WHAT INFORMATION DO WE GATHER ABOUT YOU?

The information EMPYR LOCAL gathers falls into two categories:

- Personal information, which includes personal information you supply when you subscribe, order, complete a survey, register for one of our sites, enter a contest or provide your e-mail address
- 2) Non-personal information collected through technology, which includes tracking information collected as you use the EMPYR LOCAL Services.

# PERSONAL INFORMATION THAT YOU GIVE US

Registration Information

Registration for the EMPYR LOCAL Services requires that you supply certain personal information, including, in most cases, a unique e-mail address and demographic information (ZIP code, age, sex, household income (optional), job industry and job title) to register. Purchases made through the EMPYR LOCAL Services require that you supply your name, address, telephone number, e-mail address, business address, credit card number or other billing information.

Billing and Credit Card Information

To enable payment on the EMPYR LOCAL Services, we collect and store billing and credit card information. This information will only be shared with third parties who perform tasks required to complete the purchase transaction. Examples of this include fulfilling orders and processing credit card payments.

User Generated Content and Public Activities (Including Comments, Reader Reviews and TimesPeople)

We offer you opportunities to engage in public activities on empyrlocal.com and other EMPYR LOCAL Services. "Public activities" are any actions you take on empyrlocal.com that are designed to be visible to other users, including comments, recommendations, reader reviews, ratings or any other items that you submit. Any information you disclose in your public activities, along with your screen name or ID, or any image or photo, becomes public and may be used by EMPYR LOCAL for online and offline promotional or commercial uses in any and all media.

If you choose to engage in public activities, you should be aware that any personal information you submit there can be read, collected, or used by other users of these areas, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in these forums and EMPYR LOCAL has no responsibility to publish, take down, remove or edit any of your public activities or any of your submissions that are a result of your public activities.

When you share or recommend (with or without adding your own comments) any <u>empyrlocal.com</u> articles or content to your Facebook profile, that action is governed by the Facebook Privacy Policy. We do not track or store a record of those comments or actions.

If you have registered for a empyrlocal.com account, we will track and aggregate your public activities on empyrlocal.com. By choosing to participate in public activities, you are electing to share and display such public activities via empyrlocal.com. Also, public activities may be included in RSS feeds, APIs and made available to other Web sites via other formats. As a result, your public activities may appear on other Web sites, blogs, or feeds. Keep in mind that we are not responsible for any personal information you choose to make public via your public activities, and you agree that such sharing will be deemed to have been done by you, not EMPYR LOCAL.

Contests, Sweepstakes and Special Offers

EMPYR LOCAL collects personal information from you in connection with optional sweepstakes, contests or special offers. If this information is also being collected by a third party other than EMPYR LOCAL, we will notify you at the same time. If you do not want any personal information shared, you may always decline to participate in the sweepstakes, contest or special offer.

Reader Surveys, Reader Panels and Market Research

EMPYR LOCAL may collect personal information from you in connection with voluntary surveys. Data may be collected through the EMPYR LOCAL Services, on the phone or through the mail. The information you provide in response to optional survey questions may be shared, but only in the aggregate, with advertisers and partners unless we notify you otherwise at the time of collection.

Members of our Reader Panels agree to participate in surveys, polls or discussions about their readership of EMPYR LOCAL, their household/personal characteristics and their purchase behavior. If you choose to be a panel member, we require that you supply us with your e-mail address and name. Home address and telephone number are optional.

# NON-PERSONAL INFORMATION COLLECTED USING TECHNOLOGY

Information Collected by Us Using Technology:

Device Information.

We may collect non-personal information about the computer, mobile device or other device you use to access the EMPYR LOCAL Services, such as IP address, geolocation information, unique device identifiers, browser type, browser language and other transactional information.

Cookies.

In providing the EMPYR LOCAL Services, we use "cookies," Web beacons and other similar technologies to recognize you and provide personalization, as well as to help us understand where our visitors are going and how much time they spend there. You will not be able to access certain areas of our Web sites, including empyrlocal.com, if your computer does not accept cookies from us.

EMPYR LOCAL Services also transmit non-personally identifiable Web site usage information about visitors to the servers of a reputable third party for the purpose of targeting our Internet banner advertisements on other sites. To do this, we use Web Beacons in conjunction with cookies provided by our third-party ad server on this site.

Analytics Technologies.

We have hired third parties to provide us information, reports and analysis about the usage, browsing patterns of users of the EMPYR LOCAL Services.

EMPYR LOCAL Services track and analyzes non-personally identifiable usage and volume statistical information from our visitors and customers on empyrlocal.com. All data collected is owned and used by us. We also track and analyze anonymous usage and browsing patterns of our Web site users.

IP Addresses.

EMPYR LOCAL logs Internet Protocol (IP) addresses, or the location of your computer on the Internet, for systems administration and troubleshooting purposes. We use this information in an aggregate fashion to track access to our Web sites.

Log Files and Your Reading History.

We automatically log certain usage information about your use of NYT Service. This information includes a reading history of the pages you view.

We use this information in order to provide you with customized advertisements around the web based on your reading history. We also use log files in the aggregate to analyze usage of our Web sites.

# INFORMATION COLLECTED BY THIRD PARTIES USING TECHNOLOGY & YOUR AD CHOICES

Some of the services and advertisements included in the RC Services, including on empyrlocal.com are delivered or served by third-party companies that may place or recognize cookies, Web beacons or other technology to track certain non-personal information about our Web site users. For example, in the course of serving certain advertisements, some advertisers may place or recognize a unique cookie on your browser in order to collect certain information about your use of the EMPYR LOCAL Services. In many cases, this information could be used to show you ads based on your interests on other Web sites.

We do not have access to, nor control over, advertisers' or service providers' use of cookies or other tracking technologies or how they may be used.

For example, Google is one of the companies that serve advertisements onto empyrlocal.com. It uses the DART cookie to serve ads based on your visit to empyrlocal.com and other sites on the Internet. You may opt out of the use of the DART cookie by visiting the Google ad and content network privacy policy.

You have choices about the collection of information by third parties on our Web site:

- 1) If you would like more information about advertisers' use of cookies, and about your option not to accept these cookies, please click here.
- 2) If you would like to opt-out of having interest-based information collected during your visits to this or other sites, click here.

Your access to our Web sites should not be affected if you do not accept cookies served by third parties.

# WHAT DO WE DO WITH THE INFORMATION WE GATHER ABOUT YOU?

### Providing the Services You Request

We use the information we gather about you to enable your use of the EMPYR LOCAL Services, fulfill your requests for certain products and services, such as sending out electronic newsletters and enabling you to participate in and renew paid services, polls, contests, and message boards.

## Statistical Analysis

We perform statistical, demographic and marketing analyses of users of the RC Services, and their subscribing and purchasing patterns, for product development purposes and to generally inform advertisers about the nature of our subscriber base. We use this information for analysis purposes, including analysis to improve customer relationships.

## Customizing Your Experience

We use the information that we collect to allow advertising to be targeted to the users for whom such advertising is most pertinent. We also use this information to customize certain features of the EMPYR LOCAL Services to provide you with an enhanced experienced based on the type of device you are using to access the EMPYR LOCAL Services, and in certain cases, provide you with requested services.

### Relevant Advertising

We may use demographic and preference information to allow advertising on the EMPYR LOCAL Services to be targeted to the users for whom they are most pertinent. This means users see advertising that is most likely to interest them, and advertisers send their messages to people who are most likely to be receptive, improving both the viewer's experience and the effectiveness of the ads. We disclose information to third parties only in aggregate or de-identified form.

#### E-Mail Newsletters

EMPYR LOCAL will periodically send you e-mail newsletters or promotional e-mail about services offered by EMPYR LOCAL and its advertisers.

# WITH WHOM DO WE SHARE THE INFORMATION THAT WE GATHER?

#### Service Providers

We contract with other companies to provide services on our behalf, including credit-card and billing processing, shipping, e-mail distribution, list processing and analytics or promotions management. We provide these companies only with the information they need to perform their services. These service providers are not restricted from using this data in any way other than to provide services for EMPYR LOCAL, and they may share, resell or use the data for their own direct marketing purposes.

We reserve the right to disclose your opt-out information to third parties so they can suppress your name from future solicitations, in accordance with applicable laws. We may occasionally release personal information as required by law, for example, to comply with a court order or subpoena.

# WHAT IS OUR E-MAIL POLICY?

### EMPYR LOCAL complies fully with the federal CAN-SPAM Act of 2003.

If you feel you have received an e-mail from us in error, please contact info@empyragency.com

Account and Service-Related E-Mail.

EMPYR LOCAL reserves the right to send you e-mail relating to your account status. This includes order confirmations, renewal/expiration notices, notices of credit-card problems, other transactional e-mails and notifications about major changes to the EMPYR LOCAL Services and/or to our Privacy Policy. If you have registered for online discussions or other services, you may receive e-mail specific to your participation in those activities.

E-Mail Newsletters.

EMPYR LOCAL offers several e-mail newsletters. If you no longer wish to receive a specific newsletter, follow the "unsubscribe" instructions located near the bottom of each newsletter.

Promotional E-Mail.

EMPYR LOCAL may periodically e-mail you messages about products and services that we think may be of interest to you. You can choose not to receive messages in the future by following the "unsubscribe" instructions located near the bottom of each e-mail.

From time to time, EMPYR LOCAL may obtain e-mail addresses from third party sources to be used for promotional e-mails. You can choose not to receive messages in the future by following the "unsubscribe" instructions located near the bottom of each e-mail.

Survey E-Mail.

We may send you an e-mail inviting you to participate in user surveys, asking for feedback on <a href="mailto:empyrlocal.com">empyrlocal.com</a> and existing or prospective products and services, as well as information to better understand our users. User surveys greatly help us to improve the EMPYR LOCAL Services, and any information we obtain in such surveys will not be shared with third parties, except in aggregate form.

HTML E-Mail.

When you sign up to receive e-mail from us, you can select either plain text or HTML (with images) format. If you select the HTML format, we may place a one-pixel gif to determine whether or not readers viewed the e-mail. This process does not leave any information on your computer, nor does it collect information from your computer. EMPYR LOCAL may share this data with others in aggregate only.

E-Mails From You.

If you send us e-mails, you should be aware that information disclosed in e-mails may not be secure or encrypted and thus may be available to others. We suggest that you exercise caution when deciding to disclose any personal or confidential information in e-mails. We will use your e-mail address to respond directly to your questions or comments.

# HOW DO I OPT-OUT FROM RECEIVING PROMOTIONAL OFFERS?

**E-Mail Promotions:** If, at any time, you prefer not to receive e-mail marketing information from us, simply follow the unsubscribe options at the bottom of each e-mail.

### IS MY INFORMATION PROTECTED?

**Data Security:** To prevent unauthorized access, maintain data accuracy and ensure the appropriate use of information, we have put in place commercially reasonable physical, technical and administrative controls to protect the information. Please note that no method of transmission over the Internet, or method of electronic storage, is 100% secure.

#### OTHER INFORMATION:

### Compliance With Legal Process

We may disclose personal information if we are required to do so by law or we have a good faith belief that such action is necessary to (1) comply with the law or with legal process; (2) protect and defend our rights and property; (3) protect against misuse or unauthorized use of the EMPYR LOCAL Services; or (4) protect the personal safety or property of our users or the public (among other things, this means that if you provide false information or attempt to pose as someone else, information about you may be disclosed as part of any investigation into your actions).

This Privacy Policy may be amended from time to time. Any such changes will be posted on this page.