

This Privacy Policy does not govern the following features, activities or services provided for your convenience on www.americantobaccocampus.com and www.americantobaccohistoricdistrict.com or other Services: [Facebook](#), [Google Maps](#), Triangle411.com, or [Twitter](#). Please see the separate privacy policy for each service provider.

Privacy Policy

Last Updated and Effective Date: April 30, 2013

We are committed to protecting your privacy. We know that you care about how Personal Information about you is used and shared, and we appreciate your trust that we will use that information carefully and sensibly in accordance with this Privacy Policy.

This Privacy Policy governs the personally identifiable information (“Personal Information”) collected and used by the flagship website of Capitol Broadcasting Company, Inc. (“CBC,” “we,” “our,” “us”), www.americantobaccohistoricdistrict.com (“Site”) and the various online and offline services, mobile applications (“apps”), widgets, social networking platforms, and any other services owned, operated or provided by CBC that have an authorized link to this Privacy Policy (collectively, “Services”). By visiting or using our Services, you accept the practices described in this Privacy Policy. This Privacy Policy is hereby incorporated into CBC’s Terms of Use Agreement (“TOU”) by reference, which also governs our Services. Any capitalized terms not defined in this Privacy Policy will have the same meaning as defined in the [TOU](#).

- 1. Your California Privacy Rights**
- 2. Types of information we collect and use**
- 3. Monitoring Technologies**
- 4. Disclosure of Personal Information to Third Parties**
- 5. How we protect your Personal Information**
- 6. Customized Content & Advertising**
- 7. Safeguarding Children’s Privacy**
- 8. Your choices for the collection, use and sharing of your Personal Information**
- 9. How to access, update, correct, or delete your Personal Information**
- 10. Hyperlinks to third party websites**
- 11. Notification of changes to the Privacy Policy**
- 12. Contact Us/Report Misconduct**

GENERAL

Our Services are designed and targeted to audiences in the U.S. and are governed by and operated in accordance with the laws of the U.S. If you are not a U.S. citizen or do

not reside in the U.S., by using these Services and/or providing us with your Personal Information, you voluntarily consent to our collection, transfer, use, and disclosure of your Personal Information to the U.S. You also agree to waive any claims that may arise under your own national laws.

Our Services are generally targeted to adults. Unless we indicate otherwise, you must be at least 18 years old to register and to use the Services.

1. Your California Privacy Rights

Under the California “Shine the Light Act,” if you reside in California and have an established business relationship with us, you have the right to receive information about our online and offline opt-out/opt-in policies of sharing your Personal Information with affiliated entities or non-affiliated third parties, such as our advertisers, sponsors and promotional partners (collectively, “Advertisers”) for direct marketing purposes. If you wish to learn about our opt-out/opt-in policies, please send your written request following the instructions below. **We will not accept requests via the telephone or facsimile.**

- We may not be able to respond to requests that are not labeled or sent properly, or do not have complete information.
- For all requests, include your full name, street address, city, state and zip code, and the name of the Services to which you are requesting the information.
- In your email request, you must state “**Re: Your California Privacy Rights**” in the subject line and send your email to privacy_admin@cbc-raleigh.com.
- In your postal request, you must send a letter or post card to:

Capitol Broadcasting Company, Inc.
Attn: Privacy Administrator/Your California Privacy Rights
2619 Western Boulevard
Raleigh, NC 27606

Non-affiliated third parties are independent from CBC and if you wish to receive information about your disclosure choices or stop communications from such third parties, you will need to contact those non-affiliated third parties directly.

2. Types of information we collect and use

We collect and/or use information in three (3) categories: (1) [Personal Information](#) that you voluntarily provide when you register or participate in any features or activities on this Site or other Services online or offline, (2) information that we passively collect as you navigate or use our Services such as IP Address, unique device ID, or transaction and viewing history; and (3) [Non-Personal Information](#) that cannot be used to identify or contact a specific individual, such as anonymous and aggregated information. We may

also collect and use Personal Information about other people when you participate in certain programs and features.

Definition of Personal Information and Non-Personal Information:

Generally, Personal Information is information that can be used to identify or contact a specific individual, such as your name, home or business postal address, county or country, hometown, traditional and wireless email address, wireline or mobile telephone number, business telephone number, facsimile number, date of birth, gender, hobbies and interests, and membership identification and password. Non-Personal Information is traditionally information that may not directly identify or be used to contact a specific individual, such as an Internet Protocol (“IP”) address or mobile device unique identifier, particularly if that information is de-identified (meaning it becomes anonymous). Aggregated information, as well as cookies, web beacons and similar technology are generally considered Non-Personal Information unless they are linked to or associated with Personal Information, in which case they will be classified as Personal Information. Under certain circumstances and to the extent required by applicable law, an IP Address and a mobile device unique identifier may also be classified as Personal Information because it is data that can be reasonably linked to a specific consumer, computer or other device.

Below is a description of the types of information we collect and how we use it:

- www.americantobaccohistoricdistrict.com

You can register for features and activities on www.americantobaccocampus.com and www.americantobaccohistoricdistrict.com with the submission of your e-mail address. You may be required to submit additional Personal Information such as your name and text message number. Click [here](#) for more information.

Additional www.americantobaccocampus.com and www.americantobaccohistoricdistrict.com Features and Activities:

- American Tobacco Events Newsletter – By entering your e-mail address you may sign up for the American Tobacco Events Newsletter. When you subscribe to this feature we collect your e-mail address.
- American Tobacco Events Calendar – By entering your e-mail address or another person’s e-mail address you can sync events listed in the American Tobacco Events Calendar to your personal calendar or your friends’ personal calendars. By entering your or another’s person e-mail address you can also forward events listed on the American Tobacco Events Calendar to various social media websites (e.g., Facebook, Twitter, etc). When you use to this feature we collect your e-mail address and any other e-mail address you enter.

• **Comments/Questions/Consumer Complaints.** [LEARN MORE](#)

You must provide your name and email address to submit a comment or question online; in some instances a user ID and/or password may be required. We will also accept your comments or questions offline via traditional mail and telephone. Please see the Section “Safeguarding Children’s Privacy” for details.

• **Promotions, Contests & Sweepstakes .** [LEARN MORE](#)

From time to time, www.americantobaccocampus.com and www.americantobacchohistoricdistrict.com, other Services, and/or our Advertisers, may sponsor a promotion, sweepstakes or contest. Each event may have different entry requirements. Users may be asked to provide name, email address or home address, telephone number, month, date and/or year of birth, Facebook or other social network platform user ID, or be required to answer questions or submit user generated content. We will also collect what you, Facebook or other social networking platforms authorize us to collect. We will share your Personal Information with certain Advertisers that you have requested to receive information from or consented to the disclosure of your Personal Information. It will be clear at the point of collection who is collecting the Personal Information and whose privacy statement will apply.

Winners of contests and sweepstakes may also need to show a government-issued photo ID to verify identity and eligibility prior to receiving the prize. If you win a prize valued at \$600 or more, or have won prizes that are valued at \$600 or more in the aggregate in a calendar year, you must also provide your Social Security Number and complete the required IRS Form W-9 for federal tax reporting.

• **Mobile Apps** – In the future you may be able to access www.americantobaccocampus.com and www.americantobacchohistoricdistrict.com content, features and activities via various apps designed for Apple (iPad, iPod and iPhone), Google Android, and Amazon Kindle Play devices, mobile web and other mobile app platforms. Our app privacy statement can be reviewed at the App stores prior to your download and in the “About” section within the apps.

Based on an app’s specific functions and services, we may collect or access the following:

- Name, postal address (city, state and/or zip code), telephone or text message number, or email address
- Location-based information (precise and approximate past, current, or history)
- Financial Information (credit card and transaction information)
- IP Address or unique device IDs

- Type of phone or other mobile device used and phone features
- USB storage and SD card
- System tools
- Browser history and phone or text log

We ask for your consent prior to collecting or accessing Personal Information and location-based information. You may withdraw your consent by changing your options or disabling a service according to your device settings.

We and/or our Operational Service Providers (third party owned companies that provide or perform services and functions on our behalf that support our businesses and operations) will collect or access certain information to:

- Operate and store information necessary for the app to function as requested or to prevent shut down or sleep mode.
- Monitor to measure our effectiveness, analyze trends and improve our services, features and activities.
- Monitor and analyze your usage to serve customized advertising that supports free content and features. For more details about customized advertising, see the [Personalized Content and Advertising](#) section.

We may also share individual or aggregated Personal Information with third parties such as ad networks, data analytic providers, operating systems and platforms, and social networks.

- **Off-line** –We collect Personal Information via postal mail, telephone, over-the-air, and in-person for various purposes, including contests, sweepstakes, promotions, purchases and other transactions, special events, surveys, voting, public affairs, and news gathering.

We may combine your Personal Information collected online or offline with information obtained from our Facebook Fan pages or use of other Facebook features and services, other social network and mobile platforms, or our family of affiliated companies, Operational Service Providers, or other companies, such as credit bureaus, background check firms, marketing research companies, and/or Advertisers.

3. Monitoring Technologies

In order to manage and evaluate usage of our Site and other Services, improve our content and operations, provide advertising support for free content and features, measure the effectiveness of our advertising, and protect the security of our Site, we monitor your activity and usage via your IP Address and/or unique device ID. [LEARN MORE](#)

For example, the web server for www.americantobaccocampus.com and www.americantobacchohistoricdistrict.com automatically collects limited information about your computer configuration, such as the type of browser software and operating system used, and your IP Address, which has been traditionally classified as non-Personal Information but may be considered Personal Information under certain circumstances or laws. We also log profile information, aggregate user data, browser type, browser language, referring / exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, from users and visitors to the Site.

Like most standard websites or online services, www.americantobaccocampus.com and www.americantobacchohistoricdistrict.com and other Services may use cookies, web beacons and other similar technology that improve the user's experience by allowing the website to recognize the user's computer or device. You may configure your browser to reject cookies. If you do so, you might not be able to access important functions, features and activities or enjoy certain conveniences or customized and personalized features of our Site and other Services. [Click here](#) for more information about cookies, web beacons and IP Addresses.

Description of Cookies, Web Beacons and IP Addresses:

A "cookie" is a small text file that recognizes repeat visitors, enables ongoing access and personalization to some of our features and activities and other websites, and will allow us to understand how and when pages are visited and by how many people. Cookies can do a variety of helpful things:

- Store a variety of information, including IP Addresses, navigational data, server information, data transfer times, user preferences, shopping cart information, product codes and prices for merchandise that visitors purchase, user IDs and passwords needed to access our Services so that you do not have to re-enter your log-in information.
- Help us make improvements and updates based on which content, features or activities are popular and which are not.
- Serve customized advertising or content to you based on your geographic location, age, gender, or other demographics that you have provided to us, or have been estimated based on your Internet usage and purchase history.
- Ensure the accuracy of our voting, polling and survey data.

You may configure your browser to warn you each time a cookie is being sent. If you do not want to allow our cookies on your computer, you must configure your browser to turn off all cookies used by CBC because our system does not allow you to opt-out to them individually. Your browser may also have a tool that will

identify and disable certain types of cookies, such as those used for Network Advertising. Click [here](#) for more information about Network Advertising.

A “web beacon” (also called a web bug, pixel tag or a clear GIF) is a small transparent graphic image that is placed on a webpage or in an HTML email and is used to monitor the activity of the user visiting the webpage or email. Web beacons are used for website traffic reporting, auditing and reporting user clicks on an ad, and tracking the number of unique visitors to a webpage or ad. Web beacons and cookies may also be used in combination to customize your experience on our Site and Services by monitoring your activity and interests.

An “Internet Protocol (“IP”)” Address is a number automatically assigned to your computer whenever you access the Internet. This number by itself does not identify your name, e-mail address or other Personal Information. If you request pages from any CBC website, that website’s server will enter your IP address into a log. To maintain user anonymity, CBC does not associate or link IP Addresses with records containing Personal Information unless it is necessary to enforce the law or our TOU, protect CBC or our Stations, Operational Service Providers and Advertisers, or to defend against or investigate any charges or claims against CBC. We store IP Addresses for a period of time to help us to identify anyone who refuses to comply with our TOU or applicable law. We also will use this information to measure website traffic, for system administration, and to measure the success of our Advertiser’s ads. This information also helps us to understand how you use our Site and other Services and will help us improve and customize your online experience.

If you do not want to help us improve our Site, products, offers and marketing strategy, you can "opt-out" of our ability to analyze such data by [clicking here](#).

If you leave www.americantobaccocampus.com and www.americantobaccohistoricdistrict.com to visit our Advertisers' websites, some of those Advertisers also may place cookies on your computer. We don't have access to those cookies or to any information they contain, and the use and collection of your Personal Information by Advertisers is governed by the Advertiser's Privacy Policy, which may be different from ours.

Because cookies are stored on your hard drive, not on our Site or other Services, you can set your browser to decline cookies and can delete them from your computer. However, if you don't accept cookies, you may need to re-enter your log-in information each time you visit our Services, and you may not be able to take advantage of various features or activities.

We reserve the right to collect Personal Information using any new technology yet to be developed and to use such technology to provide new services and features to you, as well as for marketing and promotional purposes. Specific information regarding your

choice to opt-out to such use will be provided when the new technology, service, or feature is introduced.

4. Disclosure of Personal Information to Third Parties

Information about our customers is an important part of our business, and we are not in the business of selling it to others. We will not rent, sell, or share your Personal Information with unaffiliated companies or people except: 1) as necessary to provide you with products or services you've requested; 2) when we have your permission; or 3) as follows:

- We will disclose your Personal Information to trusted partners and Operational Service Providers who work on our behalf under confidentiality agreements. These entities will use your Personal Information to help us serve you. However, these entities are not allowed to share your Personal Information without authorization or to use it for their own marketing or promotional purposes.
- We will disclose your Personal Information to conform to legal requirements or to respond to a subpoena, search warrant or other legal process, whether or not a response is required by applicable law.
- We will disclose your Personal Information to enforce our TOU, or to protect the rights, property or safety of CBC, other users and visitors, our Advertisers and other customers, the public, or our employees.
- As our business grows, we may buy or sell various assets. In the event that all or some of our assets are acquired by another company, Personal Information may be among the transferred assets.

5. How we protect your Personal Information

We have taken reasonable steps to protect the security and confidentiality of the Personal Information we collect and use. We implement and maintain reasonable physical, technical and administrative procedures to protect your Personal Information from unauthorized collection, use, disclosure, and disposal and request our Operational Service Providers to do the same. However, no physical or electronic security system is impenetrable, and we cannot guarantee the security of our servers or databases, nor can we guarantee that the information that you supply to us won't be intercepted during transmission over the Internet.

It is important for you to protect against unauthorized access to your accounts, especially on a shared computer or device, by logging out when you are finished using our Site and other Services and by keeping any passwords confidential. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of member information at any time.

Additionally, we cannot control and therefore cannot be responsible for any unauthorized third party use of your Personal Information that you make publicly available.

6. Customized Content & Advertising


Advertising helps us to support the free Services, Internet and broadcast content we provide to you. We may use anonymous, aggregated information to serve customized ads. (For example, we are able to provide the age range, gender, and geographic location of the audience our Advertisers will be reaching.) When we aggregate your information, no specific individual can be identified.

We, our Operational Service Providers, and Advertisers may use cookies, web beacons and other similar technology to enrich your experience on our Services by serving relevant, tailored and personalized advertising and/or content. (Please note that we do not control Advertiser cookies or web beacons, and their use of such technology is not subject to this Privacy Policy.) Customized advertising and content is based on information you provide to us; your use of our content, features and activities; your visits, search, transaction and/or purchase history; visits to our Facebook Fan page or use of other Facebook features and services, or other social network platforms, and/or projections made about you based on all of these elements. ([Click here](#) for information about IP Addresses, cookies and web beacons.)

[Click here](#) for examples of advertising featured on our Services and how they deliver personalized and customized advertising.

- **Contextual Advertising:** For example, we may serve you an advertisement for brakes and shocks based on a used car dealer ad you just viewed or a search you've made about used cars on one of our Services. This is called "Contextual Advertising" because it is based on the context of how you used a specific Service. We do not collect any Personal Information about you for Contextual Advertising.
- **First Party Advertising:** Advertising that is tailored or personalized based on a history of your use of content and participation in features and activities on our Services (possibly combined with information from our Facebook Fan page or our other social network platforms) over time is based solely on a combination of information that we collect from you – ***not from your use of other websites or third party services***. We may share such information anonymously with our Advertisers in order to measure the effectiveness of ads on our Services, such as how many users opened or acted on a particular ad.
- **Network Advertising:** Information about your use of our Services combined with similar information about your overall Internet usage across different third

party websites and online services used to serve tailored and personalized advertising is generally called “Network Advertising.” Multiple third party websites and online services are involved in this personalized advertising process, in essence a “network” of advertising providers. You are served ads based on your demographics (whether you have provided such information voluntarily or such information is estimated based on your Internet usage and search history, transactions, and interests, such as your gender, age, lifestyle, education, home ownership, geographic location, etc.

For advertising that is part of a Network Advertising service, you may see a small symbol  attached to a banner ad or other targeted advertising that can be clicked open for information about why and how you are receiving a particular ad. For more information see <http://www.aboutads.info>.

To opt-out of Network Advertising, please click [here](#). **[Link to Collective Media’s Network Advertising opt-out instruction page. Need to confirm specific instructions.]**

Please be aware that opting out of a Network Advertising service doesn’t mean that you will not receive online ads. It only means that the network from which you opted out will no longer deliver ads tailored to your preferences and interests, but you will continue to receive advertising.

7. Safeguarding Children’s Privacy

Protecting the privacy of children is especially important. Generally, we will not knowingly collect online Personal Information or any other identifying data from children under 13 years of age. Should we discover that a child under the age of 13 submitted Personal Information to our Site, apps, or other Internet-based Services without first obtaining verifiable parental consent, we will immediately reject any such entry and delete that information from our database (to the extent technically feasible), unless such information meets an exception under the Children’s Online Privacy Protection Act (“COPPA”).

Except to meet FCC, or other regulatory and legal purposes, we will not knowingly use, distribute or disclose any child’s Personal Information to unaffiliated third parties without prior parental consent. We will promptly remove such information from our database (to the extent technically feasible) if a parent withdraws his or her consent to our use of the child’s Personal Information.

For more information about the safety of children on the Internet, please visit [WE WILL INSERT FTC LINK]

8. Your choices for the collection, use and sharing of your Personal Information

Users who no longer wish to receive alerts, notifications, or promotional messages from us via email may choose to opt-out of future emails from us by following the opt-out

instructions contained in the e-mails sent to you by us. All emails and www.americantobaccohistoricdistrict.com newsletters include opt-out instructions. Alerts sent via text message also have an opt-out mechanism.

We may share your Personal Information directly with our Advertisers for their direct marketing and promotional purposes only if you have granted your permission to do so. Depending on the activity, event or feature, you will have an opportunity to either “opt-in” or “opt-out” of such sharing at the time of registration, delivery of the activity, event or feature, or by contacting the Service via [clicking here](#).

You must use the designated method to notify us of your opt-out request, as we cannot guarantee that other methods of notification will be effective or timely. Please be aware that we may continue to contact you for administrative, transactional or informational purposes related to your use of our Services, including follow-up messages regarding contests you have entered or other transactions you have undertaken. By law, such messages are not considered to be unsolicited commercial messages.

9. How to access, update, correct, or delete your Personal Information

Users who no longer wish to receive alerts, notifications, or promotional messages from us via email may choose to opt-out of future emails from us by following the opt-out instructions contained in the e-mails sent to you by us. If you terminate your www.americantobaccohistoricdistrict.com registration, your email address will remain in our archived records after your account has been closed given the technical limitations of our system. However it will be moved to an inactive status.

For mobile apps, you may access and update or change your Personal Information via “Settings.” You may also delete an app or disable a service according to your device settings. For other Services, please access your account or send an e-mail to our [Privacy Administrator](#).

We retain your Personal Information as long as it takes to provide the Services and as required by our corporate policies and laws. Upon your request, we also will remove your Personal Information from our active database(s). Given the limitations of our computer systems, corporate business policies, and the requirements of federal or state laws, we may not be able to delete all of your Personal Information from our internal or back-up files. You may be entitled to access such Personal Information or restrict the use of such Information under local or state laws. Please contact our [Privacy Administrator](#). [MORE](#)

We reserve the right to deny access to any user if we believe there is a question about his/her identity, if the burden or expense of providing access to a user’s Personal Information is disproportionate to the potential privacy risks to that user, or if the legitimate rights of others would be violated. In such cases, we will provide you with an explanation and a contact person for further inquiries.

10. Hyperlinks to Third Party Websites

www.americanbaccocampus.com and www.americanbaccohistoricdistrict.com, and users who post information on these websites, may provide links to third party websites whose privacy policies, terms and conditions, and/or business practices we do not control, including the use of cookies, web beacons or other monitoring technologies. When you access another website, use of any information you provide is governed by the privacy policy of the operator of the website you're visiting. When linking to another website a user should read the privacy policy stated on that website. Our Privacy Policy only governs information collected on this Site and our Services.

11. Notification of changes to Privacy Policy

Because the web is an evolving medium and we strive to use new technology to provide innovative features and activities, we will need to change our Privacy Policy from time to time. When we update our Privacy Policy, we will post a notice on our Site and applicable Services and update the "Last Updated/ Effective Date." For material changes, we will also notify you via email, push alert, or the preferred mode of contact you selected. However, we are not able to notify you of changes in our app privacy policy via the app given technical limitations. Such notification must be provided via other means as listed above. By continuing to use this Site or other Services after we post any such changes, you have accepted the Privacy Policy as modified.

12. Contacting Us / Report Misconduct

For more information, or if you have questions about this Privacy Policy, please contact us via our Privacy Administrator. Also, if you see behavior or communications on any of Services that you consider inappropriate or abusive, please let us know immediately.

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