

**DATA PRIVACY IN THE NEWSROOM:  
THE ETHICAL JUSTIFICATIONS OF USING  
USER DATA IN THE REPORTING PROCESS**

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by

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DATA PRIVACY IN THE NEWSROOM:  
THE ETHICAL JUSTIFICATIONS OF USING  
USER DATA IN THE REPORTING PROCESS

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ABSTRACT

This study analyzes website privacy policies used by major news corporations and attempts to understand the newsroom ethics policies as applied to protecting personal information collected about readers. The confluence of the legal and ethical questions revealed a conflicting relationship that possibly exposes news organizations that publish user information to liability while still practicing within the accepted limitations of traditional journalism ethics.

Journalists tend to be indignant about the protections they afford to personal information collected on their site, unless the user is a public official using their pseudonym to discuss public issues behind a veil of secrecy. In this situation, journalists not only justify their actions under their ethics policies, but are possibly unknowingly breaching a contract made with each and every reader.

In order to protect against liability, news organizations should change their newsroom practices to allow for the disclosure of user information in a very narrowly-constructed situation and amend their privacy policy to align with traditional journalism ethics as applied to privacy situations.



## I. INTRODUCTION

In 2010, *The (Cleveland) Plain Dealer* newspaper noticed a pseudonymous commenter on their website was making comments about the mental state of a relative of one of the newspaper's reporters. Upon further investigation, newsroom employees saw that *lawmiss* (the commenter's pseudonym) also made comments about a number of local court cases that had come before Cuyahoga County Common Pleas Judge Shirley Strickland Saffold.

After looking up *lawmiss*'s registration information for their website, editors at *The Plain Dealer* discovered the e-mail address used during registration allegedly belonged to Judge Saffold. (Saffold complaint, 2010)

*The Plain Dealer* wrote an article stating that someone using Saffold's e-mail address made opinionated comments on their website about cases that she heard in court, but Saffold disagreed and sued for \$50 million for breach of contract, defamation, invasion of privacy, fraud, promissory estoppel and tortious interference with a contract. (Saffold complaint, 2010)

Saffold's daughter admitted to using a home computer to make some of the comments under the pseudonym. Saffold eventually dismissed the lawsuit with the paper and settled with the paper's owner, Advance Internet, for an undisclosed amount. Advance Internet also changed it's policy to take "additional steps to ensure that it blocks the newspaper from access to the e-mail addresses of commenters." ("Saffolds dismiss lawsuit against *Plain Dealer*," 2010)

In a similar incident, Kurt Greenbaum, an editor at the *St. Louis Post-Dispatch*, looked up the Internet Protocol (IP) address of a commenter who was repeatedly leaving obscene comments in response to a question about the strangest things you've ever eaten. When Greenbaum saw the comments were coming from a local school, he contacted the school and the employee making the remarks resigned. (Perez, 2009)

At the time, Greenbaum said he was merely letting the school know about the comments since he thought it was just a student and never thought that the comments were coming from an employee. (Perez, 2009)

While Congress was debating whether or not to end the military's Don't Ask Don't Tell policy, a comment disparaging gay marriage left on the blog *Joe. My. God.* was traced to the Atlanta office of U.S. Senator Saxby Chambliss. The owner of the blog saw that the commenter's Internet Service Provider was listed as United States Senate. He then published the IP address in the hope that one of his readers could unmask the anonymous individual. (Joe, 2010) After researching the IP address and finding that the comment did in fact come from Sen. Chambliss' office, the Senate Sergeant at Arms became involved and was able to track the comment to a specific staffer who was then fired. (Lovley, 2010)

In November, 2010 the *Dallas Observer* in Texas published an article critical of the local district attorney running for re-election. One of the commenters anonymously published confidential information about a current investigation by the district attorney's office into money laundering by a political rival and the local Republican Party chair. The *Observer* was able to track the

comments back to the district attorney's campaign office and outed the commenter without first notifying the individual of their intent to make their identity public. (Merten, 2010)

In another situation, a reporter at the *Albany Times-Union* noticed a relatively high number of anonymous comments being made in support of the position of the city on a public issue in Troy, NY. The reporter discovered that despite using different pseudonyms, the comments were all coming from the same IP address – which was assigned to the City of Troy. (Churchill, 2009)

The *Times-Union* merely reported the issue and decided not to pursue the difficult question of discovering exactly who in city hall was making the comments. (Churchill, 2009)

And in one of the more egregious cases of a news website disclosing personal information about a pseudonymous commenter, the *Wausau Daily Herald* in Wisconsin turned over the e-mail address of a commenter to a local politician who asked to know who his online critics were. Local businessman Paul Klocko was caught off guard when he received an e-mail from Dean Zuleger, the administrator for Weston, Wisconsin, asking him to come out from behind his cloak and meet him in person. (Meyer, 2009)

These cases highlight a growing problem in journalism as some reporters have access to personal information about individuals who register with the news organization's website and that information could be useful in the reporting process. For the first 10 to 15 years of online news this was rarely an issue because most individuals provided information of little value to a news

organization, but as more and more publications begin to charge for access to online content the value of the information provided – including in some cases one's real name, home address and credit card information – greatly increases.

News organizations have privacy policies stating that they will use care not to disclose that information under certain circumstances, but when that information is voluntarily given and the reporter believes publishing the information will serve the public interest – is there a duty to disclose that information? And how do news organizations make decisions about whether to disclose this information?

The previous situations are prime examples of how news organizations can use the data they retain about their users as part of the news reporting process. A reporter had a hunch, decided to dig deeper, discovered information that their readers or others might be interested in knowing and published that information or passed it on to interested individuals. But how does this possible invasion of privacy fit within traditional journalism ethics and how journalists abide with internal policies on privacy?

This research project will use the theory of social responsibility to study the ethics and policy considerations of allowing the use of personal registration data and website tracking information in the reporting process.

The study will include a textual analysis of institution privacy policies of 13 of the largest news companies in the country to determine the strength and weaknesses of the policies. The second stage will include in-depth interviews with attorneys of those corporations along with private media and communications

law attorneys. This will help the researcher to better understand the drafting process of the policies and how they are often interpreted by both counsel and judges. The final stage will include in-depth interviews with newspaper editors in order to discover how newsroom leaders believe these policies affect their organization's ability to report the news with personal information while still protecting the privacy of their readers.

This study will shed light on the ability of website privacy policies to state an effective policy that allows the journalist to perform their job while valuing the website user's interest in protecting their personal privacy. This is one of the first instances where the data necessary for the reporting process comes from inside the news organization and that same organization has promised a certain level of privacy to those they interact with online.

This study will also help to better understand news website privacy policies and whether the current guidelines are strong enough to cover this situation or whether they need to be adapted in order to adequately deal with situations in which the reporter might be tempted to use personal registration data in the reporting process.

This research could have implications not only for journalism practices and ethics, but also how journalists perceive personal privacy in an era where privacy is limited online. By understanding the value that journalists place on personal privacy, it will be easier to draft effective privacy policies that adequately protect privacy while still allowing the journalist to serve their news reporting function in society.

This paper will begin with a literature review of the topics of e-commerce, data privacy online and media ethics. This includes a statement of how data privacy has emerged in the online environment and how journalists have embraced that goal.

Next, the paper will include a review of the theory of social responsibility. A descriptive summary of the relevant scholarship and theory on how the theory applies to media ethics is included.

Finally, the methodology will explain how a textual analysis and in-depth interviews will help describe how journalists view their function in protecting personal privacy while performing their job as a news reporter.

RQ1: Whether newspaper website privacy policies effectively protect the privacy rights of individuals using their site.

RQ2: Whether newspaper website privacy policies effectively reflect traditional journalism ethical standards?

RQ3: Whether newspaper leadership sets newsroom policy that effectively allows for the use of personally-identifiable information in the news reporting process while still protecting the individual's privacy and abiding by the institution's privacy policy?

## II. REVIEW OF THE LITERATURE

The Federal Trade Commission has been worried about commercial institutions collecting information about website users since they held their first investigations into the topic in 1995. (Laudon & Traver, 2010).

The FTC's worries stemmed from a number of issues: that individuals are often unaware their information is being collected, they have no choice on whether they would like to be tracked, and that there is often not enough security to protect information from being stolen. (Federal Trade Commission, 2000)

Specifically, the FTC is concerned about the collection of personally -identifiable information – that which could be used to identify a person – as opposed to anonymous information which could be damaging, but lacks the ability to connect the individual's identity to their information. (FTC, 2000)

The value of personal information to commercial institutions is that they can then market products using targeted-advertising based on past purchases, demographic grouping techniques and ultimately create personal profiles that detail an individual's personal information along with their retail habits and credit card numbers. (Frackman, Ray & Martin, 2002; Laudon, et. al, 2010)

### Privacy

The harm of invading another's privacy reaches beyond mere embarrassment to the individual, but possible loss of reputation, loss of job and

the organization collecting the information losing some of their reputation. If the breach is serious enough, it can sometimes result in a lawsuit. (Gauthier, 2002)

As more data becomes accessible online, it becomes more necessary to protect against possible misuse of the data. (Cooper, MacPherson & Vick, 1999)

Fred Cate states that recent development in privacy law is to give the consumer full power to control how much personal data is collected and how it is used. He argues, however, that this trend unnecessarily prohibits the collector from gaining access to low-risk data.

The focus on control ignores the extent to which many uses of personal information pose no risk of harm to individuals, while creating significant benefits for data subjects and society more broadly. Laws that facilitate that control, therefore, often create significant costs, without yielding net benefits. (Cate, 2002, p. 37)

Just collecting this information can open the institution to subpoenas for information about their visitors. This information can be used to unmask an anonymous Internet user's identity, to determine what people are purchasing or to see what websites people visit. This kind of information can be very valuable to government officials and police, but also to journalists. (Crump, 2003)

Crump argues that collecting information about the users of a website can be a dangerous precedent to set, especially when the data might not be as useful to the organization. She specifically argues against the practice by Internet Service Providers because they are one of the first places government officials will go in order to determine the identity of an anonymous online user. ISP's typically don't market this information, so collecting serves a minimal use to them. If they



were to periodically erase the information, or not keep it at all, they would prevent possible legal liabilities for withholding the information if they chose not to cooperate with government officials. (Crump, 2003)

Just because users give access to the information, does not mean they are aware of all the possible consequences of that transaction either. Hinduja found in a study of web users that most consumers could justify a minimal intrusion into their privacy by a website.

When patrons register for a customized service at a web site and provide only a few, seemingly meaningless morsels of private information, they are easily able to convince themselves that no self-harm will result from their actions. Discarding as digressive or extraneous their answers to the web site's personal queries, they fail to realize that such a provision is sometimes inexpedient. (Hinduja, 2004, p. 41)

### Website Privacy Policies

In order to protect collected information, corporations started creating privacy policies that they linked to at the bottom of every page on their website. This policy states the rights of the individual and the responsibilities of the institution in order to protect the privacy of the individual while still allowing the institution to make use of the data for marketing purposes. (Gallagher, 2001)

Website privacy policies protect the individual from a breach of their privacy because the policy acts as a contract between the individual and the institution that the individual's information will not be given out or disclosed outside of the terms of the agreement. (Haynes, 2008)

However, some courts have started to view the privacy policy as a corporate policy statement rather than as a contract. In *Meyer v. Christie* a federal district court in Kansas ruled that a web user must read and rely on the policy before it becomes binding. (*Meyer v. Christie*, 2007) However, other courts are willing to view the policies as contracts, but are hesitant to allow cases to go forward unless the plaintiff can prove damages beyond a basic claim of loss of privacy. (*Smith v. Trusted Universal Standards in Electronics Transactions Inc.*, 2010; *Cherny v. Emigrant Bank*, 2009; Brown & Raysman, 2010)

When it comes to laws that regulate the collection of information about a website's users, California has set the standard with the Online Privacy Protection Act of 2003, which mandates that companies that do business in California state their privacy policy upfront and give information about what data they are collecting, what information they are sharing with others and what the process is for a consumer to review and request changes to that information. (Online Privacy Protection Act, 2003)

California's law also effectively takes the place of any federal law because practically all websites in the country need to meet California's requirements because of the ubiquity of interstate commerce on the Internet. (Bellia, 2009)

The problem of personal data being misused can be avoided by having strong website privacy policies which guarantee that a user's information will not be used for any purpose except for anonymous marketing. When authorities seek information, however, they will often obtain a subpoena which will often supersede any guarantee of anonymity. (Cooper et al., 1999)

Another issue is that current laws merely require websites to give individuals notice of how their information will be collected and used – allowing institutions to adopt policies that are upfront about practices that are not protective of the consumer in order to augment their ability to sell and share data for their own benefit.

When it comes to collecting data about website users, most privacy policies break down information into two categories: personally-identifiable information (PII) and non-personally-identifiable information (non-PII). There is growing concern, however, that the distinction between the two is trivial because if a website has enough non-PII about an individual, it can use that information to positively identify the individual.

For example, a website may only have information about an individual's gender, race, age and zip code; but taking all that information and matching it against a publicly accessible government database could quickly get them access to an individual's full name, address, birthdate, and in more extreme cases an individual's credit card information or social security number.

In 1997, a computer scientist at MIT used anonymized data and matched it with public databases and found that 87 percent of Americans can be positively identified based on a combination of their zip code, gender and birthdate alone. (Sweeney, 1997)

One way institutions collect information is by linking data about a user's behavior (IP address, referring website, etc.) along with anonymized information (zip code and birthdate) with their personally identifiable information.

... integrating nonpersonal online information with other collected information can be an acceptable practice, just so long as the website privacy policy includes adequate disclosures of the potential for this type of data use before information is used for this new purpose. (Isaacson, 2009, p. 601)

As websites gather more and more information about an individual's personal preferences, the value of that information will only continue to grow. (Soma, Courson & Cadkin, 2009)

Solove (2001) explains that data collection and retention should be seen from a transactional approach with the user agreeing to certain types of information being collected for specific uses. Because of inequalities in the relationship between the bureaucracy and the consumer, rules should be established to allow the individual to make choices as to how the information can be used in the future. This is because most users do not object to the collection and in-house use of their personal information, but it is the distribution of their information to other entities that they object to. (Solove, 2001)

“Under a system where individuals opt-in, the default rule is that personal information cannot be collected or used about an individual unless the individual provides consent.” (Solove, 2001, p. 1,459)

Privacy invasion through data retained by a news website is a relatively un-researched area in the field of journalism. In the commercial world, Beales and Muris say that the consumer can usually take protections by being careful about whom they give their information to and by using credit protection services. (Beales & Muris, 1982)

As for journalism, the consumer can protect themselves by not giving his or her personal information to a news website they do not trust, but using a credit protection service will not protect them from having personally-identifiable information looked up and possibly disclosed in the reporting process. Along with that, an individual's e-mail address and name might be personal information, but are relatively useless to someone planning fraudulent activity.

Because website privacy policies are not typically industry-specific, but merely meet the marketing needs of the service being provided, journalism website privacy policy often look similar to those developed for other industries.

Also, because of changing economic situations for many news organizations, readers are being asked to pay a fee for access to some news site's content. By agreeing to these terms, the reader is turning over verifiable and valuable information including full name, home address, phone number and credit card number. With this added information, the possibility of linking an individual to their non-personal information online is no longer a question of possibility, but is now purely a question of ethics and necessity for the journalist with access.

### Journalism and Privacy

When it comes to data privacy in a journalism context, the issue comes down to ethical considerations of what is acceptable within society and the journalism profession.

## Social Responsibility

The concept of media ethics and the protection of the free press existed long before 1942, but it was then that the first authoritative approach to defining those concepts took place in the form of the Commission on Freedom of the Press, otherwise known as the Hutchins Commission. (Christians & Nordenstreng, 2004)

The Hutchins Commission found five requirements for a free press: a truthful, comprehensive, and intelligent account of the day's events in a context which gives them meaning; a forum for the exchange of comment and criticism; the projection of a representative picture of the constituent groups in the society; the presentation and clarification of the goals and values of the society; and full access to the day's intelligence. (Commission on Freedom of the Press, 1947)

The report went into detail about the concept of social responsibility – the notion that the press has an obligation to uphold the values of the society as a whole, at the expense of possible harm.

Christians and Nordenstreng add that one of the pivotal concepts of social responsibility is the duty to society before self. This is important not only to the citizen, but also to the journalist, as the potential for corruption of power within journalism has the ability to disrupt the entire system.

[Social Responsibility] is therefore founded on accountable freedom, human freedom with responsibility as its integrating center. Without accountable freedom, the press as a social institution can be cooped by professional privilege and self-interested power. (Christians & Nordenstreng, 2004, p. 14)

In the wake of the Warren Commission – which called on journalism organizations to adopt codes of ethics – many organizations continued to avoid strict ethical guidelines. But in the 1970s, several organizations began to draft ethical rules that were based off concepts first addressed in the Hutchins Commission. (Feighery, 2009)

Social responsibility has also put pressure on the field of journalism to not only adapt overnight, but also to adapt to a system of strict self-regulation as opposed to relegating themselves to outside oversight. Even though it took some influence from pseudo-government institutions to put the onus on journalists to impose ethical guidelines, journalists still insisted on autonomy in regulation. (Christians & Nordenstreng, 2004)

The conventional wisdom is that a free press can abide no governance except that self-imposed. Therefore, the focus has been on what the press can do internally to regulate itself convincingly ... In the [social responsibility] model, professional ethics has become a central visible institutional indicator that the press takes internal constraints seriously. (Christians & Nordenstreng, 2004, p. 14)

### Media Ethics

Media ethics are influenced by a mix of professional mores, industry norms and codes of ethics from organizations like the Society of Professional Journalists and the Radio and Television News Directors Association. (Glasser & Ettema, 2008)

One of the areas of media ethics that bucks the trend of protecting personal privacy is the overriding public need. For the SPJ Code of Ethics, personal privacy rights can only be usurped when “an overriding public need can

justify intrusion into anyone's privacy.” (“SPJ Code of Ethics,” 1996)

The Radio and Television News Directors Association (RTNDA) Code of Ethics and Professional Conduct is less specific about personal privacy, but does state that...

Use [of] surreptitious news-gathering techniques, including hidden cameras or microphones, only if there is no other way to obtain stories of significant public importance and only if the technique is explained to the audience. (“RTNDA Code of Ethics and Professional Conduct,” 2000)

Ultimately, the decision as to whether the public need is high enough to justify an intrusion into someone's privacy is a decision that must be made by a news organization.

Consequentialist ethics is a base for considerations that balance two interests like the rights of the individual and the public's need to know. As a philosophical construct, consequential ethics approaches decision-making as a balancing test based on the ultimate good that would result from each of the alternatives. (Elliot, 2007)

One of the more notable statements of consequentialism is utilitarianism - from John Stuart Mill's *On Liberty*. Mill argues that a utilitarian approach allows the individual an ideal amount of personal liberty while still allowing society to interfere when absolutely necessary for the good of society. (Mill, 1869/2008)

... if he has infringed the rules necessary for the protection of his fellow-creatures, individually or collectively. The evil consequences of his acts do not fall on himself, but on others; and society, as the protector of all its members, must retaliate on him; must inflict pain on him for the express purpose of punishment, and must take care that it be sufficiently severe. (Mill, 1869/2008, p. 69)



Mill's approach to utilitarianism applies to media ethics because it allows for a professional ethical standard that permits causing harm to another based on their choices or the possible harm to society they may have caused. The decision whether to publish information that could cause harm is made based on a balancing test that pits the potential harms against the potential benefits. (Gauthier, 2002)

Alfino and Mayes argue that privacy ethics should be strictly rule-based, but have been framed in the law and society as a consequentialist issue.

Absent a compelling argument that we have a fundamental right to control personal information (and we believe these arguments really are absent), the most compelling considerations in favor of restricting access to such information are consequentialist in nature. The harm is not the simple fact that other people know things about us that we prefer they didn't; rather, it is that they may use this information in a way that we prefer they wouldn't. (Alfino & Mayes, 2003, p. 17)

Alfino and Mayes further argue that a fundamental right to privacy is only implicated when an individual loses the ability to control their own information.

[T]here may be many good reasons for protecting people from unwelcome intrusions or giving people control of information about them, but these reasons only bear on the *fundamental* right of privacy if lacking such protection compromises their ability to reason about their choices. (Alfino & Mayes, 2003, p. 12)

Bezanson argues that the disclosure of a private fact about a private individual by a news organization is typically not in the public's interest, but is done in order to meet a literary or aesthetic need to produce a compelling story. (Bezanson, 1992)

The decision to publish a private fact is therefore often literary in quality – an instance of pure selection in which the editorial process reflects a judgment that the disclosed fact has valuable and instrumental bearing on a different or larger matter. The judgment is at once more subjective, indeed almost aesthetic, and less subject to challenge. Its justifications are grounded not in relevance or public interest, at least as they concern the disclosure itself, but in literary and artistic notions of forcefulness, impact and understanding. (Bezanson, 1992, p. 1,164)

Gajda argues that some journalists, and even some courts, are more likely to view public interest as not an issue of the public's right to know, but the public's interest in knowing. (Gajda, 2009)

Westrin and Nilstun argue that journalism ethics are less strict than other fields when it comes to data privacy because journalism depends upon an open society and privacy is antithetical to the purpose of full disclosure and informing the public.

They went on to argue that journalism ethics leave no room for the protection of individual autonomy, but that these are “unavoidable ethical costs in an open society.” (Westrin & Nilstun, 1994, p. 523)

Gratz noted that the SPJ Code of Ethics is structured in order to invade personal privacy only when necessary and when balanced with the possible harm involved. In fact the section of the code dealing with privacy is titled “Minimize Harm.” (Gratz, 2005)

While this section of the code lists the ways journalists can and should protect the subjects of their stories, implicit in the word 'minimize' is the fact that we usually can't eliminate the harm that can be done while covering news. (Gratz, 2005, p. 4)

But Christians and Nordenstreng argue that under a theory of social responsibility, ethics codes alone are not sufficient to protect both the rights of the individual and the integrity of the organization in a universal context.

Regardless of their role and possible effectiveness when [social responsibility] theory took root, codes as ethics are not an adequate foundation for the worldwide [social responsibility] paradigm of today. Professional codes are limited by professional concerns and by the local, regional, or national contexts in which they are formulated. (Christians & Nordenstreng, 2004, p. 14)

### III. METHODS

For this study, the researcher will use a mixed methods approach in order to not only test the legitimacy and strength of the institution's privacy policy, but also to test the perception of newspaper editors as to how the policy dictates how their employees can do their jobs.

The two studies should complement each other to show whether institution privacy policies are stronger than the newspaper leader's perceptions of the ethics and policy of viewing or using personal registration data.

Mixed methods research consists of taking two or more traditional types of methodology from either qualitative or quantitative research methods and merging them into a creative, inclusive form of research. However, a mixed method is criticized for reinforcing the bipolar positions of qualitative and quantitative methods and causing more diversity of methods rather than creating inclusiveness. (Symonds & Gorard, 2010)

The first part of the study will include a textual analysis of institutional privacy policies regarding the institution's use of personal information about the users of the website. Textual analysis will be utilized because it is not necessary to conduct a thorough content analysis of the text, but merely to cull through the text for certain themes and concepts that either condone or condemn the viewing or use of personal registration data. The specific policies being researched are called Privacy Policies and are typically linked to at the bottom of every page

within the institution's website. These policies typically address issues like personal privacy, data retention and use, whether the institution has protections to prevent children under 13 from registering and whether they will sell or share private information. (Proctor, Ali & Vu, 2008) These policies are written with a commercial purpose in mind, but apply to all situations involving the disclosure of the information gathered under the policy.

Once the policies have been analyzed, in-depth interviews will be conducted with legal counsel at news companies and private media attorneys around the country. They will be asked questions about how the policies are drafted, how the concept of personal privacy is weighed in the drafting of the policy and whether they believe it is possible for information collected through these policies to be discovered by journalists and published as part of the news reporting process.

The second part of the study will use the themes and concepts from the textual analysis to perform in-depth interviews with newspaper leadership at papers from large national newspaper companies. These questions will inquire about the use of personal information in the reporting process and whether they believe their privacy policy prohibits them from viewing or publishing certain data. The in-depth interview was chosen because it will offer more rich information than a survey and it targets individuals who have personal experience with these policies.

National newspaper chains were chosen because it is expected that many of them use boilerplate privacy policies at many of their papers, so this will allow

the researcher to be efficient in choosing a relatively small number of policies and conducting a relatively small number of interviews.

The questions will range in subject in order to understand not only the issues that are important in the decision-making process to view or publish personal information, but whether this scenario is actually happening in American newsrooms.

### Textual Analysis

The qualitative textual analysis that will start the study will analyze institutional policies regarding the use of personal registration data provided by website users. The study will be limited to daily newspapers from large newspaper chains across the country. Many chains write their website privacy policies at the corporate level, so using policies from large corporations will allow for greater generalizability.

A total of thirteen organizations' privacy policies will be analyzed. The organizations to be studied are the New York Times Company, Gannett Company, McClatchy Newspapers, Advance Publications, Hearst Corporation, Lee Enterprises, Tribune Company, Landmark Media Enterprises, MediaNews Group, Cox Media Group, Freedom Communications, A. H. Belo Corporation and the E.W. Scripps Company. These thirteen corporations represent 336 daily news websites in 46 states and accounted for more than 97,000,000 monthly unique visitors in April 2011. (Compete, 2011) What is missing are smaller news organizations that often hire an outside firm to build their website and may not

have any influence in the development of their privacy policy or even access to the data gathered through that policy.

A textual analysis is a thorough dissection of a text in order to consider how its parts relate to one another. The textual analysis will analyze the texts through an ethical interpretation to understand the values that are inherent in the documents – despite being based on issues like law and policy. The ethical interpretation was described by Berger as a focus on the moral aspects of the beliefs and actions of the characters or items in a text. (Berger, 1995)

For this study, each policy will be read twice using open coding and axial coding in order to ensure that all references to ethics can be extracted from the text. (Creswell, 1998)

Because the texts are not written specifically from an ethical perspective, this study will need to address the use of implications in the portrayal of certain institutional policies. Most of the policies will have either ethical or legal origins – possibly even both. Implication is an important aspect of textual analysis because it often leads to more detailed and revealing information than the text itself. (van Dijk, 1991)

Also, the policies are not written from the perspective of a journalist working for the organization, so implication will have to be used in order to determine possible issues, conflicts and liabilities that might arise from the policies for a journalist.

Issues will be tested for through the textual analysis by looking for the presence or absence of themes condoning or condemning the viewing or use of

personally-identifiable information (PII) and especially text that creates exceptions for viewing or using data in exceptional circumstances.

This research will be viewed through the theory of Social Responsibility in order to determine if the policies assist the journalist in upholding their duty to society without unnecessarily invading the personal rights of an individual.

In order to analyze the texts through Social Responsibility, certain concepts must be operationally defined. The concepts include data use and retention, personal privacy, overriding public need and viewing or using data.

#### Data Use and Retention

Because of privacy concerns, companies with an online presence typically have policies that are stated to the reader before they can voluntarily give over their information. This is to ensure that consumers know how their information will be used. This practice is fairly commonplace online. (Gallagher, 2001)

For the textual analysis and interviews, data use and retention can be defined as any terms referring to the ethical and policy implications of the collection, storage and use of information by a website about its users.

#### Personal Privacy

For the purposes of the textual analysis and interviews, this applies to any terms or phrases referring to the rights of the individual to be free from unnecessary intrusion into their private information that the website might collect.



In this case, personal privacy is the right or privilege to be free from unnecessary infringements on the access or use of personal information that the institution might retain.

#### Overriding Public Need

The one major exception to journalism ethics that allows for the publication of private information about an individual is the overriding public need to know. This refers to information that may need to be published in the interest of society – as determined through a utilitarian analysis of the benefits and risks to both the individual and society.

An overriding public need will be tested through the textual analysis by looking for exceptions in the policies that allow for the use of private data in extreme circumstances. This will also be tested by questioning attorneys as to the legitimacy of certain extraordinary circumstances to see if some policies are more receptive to publication than others.

#### Viewing or Using Data

The final concept that needs to be defined involves the actual use of the data by the journalist.

Terms regarding the viewing or use of data will be viewed within the construct of whether the privacy policy is protecting the right of the institution to look at or use the information, or if the term is protecting the right of the individual to be free from unnecessary invasions of their personal information.

### Interviews with Counsel

After reading the policies, in-depth interviews will be conducted with legal counsel at newspaper companies and media attorneys. The attorneys will be asked about how policies are drafted, how personal privacy is considered in drafting the policy, who participates in the creation of the policy and whether they believe newsroom employees have access to the personal information.

In-depth interviewing allows for an intensive, comprehensive conversation about the topic in order to elicit more descriptive information in order to make more effective inferences about the information being studied. (Gray, Williamson, Karp & Dalphin, 2007)

Interviews with the corporate counsel and private media attorneys will be analyzed for trends that show salient ways in which most companies draft policy, protect personal privacy and perceive how the information is used for marketing and news reporting purposes.

### In-Depth Interviews

For the final part of the study, in-depth interviews will be conducted with editors at newspapers around the country. The editors will be chosen from newspapers that belong to the large newspaper chains that had their website privacy policies analyzed in the first step of the research.

The interviewer will ask them questions about whether the organization has ever looked up personal information about a website user or ever published

that information. They will also be asked about whether they believe their website privacy policy allows them to participate in such activity.

The interviews will be conducted over the phone in order to reach a diversity of newspapers and newspaper chains from around the country. The editors will be chosen by selecting papers from different chains and contacting editors until an interview subject can be located.

The concepts that will be tested include perceptions of data use and retention, mere viewing of data, and whether the organization's policies allow for certain conduct and the retention of certain data. Many of these concepts were also used as variables in the previous textual analysis, but they must be re-tested because the textual analysis was merely looking for trends in internal policies, but the survey will help to recognize what rights editors at these institutions believe they have under these policies.

In-depth interviews are a type of intensive questioning that allows the interviewer to draw out deep information from a subject about their feelings, attitudes and beliefs on a subject. (Gray, Williamson, Karp & Dalphin, 2007) For this study, it will allow the researcher to draw out the subject's feelings and attitudes about their institution's privacy policy and how it affects their employee's ability to do their job effectively.

The researcher will attempt to do interviews with an editor from a newsroom at every news organization, so 13 different editors from different organizations. The editors will be chosen by selecting newspapers from each organization's list of publications and repeatedly attempting to find an editor –

specifically an online editor, managing editor or executive editor - who will agree to participate.

The individuals chosen will be contacted by e-mail and sent an informed consent by e-mail. They will then have the opportunity to choose to participate after being made aware of the procedures.

The conversations will be analyzed for indications of ethical norms, procedures that pertain to applying the privacy policy in the newsroom and how editors perceive the privacy policy affects their reporters' abilities to do their job.

#### Mere Viewing of Data

Mere viewing of data is especially important to the survey because it is not a category that can be adequately tested through the textual analysis since those policies do not typically include a clause considering this highly specific situation. Mere viewing of data consists of a newsroom employee looking up the personal information of a web user for no reason other than to attempt to learn their identity. This could be mere curiosity, or because the reporter or editor thinks that a certain individual is behind the pseudonym and would like to confirm their identity by looking up their information.

Editors will be questioned whether there is a policy in the newsroom that there must be a justifiable reason to merely view the information of an individual commenter or whether the organization would reprimand an individual for simply viewing the data out of simple curiosity. Editors will also be questioned whether a policy exists as to which individuals have access to the data.

## How the Policy Affects the Newsroom

Finally, the editor will be questioned about how they believe the policy affects their employees' ability to do their jobs effectively. This will be interpreted on how the editor believes this policy either positively or negatively affects their job performance and how the job is traditionally done. This will include whether the policy creates a barrier to accessing information that would be crucial in the function of the job.

## Conclusion

This research project will shed considerable light on the perceptions of newspaper journalists as to the implications of using personal data collected through the registration process for their employing institution's website.

The research will glean trends regarding data retention and use from the institution's internal policies and how those policies are incorporated into newsroom culture. Finally, this project will help understand the circumstances under which journalists might find it necessary to breach possible ethical guidelines in order to meet the public's need for important information.

## IV. RESULTS

This research looks at whether news organizations use consistent privacy policies that allow for internal policies that not only protect the interests of the company, but also allow journalists adequate room to report on issues of public importance. The project also examines the ethical questions involved in publishing information that was previously private and the speaker involved never expected to have made public.

How do journalism ethics written for an off-line environment effect the intersection of Internet privacy and the journalist's duty to report the truth about issues of public importance?

### Textual Analysis

The researcher began by collecting the website privacy policy of each online newspaper website for every news corporation in the study. All the policies for each company were collected on the same date in order to account for changes to corporate policy. The policies were collected by creating a PDF version of the privacy policy site in order to maintain the exact look of the page and text from the policy.

Once the policies were collected, all of the policies from each corporation were compared with each other to ensure that boilerplate language was used. For nine of the corporations, all of the newspaper websites used an identical policy.

For three of the corporations, a small minority of the newspaper websites used a slightly different policy from the rest of the corporation. And for The New York Times Company, just *The New York Times* was studied because the paper uses a unique policy. A list of all the corporations and the websites that used the studied policies are included in Appendix 2.

Each company's boilerplate policy was read twice, once for general structure and to identify the pertinent concepts and ideas expressed in the policy, and once to identify the exact language and policy statements on certain topics of specific interest to this study. The policies were then categorized by their level of disclosure of personal information.

Because the policies were written for a marketing purpose, any possible effects of the policies on journalists had to be implied from the text. This was done because as a part of the corporation, journalists are also subject to the contract and none of the corporations specifically exempted journalists or news gathering practices from the provisions of the policy.

The fact that journalists and news gathering practices specifically are not addressed in the policies points to an industry-specific gap in the policies and an area where future development might help news organizations mitigate liability.

The privacy policies of the thirteen corporations studied showed a split in the level of disclosure of personal information collected both voluntarily and involuntarily from the reader by the corporation.

Most of the policies start out with a blanket statement indicating that the policy is meant to protect the individual's private information and that the

organization is committed to protecting that information. However, much of the rest of the document is dedicated to exempting certain situational disclosures from that broad policy statement.

At least two courts that have dealt with subpoenas for the names of commenters have held that a corporate privacy policy that includes that broad statement indicates the individual had an expectation of privacy despite whether they ever read the policy. (*McVicker v. King*, 2010; *Sedersten v. Taylor*, 2009)

The privacy policies studied can be broken down into four categories based on their level of disclosure of personal information. These differences show that although there may be many ways to construct a policy that either protects the consumer's interests or the corporation's, there are four salient categories of disclosure that center around two different privacy practices: linking the individual's personal information with their non-personal information, and selling or renting personal information directly to marketers and advertisers.

#### Anonymous Disclosure

The first typical category includes only one corporation's policy. Landmark Media Enterprises is the only company with a policy that prevents the corporate entity from disclosing personal information and do not link the individual's personal information with their non-personal information.

Not linking personal information is pivotal to protection of personal information because it means that the corporation has no direct link between the individual's personal information and their web history.



Landmark uses strong language to portray how protective they are of the consumer's personal information. For example, they state in their policy that they do perform usage tracking, however they are upfront that they do not match this information. (Landmark Media Enterprises, 2009)

“However, in tracking these usage patterns, we do not match this information with a specific user's personally identifiable information.”

(Landmark Media Enterprises, 2009, Usage tracking, ¶ 1)

Landmark even includes a statement giving an example of how they disclose anonymous information.

“For example, we might disclose that a certain percentage of our users are male or within a certain age range.” (Landmark Media Enterprises, 2009, Your personal information, ¶ 4)

Landmark does reserve the right to sell and/or rent aggregate or anonymous information about their users, however. There was no corporation that did not retain the right to distribute information about their readers. In the case of Landmark, however, this could not include personal information since they do not match personal and non-personal information.

#### Limited Disclosure

The second category includes those corporations that allow for anonymous disclosure only, but include no statement as to whether the company links personally-identifiable information with non-personally-identifiable information in company databases.

Many of the companies in this category, including the New York Times, are very specific about the fact that they do not share or rent personal information.

“The New York Times will not sell, rent, swap or authorize any third party to use your e-mail address or any information that personally identifies you without your permission. We do, however, share information about our audience in aggregate form.” (New York Times Company, 2010, With Whom Do We Share The Information That We Gather, ¶ 1)

What separates the policies in this category from Landmark is that there is no guarantee that the information is not being linked and there is a greater possibility that certain personally-identifiable information may be shared with the newsroom and with marketers.

Other companies with limited disclosure policies include Lee Enterprises, Cox Media Group and Freedom Communications.

#### Advanced Disclosure

The third salient category includes those corporations that only disclose anonymous or aggregated information, but also specifically state that the corporation links personal and non-personal information in databases – increasing the possibility that personal information might be made available to marketers and advertisers.

Websites are trending toward the practice of linking information and consumer advocates are becoming more critical of the practice. In September, 2011, *The Wall Street Journal*, which is owned by News Corp. and was not

studied for this research, changed its privacy policy to allow for linking of personal and non-personal information. After writing a brief explanation of the change, the newspaper was criticized by one media critic for “a crappy and hypocritical move” given the newspaper's extensive reporting on online privacy issues. (Sonderman, 2011)

The Journal defends the practice as a way to provide more personalized services on its website. (Sonderman, 2011)

One of the more enigmatic statements of this type comes from The McClatchy Company. The statement uses language that can be perceived as protective of the consumer, but comes across as more of an attempt to maintain privacy than a promise to protect it. (The McClatchy Company, 2009)

“We also endeavor to keep your personally identifiable information inaccessible to other users or advertisers of \_\_\_\_\_ .com” (The McClatchy Company, 2009, Use of personally identifiable information, ¶ 1)

The use of the word “endeavor” gives the impression that The McClatchy Company is merely attempting to protect information rather than making a strong statement in favor of protection.

Hearst Corporation uses more upfront language about why they link personal information, but that language is suggestive that the company is using personal information – along with data from third parties – to build personal profiles that could be sold or rented. (Hearst Corporation, 2007)

“We may match information collected from you through different means or at different times, including both Personal Information and Web Site usage

information, and use such information along with information obtained from other sources, including third parties.” (Hearst Corporation, 2007, How is the Personal Information Used?, ¶ 1)

Issacson noted that more and more policies are including specific language about the use of linking practices in their privacy policies, but few organizations take the time to justify the practice to the consumer. (Isaacson, 2009) Hearst Corporation was the only company that used a policy that not only acknowledged the practice of linking, but explained the marketing purposes behind why they decided to link information.

The E.W. Scripps Company and the A. H. Belo Corporation were also included in the advanced disclosure category.

#### Full Disclosure

In the final category, the corporations use both practices – linking personal and non-personal information and selling or renting personally-identifiable information directly. This may be the most potentially profitable type of policy, but it is also the least protective of the consumer's information.

For instance, MediaNews Group has only one statement in their policy about how they use an individual's information – hence they do not even distinguish between the use of personal and non-personal information in the way they sell or rent information. (MediaNews Group, 2009)

“MediaNews may share PIN (Personally Identifying Information), CIN (Computer Identifying Information) and/or aggregate information with third

parties such as advertisers and business partners. PIN and CIN may also be used to perform statistical, demographic and marketing analysis of subscribers and their subscribing and purchasing patterns, to target advertisements and to help diagnose problems with our services and our Web sites.” (MediaNews Group, 2009, Use of Information Collected, ¶ 1)

A corporation with a similar policy is Tribune Company. Their policy has a long section outlining all the possible uses of personal information, including a statement that matches exactly to the case studies detailed earlier in this research. (Tribune Company, 2011)

Tribune may disclose information “to attribute content that you make available through the Web site.” This is the only statement by any of the companies that specifically addresses the issue of unmasking the identity of an anonymous - or pseudonymous - speaker on the web site for a purpose other than a subpoena, although no real reason is given why the paper would want to unmask such a reader. (Tribune Company, 2011) This statement is the most protective statement – as applied to journalists – of any of the 13 privacy policies in this study.

Tribune also includes a one-sentence statement that sums up their entire policy on privacy. (Tribune Company, 2011)

“We may also share your information, whether aggregated and/or anonymized or not, with any third party advertisers and/or contractors with which \_\_\_\_\_.com or any Affiliate may have a relationship.” (Tribune Company, 2011, Information sharing and disclosure, ¶ 5)

Gannett Company and Advance Publications were also included in the full disclosure category.

The curious finding about the statements in the full disclosure category is the excessive use of the word “may.” This gives the impression that the company could be disclosing personal information, but may not be. This could either be because the company is not sharing the information, or they are sharing it, but would rather be inconspicuous about that sharing.

Pollach (2005) found that website privacy policies often use statements like “may”, “occasionally” and “from time to time” in order to “downplay the frequency, probability and intensity with which certain practices occur.” (Pollach, 2005, p. 232)

Using privacy policies for the collection of basic demographic information, which is what most of the organizations studied are doing, would be a waste of resources according to Cate. His argument was that putting restrictions on the collection and use of information, that if disclosed would cause little or no harm, adds significant costs to the corporation that has to draft and implement that policy. (Cate, 2002)

In addition, Hinduja argued that most consumers are willing to turn over basic pieces of information – like name, e-mail address and age – not because they are unaware of potential risks, but because they understand any risk that exists is minimal. (Hinduja, 2004)

When these two arguments are applied to the situation of journalism organizations collecting and using basic personal information for marketing

purposes, it appears that the organizations involved are more willing to draft a long and detailed policy that would mitigate the company's liability rather than take the greater risk of having no policy at all.

As the policies apply to journalists, only Tribune Company specifically addressed the ability to attribute anonymous content, but all the corporations exempted themselves from liability for disclosure for general business practices to some extent.

### Interviews with Counsel

After completing the textual analysis, the researcher conducted interviews with attorneys representing media corporations and attorneys who practice media and communications law. The interviews were intended to gather in-depth information about the creation and maintenance of a website privacy policy, how personal privacy interests are taken into consideration in the development of and adherence with the policy and how privacy policies are interpreted when a situation arises.

The researcher contacted 16 attorneys who work for one of the large media corporations studied, four individuals who were listed within the corporate privacy policies as contacts concerning questions about the company's privacy policy, and 11 attorneys who work in the field of media and communications law for a private law firm. One corporate media attorney and four private media and communications law attorneys participated. None of the four contacts specifically listed in corporate privacy policies returned any communications.

## Privacy Policies

Most of the attorneys interviewed said they only had experience interpreting privacy policies for their clients, but the one corporate media attorney interviewed said they had experience drafting policies.

That attorney said the concept behind drafting privacy policies used to be that the company would treat the policy as a formal document stating all possible collections and disclosures of information via any technology. Now privacy advocates and consumers are asking for something more concise. (Anonymous corporate media attorney, April 5, 2011)

“In order to build a privacy policy, you need some organizing principle. Now we're distinguishing based on information you give us and information we get through technology.” (Anonymous corporate media attorney, April 5, 2011)

Based on the earlier analysis of media company privacy policies, this trend appears to be consistent among most – if not all – the companies studied. The policies are typically organized by whether information was voluntarily collected or collected from one's computer the moment one visits the site.

All of the attorneys interviewed recognized the great differences that exist in privacy policy development – especially when it comes to the differences between large news organizations owned by corporations and small news organizations that often use a third-party contractor to host their website.

One attorney who represents media clients – many of which are small – said third party web contractors will often draft the privacy policy and take



ownership of any data collected through user interactivity with the website. This protects the news organization against any possible disclosure liability and subpoenas by law enforcement, but it also inhibits any practical news gathering or marketing value that could be gained from being able to access user personally-identifiable information.

On the other end of the spectrum, large media corporations typically host their own websites, which often have similar design, structure and content management systems company-wide. Another attorney, who often represents news operations owned by large media corporations, said much like third-party website hosting companies, the corporate news entity will take ownership of the data they collect about their users including e-mail addresses, IP addresses, browser type, operating system and even the individual's history of interacting with the site through commenting and other methods. (Anonymous media attorney, June 2, 2011)

From the way the policies are structured, the primary purpose appears to be for marketing purposes – which can be met without any disclosure at all. However, the most lucrative marketing value comes from disclosing pieces of information about the website's users. This will often include anonymized information, but sometimes could include sharing an e-mail address or other personal information.

While sharing information may be a positive use of information for marketing purposes, the attorneys interviewed said journalists would have to adhere by the same requirements since the contract is between the corporate

entity and the reader. And journalists, as employees of the corporation, would be required to comply. The attorneys also said journalists often view the practice of disclosing personally-identifiable information about readers as akin to disclosing the identity of an anonymous source for a news story – no matter how trivial the information provided.

“Most are very aggressive in protecting the anonymity of their posters under the premise of First Amendment protection for anonymous speech,” one media attorney said. (Anonymous media attorney, June 2, 2011)

#### *The Cleveland Plain Dealer* Incident

The attorney representing a large media corporation was unaware of the situation at *The Plain Dealer* and was adamant that it could not occur at his or her company's publications.

“I've never heard of this kind of use. That would not be acceptable use under our policy.” (Anonymous corporate media attorney, April 5, 2011)

This attorney represents a company in the “limited disclosure” category of corporations and *The Plain Dealer*, which is owned by Advance Publications, has a policy in the “full disclosure” category. Advance Internet decided to settle the lawsuit with Judge Saffold instead of going to trial, so it is unknown what legal liability Advance Internet was considering, but it could be that the type of distribution – publication of registration information linked to content that was published pseudonymously – was not a right explicitly reserved by the company in the policy.

Another attorney, who works for a large law firm representing media clients, said he was puzzled by the Cleveland settlement because most privacy policies are vague enough to protect the corporation.

“These policies are typically sufficiently vague and ambiguous as far as giving the media entity discretion that the poster probably has no claim. I’m not sure why they decided to settle. I assume, more than anything, that (Advance Internet) was concerned about the cost of defending the case.” (Anonymous media attorney, June 2, 2011)

Other media attorneys agreed with that statement and one said that corporations establish vague policies for the express purpose of avoiding liability.

“You’re always going to want to avoid setting yourself up for liability – with this policy or any other. You always try to leave yourself some flexibility.” (Anonymous media attorney, July 28, 2011)

Another media attorney added that beyond the vague policy, *The Plain Dealer* may have settled simply because of the public relations situation that was developing since the paper had made what could be perceived as an egregious reporting error by not confirming the story with Judge Saffold. (Anonymous media attorney, August 8, 2011)

#### Protection of Personal Information

The corporate attorney interviewed also expressed angst over the idea of distinguishing between personally-identifiable information and non-personally-identifiable information.

“There is no industry standard. We're getting away from the false distinction between PII and non-PII.” (Anonymous corporate media attorney, April 5, 2011)

This is because corporations have developed ways of identifying individuals based solely on non-personally-identifiable information. By piecing together enough pieces of non-PII, a corporation can come awfully close to identifying an individual's actual identity, but there is still no standard as to how much non-PII it takes to identify someone.

“One person might say three pieces of non-PII can get you really damn close to PII, others might say ten pieces is necessary.” (Anonymous corporate media attorney, April 5, 2011)

The corporate media attorney interviewed stated that journalists at his or her corporation do not have access to any database with personal information included and only a handful of individuals would be able to access the information at all.

The other attorneys interviewed said the companies they often represent use a variety of information access policies, but typically an online editor and possibly other online employees will have access to information that could lead to the individual's identity. None of these attorneys stated that it would be difficult to gather at least the commenter's IP address.

One attorney said the Internet has changed understandings so that now most people realize they are not anonymous, but many people have not adapted their behavior to the realization that someone could pinpoint their identity.

“Certainly I don't expect that I have an expectation that no one is ever going to find out who I am. I do, however, have an expectation that my identity won't be published without my consent.” (Anonymous media attorney, June 2, 2011)

He added that most questions of privacy come down to the issue of “reasonableness”, and whether someone has a reasonable expectation of privacy on the Internet is still a highly debated issue.

But another attorney said that while online behavior is changing, website visitors are not necessarily making informed decisions based on each website's privacy policy.

“I have serious doubts whether the typical poster to a news website reads the policy in advance and frames their comments based on the policy. This is a classic shrink wrap agreement.” (Anonymous media attorney, June 1, 2011)

This same issue was addressed by Solove, who argued that the basic premise of privacy policies is to establish an agreement for the transaction of information between two parties – however, there is a great inequality in the agreed relationship and the consumer has no bargaining ability in the creation of the agreement – resulting in a contract that may lack true consent. (Solove, 2001)

In two federal district court cases involving subpoenas of media companies to unmask anonymous commenters, judges found that the privacy policies created a reasonable expectation of privacy for the commenter to publish anonymously.

In the case of *Sedersten v. Taylor*, which involved the Gannett-owned *Springfield News-Leader* (Mo.), the judge held that the policy's blanket

statement protecting the individual's privacy trumped any later statement in the policy that could be seen as waiving a constitutional right to speak anonymously. (*Sedersten v. Taylor*, 2009)

“Nothing on the face of the privacy policy even hints a user may be waiving his or her constitutional right to anonymous free speech by posting comments or materials on the *News-Leader's* website. Given the presumption against waiver and the boiler-plate language Plaintiff relies upon, it cannot be said that the anonymous poster was aware he or she may be waiving the right to free speech, let alone the significance of such waiver.” (*Sedersten v. Taylor*, 2009, p. 3)

In *McVicker v. King*, the judge held that a similar blanket statement in a policy for the Trib Total Media Group and its news organizations granted website users protection against their identity being disclosed to law enforcement. (*McVicker v. King*, 2010)

“The Privacy Policy clearly reflects that Trib Total Media will disclose its users personally identifiable information only in very limited situations. Thus, the Court finds that the terms of service of the blog create an expectation of privacy for any registered user.” (*McVicker v. King*, 2010, p. 96)

The legal questions in those two cases are not completely comparable to the current situation because in those cases constitutional issues arose because government officials were subpoenaing the disclosure of the identities of anonymous commenters from the news organizations. However, the fact that judges had found the privacy policies to have created an expectation of privacy goes against what most media attorneys stated as to the vagueness of the policies.

If the traditional online privacy policy is vague enough as to cause one to waive their expectation of privacy and individuals are agreeing to such terms on a regular basis, the question of whether an individual can actually ever control the information that exists about themselves is brought into serious question.

One media attorney pointed out that even if the individuals being unmasked are public officials and the disclosure is newsworthy, the news organization may still be liable depending on their privacy policy. In traditional privacy jurisprudence, public officials have a lower expectation of privacy – especially in a newsworthy situation – but because the privacy policy is a private contract between an individual and a corporation, the situation is a breach of contract question and not a privacy law question – thus making any issues of public importance or newsworthiness moot. (Anonymous media attorney, August 8, 2011)

The issue of whether a news organization can violate a contract with a purported source even when the information involves a public official or a newsworthy piece of information was decided by the United States Supreme Court in 1991 in *Cohen v. Cowles Media*. The Court held that a journalist does not have a First Amendment freedom of the press exemption from a generally applicable law like a contract claim. (*Cohen v. Cowles Media*, 1991, p. 671-672) However, the Court held that a state's constitution or laws could possibly prevent certain state law claims from being enforced against journalists within the practice of reporting the news. (*Cohen v. Cowles Media*, 1991, p. 672)

### Interviews with Editors

After interviewing attorneys, the researcher conducted interviews with seven editors representing different news organizations covered by the studied policies. The editors ranged from newsroom managing editors to editors who managed the organization's online news operation. The interviews were intended to gather information about the newsroom policies of how to collect, manage and protect personal information gathered from website users and also how journalists approach ethical issues surrounding publishing the information.

The researcher contacted 133 editors from all 13 corporations studied. Seven individual editors agreed to participate. All participating individuals represented a different corporation.

Editors' perspective of personal privacy were ethics-based rather than legal-based, they were insistent that their organization's practices were protective of the personal information of their readers, and they applied traditional journalism ethics in situations involving anonymous sources to the issue of anonymous commenters.

### Defining Privacy Policy

The first issue that had to be addressed with each editor was the difference between the newsroom's ethics policy as applied to privacy situations and the corporation's boilerplate legal privacy policy. To the editors interviewed, the difference was nuanced and for some even insignificant because many believed that the corporate policy did not actually apply to their work.



Of the editors interviewed, none stated that the company's legal privacy policy was referred to in situations where the newspaper might be looking at the personally-identifiable information of a reader in order to determine whether to publish the information. In fact, a number of interviewees were dismissive toward the policy.

An editor from a Hearst newspaper said their newsroom follows an internal ethics policy when it comes to issues of disclosing personal information. They were unsure of how the company's legal privacy policy might apply and referred to it as a boilerplate policy that lawyers can “throw in your face on the witness stand.” (Anonymous Hearst Corporation editor, June 15, 2011)

An editor from a Lee Enterprises newspaper was confused why the company's privacy policy would apply to an anonymous commenter situation because the newsroom already has a separate policy in place. They said the first step when attempting to identify an anonymous commenter – which is rarely done – is to contact them via their provided e-mail address. If it were necessary to go further, they could attempt to look up the individual's IP address. (Anonymous Lee Enterprises editor, June 16, 2011)

One editor from a McClatchy newspaper said they were aware of the corporate privacy policy, but mistakenly believed that the policy only applied to business and marketing transactions of information and did not apply to situations involving the newsroom. (Anonymous McClatchy Newspapers editor, July 7, 2011)

## Access to Information

One of the easiest ways to protect personal information is to place the information under strict controls that prevent access by most employees. There appeared to be differing standards for how access to information within the newsroom was controlled, according to editors.

All of the editors interviewed described their access scenarios as falling into one of three categories: corporate control, online staff control or access for all newsroom employees. The level of control used can contain the amount of times that employees will merely view the personal data out of curiosity or based on a hunch.

The only institution that appeared to have a system in place that allowed all newsroom employees access to personal information about online users was at the Hearst newspaper studied. The editor interviewed stated that the website only allows commenting on blogs, but anyone with access to the WordPress-based blogging system could see information about commenters including possibly identifying information like e-mail address and IP address. (Anonymous Hearst Corporation editor, June 15, 2011)

At most organizations, information was controlled by the online news staff. In this situation, the salient standard operating procedure was that a news staff member could ask a member of the online staff for access to a specific web user's registration information – typically an e-mail address. Whether or not that information is turned over depended upon the reason that the staff member wanted to contact the web user.

“I want to know why they want to contact the person and later I want to know if the person was upset that the reporter got their e-mail address,” said one Tribune editor. (Anonymous Tribune Company editor, June 22, 2011)

Another method, which is used by the Gannett editor interviewed, is that when a news staff member asks to contact a web user, the online editor will e-mail the user with the request for them to contact the other staff member if they are willing. The editor said this was to give the perception of an additional level of security for the user's information.

“It's probably all psychological, but we don't want them to think that their information is too accessible.” (Anonymous Gannett Company editor, June 30, 2011)

The most restrictive access policy, however, is used by Advance. The editor interviewed stated that prior to the disclosure incident at *The Plain Dealer*, an Advance publication, newsroom online employees had access to the e-mail address of the commenter posting the statement. The e-mail address involved in the Cleveland case is what initially led the reporter involved to suspect that Judge Shirley Strickland-Saffold was making the comments. (Saffold complaint, 2010) Now editors and online news staff members are required to contact Advance Internet – a subsidiary of Advance Publications – in New Jersey to request access to a user's contact information. Advance Internet will send an e-mail to the user and request they contact the reporter themselves – much like how the Gannett news organization described its process. (Anonymous Advance Publications editor, June 30, 2011)

This was the only corporation that required newsroom employees to go outside of the news environment to request access to information.

All of the situations of disclosure of personally-identifiable information through the reporting process have come from a newsroom employee having access to information – either an e-mail address or an IP address – that has led to a certain individual or a certain computer. Thus, access appears to be the greatest determiner of whether a news-based disclosure will occur.

Cate would argue that policies that place too much restriction on the journalist's access to the information are only creating additional unnecessary costs to the institution – costs that could be avoided by acknowledging that incidental leaks of information will cause little or no harm. (Cate, 2002) Under this approach, policies like Hearst's may be too lenient while Advance is too strict. However, an approach like Gannett's, which only requires asking a superior for the information, may be sufficient at reducing resource costs.

#### Commenters as Anonymous Sources

All of the editors interviewed compared anonymous commenters – and the newsroom's duty to protect their identity – to anonymous sources. A few editors expressed concern that there was no real news value in protecting the identity of online commenters and ethics-based review of the system does not merit protecting these individuals.

Most of the newer commenting systems are embracing identity in an attempt to make the commenting process more civil, personal and less

overwhelming on staff resources since it is believed that fewer people will comment using their real name.

Despite the trend to protect commenters like anonymous sources, most editors stated their anonymous commenting systems are disliked by newsroom staff members. An editor with Advance suggested a commenting policy that was similar to that used for letters to the editor – name and hometown.

“Most of us believe commenters would be more well-behaved if their names were on things. It would make it a better experience for everybody. Stick to the context of the story and be more pleasant to one another. The reality of finding out who your readers are is disheartening.” (Anonymous Advance Publications editor, June 30, 2011)

None of the editors interviewed could explain the initial decision at their news organization to start offering anonymous commenting, but some recognized the added value it can bring to the site through additional page views and increased traffic that allows the news organization to charge higher rates for advertising. Only one editor, from the Tribune Company, said they did not believe that taking away anonymous commenting would cause a drop in traffic to the website. (Anonymous Tribune Company editor, June 22, 2011)

The Tribune editor was also one of the most adamant about stressing that the personal information of commenters would be protected. They stated that the information is secure and that no one else would be able to access it unless going through a member of the online staff. The editor also recognized that members of other departments in the organization had access to personal information, but

they were also devoted to protecting that information. (Anonymous Tribune Company editor, June 22, 2011)

That statement is possibly in contradiction with the very permissive privacy policy that Tribune states on its web properties – stating that the company may use personal information for any business purpose and share the information with any affiliate for any reason.

Tribune Company was also the only company to state in its privacy policy that the corporation may specifically use personal information to discover the identity of an anonymous commenter – although merely discovering one's identity without publishing the information is not typically a disallowed practice under any of the company's policies. (Tribune Company, 2011)

Editors interviewed stated that a situation like what occurred at *The Plain Dealer* would not happen at their organizations because traditional journalism ethics and practices would require the journalist to at least confirm the information in the company's database by inquiring with the individual if they had made the comments in question.

“We wouldn't out someone just on the basis of a comment alone. We would make every effort to contact someone.” (Anonymous Cox Media Group editor, June 23, 2011)

This stance appears to comply with traditional journalism ethics standards that require journalists to use caution when reporting on private individuals and as stated in the SPJ Code of Ethics, “[a]void pandering to lurid curiosity.” (“SPJ Code of Ethics,” 1996)

But once the question was posed as a public official or public figure using the anonymous commenting system as a method for speaking on issues of public importance, most editors stated that they would consider the possibility of unmasking the individual, but only after a long discussion balancing the ethical considerations.

“I'd probably imagine that would be a story – there would be a lot more input and a lot more thought involved, though. But contacting them, that just seems basic.” (Anonymous Gannett Company editor, June 30, 2011)

“If the issue came up to out an individual, I would bounce it off some other people. A vigorous discussion would happen before it was disclosed.”  
(Anonymous Hearst Corporation editor, June 15, 2011)

However, the Hearst editor said the news organization often discusses protecting the anonymity of a commenter against public officials attempting to identify their accusers. (Anonymous Hearst Corporation editor, June 15, 2011)

Journalists justified the decision to treat public officials differently based on the individual's status in society as someone who creates public policy and helps to write laws. This notion of a public/private distinction is not expressly stated in the Hutchins Report's stance on Social Responsibility, but Christians and Nordenstreng stated in their analysis of Social Responsibility that the press can only be effective when given the ability to hold those in power accountable. (Commission on Freedom of the Press, 1947; Christians & Nordenstreng, 2004)

Because of the public nature of online communication, it was difficult to determine from editors what they considered the test of whether an individual

was a public or private individual online because the speaker expected to be anonymous, yet was making public statements about public issues. In addition, what amount of evidence would suffice to determine the identity of an individual – since data provided in an online is often fabricated or unhelpful.

Across the board, editors were adamant about protecting the identity of anonymous commenters like sources, almost indignant that they would never let a situation like the one in Cleveland occur in their newsroom.

That salient situation – when the editor had reason to believe that a public official or employee was using the commenting method for questionable purposes including making personal attacks on their opponents, making obscene or offensive comments and/or inundating the commenting system with suspect messages in support of their stance on an issue – developed as a categorical exception to the rule.

However, it was not enough for a public official to use the commenting system only to attempt to drive public opinion – much like how public officials have been ghost writing letters to the editors of local newspapers for years – but that the attempts become so sycophantic and numerous as to create an apparent air of suspicion.



## V. DISCUSSION AND CONCLUSION

A conflicting understanding of how a website's privacy policy applies to journalists has resulted in a situation where journalism ethics and contract law appear to exist in harmony – absent an egregious disclosure situation that could cause damage, like it did at *The Cleveland Plain Dealer*.

This coincidence creates an unnecessary risk that can be remedied with simple changes to the privacy policy and newsroom practice and by adopting an approach to privacy that includes recognizing that traditional journalism ethics extend to online journalism – including content created by a third party.

### Summary of Research Questions

The following research questions were addressed through the textual analysis and subsequent interviews:

**RQ1:** Whether newspaper website privacy policies effectively protect the privacy rights of individuals using their site?

**RQ2:** Whether newspaper website privacy policies effectively reflect traditional journalism ethics?

**RQ3:** Whether newspaper leadership sets newsroom policy that effectively allows for the use of personally-identifiable information in the news

reporting process while still protecting the individual's privacy and abiding by the institution's privacy policy?

Relying on a system of internal policies that includes discussions of professional ethics, unwritten rules, and a lack of a consistently-applied approach threatens to derail the attempts of journalists to use their website as an effective reporting tool without also jeopardizing their relationship with their readership.

### Protecting the User's Information

The majority of newspaper privacy policies studied use a dangerous mix of collecting PII, linking non-PII to PII and sharing both types of information. This means that the typical web user should not expect information they share with that corporation for commercial purposes to stay private.

Eight of the 13 companies surveyed link information and share in ways that could increase digital advertising revenue for the company, but put the individual at risk.

Only Hearst Corporation was up-front about the purpose of linking the information – in order to create an understanding between the corporation and the consumer. Most corporations took an ownership approach instead – merely explaining that once the data was transferred to the corporation it became corporate property for whatever purpose necessary.

As Isaacson suggested, being up-front about the purpose of linking PII and non-PII is the optimal approach for being honest with the organization's

readership while also taking advantage of the information's possible uses.

(Isaacson, 2009)

However, protecting the consumer's privacy interests is only one consideration a corporation must make, and according to Cate an over-reliance on security measures can inhibit the corporation from making effective use of the information they collect. (Cate, 2002) If the Cate approach were to be followed, organizations would place stricter controls on PII than non-PII. However, the research shows that many organizations recognize the false distinction between the two kinds of information and are capable of turning non-PII into valuable PII.

Despite the fact that the privacy policy is typically intended to promote marketing purposes, the policy also applies to journalists – and a policy that possibly puts readers at unnecessary risk does not adhere to the SPJ Code of Ethics' stance on minimizing harm. (SPJ Code of Ethics, 1996)

### Reflecting Traditional Journalism Ethics

While journalism ethics might lead to the decision that involves the least amount of liability in most cases, the balancing of privacy interests when a public figure or official is involved opens up the institution to possible litigation. It may be a defense to a cause of action for breach of privacy that the individual was a public figure, that they had no reasonable expectation of privacy or that they had engaged in some newsworthy conduct; however, a breach of contract claim does not include such affirmative defenses and the institution could be held liable despite the public status of the individual or the newsworthiness of the situation.

The institution's privacy policy may be vague enough to protect the journalist when disclosing personal information about public figures or officials, but without definitive language on the subject, the journalist is practicing at the mercy of a judge or jury who is sympathetic to their situation. While they may show sympathy in a situation where a public figure has used anonymity to disguise what many might believe should be public conduct, it is not effective in a situation like what happened in Cleveland where a lack of diligent news reporting led to the publication of false information.

The simple fact that the privacy policy is vague enough to protect the journalist's actions does not necessarily mean that the policy is in-line with traditional journalism ethics. Just as it protects the journalist in disclosing information about public figures, it does little to protect the interests of the private individual. This does not adhere to the basic protections outlined in traditional journalism ethics to protect the privacy of private individuals. (Hutchins Commission, 1947; RTNDA Code of Ethics and Professional Conduct, 2000; SPJ Code of Ethics, 1996)

### Adapting Newsroom Policy

Editors who were interviewed often were confused when asked about the existence of a written privacy policy and just assumed the researcher was asking about an unwritten newsroom ethics policy.

The unwritten newsroom policy as explained by the editor often went above and beyond traditional journalism ethics and followed the existing legal

policy; however, editors were often quick to abandon their adherence to the rules when asked about hypothetical situations that have occurred in other newsrooms involving public individuals.

Editors stated that they would likely look into the situation of a public figure using their website for discussing public issues behind a veil of secrecy, but none stated that they would consult the website's privacy policy before possibly identifying the individual. This is where the unwritten policy of the newsroom begins to stray from the website privacy policy's stance on disclosure.

This policy, while not legally-binding, amounts to a form of self-censorship as expressed by Christians and Nordenstreng and helps the journalists protect themselves from regrettable conduct. (Christians and Nordenstreng, 2004)

### Recommendations

- Newsrooms should develop a written policy explaining the circumstances under which they would consider publishing the identity of an anonymous commenter after a conversation about the ethics surrounding the situation. This policy should apply to situations where the commenter is known to be a public official, public figure, or public employee using public resources; and that individual is using a pseudonym to comment on public affairs, to make personal attacks, or to make obscene or offensive comments.

The policy should also include a statement requiring that the news organization reach out to the individual in order for them to confirm or deny the connection.

This policy would reflect an interest by the corporation in promoting social responsibility and building trust with consumers by limiting the situations in which the corporation might use information gathered from readers.

- News organizations should amend their privacy policies to more accurately reflect traditional journalism ethics. This would include a statement that allows for disclosure of personal information when the news organization has reason to believe the individual is a public official, public figure, or a public employee using a pseudonym to protect their identity.

This statement is more broad than necessary, but protects the news organization's ability to report on public issues and applies a standard similar to that used in journalism ethics.

This change is relatively simple to make in terms of traditional journalism ethics because public figures are treated differently than private individuals – the bigger issue would be defining in the policy those individuals who merit increased scrutiny.

This change would support the theory of social responsibility and traditional journalism ethics by encouraging a unified approach on how to deal with the disclosure of personal information about website users – specifically public individuals.

News organizations are constantly searching for new ways to increase revenue from their websites, and the collection and sale of information about web users can be a lucrative business, however, traditional journalism ethics and newly-developed marketing practices should be able to co-exist as long as

newsrooms are explicit with the ways they access and use the personal information collected.

These two recommendations would greatly reduce the liability of the news organizations when publishing the personal information of an anonymous commenter, as these two suggestions would cover all of the real world case studies presented earlier and possibly could have prevented the situation that occurred at *The Cleveland Plain Dealer*.

### Limitations and Future Research

This research does not explain why journalists would feel compelled to protect the interests of anonymous commenters, but merely aims to understand the ethical questions that surround the decision to make some individuals' personal information public.

This research also does not attempt to discover the reason why journalists accepted anonymity in commenting. Many of the editors struggled with understanding why the approach was originally taken and even those who have been in their roles for a long time cannot recall why anonymity was implemented.

This research could be expanded as part of the larger ethics conversation as to how journalism ethics should apply in a digital news environment and whether changes should be made to traditional journalism ethics or new ethics guidelines should be developed specifically for online journalism.

Whether personal privacy exists online as it does in real life is up for debate, but this research shows that one's reasonable expectation of privacy

online depends greatly on a myriad of contractual relationships made daily between a consumer who has little bargaining power and a large corporation.

Further research could also be done as to how public officials and public figures use digital media – both by using their real name and with a pseudonym – in order to comment on public issues and attempt to drive public opinion.

A unified approach to data privacy by news organizations online may be difficult because of the number of companies involved. However, a concerted effort by major corporations to streamline traditional journalism ethics with corporate privacy policies and attempting to ensure that disclosures are only made in a specific type of situation that promotes the public good would bring more stability to the confluence of privacy and news gathering in a digital environment.

### Conclusion

A corporation's need for increased digital revenue mixed with a journalist's need to report on issues of public importance need not be principles that exist in conflict with one another. A simple approach to information collection and sharing that promotes the use of information for marketing purposes while placing reasonable restrictions on how journalists access and use the information would improve the practice of collecting information about individuals.

It is unclear why privacy policies were not drafted with journalists in mind, but the nature of the profession requires a written policy that dictates the actions of both the corporation and the journalist in furtherance of a greater policy protecting private individuals while upholding the watchdog role of the press.



## **1. Attorney Recruitment Email**

My name is David Wolfgang and I am a Master's student in journalism and a law student at the University of Missouri working on my thesis on news website privacy policies. I am writing you to request a short interview to ask about your institution's policy and how it was drafted and updated. The interview would take no more than 15-20 minutes.

Sample questions include:

- Who participates in drafting the policy?
- How is the issue of personal privacy weighed in the drafting process?
- Is the policy drafted at the corporate level?
- What protections are taken to prevent misuse of personal information?

If you would be willing to participate, you can respond to this e-mail to set up a time that works best for you for an interview.

Thank you for your time and assistance. Sincerely,

David Wolfgang

## **2. Editor Recruitment Email**

I am a graduate student at the Missouri School of Journalism at the University of Missouri. I would like to invite you to participate in my research study to investigate newspaper website privacy policies and whether they can be used in the news reporting process.

For this part of the research, I will be conducting telephone interviews with newspaper editors. You may participate if you are a working journalist and an editor at a newspaper in the United States.

Participants will be asked to answer a set of questions over the phone that should only take 20 to 25 minutes.

Because you will be asked questions about your feelings regarding certain journalism ethics, there is a minimal risk that your answers could cause some harm if they were discovered. The study will only ask a few demographic questions and your personal information will not be disclosed in order to protect your identity. None of the personal data from this research project will be published, but ultimate findings will possibly be published.

If you would like to know more information about this study you can contact me by sending me an e-mail at [jdwc5f@mail.missouri.edu](mailto:jdwc5f@mail.missouri.edu) or my advisor, Dr. Charles Davis at [daviscn@missouri.edu](mailto:daviscn@missouri.edu). If you decide to participate after reading this letter, you can respond by e-mailing me.

If you have any questions about your rights as a research participant, you can contact the University of Missouri Institutional Review Board at 573.882.9585.

Thank you for your consideration,

David Wolfgang

### 3. Informed Consent

INFORMED CONSENT – Project #1182037

Title of Research: Data Privacy in the Newsroom: The ethical justifications of using user data in the reporting process.

Investigator: David Wolfgang, Missouri School of Journalism graduate student.  
Faculty advisor - Dr. Charles Davis, Missouri School of Journalism.

Before agreeing to participate in this research, read the following statement. This form describes the purpose and procedures of the study. Also described is your right to withdraw at any time.

#### Procedures.

You are being asked to answer questions about journalism ethics. Questions will also be asked about data privacy and news reporting.

The research involves an interview with editors at newspapers. The interview should take about 20 to 25 minutes to complete.

The data will be studied to see how editors see ethics and their website privacy policy. It will also be studied to see how they feel about using personal data in the reporting process.

Your information will be stored without personal data to protect your identity.

#### Risks and Discomforts.

There is a minimal risk that if your identifying information were to become known, that your information could cause a risk with your employer depending on the answers you provide.

#### Benefits.

There are no direct benefits from this study. The research might yield knowledge about journalism ethics.

#### Confidentiality.

All information will remain confidential. Your identity will be coded by the organization you work for and not by your name. All your information will be recorded and maintained with a code number that is assigned to the organization you work for and not by your name, the exact newspaper you work for or any other identifying criteria.

If you choose to withdraw from the study, the data you had provided up to that point will be destroyed

A record will be kept that you participated, but your responses will not be connected. The data from this research will be shared with fellow researchers on this project and may be

published, but your identity will not be shared or published.

The data will only be accessible by the researchers on this project and no one else. It will be stored by the researcher for 7 years after the completion of this project before being destroyed.

Withdrawal Without Prejudice.

Participation in this study is voluntary. You are free to withdraw consent at any time without punishment. If you choose to withdraw, your information will be destroyed and will not be used in the research.

Questions.

Any questions can be sent to Dr. Charles Davis (faculty advisor) at 573.882.5736 or [daviscn@missouri.edu](mailto:daviscn@missouri.edu); or the researcher David Wolfgang at [jdwc5f@mail.missouri.edu](mailto:jdwc5f@mail.missouri.edu).

The Campus Institutional Review Board approved this research study. You may contact the Campus Institutional Review Board if you have questions about your rights, concerns, complaints or comments as a research participant. You can contact the Campus Institutional Review Board directly by telephone or email to voice or solicit any concerns, questions, input or complaints about the research study.

483 McReynolds Hall E-Mail: [umcresearchcirb@missouri.edu](mailto:umcresearchcirb@missouri.edu)  
Columbia, MO 65211 Website: <http://www.research.missouri.edu/cirb/index.htm>  
573-882-9585

Agreement.

This agreement states that you have received a copy of this informed consent.

## **4. Attorney Interview Questions**

1. Is your policy company specific or written at the local level?
2. In general, what experience do you have with interpreting website privacy policies?
3. What personal privacy considerations are weighed in the drafting of the policy?
4. Outside of counsel, which individuals from the company are involved in the drafting of the privacy policy?
5. Do you believe it is possible for information collected through the privacy policy to be published as part of the news reporting process?
6. Do newsroom employees have access to personal information provided by the user?
7. What protections are taken to prevent misuse of personal information?
8. Who in the company is given access to data collected about user's of the website?
9. How much is the value of the data at stake considered? Whether or not to share just non-personally-identifiable data or to share all data with outsiders?
10. Do you think it is reasonable to say that a typical website user has a reasonable expectation of privacy?

## **5. Editor Interview Questions**

1. Does your news organization have a policy or procedure on how to deal with pseudonymous commenters and other users who interact with the website?
2. What happens if a reporter or editor becomes curious as to the identity of a pseudonymous user?
3. Does the news organization commonly attempt to identify an individual online?
4. What is the most important factor you consider in deciding whether or not to attempt to discover the identity of a pseudonymous user?
5. How likely would you be to publish the person's identity?
6. Do you believe that traditional journalism ethics can be applied to the situation of website commenting and anonymity? Or does the industry need a new set of rules to deal with online issues?
7. Would you feel differently about publishing a user's personal information if you had reason to believe they were a public official?
8. Do you believe your website privacy policy prevents you from publishing an individual's personal information?

## **6. Policies By Category**

### **Anonymous Disclosure**

Landmark Media Enterprises

### **Limited Disclosure**

New York Times Company

Lee Enterprises

Cox Media Group

Freedom Communications

### **Advanced Disclosure**

The McClatchy Company

Hearst Corporation

E.W. Scripps Company

A. H. Belo Corporation

### **Full Disclosure**

MediaNews Group

Gannett Company

Advance Publications

Tribune Company

## **7. News Websites Surveyed By Company**

### **Advance Publications (surveyed 1/2/2011)**

The Birmingham News, AL  
The Huntsville Times, AL  
Press-Register, AL  
The Plain Dealer, OH  
Sun News, OH  
The Republican, MA  
The Bay City Times, MI  
The Flint Journal  
The Grand Rapids Press  
Jackson Citizen Patriot  
Kalamazoo Gazette  
Muskegon Chronicle  
The Saginaw News  
The Mississippi Press  
The Express-Times, PA  
The Post-Standard, NY  
The Star-Ledger, NJ  
The Times, NJ  
The Jersey Journal, NJ  
Gloucester County Times, NJ  
The News of Cumberland County, NJ  
Today's Sunbeam, NJ  
Hunterdon County Democrat, NJ  
The Warren Reporter, NJ  
The Messenger-Gazette (Somerset), NJ  
Independent Press, NJ  
Suburban News, NJ  
Cranford Chronicle, NJ  
The Times-Picayune  
The Oregonian  
Hillsboro Argus, OR  
The Patriot News, PA  
Staten Island Advance, NY

### **Cox Media Group (surveyed 2/7/2011)**

Atlanta Journal Constitution  
Austin American-Statesman  
Dayton Daily News  
JournalNews - Hamilton, OH



Middletown Journal, OH  
Palm Beach Daily News  
Palm Beach Post  
Springfield News-Sun, OH

**Freedom Communications (surveyed 2/7/2011)**

Appeal-Democrat, CA  
Brownsville Herald  
Clovis News Journal, NM  
Colusa County Sun-Herald, CA  
Corning Observer, CA  
Daily News, Jacksonville, NC  
Daily Press, Victorville, CA  
Desert Dispatch, Barstow, CA  
Destin Log, Destin, FL  
Free Press, Kinston, NC  
Gaston Gazette, Gastonia, NC  
Gazette, Colorado Springs  
Havelock News, NC  
Hesperia Star, CA  
Jacksonville Journal-Courier  
Jones County Post, Trenton, NC  
Lima News, OH  
Lucerne Valley Leader, CA  
Mid Valley Town Crier, TX  
The Monitor, McAllen, TX  
News Herald, Panama City, FL  
Northwest Florida Daily News  
Odessa American  
Orange County Register  
Orland Press-Register, CA  
Portales News-Tribune, NM  
Porterville Recorder, CA  
Quay County Sun  
Sedalia Democrat  
Shelby Star, Shelby, NC  
The Star, Port St. Joe, FL  
The Sun, Yuma, AZ  
Sun Journal, New Bern, NC  
The Telegraph, Alton, IL  
Times-News, Burlington, NC  
The Topsail Advertiser, Surf City, NC  
The Tribune, Seymour, IN  
The Walton Sun, Santa Rosa Beach

Willows Journal, CA  
Valley Morning Star, Harlingen, TX

**Gannett Company (surveyed 1/4/2011)**

Montgomery Advertiser  
The Arizona Republic  
Tusconcitizen.com  
The Baxter Bulletin, Mountain Home, Arkansas  
The Salinas Californian  
The Desert Sun, Palm Springs  
Tulare Advance-Register  
Visalia Times-Delta  
Fort Collins Coloradoan  
The News Journal, Wilmington  
Florida Today, Brevard County  
The News-Press, Fort Myers  
Pensacola News Journal  
Tallahassee Democrat  
Pacific Daily News, Hagatna, Guam  
The Indianapolis Star, Indianapolis  
Journal and Courier, Lafayette, IN  
Palladium-Item, Richmond, IN  
The Star Press, Muncie  
The Des Moines Register  
Iowa City Press-Citizen  
The Courier-Journal, Louisville  
The Town Talk, Alexandria  
The Daily Advertiser, Lafayette, LA  
The News-Star, Monroe  
Daily World, Opelousas  
The Times, Shreveport  
The Daily Times, Salisbury, MD  
Battle Creek Enquirer  
Detroit Free Press  
Daily Press & Argus, Livingston County, MI  
Times Herald, Port Huron  
St. Cloud Times  
Hattiesburg American, Hattiesburg MS  
The Clarion-Ledger, Jackson, MS  
Springfield News-Leader  
Great Falls Tribune, MT  
Reno Gazette-Journal, Reno, NV  
Asbury Park Press, Neptune, NJ  
Courier News, Somerville, NJ

Courier-Post, Cherry Hill, NJ  
Home News Tribune, East Brunswick, NJ  
Daily Record, Parsippany, NH  
The Daily Journal, Vineland  
The Ithaca Journal  
The Journal News, Westchester County, NY  
Poughkeepsie Journal  
Press & Sun-Bulletin, Binghamton  
Rochester Democrat and Chronicle, Rochester  
Star-Gazette, Elmira, NY  
Asheville Citizen-Times, Asheville, NC  
The Advocate, Newark, OH  
Chillicothe Gazette, Chillicothe, OH  
The Cincinnati Enquirer  
Coshocton Tribune, OH  
Lancaster Eagle-Gazette, Lancaster, OH  
The Marion Star, OH  
News Herald, Port Clinton, OH  
News Journal, Mansfield, OH  
The News-Messenger, Fremont, OH  
Telegraph-Forum, Bucyrus, OH  
Times Recorder, Zanesville, OH  
Statesman Journal, Salem, OR  
The Greenville News, Greenville, SC  
Argus Leader  
The Leaf-Chronicle, Clarksville, TN  
The Tennessean, Nashville, TN  
The Jackson Sun, Jackson, TN  
The Daily News Journal, Murfreesboro  
The Spectrum, St. George, UT  
The Burlington Free Press, Burlington, VT  
The Daily News Leader, Staunton, VA  
The Daily Tribune, Wisconsin Rapids, WI  
Green Bay Press-Gazette  
Herald Times Reporter, Monitowoc  
Marshfield News-Herald, Marshfield, WI  
Oshkosh Northwestern, Oshkosh  
The Post-Crescent, Appleton, WI  
The Reporter, Fond du Lac, WI  
The Sheboygan Press, WI  
Stevens Point Journal, WI  
Wausau Daily Herald, WI

**Hearst Corporation (surveyed 1/2/2011)**

The Advocate, CT  
Albany Times Union, NY  
Beaumont Enterprise, TX  
Connecticut Post, CT  
Edwardsville Intelligencer, IL  
Greenwich Time, CT  
Houston Chronicle, TX  
Huron Daily Tribune, MI  
Laredo Morning Times, TX  
Midland Daily News, MI  
Midland Reporter-Telegram, TX  
The News-Times, CT  
Plainview Daily Herald, TX  
San Antonio Express-News, TX  
San Francisco Chronicle, CA  
Seattlepi.com, WA

**Landmark Media Enterprises (surveyed 1/2/2011)**

The Roanoke Times  
Carroll County Times, MD  
Citrus County Chronicle, Florida  
The News-Enterprise, KY  
Los Alamos Monitor, NM  
Los Vegas Optic, NM

**Lee Enterprises (surveyed 1/2/2011)**

Arizona Daily Sun  
Arizona Daily Star  
Santa Maria Times, CA  
The Lompoc Record, CA  
North County Times, CA  
Napa Valley Register  
The Garden Island, HI  
The Times-News, ID  
Elko Daily Free Press, NV  
The Pantagraph, IL  
The Southern Illinoisan  
Herald & Review, Decatur, IL  
Times-Courier, Charleston, IL  
The Times, NW Indiana, Munster  
Globe Gazette, Mason City, IA  
Quad-City Times

Muscatine Journal  
Sioux City Journal  
The Courier, Waterloo/Cedar Falls, IA  
The Ledger-Independent, Maysville, KY  
St. Louis Post Dispatch  
Billings Gazette, MT  
The Montana Standard, Butte  
Independent Record, Helena, MT  
Missoulian  
The Bismarck Tribune, ND  
Lincoln Journal Star  
Beatrice Daily Sun, NE  
Columbus Telegram, NE  
Fremont Tribune, NE  
The Citizen, Auburn, NY  
The Post-Star, Glens Falls, NY  
The World, OR  
Albany Democrat-Herald, OR  
Corvallis Gazette-Times, OR  
The Sentinel, PA  
The Times and Democrat, SC  
Rapid City Journal  
The Daily Herald, UT  
The Daily News, WA  
Wisconsin State Journal, Madison  
Daily Citizen, Beaver Dam, WI  
Baraboo News Republic, WI  
Portage Daily Register, WI  
Chippewa Herald, WI  
The Journal Times, Racine, WI  
La Crosse Tribune, WI  
Winona Daily News, MN  
Casper Star-Tribune, WY

**The McClatchy Company (surveyed 1/2/2011)**

Anchorage Daily News  
Beaufort Gazette, SC  
Belleville News-Democrat, IL  
Bellingham Herald, WA  
Biloxi Sun Herald, MS  
Bradenton Herald, FL  
Centre Daily Times, PA  
Charlotte Observer, NC  
Columbus Ledger-Enquirer, GA

Fort Worth Star-Telegram, TX  
Fresno Bee  
The (Rock Hill) Herald, SC  
Idaho Statesman  
The Island Packet, SC  
Kansas City Star  
Lexington Herald-Leader, KY  
Merced Sun-Star, CA  
Miami Herald  
Modesto Bee  
Raleigh News & Observer  
News Tribune, Tacoma, WA  
The Olympian  
Sacramento Bee  
The State, SC  
The Sun News, SC  
The Telegraph, GA  
The Tribune, CA  
Tri-City Herald, WA  
Wichita Eagle, KS

**MediaNews Group (surveyed 1/4/2011)**

Alameda Times-Star, CA  
Enterprise-Record, CA  
Times-Standard, CA  
Argus, CA  
The Daily Review, CA  
Lake County Record-Bee, CA  
The Monterey County Herald, CA  
Marin Independent Journal, CA  
Oakland Tribune  
Oroville Mercury-Register, CA  
Tri-Valley Herald, CA  
Red Bluff Daily News, CA  
San Jose Mercury News  
San Mateo County Times, CA  
Santa Cruz Sentinel, CA  
The Ukiah Daily Journal, CA  
The Reporter, CA  
Times-Herald, CA  
Contra Costa Times, CA  
Daily Democrat, CA  
Daily Camera, Boulder, CO  
Fort Morgan Times, CO

Journal-Advocate, CO  
Sentinel and Enterprise, MA  
North Adams Transcript, MA  
The Berkshire Eagle, MA  
St. Paul Pioneer Press, MN  
Alamogordo Daily News, NM  
Carlsbad Current-Argus, NM  
The Deming Headlight, NM  
The Daily Times, NM  
Las Cruces Sun-News, NM  
Public Opinion, PA  
The Evening Sun, PA  
Lebanon Daily News, PA  
The York Dispatch, PA  
York Daily Record - York Sunday News, PA  
El Paso Times, TX  
Salt Lake Tribune, UT  
Bennington Banner, VT  
Brattleboro Reformer, VT

**The New York Times Company (surveyed 1/2/2011)**  
The New York Times

**E.W. Scripps Company (surveyed 2/7/2011)**  
Times Record News - Wichita Falls  
Abilene Reporter-News  
Commercial Appeal  
Evansville Courier & Press  
The Gleaner - Hendersonville  
Kitsap Sun - WA  
Knoxville News-Sentinel  
Naples Daily News  
Stuart News, FL  
Ventura County Star  
Vero Beach Press Journal, FL  
San Angelo Standard-Times  
Corpus Christi Caller Times  
Anderson Independent-Mail, SC  
Redding Record Searchlight, CA

**Tribune Company (surveyed 1/2/2011)**

Los Angeles Times  
Chicago Tribune  
Baltimore Sun  
Sun Sentinel  
Orlando Sentinel  
The Hartford Courant  
The Morning Call  
The Daily Press, Newport News, VA

**A. H. Belo Corporation (surveyed 8/8/2011)**

Dallas Morning News  
Denton Record Chronicle  
Providence Journal  
Press Enterprise



## 8. Policies By Company

### Advance Publications (1/2/2011)

Last Revised **July 22, 2010**

The following Privacy Policy summarizes the various ways that **Cleveland Live, LLC** ("Service Provider," "we" or "our") treats the information you provide while using **www.cleveland.com** ("Website"). It is our goal to bring you information that is tailored to your individual needs and, at the same time, protect your privacy.

Please read this Privacy Policy carefully. You can access the Privacy Policy any time at **<http://www.cleveland.com/privacypolicy>**. **Your use of and/or registration on any aspect of the Website will constitute your agreement to this Privacy Policy.** If you cannot agree with the terms and conditions of this Privacy Policy, please do not use the Website. This Privacy Policy does not cover information collected elsewhere, including without limitation offline and on sites linked to from the Website.

In addition to reviewing this Privacy Policy, please read our User Agreement. Your use of the Website constitutes agreement to its terms and conditions as well.

This Privacy Policy may be modified from time to time; the date of the most recent revisions will appear on this page, so check back often. Continued access of the Website by you will constitute your acceptance of any changes or revisions to the Privacy Policy.

#### **I. THE TYPE OF INFORMATION THE WEBSITE COLLECTS**

The Website generally collects personally identifying information with your specific knowledge and consent. For instance, when you enter a sweepstakes or contest, complete a survey, make a purchase, subscribe to our publication(s), or register for any portion of our services, you are asked to provide information such as your e-mail address, name or phone number. Optional information such as your age or gender may also be requested.

Our servers may also automatically collect information about your computer when you visit the Website, including without limitation the type of browser software you use, the operating system you are running, the website that referred you, and your Internet Protocol ("IP") address. Your IP address is usually associated with the place from which you enter the Internet, like your Internet Service Provider, your company or your university.

## **II. HOW THE WEBSITE USES INFORMATION PROVIDED BY YOU**

Service Provider uses personally identifying information you supply through the Website to provide you with the service you have requested. For example, if you subscribe to any of our publications, we may use your e-mail address to send you a confirmation notice and your mailing address to send you the publication. Similarly, if you enter an online sweepstakes, we will use this information to notify you if you are a winner. We may also use the information to communicate with you about new features, products or services, and/or to improve the services that we offer by tailoring them to your needs.

Unless otherwise specified on the Website, Service Provider may sell or share personally identifying information with our affiliates and with carefully selected companies who we think can offer you services and products of interest to you. If you do not wish to have your personally identifying information shared, write to us at the street address set forth at the end of this document. If you do not wish to receive future commercial communications from us by e-mail, simply follow the unsubscribe instructions contained within the e-mail. If you've registered on any part of the Website, please use the mechanism on the Website that allows you to change or update your member preferences or information, if available, to keep all such data accurate and up-to-date. Otherwise, contact our Privacy Policy Coordinator as described below with your changes.

We also allow access to our database by third parties that provide us with services, such as technical maintenance or forums and job search software, but only for the purpose of and to the extent necessary to provide those services. And if you choose to purchase items through features on the Website, we may forward your information to third parties for services such as credit card processing and order fulfillment. There are also times when you provide information about yourself to us in areas of the site that may be managed or participated in by third parties, such as auction services or shopping areas. In such cases, the information may be used by us and by such third party(ies), each pursuant to its own policies. We may also provide your information to our advertisers, so that they can serve ads to you that meet your needs or match your interests. While Service Provider will seek to require such third parties to follow appropriate privacy policies and will not authorize them to use this information except for the express purpose for which it is provided, Service Provider does not bear any responsibility for any actions or policies of third parties. We may also provide access to our database in order to cooperate with official investigations or legal proceedings, including, for example, in response to subpoenas, search warrants, court orders, or other legal process.

In addition, we reserve the right to use the information we collect about your computer, which may at times be able to identify you, for any lawful business purpose, including without limitation to help diagnose problems with our servers, to gather broad demographic information, and to otherwise administer our Website.

While your personally identifying information is protected as outlined above, we reserve the right to use, transfer, sell, and share aggregated, anonymous data about our users as a group for any business purpose, such as analyzing usage trends and seeking compatible advertisers and partners.

In addition, as our business changes, we may buy or sell various assets. In the event all or a portion of the assets owned or controlled by Service Provider, its parent or any subsidiary or affiliated entity are sold, assigned, transferred or acquired by another company, the information from and/or about our Website users may be among the transferred assets.

### **III. COOKIES**

You may have read about "cookies," nuggets of information that are placed by a Website in a storage place on your own computer. We may use cookies to control the display of ads, to track usage patterns on the site, to deliver editorial content, and to record registration and personalization information. For example, if you register on any part of the Website and are given the option to save your user name and password on your computer, we can provide this convenience to you by placing a cookie on your computer. Our cookies may contain personally identifiable information and such cookies may be shared with our affiliates and other companies.

Some of our advertisers occasionally serve you cookies as well. We do not have control over cookies placed by advertisers.

We may also use advertising service vendors to help present advertisements on the Website. These vendors may use cookies, web beacons, or similar technologies to serve you advertisements tailored to interests you have shown by browsing on this and other sites you have visited, to determine whether you have seen a particular advertisement before and to avoid sending you duplicate advertisements. In doing so, these vendors may collect non-personal data such as your browser type, your operating system, Web pages visited, time of visits, content viewed, ads viewed, and other clickstream data. The use of cookies, web beacons, or similar technologies by these advertising service vendors is subject to their own privacy policies, not ours, and Service Provider disclaims all liability in connection therewith. If you do not want the benefits of these advertising cookies, you may be able to opt-out by visiting

[http://www.networkadvertising.org/optout\\_nonppii.asp](http://www.networkadvertising.org/optout_nonppii.asp).

If you don't want any cookies, your Web browser likely includes an option that allows you to not accept them. However, if you set your browser to refuse cookies, some portions of the Website may not function properly.

#### **IV. INFORMATION SECURITY AND NOTIFICATION**

Because no data transmission over the Internet is completely secure, and no system of physical or electronic security is impenetrable, Service Provider can not guarantee the security of the information you send to us or the security of our servers or databases, and by using the Website you agree to assume all risk in connection with the information sent to us or collected by us when you use the Website. In the unlikely event that we believe that the security of your information in our possession or control may have been compromised, we may seek to notify you. If notification is appropriate, we may notify you by e-mail (provided we have your e-mail address).

#### **V. KIDS AND PARENTS**

This Website is not intended for use by children, especially those under age 13. No one under age 13 is allowed to provide any personal information or use our public discussion areas, forums and chats. Minors between the ages of 13 and 17 must get the permission of their parent(s) or legal guardian(s) before making purchases, including subscriptions, on this site.

If your children disclose information about themselves in publicly accessible areas of the Website, they may get unsolicited messages from other parties. Accordingly, you should tell them not to do so.

If you're worried about your children's activities or their privacy on our site, we encourage you to contact our Privacy Policy Coordinator as described below.

#### **VI. PRIVACY POLICY COORDINATOR**

If you have any concerns or questions about any aspect of this policy, please feel free to contact our Privacy Policy Coordinator as follows:

Privacy Policy Coordinator  
Cleveland Live, LLC 2019 Center Street, Suite 200 Cleveland, OH 44113

## **A. H. Belo Corporation (8/8/2011)**

### **Effective as of August 18, 2007**

www.dallasnews.com respects the privacy of visitors to our site. This Privacy Policy governs the use and collection of information from you by A. H. Belo Corporation and its affiliated companies (collectively, "A. H. Belo", "we" or "us") through your use of www.dallasnews.com (the "Site"). This Privacy Policy does not apply to any information you may provide to us offline or through any means other than this Site. For example, this Privacy Policy does not apply to information you provide when you subscribe by postal mail or telephone to one of our newspapers or to information that you provide to us at a live event or when you respond by postal mail or telephone to a survey or an invitation to enter a sweepstakes. These examples are not meant to be exhaustive, and this Privacy Policy does not apply to many other instances in which we may collect information from you offline. Please read this Privacy Policy carefully so that you understand our online privacy practices. By visiting this Site, you agree that your visit, and any dispute over our online privacy practices, is governed by this Privacy Policy and our [Terms of Service](#). Understanding that Internet technologies are rapidly evolving, we reserve the right to make changes to this Privacy Policy at any time. Any such changes will be promptly posted on this page, with an updated "effective date" posted at the beginning and/or end of this policy.

This Privacy Policy explains the following:

- [What types of information we collect](#)
- [What cookies and beacons are and why we use them](#)
- [How we use your personal information](#)
- [With whom we share your personal information](#)
- [Who is the party collecting your personal information](#)
- [How you can opt-out of sharing your personal information or receiving our promotional communications](#)
- [How you can update your personal information or registration information](#)
- [What safeguards we put in place to protect your personal information](#)
- [What you need to know about third-party sites and advertising](#)
- [Whether we knowingly collect personal information of children under 13](#)
- [How you can contact us](#)
- [What you should know about "phishing"](#)
- [When this privacy policy is effective and how changes to the privacy policy are posted](#)

### **What Types of Information Do We Collect?**

The information we gather falls into two categories: (1) information (for example, your name, email address and mailing address) that you voluntarily supply when you register or initiate transactions on the Site, and (2) information gathered on usage patterns and preferences as you

navigate through our Site, use our services, or read our email newsletters. In some cases, it is an agent or vendor of ours that collects the information on our behalf. Third-party providers featured on or linked to by our Site may be gathering the same kinds of information.

### **Registration Information**

While visiting the Site, we may ask you to register and/or provide information that personally identifies you ("Personal Information"). Such Personal Information may include, but is not limited to, your name, phone number, mailing address, and e-mail address. On any page that collects Personal Information, we will describe what information is required to provide you with the product or service you request or to respond to your inquiry or comment.

### **IP Addresses and Browser Level Information**

Our web servers automatically collect limited information about your computer configuration when you visit our Site, including the type of browser software you use, the operating system you're running, the resolution of your computer monitor, the website that referred you to our Site and your IP address. Your IP address is a numerical address that is used by other computers connected to the Internet to identify your computer so that data (such as the web pages you want to view) can be transmitted to you. We also use IP address information for systems administration and trouble shooting purposes. Your IP address does not tell us who you are. We use this information and cookies (see section below on cookies) to deliver our web pages to you upon request, to tailor our Site to the interests of our visitors, and to measure traffic within our Site. When you submit a query using a search tool on our Site or click on a search result, we may also share your IP address, browser level information and other anonymous information, such as a cookie identification code, with any third-party vendors that provide us with search functionality for our Site.

### **What Are Cookies and Web Beacons and Why Do We Use Them?**

#### **What are Cookies?**

To help make our Site more responsive to the needs of our visitors, we use a standard feature of browser software, called a "cookie," to assign each visitor a unique, random numerical identification code that resides on their computer. The cookie doesn't actually identify the visitor, just the computer that a visitor uses to access our site. Unless you voluntarily identify yourself (through registration, for example), we won't know who

you are, even if we assign a cookie to your computer. The only personal information a cookie can contain is information you supply. A cookie can't read unrelated data off your hard drive. Our advertisers and the third parties that provide products or services through our Site may also assign their own cookies to your browser, a process that we don't control.

### **Why does the Site use cookies?**

We use cookies to track usage of the Site and further personalize your experience when you are visiting the Site. By tracking usage, we can best determine what features of the Site best serve our users.

### **What benefits do I receive from cookies?**

Overall, the use of cookies helps to give you a more personalized experience at the Site. The information is used to keep our Site fresh and relevant to you the user. Cookies also identify you to our server, allowing you to avoid retyping your e-mail address and password each time you access the Site.

### **May I decline to accept a cookie?**

You may decline to accept cookies sent by the Site by selecting an option on your browser to reject cookies. However, features of the Site that require registration will not be accessible to you. Cookies enable our server to know that you are a registered user, and will eliminate the need for you to log in each time you access our Site.

### **What are Web Beacons?**

Web beacons (sometimes called single-pixel or clear-pixel gifs) are invisible images that are used to assign cookies or access cookies assigned previously to a visitor's computer. We use Web beacons to access information about the pages visitors are viewing so we can recognize our returning users and analyze traffic patterns. We also work with a leading web analytics firm, Omniture, that places Web beacons on our Site and uses them in combination with cookies to collect, aggregate and analyze anonymous tracking information called "session" data on our behalf. This session information does not identify you personally and does not include your name, address, email address, telephone number or other Personal Information. We use this information to help us measure traffic and user behavior and count the number of unique visitors who view particular pages within our Site. If you wish to learn more about Omniture's privacy practices, you can visit <http://www.omniture.com/privacy/product> for

more information. If you want to opt-out from the collection and analysis of your session data or if you want to uninstall an opt-out cookie from a prior visit (i.e., if you change your mind and decide to opt-in again to allow us to collect and analyze your session data), [click here](#). Please note that you will need to opt-out separately before visiting our Site each time that you clear your cookies from your web browser or switch to a different computer or browser (e.g., if you previously opted-out of the use of Web beacons for us to collect and analyze your session data using the FireFox web browser but later visit our site using the Internet Explorer web browser, you will need to once again opt-out of the Web beacons). We use an advertising server developed by a third party to display ads on the Site. Some of these ads may contain cookies or Web beacons that are sent by third parties (e.g., advertisers or their advertising agencies) that we do not control. If you have questions regarding the data collection practices of any of the advertisers that appear on our Site, we encourage you to contact the applicable advertiser or review its privacy policy, which should be posted on the advertiser's website.

### **How Do We Use Your Personal Information?**

We believe we can enhance your experience on our Site with the information you share with us. We use Personal Information to improve our advertising and marketing efforts, to statistically analyze Site usage, to improve our content and product offerings and to personalize the Site's content, layout, and services. We will use your Personal Information to respond to your comments and questions. We may also use your Personal Information, such as your e-mail address, phone number or mailing address, to contact you regarding products and/or services that we think may be of interest to you, including products and services of third parties, unless you have elected not to receive these promotions and offers by modifying your profile as described below in "How Can You Opt-Out of Sharing Your Personal Information or Receiving Our Promotional Communications?"

We may match Personal Information we collect on the Site with other information about you supplied by third parties so that we can provide you with customized product and content offerings that we believe will interest you and to otherwise improve our advertising and marketing efforts. After registering on the Site, you may receive communications including mail, email, telephone or wireless short text messages from us related to products and services that we believe will interest you. Although we hope you find these communications informative and useful, you can always opt-out from receiving these types of communications from us by changing the privacy preferences in your member profile or by deleting your profile from our database. Please refer to "How Can You Opt-Out of Sharing Your



Personal Information or Receiving Our Promotional Communications?" for additional information and instructions.

## **With Whom Do We Share Your Personal Information?**

### **Our Affiliated Companies**

We may share the information, including Personal Information, that we collect through the Site with any company that is directly or indirectly owned, controlled or operated by A. H. Belo so that we and they can communicate with you about products and services that we believe may be of interest to you. The use and further disclosure of the information collected on this Site by our affiliated companies will be governed by this Privacy Policy.

### **Vendor and Service Providers**

We have today, and will in the future have, arrangements with third-party vendors, such as credit card processors, shipping companies and fulfillment services that assist us with the operation of the Site or the services we offer through the Site. Occasionally, we will hire a third party to act on our behalf for projects such as market-research surveys and contest-entry or sweepstakes-entry processing. When you sign up for a service we offer, initiate a transaction, complete a survey or enter a contest or sweepstakes, we may be required to share Personal Information with one or more of our vendors. To protect your privacy, we do not authorize our vendors to retain, use or disclose your Personal Information for any purpose unrelated to the services that they provide for us or our users. To make our Site more valuable to our visitors, we may offer some services and features in conjunction with other service providers ("Service Providers"). For example, we may offer a car buying service, personalized finance and weather information alerts, sweepstakes offers or other promotions through cooperative arrangements with Service Providers that specialize in operating such services and features. If you choose to use these optional services or features, we may provide some of your Personal Information to one or more of our Service Providers. We will not do so without telling you in advance, and you can avoid having us make such disclosures by choosing not to use these services or features of the Site. Some of these Service Providers may also collect their own Personal Information in connection with providing the service. Their use of your information will be subject to the terms of their respective privacy policies, which you can find on their websites or obtain by contacting the Service Providers directly. Please refer to "Who is the Party Collecting Your Personal Information?" for additional information.

## **Statistical Information**

Much of the information we collect is in the form of aggregated statistics, such as the traffic generated by visits on various pages within our Site, and the habits and preferences of our audience. Such aggregated information does not include any information that would identify you personally. We may use such aggregated information and disclose it to third parties as we see fit.

## **Other Disclosures**

We reserve the right to release Personal Information about our visitors when release is appropriate to comply with law, to enforce our [Terms of Service](#), or to protect the rights, property or safety of visitors to our Site, the public, our customers, or of A. H. Belo. As our business grows, we may buy or sell various assets. In the unlikely event that A. H. Belo, or the bulk of our assets relating to this Site, is acquired by another company, Personal Information about our visitors would be among the transferred assets. If you choose to unsubscribe from a specific advertiser's email program in response to an email message that we deliver, we will share your email address and opt-out instructions with the relevant advertiser to ensure that your email privacy preferences are honored. Similarly, if we ask a third-party company to send email offers for A. H. Belo products and services to its customers, we will share with that company a list of email addresses collected from visitors of our Site who have opted-out of our email program to ensure that their privacy preferences are honored.

## **Who is the Party Collecting Your Personal Information?**

This Privacy Policy only addresses the use and dissemination of information that we collect from you. To the extent that you disclose any information to other parties, whether through, for example, on-line auctions, chat rooms, forums, personal ads, interactive areas on the Site that allow you to submit and post your own content (such as stories, blogs, photos and videos), or the like, through third-party services or promotions offered on or through the Site, or through other websites throughout the Internet, different policies will apply and A. H. Belo will not be responsible for the use or dissemination of such information. The Site may offer message boards, chat rooms or other forums or interactive areas you can use to communicate with other computer users or Site visitors or to submit and post your own content. If you disclose personal information in one of these forums, this information can be viewed, collected, and used by others. A. H. Belo is not responsible for the use of information you disclose in these forums. We encourage you to consult the forum rules and the [Terms of Service](#) regarding the policies and procedures that apply to that

portion of the Site.

Our Site may operate as part of a larger group of sites and may carry co-branded pages. In addition, other third-party sites may use the Site's name, A. H. Belo's name, or the name of one of A. H. Belo's affiliated companies. Since A. H. Belo does not control the privacy policies of third parties, you are subject to the privacy policies, if any, of such third parties, and A. H. Belo shall not be responsible for the use or dissemination of your private information by such parties. Therefore, we encourage you to ask questions and review those parties' privacy policies before you disclose your Personal Information to others.

### **How Can You Opt-Out of Sharing Your Personal Information or Receiving Our Promotional Communications?**

We respect your privacy and ability to choose whether to share information with us and third parties. You may choose to "opt-out" of sharing Personal Information in several ways. When choosing to use certain features or services on the Site, you can choose whether to share optional Personal Information in connection with the feature or service. If you receive email, phone or mail communications from us that you prefer not to receive, you may opt-out from receiving these communications by modifying the contact options in your registration profile. You may change your contact options at any time by following the process described in "How Can You Update Your Personal or Registration Information," below.

In addition to opting-out by managing your contact preference options, you may opt-out from receiving e-mail communications from any Site service by sending your request to [Customer Service](#), or by sending postal mail to:

A.H. Belo Corporation Attn: Circulation Digital Opt-Out 508 Young St.  
Dallas, TX 75202

Please note that changing the contact preference options described above will not affect your receipt of any wireless short text communications you may have registered to receive. To unsubscribe from wireless short text communications delivered to your wireless device(s) such as a cell phone, please send your "opt-out" request, including the wireless number or wireless address you wish to remove from our list, to [Customer Service](#), or by sending postal mail to:

A.H. Belo Corporation Attn: Circulation Digital Opt-Out 508 Young St.  
Dallas, TX 75202

You may "opt-out" altogether from providing Personal Information to us by not registering on the Site, or registering for any Site sponsored promotion, and thereby not providing Personal Information. You may also

choose at a later date to have your name removed from our database by deleting your registration profile. To do so, please follow the process described in "How Can You Update Your Personal or Registration Information."

Certain portions of the Site and certain services provided on the Site, however, do require registration in order to access or use these areas and services. If you choose not to register or provide certain information, these areas will not be accessible to you.

### **How Can You Update Your Personal Information or Registration Information?**

You may access all of the Registration Information that we collect from you online and maintain by using the procedure described below. We use this procedure to better safeguard your Personal Information. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access to your profile or making changes.

You may also at any time choose to change or delete your profile from our database using this procedure. You should know that if you choose to delete your profile, certain areas of our Site may no longer be accessible to you.

- Enter (or click)

<http://reg.dallasnews.com/registration/membercenter.do> • Sign in by entering your e-mail address and password. Your account information will then be displayed. • To change your contact options select "Contact Options," make your selections, and submit the form. • To remove your registration profile from our database, select "Delete My Account," make your selections, and submit the form.

### **What Safeguards Do We Put in Place to Protect Your Personal Information?**

A. H. Belo maintains industry-standard safeguards to protect the security, integrity, and privacy of the Personal Information that you provide to us. However, no security system is impenetrable and we cannot guarantee the security of our database. Nor can we guarantee that the information you supply won't be intercepted while being transmitted to us over the Internet.

### **What Do You Need to Know About Third-Party Sites and Advertising?**

#### **Third-Party Sites**

Our Site includes links to many other websites, and provides access to products and services offered by third parties whose privacy policies we don't control. When you access another site, purchase products or services, or conduct other transactions through links on our Site, use of any information you provide will be governed by the privacy policy of the operator of the site you're visiting or of the provider of such products or services. A. H. Belo assumes no responsibility or liabilities whatsoever for the content or privacy practices of the operators of any such linked sites or of any link or linking program. A. H. Belo does not necessarily endorse companies (or related products or services) promoted on the pages to which our Site is linked. If you decide to access any of the third-party sites linked to the Site, you do so entirely at your own risk.

### **Third-Party Advertising**

We use third-party advertising companies to serve ads when you visit our Site. These companies may use information (not including your name, address, email address or telephone number) about your visits to this and other websites in order to provide advertisements on this Site and other sites about goods and services that may be of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, please [click here](#).

### **Yahoo! Ad Network Opt-Out**

A. H. Belo participates in the APT from Yahoo! platform, and Yahoo! is an ad network partner to display ads on our sites. To improve your ad experience on A. H. Belo sites and elsewhere on the Internet, we may send non-personal information to Yahoo! based on your browser's activities, such as type of pages viewed and categories of interests, so that the advertising you see is relevant to you. Yahoo! also may use information regarding its own users to select which ads to display. [Learn more](#) about Yahoo!'s ad practices, including how to opt out of using anonymous information to select which ads to show you. Yahoo! is a member of the [Network Advertising Initiative](#).

### **Do We Knowingly Collect Personal Information of Children Under 13?**

Children should always get permission from their parents before sending any information about themselves (such as their names, email addresses, and phone numbers) over the Internet, to us or to anyone else. We won't knowingly allow anyone under 13 to register with our Site or to provide any other Personal Information via the Site. If you're under 13, please do

not provide us with any Personal Information about yourself (such as your name, your email address or your phone number).

### **How Do You Contact Us?**

If you have any questions or comments about our Privacy Policy, please contact [Customer Service](#).

### **What we do NOT do: a warning about "phishing."**

We do not and will not, at any time, request your credit card information, login name, or password, in an unsecured or unsolicited e-mail or telephone communication. Identity theft and the practice currently known as "phishing" are of great concern to us. Safeguarding information to help protect you from identity theft is our priority. For more information about phishing, you may want to visit the Federal Trade Commission at [www.ftc.gov](http://www.ftc.gov).

### **When is this Privacy Policy Effective? How Do We Post Changes to the Privacy Policy?**

This Privacy Policy is effective as of August 18, 2007. A. H. Belo reserves the right to modify the terms of this policy at any time and in our sole discretion, by posting a change notice to this page and/or on the Site. Your continued viewing, browsing, use or access of the Site following our posting of a change notice will constitute your binding acceptance of those changes.

## **Cox Media Group (2/7/2011)**

Privacy Policy  
Last updated March 17, 2006

We care about your privacy. We will not sell your name or email address to any third party advertisers without your permission. **Please read our privacy policy below for further details.**

AJC.com respects the privacy of visitors to our site. This Privacy Policy governs the use and collection of information from you by Cox Enterprises, Inc., d/b/a The Atlanta Journal-Constitution ("we" or "us") through your use of this site. This Privacy Policy does not apply to any information you may provide to us through other means; for example, at a live event, via

mail, or via telephone. Please read this Privacy Policy carefully so that you understand our online privacy practices. By visiting this site, you agree that your visit, and any dispute over our online privacy practices, is governed by this Privacy Policy and our Visitor Agreement.

Questions regarding privacy issues should be directed to: The Atlanta Journal-Constitution P.O. Box 4689 Atlanta, Georgia 30302  
listen@ajc.com

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## **Children's privacy**

Children should always get permission from their parents before sending any information about themselves (such as their names, email addresses, and phone numbers) over the Internet, to us or to anyone else. We won't knowingly allow anyone under 13 to register with our site or to provide any other personally identifying information. If you're under 13, please do not provide us with any personally identifying information about yourself (such as your name, your email address or your phone number).

## **Types of information we collect**

The information we gather falls into two categories: (1) information (for example, your name and address) that you voluntarily supply when you register or initiate transactions, and (2) information gathered on usage patterns and preferences as visitors navigate through our sites, use our services such as free email, or read our email newsletters. In some cases, it is an agent or affiliate of ours that collects the information on our behalf. Third party providers featured on or linked to by our site, such as vendors of products and services offered through our site, may be gathering the same kinds of information.

## **Registration Information.**

To make use of certain features on our site (such as to receive email newsletters, or post a classified ad) visitors need to register and to provide certain information as part of the registration process. We may also ask for information from those who buy products or services or conduct other transactions on our site. (We may ask, for example, for your name, email address, sex, age, zip code or credit card number,

and we might request information on your interest in sports, personal finance, the performing arts, and the like.) The information you supply will help us to offer you more personalized features, to tailor our site to your interests and make them more useful to you, and to process e-commerce transactions.

The more you tell us about yourself, the more value we can offer you. Supplying such information is entirely voluntary. But if you don't supply the information we need, we may be unable to provide you with services we make available to other visitors to our site. And we can't send you email alerting you to a new service we're offering, or breaking news that may interest you if you don't tell us what you're interested in and give us your email address. Please see the "Shopping" section below to learn more about purchasing products or services on our site.

### **Contests and Other Promotions.**

From time to time, we may offer contests, sweepstakes or other promotions on our site. If you enter one of these promotions, you'll have to provide information about yourself (such as your name, address, telephone number and email address) so that we can contact you if you win. We may share this information with any wholly or majority-owned subsidiary of Cox Enterprises, Inc. and any co-sponsor of the promotion (we will identify any co-sponsor in the official rules for the promotion). If you don't want us to collect the information requested in the registration form or to provide it to any wholly or majority-owned subsidiary of Cox Enterprises, Inc. or contest co-sponsors, please do not enter the contest or sweepstakes.

### **Email Newsletters.**

We may also offer you the opportunity to subscribe to email newsletters on topics that we believe are of interest to our visitors. If you have opted to receive a particular newsletter, you may always unsubscribe later if you decide not to receive further mailings of the newsletter from us. See "Opting Out" below.

### **Cookies.**

To help make our sites more responsive to the needs of our visitors, we use a standard feature of browser software, called a "cookie," to assign each visitor a unique, random number, a sort of user ID, if you will, that resides on your computer. The cookie doesn't actually identify the visitor, just the computer that a visitor uses to access our site. Unless you voluntarily identify yourself (through registration, for example), we won't know who you are, even if we assign a cookie to your computer. The only personal information a cookie can contain is information you supply. A cookie can't read unrelated data off your



hard drive. Our advertisers and the third parties that provide products or services through our site may also assign their own cookies to your browser, a process that we don't control.

We use cookies to help us tailor our site to your needs, to deliver a better, more personalized service. For example, we use cookies to avoid showing you the same ad, repeatedly, during a single visit. In addition, we may use cookies to track the pages on our site visited by our users. We can build a better site if we know which pages our users are visiting and how often. Of course, you can set your browser not to accept cookies, but if you do, you may not be able to take advantage of the personalized features enjoyed by other visitors to our site.

### **Other Methods of Collecting Information.**

Our web pages may contain electronic images (called "single-pixel GIFs" or "web beacons") that allow us and our vendors to count users who have visited particular pages or to access certain cookies. We may use these tools and other technologies to recognize which pages users visit, and which links they click on. These features may also be included in our email newsletters so that we can learn which messages have been opened and acted upon. We may also be able to verify your online purchases from us or from third party sites that have agreed to share such information with us.

### **Browser Level Information and IP Addresses.**

Our web servers automatically collect limited information about your computer configuration when you visit our site, including the type of browser software you use, the operating system you're running, the resolution of your computer monitor, the website that referred you, and your IP address. (Your IP address is a numerical address that is used by computers connected to the Internet to identify your computer so that data (such as the web pages you want to view) can be transmitted to you. We also use IP address information for systems administration and trouble shooting purposes. Your IP address does not tell us who you are.) We use this information to deliver our web pages to you upon request, to tailor our site (including our ads) to the interests of our users, and to measure traffic within our site. To improve your ad experience on **AJC.com**, we may send non-personal information to Yahoo!, an ad network partner that displays ads on **AJC.com**. Such information is based on your browser's activities, such as type of pages viewed and categories of interests, so that the advertising you see is relevant to you. Yahoo! also may use information it gathers regarding its own users to select which ads to display on **AJC.com**. Please click this **link** to learn more about Yahoo!'s ad practices, including how to opt out of Yahoo! using anonymous

information to select which ads to show you.

## **Disclosure of information**

### **Why we want to know.**

As with any business, it's important for us to know our customers -- their needs, their likes, what they want and expect from us. Unlike most businesses, however, we deliver a valuable product to our customers without asking for anything in return. It's like prime-time television, only better for you! Since we make most of this site available without charge to you, we rely heavily on advertisers to produce the income necessary to operate our site. Advertisers are like most people: They expect something in return for the money they spend. They want to know how many people will see their ad and how often -- in other words, how effective their ad is likely to be. So it's important that we be able to tell advertisers who our audience is.

### **Advertisers.**

Without your permission, we will not share the personally-identifiable information you provide when registering on our site with advertisers. We will, however, take the information you provide and aggregate it with data from all the other people that use this site and associated services. Then we will use that pool of information to inform our advertisers about our audience without identifying you personally. For example, we'll be able to say to an advertiser: "We have 3,470 readers in this ZIP code," which happens to be your location.

### **Vendors and Service Providers.**

To make our sites more valuable to our visitors, we may offer some features in conjunction with other providers ("Provider Partners"). Our chat, email newsletters, email services and online classifieds for example, may be made available through cooperative arrangements with providers that specialize in operating such services. In some instances, our Provider Partners will have the same access to your information as we do. Their use of the information will be subject to the terms of their respective privacy policies, which you can find on their websites.

### **Our Affiliates.**

We may share the information that we collect from you with any wholly or majority-owned subsidiary of Cox Enterprises, Inc. so that we and they can provide you with products and services provided by these entities that we believe may be of interest to you.

### **Statistical Information.**

Much of the information we collect is in the form of aggregated

statistics, such as the traffic that visits various pages within our sites, and the habits and preferences of our audience. Such aggregated information does not include any information that would identify you personally. We may use such aggregated information and disclose it to third parties as we see fit.

### **Sites to Which We Link.**

Of course, our site includes links to plenty of other websites, and provide access to products and services offered by third parties, whose privacy policies we don't control. When you access another site or purchase products or services or conduct other transactions through our sites, use of any information you provide is governed by the privacy policy of the operator of the site you're visiting or the provider of such products or services.

### **Other Disclosures.**

We may occasionally release information about our visitors when release is appropriate to comply with law, to enforce our Visitor Agreement, or to protect the rights, property or safety of visitors to our sites, the public, our customers, or our company and its employees, agents, partners and affiliates. As our business grows, we may buy or sell various assets. In the unlikely event that our company, or the bulk of our assets relating to this site, is acquired by another company, information on our visitors would be among the transferred assets.

### **Shopping**

When you are ready to make a purchase on our site, we will ask you to provide us with certain information, including your contact details (such as your name, address, telephone and email), and your billing information (such as your credit card number and the date that your card expires). We may also ask you to provide additional information such as unique identifiers (such as your date of birth), and registration information (login name and password). You will be able to review, update, or delete the information you have provided us (except, of course any information that we do not store) at any time by accessing your account on our site.

We will use the information you provide us to process your transaction and to contact you regarding your purchase if necessary. We will share this information with our Provider Partners to the extent necessary to facilitate your purchase (for purposes such as customer service, verification, fulfillment and billing purposes). We will not sell or rent your personal billing information to any third party. We may share non- financial information with our Provider Partners in accordance with this Privacy Policy. If you consent (for example, by checking a box or by some other means), we will make your information available to third parties so that

they, we, or both may contact you directly regarding special offers, promotions, products or services that may be of interest to you.

### **Opting out**

If you register with us, you will have the opportunity to review, update, or delete the information you have provided us at any time (except, of course, any information that we do not store). If you remove your registration information completely, you may not be able to continue using certain services that require registration (such as free email). You agree that we may use your information to contact you for customer service, to inform you of important changes or additions to our site or the services offered over our site and to send you administrative notices or any communications relevant to your use of our site. If you do not wish to receive these notices, please email us at our opt-out page for [ajc.com](#) communication.

If you have subscribed to one of our email newsletters, you will always have the opportunity to unsubscribe from future mailings (for example, by clicking on an unsubscribe link in an email newsletter or by going back to our site).

If you have submitted your information on a page provided in conjunction with one of our Provider Partners, the information you submit may be jointly maintained by us and the Provider Partner. If you decide to opt out on our site, you may also need to contact the Provider Partner separately to request the Provider Partner to remove your information from its database.

### **Storage of information**

All information gathered on our site is stored within a database operated by us or by a contractor on our behalf. Sensitive information, such as your password is encrypted for storage. For e-commerce transactions, in certain instances we may transmit your billing information using encryption. Encryption scrambles your credit card number and personal information. However, as effective as encryption technology is, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet.

### **Changes to this privacy policy**

A final note: The Web is an evolving medium. If we need to change our privacy policy at some point in the future, we'll post the changes before they take effect.

## **Freedom Communications (2/7/2011)**

### **PRIVACY POLICY**

This is the Privacy Policy for all Web sites owned or operated by Freedom Communications, Inc. ("Freedom" "we" or "our"), including, without limitation the Web sites listed here (collectively, the "Site"). We respect your privacy and appreciate the confidence you have placed in the Site. We are committed to protecting your privacy and preserving your trust. Please carefully review this Privacy Policy to learn about how we collect, use, and protect any personal information you provide us and your choices for managing your personal information. This Privacy Policy is subject to the User Agreement posted on the Site.

#### **Managing Information Preferences**

We want to communicate with you only if you want to hear from us. If you have questions or concerns regarding this Privacy Policy or if you wish to exclude your personal information from our direct marketing purposes, please feel free to contact us at:

17666 Fitch Irvine , CA 92614 E-mail: [pp@freedom.com](mailto:pp@freedom.com)

If you would like to correct, update, or change your personal information with us please contact us the same way.

#### **What Types Of Information Do We Collect?**

We collect information that may personally identify you (such as your name, address, telephone number, email address, billing information, or other data which can be reasonably linked to such information) only if you choose to share such information with us. For example, we may collect personal information from you when you register on the Site, subscribe to one of our services, enter sweepstakes, contests or other promotions, and at other times. We also collect credit card information in connection with any purchase you make on or through the Site. The decision to provide this information is optional; however, if you decide not to register or provide such information, you may not be able to use certain features of the Site or other services.

We may automatically collect non-personal information that does not identify an individual user, such as IP (internet protocol) address, ISP (internet service provider), the Web browser used to visit the Site, the time the Site is visited, which Web pages were visited on the Site, a unique mobile device identifier (in connection with the use of the Sites or related services from mobile devices) and other anonymous Site usage data.

We also use cookies (a small file containing a string of characters that uniquely identifies your Web browser) and Web beacons (an electronic file placed within a Web site that monitors usage). We use cookies and Web beacons to improve the quality of the Site. Most Web browsers are initially set up to accept cookies, but you can reset your Web browser to refuse all cookies or to indicate when a cookie is being sent. However, certain features of the Site may not work if you delete or disable cookies. Certain of our Service Providers (defined below) may use cookies and Web beacons in connection with the services they perform on our behalf, including, without limitation, ad serving.

### **How Do We Use The Information We Collect?**

We will not sell, share, or rent personal information to third parties, and we will not otherwise disclose personal information to third parties, without your permission, except as disclosed in this Privacy Policy.

We use personal information and non-personal information for internal purposes, including:

- enhancing your experience at the Site;
- performing administration and technical support for the Site;
- enabling you to enter sweepstakes, contests and other promotions;
- enabling you to use certain services and features available on or through the Site;
- creating aggregate information about demographics and usage patterns;
- inviting our promotional vendors and advertisers—with your permission—to call to your attention special offers, products and services that may be of interest to you; and
- enabling purchases of goods and services.

We may use aggregate information to measure general Site usage patterns and characteristics of our user base, and we may include such aggregate information about our audience in reports to our commercial vendors. We may also disclose aggregated user statistics (for example, a certain percentage of our users live in a certain area) without your permission in order to describe our audience to existing and prospective advertisers or other third parties. However, this aggregate information does not reference names, phone numbers, e-mail addresses, or other personal information, and it is not traceable to a specific recipient or user e-mail address.

We also may share personal information with entities controlling, controlled by, or under common control with Freedom. In the event that Freedom is merged, or in the event of a transfer of our assets, we may disclose or transfer your personal information and non-personal information in

connection with such transaction.

From time to time, we might establish a business relationship with other persons or entities whom we believe trustworthy and whom we have asked to confirm that their privacy practices are consistent with ours ("Service Providers"). For example, we may contract with Service Providers to provide certain services including credit card processing, advertising, promotions, analytics tools, data management, Web hosting, and Web development. We provide our Service Providers with promotions, analytics tools, data management, Web hosting, and Web development. We provide our Service Providers with the information needed for them to perform these services. Each Service Provider must agree to implement and maintain reasonable security procedures and practices appropriate to the nature of your information in order to protect your personal information from unauthorized access, destruction, use, modification, or disclosure.

We may work with third-party advertising companies which may use information about your visit to the Site in order to provide advertisements about goods and services that may be of interest to you on the Site and on third-party Web sites. From the Site, these companies may place or recognize a unique cookie on your computer or use other technologies such as Web beacons or pixel tags. Our Privacy Policy does not cover any use of information that a third-party advertisement serving company may collect from you. For more information about ad cookies and companies that provide users the ability to "opt-out" of the collection of information from such cookies, please click [here](#).

Although unlikely, in certain instances we may disclose your personal information when we have reason to believe it is necessary to identify, contact or bring legal action against persons or entities who may be causing injury to you, to Freedom or its affiliates, or to others. We may also disclose your personal information when we believe the law or legal process requires such disclosure. Please note that courts of equity, such as U.S. Bankruptcy Courts, may have the authority under certain circumstances to permit your personal information to be shared or transferred to third parties without your permission.

### **Security**

We use encryption and authentication tools to protect the security of personal information that you share with us. However, no data transmission over the Internet (or, with respect to our mobile services, over cellular phone networks) can be guaranteed to be 100% secure. As a result, while we strive to protect personal information, we cannot and do not guarantee or warrant the security of any information you transmit to or from the Site, and you do so at your own risk.

**Links To Third-Party Web Sites**

The Site may contain links to Web sites operated and maintained by third parties, over which we have no control. Privacy policies on such linked Web sites may be different from our Privacy Policy. You access such linked Web sites at your own risk. You should always read the privacy policy of a linked Web site before disclosing any personal information on such site.

**Discussion Board, Forums and Other User Generated Content**

Our online chat areas, bulletin boards, social networks, mobile messaging services, other public forums and user-generated content (i.e., photos, videos) can be a useful way for you to express yourself to other online users. When you post messages or otherwise use these features, the information that you provide (including personal information) may be publicly available to, collected by, and used by third parties. We are not responsible for the content of such messages or images posted by users or such disclosures of personal information.

**Children's Privacy Statement**

We do not knowingly collect personal information from children under the age of 13. If we become aware that we have inadvertently received personal information from a child under the age of 13, we will delete such information from our records.

**Policy Changes**

If we decide to change our Privacy Policy, in whole or in part, we will inform you by posting the changed Privacy Policy on the Site. Your continued use of the Site constitutes your agreement to abide by the Privacy Policy as changed. If you object to any such changes, your sole recourse shall be to cease using the Site.

Effective Date: 3/1/2009

**Gannett Company (1/4/2011)****Privacy Policy**

Last Updated: September 22, 2010

We take seriously your interest in how your information is collected and used. Please read the following to learn about our Privacy Policy.

This Privacy Policy discloses the privacy practices of this website (the "Site"). Specifically, it outlines the types of information that we gather about



you while you are using the Site, and the ways in which we use and share this information. This Privacy Policy does not apply to any information you may provide to us, or that we may collect, offline and/or through other means (for example, at a live event, via telephone, or through the mail).

Please read this Privacy Policy carefully. By visiting and using the Site, you agree that your use of our Site, and any dispute over our online privacy practices, is governed by this Privacy Policy and our Terms of Service. Because the Web is an evolving medium, we may need to change our Privacy Policy at some point in the future, in which case we'll post the revised Privacy Policy on this website and update the "Last Updated" date to reflect the date of the changes. By continuing to use the Site after we post any such changes, you accept the Privacy Policy as modified.

### **Your California Privacy Rights**

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our customers who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to:

Kim Jaske Online Privacy Coordinator [www.argusleader.com](http://www.argusleader.com) Gannett Law Department 7950 Jones Branch Drive McLean, VA 22107

### **How We Collect And Use Information**

We may collect and store information, including personally-identifiable information (such as your name, postal address or email address) or other information, that you voluntarily supply to us while on our Site. Some examples of this type of information include information that you electronically submit when you contact us with questions, information that you post on blogs, discussion forums or other community posting and social networking areas on our Site, and information that you electronically submit when you complete an online registration form to access and use certain features of our Site. We also may ask for information (including a credit card number and other financial information) from those users who make purchases or have payment transactions on our Site. If you decline to supply or provide us with certain information while using the Site, you may not be able to use or participate in some or all of the features offered through the Site.

We also collect and store non-personally identifiable information that is generated automatically as you navigate through the Site. For example, we may collect information about your computer's connection to the Internet, which allows us, among other things, to improve the delivery of our web pages to you and to measure traffic on the Site. We also may use a standard feature found in browser software called a "cookie" to enhance your experience with the Site. Cookies are small files that your web browser places on your hard drive for record-keeping purposes. By showing how and when visitors use the Site, cookies help us deliver advertisements, identify how many unique users visit us, and track user trends and patterns. They also prevent you from having to re-enter your preferences on certain areas of the Site where you may have entered preference information before. This Site also may use web beacons (single-pixel graphic files also known as "transparent GIFs") to access cookies and to count users who visit the Site or open HTML-formatted email messages.

If you want to limit the non-personally identifiable information that is automatically collected while you use our Site, most Web browsers allow you to disable cookies. To disable cookies using Internet Explorer, select "Internet Options" under the Tools menu and click on "Privacy." Select "High" or "Block All Cookies." To disable cookies using Mozilla Firefox, select "Options" under the "Tools" menu. If you choose to disable cookies, you may not be able to use or participate in some or all of the features offered through the Site.

The information we collect may be collected directly by us, or it may be collected by a third-party website hosting provider, or another third-party service provider, on our behalf.

We use the information we collect from you while you are using the Site in a variety of ways, including, for example, to process your registration request, provide you with services and communications that you have requested, send you email updates and other communications, customize features and advertising that appear on the Site, deliver our Site content to you, measure Site traffic, measure user interests and traffic patterns, and improve the Site and the services and features offered via the Site.

In addition, we may use any information submitted by or collected from you via the Site for any purpose related to the Site, including to contact you for customer service purposes, to inform you of important changes or additions to our Site or the services offered over our Site, and to send you administrative notices and any other communications that we believe may be of interest to you.

We also may provide your information to our affiliates or to third parties,

including our third party service providers and contractors, for purposes related to Site administration and other services. For example, if you use a credit or debit card to complete a transaction on our Site, we may share your personal information and credit card number with a credit card processing and/or a fulfillment company in order to complete your transaction, or such service provider(s) may collect that information from you directly, on our behalf.

If you do not wish your personally identifiable information to be used or shared for these purposes, send a letter to the Online Privacy Coordinator whose contact information is listed at the end of this Privacy Policy.

For information about use of your information by us and by third-party advertising service providers for advertising, see the section "Data Collected in Connection with Ad Serving and Targeting."

Our Site also includes links to other websites and provides access to products and services offered by third parties, whose privacy policies we do not control. When you access another website or purchase products or services from a third-party, use of any information you provide is governed by the privacy policy of the operator of the site you are visiting or the provider of such products or services.

We also make some content, products and services available through our Site through cooperative relationships with third-party providers, where the brands of our provider partner appear on the Site in connection with such content, products and/or services. We may share with our provider partner any information you provide, or that is collected, in the course of visiting any pages that are made available in cooperation with our provider partner. In some cases, the provider partner may collect information from you directly, in which cases the privacy policy of our provider partner may apply to the provider partner's use of your information. The privacy policy of our provider partners may differ from ours. If you have any questions regarding the privacy policy of one of our provider partners, you should contact the provider partner directly for more information.

Please be aware that we may occasionally release information about our visitors if required to do so by law or if, in our business judgment, such disclosure is reasonably necessary: (a) to comply with legal process; (b) to enforce our Terms of Service; or (c) to protect the rights, property, or personal safety of our Site, us, our affiliates, our officers, directors, employees, representatives, our licensors, other users, and/or the public.

Please also note that as our business grows, we may buy or sell various assets. In the unlikely event that we sell some or all of our assets, or our Site

is acquired by another company, information about our Site users may be among the transferred assets.

### **Data Collected In Connection With Ad Serving And Targeting**

We may use cookies, web beacons and similar technologies, and/or a third-party ad serving software, to collect non-personally identifiable information about site users and site activity, and we may use this information to, among other things, serve targeted advertisements on this site. The information collected allows us to analyze how users use the site and to track user interests, trends and patterns, thus allowing us to deliver more relevant advertisements to users.

We also may use third-party service providers, including Yahoo!, to target and serve some of the advertisements you see on the pages of our Site. We may share non-personally identifiable information, such as type of pages viewed and categories of interest, from our Site with these service providers for their use in displaying ads on our Site. These providers may use their own cookies, web beacons and similar technologies to collect non-personally identifiable information from our Site. These service providers may use that information, sometimes in conjunction with similar non-personally identifiable information gathered through other websites, to deliver advertisements on this Site, and on other websites that participate in our service providers' advertising networks, that are tailored to match the perceived interests of consumers. In addition, Yahoo!, which is one of our third-party advertising service providers, may use information regarding its own users to select which ads to display on this Site. The non-personally identifiable information obtained by our third-party service providers also may be used to help measure and research an advertisement's effectiveness, or for other purposes.

The data collected in connection with the ad serving and ad targeting on our Site does not identify you personally and does not include your name, address, email address or telephone number, but it may include the IP address of your computer.

The use and collection of information by third-party advertising service providers is governed by the relevant third party's privacy policy and is not covered by our privacy policy. If you would like more information about the information collection practices of a particular service provider, or if you would like more information on how to opt out of a service provider's information collection practices, please [click here](#).

### **Information You Post To Blogs, Discussion Forums And Other Community Posting Or Social Networking Areas**

Please keep in mind that whenever you voluntarily make your personal

information or other private information available for viewing by third parties online - for example on blogs, discussion forums, or other community posting or social networking areas of our Site - that information can be seen, collected and used by others besides us. We cannot be responsible for any unauthorized third-party use of such information.

### **Children's Privacy Statement**

This children's privacy statement explains our practices with respect to the online collection and use of personal information from children under the age of 13, and provides important information regarding their rights under federal law with respect to such information.

This Site is not directed to children under the age of 13 and we do NOT knowingly collect personally identifiable information from children under the age of 13 as part of the Site. We screen users who wish to provide personal information in order to prevent users under the age of 13 from providing such information. If we become aware that we have inadvertently received personally identifiable information from a user under the age of 13 as part of the Site, we will delete such information from our records.

Because we do not collect any personally identifiable information from children under the age of 13 via the Site, we also do NOT knowingly distribute such information to third parties. We do NOT knowingly allow children under the age of 13 to publicly post or otherwise distribute personally identifiable contact information through the Site.

Because we do not collect any personally identifiable information from children under the age of 13 via the Site, we do NOT condition the participation of a child under 13 in the Site's online activities on providing personally identifiable information.

### **How To Make Changes To Your Information**

If you are a registered member of our Site, you can make changes to your account information by logging in to the Site and using the account tools available via the Site. If you have subscribed to one or more of our email newsletters, you also may change your subscriber information, modify your subscriptions, and/or unsubscribe from these newsletters at any time by logging in to your account. If you have any questions about modifying your account or preference information, please visit the "Customer Service" pages of our Site.

### **Storage Of Information**

All information we gather on our Site is stored within a database to which only we and our hosting services provider are provided access. However, as effective as the reasonable security measures implemented by us may be, no

physical or electronic security system is impenetrable. We cannot guarantee the security of our Site's servers or databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet.

### **Questions Regarding Privacy**

If you have any questions about this Privacy Policy, our privacy practices, or your dealings with us, you can contact:

Kim Jaske Online Privacy Coordinator [www.argusleader.com](http://www.argusleader.com) Gannett Law Department 7950 Jones Branch Drive McLean, VA 22107

## **Hearst Corporation (1/2/2011)**

### **Privacy Policy**

This Privacy Policy governs your use of this web site and any content made available from or through this web site located at [www.chron.com](http://www.chron.com) or [www.HoustonChronicle.com](http://www.HoustonChronicle.com), including any subdomains thereof (the "Web Site"). The Web Site is made available by Houston Chronicle Publishing Company Division, a division of Hearst Newspapers LLC. ("The Chronicle", "The Newspaper" or "we" or "us"). By visiting this Web Site or using the services offered on or through this Web Site, you agree to the terms of this Privacy Policy, as they may be amended from time to time. As we update and expand our Web Site and services, this Privacy Policy may change, so check back to this page from time to time. This Privacy Policy is incorporated into, and part of, The Chronicle Web Site Terms and Conditions of Use located at [www.chron.com/terms](http://www.chron.com/terms) (the "Terms of se"), which governs your use of this Web Site in general.

This Privacy Policy does not apply to information that you may provide to us, or that we may obtain, other than through our Web Site, such as by phone, through postal mail and through other offline and print media. This Privacy Policy does not apply to information collected about you by anyone except us and only applies to the Web Site to which this policy is linked.

This Web Site is intended for users who are located in the United States of America. This Privacy Policy shall be interpreted under the laws of the United States.

### **A. Purpose**

In order to make your visits to our Web Site and use of the services available on or through our Web Site as worthwhile as possible, we may ask you for Personal Information and we may collect certain information from your

computer each time you visit us. "Personal Information" includes, for example, your name; home address; business address; e-mail address; telephone, wireless or fax number; short message service or text message address or other wireless device address; instant messaging address; credit card and other payment information; demographic information and other information that may identify you as an individual or allow online or offline contact with you as an individual. From time to time, other information, such as your age, gender, education and subscription information may also be requested. This Privacy Policy explains, in general, what Personal Information and other information is collected on our Web Site, how the information is used, and with whom we may share such information. California and Canadian residents have the right to know how their information may be shared with third parties who engage in direct marketing activities and this Privacy Policy explains our practices and how you can opt-out of having your information shared for such purposes. Please take a few minutes to read our Privacy Policy so that you understand how we treat your information.

## **B. What Information is Collected on this Web Site?**

### **1. User-Provided Information**

We collect two types of personally identifying information from users: personal data (such as names and contact details) and aggregated data (such as information about traffic patterns on the Web Site, for example, how many users log onto the Web Site on a daily basis). We collect personal information from users of our Web Site, for example, through such users' activities, transactions and completion of online forms on our Web Site. Such information is collected, for example, when users register or subscribe for accounts or features on our Web Site, make online purchases, enter sweepstakes and contests, complete surveys, contribute to a chat room, bulletin board, list serve, blog, wiki or other open forum that we may make available on or through our Web Site, submit a comment or question to us using a "contact us" or similar feature on our Web Site, send us an e-mail, or in any other way submit personal information to us via our Web Site.

You may be able to send information about our products and services to your friends and family members through our Web Site by clicking on an "E-mail to Friend" or similar link on our Web Site or in an e-mail that we have sent you. In some of these cases (unless you simply forward our e-mail on your own), you may provide the name and e-mail address of your friend or family member to us. Such information will be treated in accordance with this Privacy Policy and applicable law.

You may also be able to send an online card to a friend or family

member, or send them a gift or gift certificate. If so, you may be required to provide us with your friend's or family member's Personal Information. Such information will be treated in accordance with this Privacy Policy and applicable law.

## **2. Web Site Usage Information**

### **(i) Cookies**

We may use "cookies" to keep, and sometimes track, information about you. Cookies are small data files that are sent to your browser or related software from a Web server when you visit it and are stored on your computer's hard drive for record keeping purposes. Cookies track where you travel on our Web Site and what you look at and purchase. They may store the information in your shopping cart, and/or your username and password. A cookie may enable us to relate your use of our Web Site to other information about you, including your Personal Information. These purposes serve to improve and personalize your experience on our Web Site.

You may occasionally get cookies from our advertisers, which is standard in the internet industry. We do not control these cookies, and these cookies are not subject to our privacy policies.

Most Web browsers can be set to inform you when a cookie has been sent to you and provide you with the opportunity to refuse that cookie. Additionally, if you have a Flash player installed on your computer, your Flash player can be set to reject or delete Flash cookies. However, refusing a cookie may, in some cases, preclude you from using, or negatively impact the display or function of, the Web Site or certain areas or features of the Web Site.

### **(ii) Clear GIFs**

We may use "clear GIFs" (aka "Web beacons" or "pixel tags") or similar technologies, in the Web Site and in our communications with you to enable us to know whether you have visited a web page or received a message. A clear GIF is typically a one-pixel, transparent image (although it can be a visible image as well), located on a web page or in an e-mail or other type of message, which is retrieved from a remote site on the internet enabling the verification of an individual's viewing or receipt of a web page or message. A clear GIF may enable us to relate your viewing or receipt of a web page or message to other information about you, including your Personal Information.



### **(iii) IP Address and Clickstream Data**

Aggregated information, such as which pages users access or visit and information volunteered by users, such as survey information and/or Web Site registrations, is collected through various methods. For example, our server may automatically collect data about your server's internet address when you visit us. This information, known as an Internet Protocol address, or IP Address, is a number that is automatically assigned to your computer by your internet service provider whenever you're on the internet. When you request pages from our Web Site, our servers may log your IP Address and sometimes your domain name. Our server may also record the referring page that linked you to us (e.g., another web site or a search engine); the pages you visit on this Web Site; the web site you visit after this Web Site; the ads you see; the ads you click on; other information about the type of web browser, computer, platform, related software and settings you are using; any search terms you have entered on this Web Site or a referral site; and other web usage activity and data logged by our web servers. We use this information for internal system administration, to help diagnose problems with our server, and to administer our Web Site. Such information may also be used to gather broad demographic information, such as country of origin and internet service provider. We may also link this information with your Personal Information when we feel that it is necessary to enforce compliance with our rules and policies or Terms of Use or to protect our Web Site, customers or others.

Any or all of these activities with regard to Web Site usage information may be performed on our behalf by our services providers.

### **C. How is the Personal Information Used?**

We use both personal and aggregated information we collect for multiple purposes. The Personal Information may be used to improve the content of the Web Site, to customize the content and/or layout of the Web Site for each individual user, and to notify users about updates to the Web Site or promotional offers or opportunities that we believe will be of interest to you. We will use the Personal Information you provide to our Web Site, for example, to respond to your requests and to provide you with our product and service offerings. For example, we will process your orders, respond to your requests and inquiries and provide you with the services and features offered on or through our Web Site. We may also use your Personal Information to maintain our internal record keeping. We may also report information about your account to credit bureaus. Late payments, missed

payments, or other defaults on your account may be reflected in your credit report. We may match information collected from you through different means or at different times, including both Personal Information and Web Site usage information, and use such information along with information obtained from other sources, including third parties. In addition, we may send you notices (for example, in the form of e-mails, mailings, and the like), and otherwise correspond with you, about products, services, companies and events, sponsored by us and others, that we think might interest you. You may opt-out of receiving such notices from us, at any time, by following the instructions in the Right to Opt-out section below.

We may analyze user behavior as a measure of interest in, and use of, our Web Site and e-mails, both on an individual basis and in the aggregate. We may also use information provided to us on an anonymous aggregated basis for purposes of analyzing traffic and usage patterns.

In addition, we may use information you provide us through e-mails, Q & A, and in response to polls for editorial purposes, and may use your name and any stories you provide us in articles published online and in our newspaper. Please be advised that any such submissions may be used by us for any lawful purpose. If you provide us with personal anecdotes, they may be attributed to you and we may include your user name and any personal information that you provide in an open forum on this Web Site, as provided in section D(i) below, to facilitate such attribution. We can edit, rewrite, use, and reuse the content, including your name, likeness, photograph, and biographical information you provide, in any way and any media whether now known or invented in the future, with or without attribution, including publication in our newspaper, and in trade media, and advertising and promotions. You agree that any content you send will comply with Terms of Use.

#### **D. Do we Share Personal Information and Web Site Usage Information with Others?**

##### **(i) Public Forums**

When you contribute to a public area or feature of our Web Site, such as a chat discussion, bulletin board, list serve, blog, wiki or other open forum that we may make available on or through our Web Site, the information that you submit will be made available to the general public and will not be considered "Personal Information" for purposes of this Privacy Policy. For this reason, we recommend that you do not submit any sensitive information, including your full name, home address, phone number, other information that would enable other users to locate you, or financial information on these areas of our Web Site. Instead, make up a username that does not disclose your personal identity.

**(ii) Third Party Offers**

We may communicate with you on behalf of other entities not affiliated with The Chronicle that have goods, services and offers that we believe might be of interest to you. We will not share your individual Personal Information with these entities.

**(iii) Co-sponsored Contests, Sweepstakes and Offerings**

Some of our contests, sweepstakes and other offerings may be co-sponsored by another company. In those situations, the information we obtain from you in connection with such contest, sweepstakes or offering may be shared with our co-sponsor. In those situations, our co-sponsors will have the right to use your information for their own purposes, in accordance with their own policies. If you do not wish for the information we obtain from you to be shared with our co-sponsor, then do not enter such contest, sweepstake or other offering or otherwise provide to us any Personal Information in connection with such contest, sweepstake or other offering. We are not responsible for how our co-sponsors may use your information.

**(iv) Service Providers**

We may use third parties to help operate our Web Site and deliver our products and services, and may share your Personal Information with our affiliates, service providers and other third parties that provide products or services for or through this Web Site or for our business (such as Web Site or database hosting companies, address list hosting companies, e-mail service providers, analytics companies, distribution companies, fulfillment companies, and other similar service providers that use such information on our behalf). Unless otherwise stated, these companies do not have any right to use the Personal Information we provide to them beyond what is necessary for them to assist us. We may use third parties to provide services in connection with Submitted Materials, as that term is defined in the Terms of Use. In accordance with section D(i) above, information in forums, information submitted for sweepstakes, and Submitted Materials (including submitted video and pictures), become publicly available and may be used by us for any lawful purpose. We may share personal information that is included with Submitted Materials with third parties, including, without limitation, vendors or other service providers, affiliates and partners.

We use services provided by the AP News Registry to help us understand how our content is used on this site, and on third party sites where our content may appear. The AP News Registry uses cookies in connection with this service. To learn more, and to opt-out of the AP cookie, please visit:

<http://www.apnewsregistry.com/privacycenter/servicepolicy.aspx>

When you conduct e-commerce with one of the e-commerce affiliates or service providers to which the Web Site may be linked, certain personal information such as your e-mail and home address may be collected by the service provider's server and made available to us. We do not, however, transfer credit card information you may provide to that service provider.

**(v) Aggregate Statistics**

We may disclose aggregate statistics regarding user behavior as a measure of interest in, and use of, our Web Site and e-mails to third parties in the form of aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual user.

**(vi) Legally Compelled Disclosures**

We may disclose Personal Information to government authorities, and to other third parties when compelled to do so by government authorities, at our discretion, or otherwise as required or permitted by law, including but not limited to in response to court orders and subpoenas. We also may disclose Personal Information when we have reason to believe that someone has committed, or will commit, unlawful acts or acts that endanger the health or safety of another; is causing injury to, or interference with, our rights or property, other users of the Web Site, or anyone else that could be harmed by such activities. In some situations, we may share your Personal Information, on a confidential basis, with third parties who perform a particular service on our behalf, such as sending e-mails.

**(vii) Business Transfer**

In the event that The Chronicle, any affiliate of The Chronicle, or substantially all of its assets, are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, Personal Information may be one of the transferred assets. For purposes of this policy, an "affiliate" of The The Chronicle is an entity that is under the control of, or under common control with, The Chronicle (and for these purposes, a company controlling twenty 20% percent or more of the voting stock of another entity shall be deemed to control such entity).

**(viii) Third Party Ad Servers**

We may use third-party advertising companies to serve ads when you visit our Web Site. If so, a list of these ad serving companies will be available here. These companies may use information (generally, not

including your name, address, e-mail address or telephone number) about your visits to this Web Site and to other web sites in order to provide advertisements about goods and services of interest to you. These companies may employ cookies and clear GIFs to measure advertising effectiveness. Any information that these third parties collect via cookies and clear GIFs is generally not personally identifiable (unless, for example, you provide personally identifiable information to them through an ad or e-mail message). We encourage you to read these businesses' privacy policies if you should have any concerns about how they will care for your personal information. If you would like more information about this practice and to know your choices about not having this information used by these companies, see the Network Advertising Initiative's consumer web site at <http://www.networkadvertising.org/consumer/>.

We participate in the APT from Yahoo! Platform. Yahoo! is an ad network partner that displays ads on our Web Site. To improve your ad experience on our Web Site and elsewhere on the Internet, we may send non-personal information to Yahoo! based on your browser's activities, such as type of pages viewed and categories of interests, so that the advertising you see is relevant to you. Yahoo! also may use information regarding its own users to select which ads to display. Click here to learn more about Yahoo!'s ad practices, including how to opt out of using anonymous information to select which ads to show you. Yahoo! is a member of the Network Advertising Initiative, <http://www.networkadvertising.org>.

Other ad companies:

- Rubicon
- 5to1
- VideoEgg
- Bizo

### **E. Right to Opt-out**

You have the right to "opt-out" of certain of our uses of your Personal Information. For example, at the time you are requested to provide Personal Information on this Web Site, you may have the opportunity to elect to, or not to receive periodic email products and opportunities from the Houston Chronicle on behalf of selected advertisers. You may also make this request by visiting your profile page at [www.chron.com](http://www.chron.com) or by sending an e-mail to [privacy@chron.com](mailto:privacy@chron.com) and indicating that you opt not to receive any marketing correspondence from us or from affiliated and unaffiliated entities. In this e-mail, please indicate whether you would like to: (i) opt-out of receiving any correspondence from us or from entities affiliated with us or unaffiliated third parties for their marketing purposes; or (ii) opt-out of

only selected products. You may also opt-out of The Chronicle's promotional e-mails by clicking on an opt-out link within the e-mail you receive, or opt-out of The Chronicle's SMS messages by texting STOP to chron (24766) Please understand that if you opt-out of receiving correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us.

Also, a request to have us stop sharing your Personal Information with other entities for marketing purposes will apply as of the date that is ten (10) business days after our receipt of your request, and we will not be responsible for any communications that you may receive from entities that received your Personal Information prior to such request. In these cases, please contact that entity directly.

## **F. Security**

### **1. General**

No transmission of data over the Internet is guaranteed to be completely secure. It may be possible for third parties not under the control of The Chronicle to intercept or access transmissions or private communications unlawfully, including in the case of your contacting us by e-mail or a "contact us" or similar feature on our Web Site.

Accordingly, though The Chronicle will take reasonable steps to protect the security and integrity of all Personal Information provided to this Web Site, due to the inherent nature of the internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the internet or while stored on our system or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers. Any such transmission is done at your own risk.

You may be able to create an account on our Web Site with a username and password. If so, you are responsible for maintaining the strict confidentiality of your account password, and you shall be responsible for any access to or use of the Web Site by you or any person or entity using your password, whether or not such access or use has been authorized by or on behalf of you, and whether or not such person or entity is your employee or agent. You agree to (a) immediately notify The Chronicle of any unauthorized use of your password or account or any other breach of security, and (b) ensure that you exit from your account at the end of each session. It is your sole responsibility to control the dissemination and use of your password, control access to and use of your account, and notify The Chronicle when you desire to cancel your account on this Web Site. We will not be responsible or liable for any loss or damage arising from your failure to comply with this provision.

We will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during or after transmission.

**In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your e-mail address, we may notify you by e-mail or by other means as required by law. You consent to our use of e-mail as a means of such notification.**

## **2. Phishing**

With identity theft a continuing problem, it has become increasingly common for unauthorized individuals to send e-mail messages to consumers, purporting to represent a legitimate company such as a bank or on-line merchant, requesting that the consumer provide personal, often sensitive information. Sometimes, the domain name of the e-mail address from which the e-mail appears to have been sent, and the domain name of the web site requesting such information, appears to be the domain name of a legitimate, trusted company. In reality, such sensitive information may be collected by an unauthorized individual to be used for purposes of identity theft. This illegal activity has come to be known as "phishing."

If you receive an e-mail or other correspondence requesting that you provide any sensitive information (including your Web Site password or credit card information) via e-mail or to a web site that does not seem to be affiliated with our Web Site, or that otherwise seems suspicious to you, please do not provide such information, and report such request to us at [privacy@chron.com](mailto:privacy@chron.com).

## **G. Children**

The Web Site is not intended for use by children under the age of 13 or for children between the ages of 13 and 17, except in accordance with the Terms of Use. No one under age 13 is authorized to provide any Personal Information or use our public discussion areas, forums and chat rooms. The Chronicle does not knowingly collect Personal Information from children under the age of 13.

## **H. Wireless Addresses**

If the e-mail address you provide to us is a wireless e-mail address, you agree to receive messages at such address from The Chronicle or entities

affiliated with The Chronicle (unless and until you have elected not to receive such messages by following the instructions in the Right to Opt-out section above). You understand that your wireless carrier's standard rates apply to these messages, and that you may change your mind at any time by following the instructions in the Right to Opt-Out section above. You represent that you are the owner or authorized user of the wireless device on which messages will be received, and that you are authorized to approve the applicable charges.

### **I. Short Message Service**

We may make available a service through which you can receive messages on your wireless device via short message service ("SMS Service"). If you subscribe to one of our SMS Services, you thereby agree to receive SMS Service messages at the address you provide for such purposes. Such messages may come from The Chronicle, the rest of the affiliates of The Chronicle (unless and until you have elected not to receive such messages by following the instructions in the Right to Opt-out section above).

You understand that your wireless carrier's standard rates apply to these messages, and that you may change your mind at any time by following the instructions in the Right to Opt-out section above. You represent that you are the owner or authorized user of the wireless device you use to sign up for the SMS Service, and that you are authorized to approve the applicable charges. To use the SMS Service, you must be 18 years of age or older and reside in the United States. You must first register and provide all required Personal Information, which may include, for example, your name, SMS address, wireless carrier and, if fees are applicable to the SMS Service you subscribe to, billing information (either your credit card information or mobile service carrier information if applicable fees will be billed through your carrier). We may also obtain the date, time and content of your messages in the course of your use of the SMS Service. We will use the information we obtain in connection with our SMS Service in accordance with this Privacy Policy. If fees are charged to your wireless account invoice, we may provide your carrier with your applicable information in connection therewith. Your wireless carrier and other service providers may also collect data about your wireless device usage, and their practices are governed by their own policies.

You acknowledge and agree that the SMS Service is provided via wireless systems which use radios (and other means) to transmit communications over complex networks. We do not guarantee that your use of the SMS Service will be private or secure, and we are not liable to you for any lack of privacy or security you may experience. You are fully responsible for taking precautions and providing security measures best suited for your situation and intended use of the SMS Service. We may also access the content of



your account and wireless account with your carrier for the purpose of identifying and resolving technical problems and service-related complaints.

By signing up for the SMS Service, you consent to receive, from time to time, further messages which may include news, promotions and offers from us, our affiliates and partners, and, unless and until you have opted-out of these activities by following the instructions in the Right to Opt-out section above. Please follow the instructions provided to you by third parties to unsubscribe from their messages.

#### **J. Third Party "Linked-To" Web Sites**

When you are on our Web Site you may have the opportunity to visit, or link to, other web sites not operated by The Chronicle, including other web sites operated by our affiliates, by service vendors, or by unaffiliated third parties. These web sites may collect personal information about you. The Chronicle does not control web sites that are operated by these entities and is not responsible for the information practices of these web sites. This Privacy Policy does not address the information practices of those other web sites. The privacy policies of web sites operated by other affiliates of The Chronicle are located on those web sites.

#### **K. Miscellaneous**

##### **(i) Consent to Processing**

We control and operate the Web Site from our offices in the United States of America. By providing Personal Information to this Web Site, you understand and consent to such collection, maintenance, processing and transfer of such information. We do not represent that materials on the Web Site are appropriate or available for use in other locations. Persons who choose to access the Web Site from other locations do so on their own initiative, and are responsible for compliance with local laws, if and to the extent local laws are applicable. All parties to this Privacy Policy waive their respective rights to a trial by jury.

##### **(ii) Your Access Rights**

You may review the Personal Information that is stored in your user account on this Web Site by visiting the "Member Profile" or equivalent area of your account on this Web Site or by e-mailing [privacy@chron.com](mailto:privacy@chron.com) Upon your written request, we will send you a copy of the Personal Information we have on file in your user account (if any). You may send us new or updated information at any time. We will endeavor to respond to your request to access, update or delete your information as soon as reasonably practicable. Before we are able to provide you with any information, correct any inaccuracies or delete

any information, however, we may ask you to verify your identity and to provide other details to help us to respond to your request.

**(iii) Changes to this Privacy Policy**

The Chronicle reserves the right to change or update this Privacy Policy, or any other of our policies or practices, at any time, and will notify users of this Web Site by posting such changed or updated Privacy Policy on this page. Any changes or updates will be effective immediately upon posting to this Web Site. Under certain circumstances, we may also elect to notify you of changes or updates to our Privacy Policy by additional means, such as posting a notice on the front page of our Web Site or sending you an e-mail.

**(iv) Contact Us**

If you have any questions or comments regarding our privacy practices, you may contact us at [privacy@chron.com](mailto:privacy@chron.com).

**Effective Date: December 19, 2007**

**Landmark Media Enterprises (1/2/2011)**

**Privacy Policy, Terms and Conditions**

*Updated 06/22/2009*

Welcome to [roanoke.com](http://roanoke.com), Times-World Corporation's (d/b/a The Roanoke Times) space in the Internet.

We've adopted a set of information management guidelines that serve as the basis for our customer and advertiser relationships. These guidelines have been developed with the recognition that Internet technologies are rapidly evolving, as are underlying business models. We reserve the right to change these guidelines at any time. Any such changes will be posted on this page. These guidelines do not apply to the practices of entities that [roanoke.com](http://roanoke.com) and its affiliates do not control or to individuals who are not under our control.

The following privacy policy applies to The Roanoke Times, [roanoke.com](http://roanoke.com) and other Web sites owned and operated by the Times-World Corp, based in Southwestern Virginia. We are affiliated with other online companies, some of which feature our branding. This policy statement does not apply to those companies' Web sites; please refer to these affiliated sites to obtain information on their privacy policies. These sites include, but are not limited to, [Weather.com](http://Weather.com), [Nando Media](http://Nando Media) and [Switchboard](http://Switchboard).

### **Your personal information**

Roanoke.com collects personally identifiable information (name, e-mail address, etc.) and/or demographic data (zip code, gender, interests, etc.) that you submit when you:

- Order a subscription to The Roanoke Times
- Complete certain surveys
- Register for a promotion or contest or sweepstakes
- Send us an e-mail
- Place a classified ad
- Join a discussion board (you can opt out)
- Comment on news stories you send to a friend

This information is encrypted and retained in a secure database, not on a Web site.

We use this information to operate roanoke.com's services, to provide you with the highest quality service, and to offer you opportunities we think will be of interest to you. We will send e-mails to those who have elected to receive them in which we inform registered users about specific offers (from roanoke.com and our advertising partners) that may be of interest to them.

We will not disclose any personal information without your advance permission except when we believe the law requires us to do so or the disclosure is necessary to protect the rights or property of Times-World Corp. In order to describe our services to prospective partners, advertisers and others, we may disclose user information -- but only in an aggregate form. For example, we might disclose that a certain percentage of our users are male or within a certain age range.

We accept credit-card transactions for the purchase of online-only jobs and for the newspaper's subscription system. We do not take consumers' credit card information and forward it to third-party suppliers of ordered goods and services. People can also buy goods and services from vendors with whom we associate – including but not only premium personals membership or travel reservations. Credit card information you provide in the context of an order for those goods or services will be provided to the parties providing such goods and services only. Those companies and The Roanoke Times may use the contact information that you provide to contact you about your account and/or to send you necessary information directly related to the good or service for which you have registered.

### **Surveys**

Roanoke.com may occasionally use online surveys to ask visitors for feedback on our products and services as well as to collect contact

information (such as e-mail address). We may use contact data from such surveys to send the user information about our company or to contact users when necessary. Users may choose not to receive these future, direct communications by invoking the "Opt out procedures" set forth below.

### **Children's privacy**

The Children's Online Privacy Protection Act stipulates that Web site operators cannot knowingly collect information from children under age 13 without verifiable parental permission. Roanoke.com respects the privacy of children, and does not seek children's participation in services that require registration. We strongly recommend that parents supervise their children's use of the Internet. We also encourage parents to instruct their children not to give out personal information in e-mail messages or forums.

### **Opt out procedures**

From time to time, we may send you information about various goods and services. If you do not want to receive this information, you may send your unsubscribe request via e-mail to Meg Martin, online editor.

### **Correcting and updating your private information**

The information that you provide to roanoke.com may be stored by us for an indefinite time. However, please feel free to request a change or deletion of this information at any time by sending us an e-mail.

### **Usage tracking**

Some information about you is automatically collected via server logs. This information can include your IP address, browser type, domain names, access times and referring URLs. We use this information to administer our Web site, help diagnose problems with our server, and to help identify you as a unique visitor to our site and to gather broad information about your site usage. However, in tracking these usage patterns, we do not match this information with a specific user's personally identifiable information.

### **Cookies**

A "cookie" is a small text file that is placed in your browser and allows a Web site to recognize you each time you -- as an individual but not your identity -- visit its pages. Roanoke.com uses cookies to track usage of the site. We never give out information to others about individual usage. This is the foundation of our privacy policy. We do provide our advertisers with aggregate information, such as: "1,000 users saw your advertisement today, and 500 of them clicked on it." We can also tell how many users looked at a particular section, how often users come back, and what areas of the site people look at most often and least often. Other parts of our site that are not administered by roanoke.com, such as the TV listings, also use cookies to remember show line-ups you request, for example.

We may also use an ad network provider to help present advertisements on this site. This ad network provider, like other advertising service vendors, uses cookies, web beacons, or similar technologies on the hard drive of your computer to serve you advertisements tailored to interests you have shown by browsing on this and other sites you have visited, and to determine whether you have seen a particular advertisement before and to avoid sending you duplicate advertisements. In doing so, the provider collects non-personal data such as your browser type, your operating system, Web pages visited, time of visits, content viewed, ads viewed, and other clickstream data. The use of cookies, web beacons, or similar technologies by these ad network providers is subject to their own privacy policies, not ours. If you do not want the benefits of these advertising cookies, you may opt-out by visiting [http://www.networkadvertising.org/optout\\_nonppii.asp](http://www.networkadvertising.org/optout_nonppii.asp). However, if you do so you may not receive the full benefit from the use of our site.

Google, as a third party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on their visit to our site and other sites on the Internet. Users may opt out of the use of the DART cookie by visiting the Google ad and content network privacy policy.

### **Security**

The security of the information that you provide roanoke.com is very important to us. We use SSL encryption software to protect your data. However, our Web sites include links to other sites, and when you choose to visit those sites, you should determine their guidelines and privacy policies as we are not responsible, and we affirmatively disclaim any responsibility, for their privacy policies. In addition, we may permit third parties to offer registration-based services through our site. We are not responsible, and we affirmatively disclaim responsibility, for the actions and policies of these third parties. We urge you to review the privacy policies of these parties when supplying personally identifiable information to them.

### **Remember the risks whenever you use the Internet**

You should know that when you voluntarily disclose personal information to the public on roanoke.com Web sites and its affiliated sites (for example, in electronic forums, chat rooms and other public posting areas), that information can be collected and used by others and may result in unsolicited messages from other people. While we do our best to protect your personal information, we cannot be responsible, and we affirmatively disclaim responsibility, for information that you choose to publicly disclose. Further, you are solely responsible for maintaining the secrecy of any passwords or other account information.

Our partners and other Internet sites or services that may be accessible through the roanoke.com sites have separate data and privacy practices that are independent of us, and we disclaim any responsibility or liability for their policies or actions. We encourage you to contact those sites directly if you have questions about their privacy policies.

### **How to contact us**

For any questions or comments regarding our privacy policy, you may contact us:

- by e-mail: Meg Martin, online editor
- by phone: (540) 981-3340 or (800) 346-1234 ext. 340
- by regular mail: Roanoke.com 201 W. Campbell Ave. Roanoke, Va. 24010

### **Registration**

During a free registration process prior to using the site, The Roanoke Times on the Web requires that you supply a unique Member ID, e-mail address, and demographic information. You must agree to the terms of our member agreement, which follow.

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### **Indemnity**

To the full extent permitted by law, you agree to indemnify and hold us harmless from and against any and all claims, suits, liabilities, obligations, damages, injuries, penalties, fines, losses, costs and expenses (including, without limitation, attorneys' fees) arising out of, resulting from or related to any breach of the foregoing representations and warranties. This obligation shall survive the termination of this Agreement for any reason. This right of indemnity does not extend to such claims, suits, liabilities, obligations, damages, injuries, penalties, fines, losses, costs and expenses which arise out of the sole negligence of Times-World Corporation, its affiliates, and employees.

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The Online Service web sites include weblogs, forums, photo galleries and other interactive areas in which users can express opinions and share ideas and information. We cannot and do not monitor all of the material submitted to the Online Service. Additionally, we do not control, and are not responsible for, Content submitted by users.



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If you believe that any Content on any of the Online Service web sites infringes upon any copyrights that you own, please contact us pursuant to the procedures outlined in the Digital Millennium Copyright Act (Title 17 U.S.C. § 512) at the following address:

**Copyright Agent**

The Roanoke Times 201 W. Campbell Ave. Roanoke, Va. 24010

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You agree not to submit Content:

- That is unlawful, pornographic, defamatory, libelous, harmful, threatening, abusive, harassing, or invasive of another's privacy, or harms minors in any way;
  
- That harasses, degrades, intimidates or is hateful toward an individual or group of individuals on the basis of religion, gender, sexual orientation, race, ethnicity, age, or disability;
  
- That falsely claims to be submitted by another person or entity, or falsely states or otherwise misrepresent your affiliation with another person or entity;
  
- That includes personal or identifying information about another person, or uses the name or likeness of another person for commercial purposes, without that person's explicit consent;
  
- That infringes any patent, trademark, trade secret, copyright or other proprietary rights of any party, or Content that you do not have a right to make available under any law or under contractual or fiduciary relationships;
  
- That is false, fraudulent, deceptive, misleading, deceitful, misinformative or uses "bait-and-switch" tactics;
  
- That constitutes or contains "junk mail," "spam," "chain letters,"

"pyramid schemes," unsolicited commercial advertisement, "affiliate marketing," or "link referral code";

- That constitutes or contains any form of advertising or solicitation if (1) posted in areas which are not designated for such purposes; or (2) emailed to Online Service web site users who have requested not to be contacted about other services, products or commercial interests;

- That advertises any illegal services or the sale of any items the sale of which is prohibited or restricted by applicable law, including, without limitation, items the sale of which is prohibited or regulated by Virginia law;

- That contains software viruses, worms, trojan horses, or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer software or hardware or telecommunications equipment;

- That disrupts the operation of any of the Online Service web sites with an excessive number of messages (flooding attack) to such web sites, or that otherwise negatively affects other users' ability to use such web sites; or

That employs misleading email addresses, or forged headers or otherwise manipulated identifiers in order to disguise the origin of Content .

Additionally, you agree not to:

- Contact anyone who has asked not to be contacted or otherwise "stalk" or harass anyone;

- Collect personal data about other users for commercial or unlawful purposes;

- Use automated means, including scripts, spiders, robots, crawlers, data mining tools, or the like to download data from or upload data to any of the Online Service web sites; or

- Attempt to gain unauthorized access to our computer system or to any other user's computer systems, or engage in any activity that disrupts, diminishes the quality of, interferes with the performance of, or impairs the functionality of, any of the Online Service web sites.

Finally, you agree that regardless of your location any disputes arising out of the your use of the Online Service shall only be prosecuted in the Circuit Court for the City of Roanoke, Virginia, or the United States District Court

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As a customer of jobs.roanoke.com and The Roanoke Times ("Host" ), you must agree to accept and abide by the following terms and conditions upon using the services on this web site. The Roanoke Times reserves the right, at its discretion to suspend the use of this web site by any customer. If you do not accept these terms and conditions, do not use this web site and service. By using this web site and service, you are accepting to be bound by these terms and conditions. Please visit these terms and conditions periodically as they change. You will be bound by all changes. Questions concerning the use of jobs.roanoke.com should be directed to [jobsupport@roanoke.com](mailto:jobsupport@roanoke.com).

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Individuals/Companies who disclose or share any password, which grants access to any non-public area of this web site with any third party, or use their password for unauthorized purposes will be held liable for all damages resulting from this disclosure.

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The Roanoke Times reserves the right to remove the job posting(s) if an arrangement for the billing process has not been met within a 24-hours period of posting.

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You are responsible for maintaining the confidentiality of your information and password. You shall be responsible for all uses of your registration, whether or not authorized by you. You agree to immediately notify us at jobs@roanoke.com of any unauthorized use of your registration or password.

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### **Indemnity**

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**The Roanoke Times has the right to modify these terms and conditions any time.**

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## **Lee Enterprises (1/2/2011)**

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Welcome to the web sites of the Capital Newspapers. We (which includes our parent company, Lee Enterprises, Incorporated) believe in your right to know what information is collected during your visit to our web sites and how that information is used and safeguarded.

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We collect aggregate and user-specific information on which pages consumers access or visit. This information is used to generate reports that help us assess the value of and interest in the various web sites we provide. We use the information we collect to improve the content of our web pages. We can build a better site if we know which pages our users are visiting, how often they visit and how long they stay on a page.

Our web servers automatically collect limited information about your computer's connection to the Internet, including your IP address (but not the e-mail address), when you visit our sites. Your IP address does not contain personally identifiable information, nor does it identify you personally. We use this information to deliver our web pages to you upon request, to tailor our sites to the interests of our users, and to measure traffic within our sites.

To help make our sites more responsive to the needs of our visitors, we may utilize a standard feature of browser software called a "cookie." A cookie is a small piece of computer code that is deposited on your hard drive by our site. Browsers typically recognize when a cookie has been sent to your computer and give you the option to refuse or allow it. A cookie does not actually identify you, just the computer that you are using to access our site. A cookie cannot read data off your hard drive. Our advertisers, content partners and sites that are reached from links on our site may also assign their own cookies to your browser, a process that we cannot control.



We use cookies to help us tailor our site to your needs so we can deliver a better and more personalized service. It is a cookie, for example, that allows us to deliver to you any personalized information each time you visit a site. In addition, we can access cookies later in your current session or in a later session on our site in order to improve your visit to our web site, as in the following examples:

#### **Account Registration**

If your use of a component of the site requires you to register, a cookie will be used to automatically identify you as a registered user when you are using our site. These cookies are known as persistent cookies and continue on your computer after the initial session in which they are created.

#### **Payment Identification**

This cookie allows us to maintain information containing the products (like photo reprints) or services (such as placing a classified advertisement or signing up for home delivery) you are purchasing while you are online. To limit unauthorized access, this cookie, also called a session cookie, expires whenever you exit a browser session.

Like many other commercial sites, our sites may utilize an electronic file called a web beacon to count users who have visited a page or to recognize users by accessing certain cookies. Our site and/or our partner web sites use web beacons for auditing purposes and to collect information from the websites of certain partners. Information recorded through these web beacons is used to report anonymous individual and/or aggregate information about our users from our partners. Aggregate information may include demographic and usage information. No personally identifiable information about you is shared with partners. **To opt-out of a third parties' use of web beacons please click here.**

#### **Information Gathered by Voluntary Submission**

To make use of certain features on our web sites (such as contests, story comments, letters to the editor, personalized web pages and other interactive forums and blogs) visitors need to register and to provide certain information as part of the registration or participation process. We may ask, for example, for your name, e-mail address, gender, age, and zip code, and we might request information on your interest in sports, personal finance, the performing arts, and the like.

The information you supply will help us offer you more personalized features, to tailor our sites to your interests and make them more useful to you. The more you tell us about yourself, the more value we can offer you.

Supplying such information is entirely voluntary. But if you do not supply the information we need, we may be unable to provide you with services and content we make available to other visitors to our sites. Of course, even if you want to remain completely anonymous, you are still free to take advantage of the wealth of content that is otherwise available, without registration, on our sites.

### **Children under the Age of 13**

*If you are under the age of 13, do not send us any information about yourself such as your name, address or e-mail address. You may only send us personally identifiable information if your parents have verified to us their consent to the collection of the information.*

Because we are a media company, some of our online services and content may be attractive to children. Because we strive to protect the privacy of all users of our site, including children, we endeavor to comply with the Children's Online Privacy Protection Act. Our site:

- Includes our contact information.
  
- Explains the types of personal information we collect, and how we use it.
  
- Explains our practices in terms of sharing personal information with third parties.
  
- Allows parents to consent to the collection and use of their children's personal information, without consenting to disclosure to third parties.
  
- Does not condition a child's participation in an activity on the child's providing more personal information than is reasonably necessary for the activity.
  
- Allows parents to review their child's information, have it deleted, or refuse to permit any further collection, by contacting us.

We make a special effort to encourage children under the age of 13 to consult with their parents before furnishing any personal data. However, we also believe that parents should supervise their children's online activities and consider using parental control tools available from online services and software manufacturers that help provide a child-friendly online environment. These tools can also prevent children from disclosing their name, address, and other personal information online without parental permission. For additional information about parental control tools, please consult [http://www.icra.org/\\_en/parents](http://www.icra.org/_en/parents)

### **E-mails from Us**

Upon registering with our website, you may begin receiving communications from us. In addition, if you have signed up for any of our automated account services, we will send you transactional e-mails regarding the status of your account, including confirmations, notices of expiration and renewal and other related electronic correspondence. If you have signed up for any of our e-mail newsletters, you may stop receiving them if you follow the "unsubscribe" instructions located near the bottom of each newsletter. We may send you an e-mail inviting you to participate in subscriber or website user surveys. Such surveys greatly help us improve our services and the value of our web sites. Any information you give us in those surveys will not be shared with any third parties except in aggregate form.

### **What We Do With the Information We Gather About You**

We or one of our affiliated companies may perform statistical, marketing and demographic analyses of our delivery subscribers and their subscription patterns. In addition, we may generally inform our advertisers about our subscriber base. When we present information to our advertisers -- to help them understand our audience and confirm the value of advertising on our websites -- it is usually in the form of aggregated statistics on traffic to various pages within our sites. We will not share individual user information with third parties unless the user has specifically approved the release of that information. In some cases, however, we may provide information to legal officials as described in "Compliance with Legal Process" below.

In some cases, we contract with third parties to provide services on our behalf, including credit-card and bill processing, shipping, e-mail distribution, list processing and analytics or promotions management. We provide these third parties only with the information necessary for them to perform their specific services. These service providers are restricted from using this information in any way other than to provide services to us, and they may not share this information with any one else nor may they resell this data.

### **Compliance with Legal Process**

We may disclose personal information if we or one of our affiliated companies is required by law to disclose personal information, or if we believe in good faith that such action is necessary to comply with a law or some legal process, to protect or defend our rights and property, to protect against misuse or unauthorized use of our web sites or to protect the personal safety or property of our users or the public.

### **A Final Note:**

We are affiliated with other online companies, some of which feature our

branding; in addition there are numerous links to third parties contained on our site. Our Privacy Policy does not apply to those companies' web sites, so you should refer to each of those sites to obtain information on their privacy policies. If you cannot find the privacy policy on any of these sites once you have arrived at their site via a link from our site, you should contact that site directly for more information.

The web is an evolving medium. If we need to change our Privacy Policy at some point in the future, we will post the changes before they take effect if we believe that the change in the way we use your personal information is significant or material. Of course, our use of information gathered while the current policy is in effect will always be consistent with the current policy, even if we change that policy later.

Last updated on 10/04/09

## **The McClatchy Company (1/2/2011)**

Privacy Policy

**Effective Date: 10-30-09**

Idahostatesman.com ("Idahostatesman.com", "we", "our") has a firm commitment to privacy. We take your privacy concerns seriously and want to make reasonable efforts to address them as we strive to offer our site visitors a high quality, interactive and personalized experience. This Privacy Policy explains our position on information gathering and how we intend to use and share any information we collect. This Privacy Policy applies only to information collected by Idahostatesman.com and does not apply to information obtained or used by Idaho Statesman or its affiliates through other means.

**You understand and agree that, by visiting Idahostatesman.com and its affiliated sites, you are accepting, without modification, this Privacy Policy. If you disagree with any portion of this Privacy Policy, then your only option is to not use Idahostatesman.com.**

Idahostatesman.com collects and stores personally identifiable information such as your name, address, and e-mail address. The information that we collect and store about you depends on the page you visit and the services in which you elect to participate. We use this information to operate our services, improve the quality of our services, offer you opportunities we think will interest you, and better tailor the advertising you see from us to

suit you. This information is not shared with anyone outside of Idaho Statesman and Idahostatesman.com except as provided for in this Privacy Policy or as explained at the time the information is collected. More specifics on the information we collect and how we use it are outlined within this Privacy Policy.

This Privacy Policy is subject to change from time to time by Idahostatesman.com and your continued use of Idahostatesman.com means you agree to, without modification, the revisions. If you are a registered member of Idahostatesman.com, you will be notified of material revisions to this Privacy Policy via an e-mail message to the e-mail address that you provided at registration. If you are not a registered member of Idahostatesman.com, you may view revisions to this Privacy Policy on this page. Material changes to this Privacy Policy will be indicated by a revised effective date at the top left hand corner of this page and by a notice posted on the homepage of Idahostatesman.com. Whether or not you are a registered member of Idahostatesman.com, it is your responsibility to check back and review this page regularly to ensure you are familiar with the most current terms. Should you object to any such modifications to this Privacy Policy or become dissatisfied with Idahostatesman.com in any way, your only option is to immediately terminate your membership and discontinue use of Idahostatesman.com. Otherwise, continuing to use the service after the effective date means that you agree to be bound by the changes, without modification.

### **Information we collect**

Access to certain special content, services and features on Idahostatesman.com requires users to be subscribers to Idaho Statesman and/or to become registered members at Idahostatesman.com. Member registration may require you to provide certain personally identifiable information, such as your name, e-mail address, street address, telephone number, gender, and date of birth. If you choose to purchase a print subscription to Idaho Statesman or a classified ad when you register, we also require credit card and billing information. For more information about how we use your credit card and billing information, see the Section below titled "Electronic commerce". You will be asked to select a member name and password so that you have access to this information and can revise it in the future. To complete the registration process, we will send you a validation e-mail message. You must click the link in the e-mail to fully activate your membership account. At registration you will have the opportunity to Opt out of subscribing to e-mail newsletters and alerts sent to you on behalf of Idahostatesman.com and its advertisers.

Some features and services of Idahostatesman.com may require additional personally identifiable information or other demographic information. We

may collect other personally identifiable information when you provide feedback, comments, engage in chat, message boards, interactive forums or participate in surveys, or if you contact us offline. For example, when you enter contests you will be asked to also provide your phone number so that we can reach you in the event you have won a prize. All users may decline to share such information with us, by choosing not to register on Idahostatesman.com or not to use our services. Only registered members, however, may access certain content, services and features. You may also be asked to create a separate registration account with some of the services provided by partners and other third-party providers on Idahostatesman.com. Be aware that the information collected by a third-party provider will be subject to that provider's privacy policy and terms of service, rather than this Privacy Policy. We, therefore, recommend you review the privacy policy of each third-party service provider with whom you interact and each Web site you visit prior to submitting information in connection therewith.

If you wish to forward an article to a friend, we will ask that you provide your friend's name and e-mail address. While we may collect statistics on which articles are forwarded, we do not sell, rent, or market your friend's personal information, and retain the information only as long as necessary to provide this service.

### **Passive data collection and use**

Like most Web sites, Idahostatesman.com also collects and logs information automatically and through the use of electronic tools that may be transparent to you, such as your IP address, the name and location of your Internet Service Provider, the type and version of your browser, the length of time that you stay on Idahostatesman.com, search queries, your click-stream data, the location that referred you to Idahostatesman.com and the average number of pages viewed. If you visit another Web site prior to browsing Idahostatesman.com, that Web site might place personally identifiable information within a URL, which may be logged by us. Your IP address is the identifier assigned to your particular computer when you access the Internet. Depending on how you connect to the Internet, your IP address may always be the same, or it may change each time you access the Internet. Note that logging your IP address does not in and of itself provide us with your name, e-mail address or home or work address. We use this log information for systems administration and troubleshooting purposes and may also use it to gather general demographic information about you such as your general location and your Internet Service Provider. To better provide our services to you and to develop member profiles that enable us to tailor Idahostatesman.com's services and its advertisements to your interests, we may correlate this log information with other information about you, such as your registration information or newspaper subscription

records. We may provide to third parties anonymous aggregated (non-personally identifiable) general information about our Web site and its users.

### **Use of cookies**

Most standard Web browsers contain a feature called "cookies," which allow a Web site to place information about a user's visit to that Web site in a small data text file that is stored on the user's computer. Our use of cookie technology will likely be transparent to you and is used to recognize you and hold information from one visit to the next in an effort to increase your ease of use of Idahostatesman.com and to allow us to better understand how people use Idahostatesman.com through click-stream analysis. For example, cookies may be used to store information such as your member name and password, sparing you from having to re-enter that information each time you visit. Another example is that we may use cookie technology to control the number of times you see a particular advertisement while visiting Idahostatesman.com. You can turn the cookies feature off by using your browser preference options, but doing so will severely limit your access to Idahostatesman.com and may prevent you from registration.

Some of Idahostatesman.com's third-party content providers also may place a cookie on your computer. If you choose to monitor or restrict cookies that are placed on this computer, you can determine the Web site that is attempting to place a cookie. Those cookies are controlled by the content provider, and you should refer to that provider's privacy policy for further information regarding its use of cookies and about your options not to accept them.

We use services provided by Yahoo! to display advertising on Idahostatesman.com, and we may use cookies in conjunction with displaying those ads. Please refer to Yahoo!'s privacy policy at <http://privacy.yahoo.com/> for further information concerning Yahoo!'s use of cookies.

We participate in Tacoda Audience Networks (TAN), through which Tacoda Systems, a division of AOL, places a cookie on the user's computer to gather non-personal information about the user, such as the user's browsing behavior and demographic information. This non-personal information is aggregated into audience segments, allowing Tacoda to display relevant advertising to users who visit the websites of other members of TAN. Users' personally identifiable information is not shared with Tacoda or with third-party members of TAN. For more information about how Tacoda uses the information collected by these cookies, please review Tacoda's privacy policy at <http://www.platform-a.com/privacy/tacoda>. We are not responsible for any actions or policies of Tacoda or of any third-party

members of TAN.

In addition, advertisers may elect to use other advertising companies to serve their ads on [Idahostatesman.com](http://Idahostatesman.com), and advertisers themselves may also place a cookie on a user's computer. We do not have access to the cookies or their contents that are placed by advertisers or by third-party advertising companies. We, therefore, recommend that you read the privacy policy of each and every Web site you visit or with which you interact. Users may elect to be excluded from these and other targeted-advertising networks by following this link:  
[http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

Pages on [Idahostatesman.com](http://Idahostatesman.com) may contain tiny electronic images known as web beacons. We use web beacons to assist us in delivering cookies on [Idahostatesman.com](http://Idahostatesman.com) and to allow us to count users who have visited those pages. We may include web beacons in promotional e-mail messages in order to determine whether messages have been opened and acted upon. Many of our web beacons are provided by Omniture, which uses the domain [207.net](http://207.net). Please refer to Omniture's privacy policy at <http://www.omniture.com/en/privacy> for more information concerning the use of web beacons. Users may elect to opt out of Omniture cookie tracking by following this link <http://www.omniture.com/en/privacy/207> and clicking on the "Click Here To Opt-Out of 207.net Cookie Tracking Now" link at the bottom of the page.

### **Behavioral Targeting**

[Idahostatesman.com](http://Idahostatesman.com) participates in the APT from Yahoo! platform and Yahoo! is an ad network partner to display ads on our sites. To improve your ad experience on [Idahostatesman.com](http://Idahostatesman.com) and elsewhere on the Internet, we may send non-personal information to Yahoo! based on your browser's activities, such as type of pages viewed and categories of interests, so that the advertising you see is relevant to you. Yahoo! also may use information regarding its own users to select which ads to display. Learn more about Yahoo!'s ad practices, including how to opt out of using anonymous information to select which ads to show you. Yahoo! is a member of the Network Advertising Initiative.

### **Use of personally identifiable information**

Personally identifiable information may be accessed by the user who entered it, by Idaho Statesman and [Idahostatesman.com](http://Idahostatesman.com) personnel, and by certain third parties, such as those who provide technical support or content services to [Idahostatesman.com](http://Idahostatesman.com). For example, your billing and credit card information will be shared with third parties who perform tasks required to complete the purchase transaction. We ask these third parties to keep any personal information supplied by us confidential. We also endeavor to keep



your personally identifiable information inaccessible to other users or advertisers of Idahostatesman.com. Note that your first name may be displayed on Idahostatesman.com when you visit Idahostatesman.com as a logged in member. We will also display your e-mail address and contact information in your Member Center. While no Web site is completely secure, we make reasonable efforts to secure the Member Center, such that; it can only be accessed by logging in with your member name and password.

We may also disclose personally identifiable information when deemed necessary or appropriate:

- to comply with a subpoena or other service of process, court order, or other legal proceeding, or if otherwise requested by a legitimate law enforcement body to cooperate in their investigations;

- to otherwise comply with applicable law;

- to prevent, investigate, or to take some other action against illegal activities, potential fraud, potential physical threats to any person, or as required by law;

- to comply with part of the sale or transfer of business assets, if we sell all or a part of our business;

- to protect the rights, property, or safety of Idahostatesman.com, its affiliates or others.

### **Use of aggregated information**

To describe our services to prospective partners, advertisers and others, we may use your personally identifiable information to create a compiled, aggregate and anonymous view of the Idahostatesman.com audience and their usage patterns ("Aggregated Information"). We use Aggregated Information to operate our services and to better understand our audience as we develop new content and services. Aggregated Information may also be shared with third parties with whom we contract to provide content and services on Idahostatesman.com as well as advertisers so that they can better understand our audience. For example, we might disclose that a certain percentage of our users are female or within a certain age range or live within a cluster of ZIP codes.

### **Children's privacy**

Idahostatesman.com is particularly concerned with providing a safe online environment for children. Children under the age 13 will not be allowed to register and become a member of Idahostatesman.com in order to access general Idahostatesman.com content, features and services. We do not knowingly collect or solicit personally identifiable information from or

about children under 13 except as permitted by law. If we discover we have received any information from a child under 13 in violation of this Privacy Policy, we will delete that information immediately. If you believe we have any information from or about anyone under 13, please contact us at the address listed below.

Idahostatesman.com, 1200 North Curtis Road, Boise, ID 83706, or 208-377-6200, or [onlinenews@idahostatesman.com](mailto:onlinenews@idahostatesman.com)

### **Member mail and e-mail offers**

Idahostatesman.com does not rent, sell, barter or give away its user or member lists or its users' or members' names, e-mail addresses or mailing addresses for use by advertisers and other third parties for the purpose of solicitations, unless the user has previously given his or her consent at the time of general registration or registration for a specific contest or service. If a user granted permission to receive solicitations (referred to on Idahostatesman.com as e-mail Offers) at the time of registration but subsequently wishes to opt out from receiving such solicitations, the user may visit the Member Center and change one or more of the category-specific permissions related to receiving e-mail from Idaho Statesman and Idahostatesman.com advertisers.

All registered users will receive periodic Member Mail e-mail related to their membership account or various features and services on the Idaho Statesman Web sites to which their membership entitles them access. Because Member Mail is an integral part of our service to you, users cannot opt-out of receiving Member Mail. If you do not want to receive Member Mail, your only option is to terminate your membership by following the directions in the Member Center.

Separate from Idahostatesman.com Member Mail, Idaho Statesman may send you information via e-mail about various products or services that we believe may be of interest to you, including e-mails that may contain content provided by third-party advertisers. If you do not want to receive this information, you can Opt out by changing your permission setting for Idaho Statesman Promotions e-mail in the Member Center. The Member Center also allows you to select which categories of e-mail Offers might interest you. You can also change your Opt out preferences in the Member Center. When a user specifically authorizes e-mail solicitations we make available the user names and other Personally Identifiable Information in accordance with the applicable license.

Our HTML-encoded e-mail messages may include graphic files, which we use to gather information about e-mails sent our members. When such a message is opened in an HTML-capable e-mail program, the recipient's

computer accesses our server to retrieve the graphic file, and allows us to record and store the date and time, the recipient's e-mail address, and other standard logging information. These HTML-encoded e-mail messages may also read cookies.

### **Affiliated sites, linked sites and advertisements**

Idahostatesman.com expects its partners, providers of content and services and advertisers to respect the privacy of its users. Be aware, however, that third parties, including our partners, providers of content and services, advertisers and others accessible through our site may have their own privacy and data collection policies and practices. For example, during your visit to Idahostatesman.com you may link to, or view as part of a frame on a Idahostatesman.com page, certain content that is actually created or hosted by a third party. Also through Idahostatesman.com you may be introduced to, or be able to access information, services, Web sites, features, contest or sweepstakes offered by other parties. Idaho Statesman and Idahostatesman.com are not responsible for the actions or policies of such third parties. You should use common sense when you navigate the Web and be aware of when you travel outside of Idahostatesman.com. In addition, you should carefully review the applicable privacy policies of each Web site you visit and each Web service you use.

### **Electronic commerce**

For certain electronic commerce services on Idahostatesman.com, such as placing classified ads electronically or subscribing to Idaho Statesman, we require additional information. To complete these transactions, we may collect information from you such as your name, credit card number and other financial or personally identifiable information. We endeavor to protect the security of your payment information during transmission by using Secure Sockets Layer (SSL) technology, which encrypts information you submit. Idaho Statesman uses the credit card and shipping information for the purpose of completing the transaction and does not provide this information to third parties except for the providers of the transaction processing and the issuers of credit cards in order to process the transaction, or as otherwise set forth in this policy.

### **Changing your personal information and deleting your account**

In general, if you are a registered member, you may return to your account information page in the Member Center to update the information you previously provided to us. To prevent minors from improperly entering contests for which they are not eligible, we may require additional proof from people asking to change information regarding their date of birth. Idahostatesman.com may retain personal information for an indefinite amount of time.

You can delete your Idahostatesman.com membership account in Member Center by clicking on the link labeled "delete my account." By doing so, all but a transactional record of your membership account will be removed from our databases, though some records may remain on back-up media. Note that by deleting your account, you will cancel your membership and may no longer be able to access those parts of Idahostatesman.com for which membership is required.

### **Remember the risks when you use the Internet**

You should know that when you voluntarily disclose personal information on the Idahostatesman.com Web site (for example, in the discussion forums), that information can be collected and used by others and may result in unsolicited messages from other people. While we do our best to protect your personal information, we cannot be responsible for information that you choose to publicly disclose. Further, you are solely responsible for maintaining the secrecy of any passwords or other account information. Although we make good faith efforts to store the information we collect in a secure operating environment that is not available to the public and to work with responsible third parties, we cannot guarantee complete security for your information.

In addition, our advertisers, content providers, partners and other Internet sites or services that may be accessible through Idahostatesman.com have separate data and privacy practices that are independent of us, and we disclaim any responsibility or liability for their policies or actions. Please contact those sites directly if you have questions about their privacy policies.

### **International users**

If you are an international user, by using Idahostatesman.com or by registering for any of its services, you agree that Idahostatesman.com may collect, use and transfer your personal information as described in this privacy policy, including transfers outside the country where you live. If you reside in a country in the European Union or other jurisdiction that provides access rights under law, you may access your personal information or have it corrected or updated by going to your account information page in the Member Center and personally updating the information in accordance with applicable law or by contacting us at the address or e-mail set forth below. In some jurisdictions, you may be charged a reasonable fee for access to information.

### **Platform for privacy preferences**

Idahostatesman.com supports P3P, the Platform for Privacy Preferences, which allows us to convey our privacy policies, to the extent possible, in standardized, machine-readable code. While Idahostatesman.com supports P3P, the resulting code has inherent limitations such that it does not fully

and may not accurately express all of our data practices. Some P3P-enabled browsers may interpret the same P3P code in different ways, while others may interpret P3P code in a manner inconsistent with the original intention. Accordingly, your browser's interpretation of the P3P code should only be considered as a short-hand expression of our privacy practices. This Privacy Policy remains our primary policy, and takes precedence over the P3P code or other privacy principals for all purposes.

### **Contact Information**

If you have any questions or comments about our policies, we may be reached at [Idahostatesman.com](http://Idahostatesman.com), 1200 North Curtis Road, Boise, ID 83706, at 208-377-6200 or at [onlinenews@idahostatesman.com](mailto:onlinenews@idahostatesman.com).

## **MediaNews Group (1/4/2011)**

### **PRIVACY POLICY**

This policy describes the privacy practices of MediaNews Group, Inc., and MediaNews Group Interactive, Inc. and MediaNews Group affiliates, collectively referred to herein as “MediaNews.” This Privacy Policy is applicable only to the MediaNews Web sites (“Web site(s)”) and does not apply to the print versions of any of the MediaNews publications. This policy does not apply to any third party web sites or to companies or persons not controlled by, affiliated with or managed by MediaNews and applies only to information collected by MediaNews on the MediaNews Web sites and not to information disclosed, obtained or used by MediaNews through other means. MediaNews may provide links to unaffiliated web sites for which this privacy policy does not apply. If you are unsure whether a web site is controlled, affiliated or managed by MediaNews, we recommend that you review the privacy policy at each linked web site to determine how that site treats your personal information.

MediaNews may change this privacy policy from time to time. The revised policy will be posted on the MediaNews Web site. Please check this page periodically for changes.

### **INFORMATION COLLECTED**

#### **Personally Identifying Information (PIN)**

The Personally Identifying Information (PIN) gathered by MediaNews on MediaNews Web sites generally includes, e-mail address, password, zip code, age, gender and whether you are a print subscriber, but may also include your name (and/or company name), street address, and date of birth, phone numbers, and credit card numbers or other billing information

where necessary to contact you or to process your Web site purchases. MediaNews may also collect information such as household income, job title, personal interests and hobbies. The PIN collected depends on the page you are visiting and the services that you participate in.

**Web Site User Registration:** User registration is required to access the majority of content, services and features on MediaNews Web sites. Upon registration, we require you provide your email address or your first name as a username and a password that will allow you to change your PIN as needed. User registration with MediaNews Web sites is completed and membership activated upon clicking a link e-mailed to the address provided in registration. At that time you have the opportunity to opt-in to e-mail newsletters and alerts and have e-mail offers sent to you on behalf of MediaNews advertisers, however, you can update your preferences at a later time.

**Web Site Sites & Products:** Your PIN as well as a telephone number, credit card number or other billing information is generally collected in order to process the purchase of services or products on the MediaNews Web sites, such as purchasing a newspaper subscription or placing an ad. Your PIN will also be collected upon registration for home delivery requests, vacation delivery stop requests and other similar requests as well as upon the use or download of software available on MediaNews Web sites.

**Sweepstakes, Contests, Promotions, Special Offers:** MediaNews may request additional PIN from you upon your optional entry in any sweepstakes, contests, promotions or special offers found on MediaNews Web sites.

**Feedback, Commentary, Surveys, Message Boards, Chat Rooms:** Those Web site users that choose to provide feedback or commentary, fill out surveys, engage in MediaNews chat rooms or use MediaNews message boards may be required to provide additional PIN such as demographic information, household/personal characteristics and purchase behavior.

If such information is gathered for a MediaNews survey, no PIN is released and is reported or used only in aggregate form.

Some chat room and message board forums may require registration and the sharing of PIN. Any information disclosed in

chat rooms, forums, message boards, and/or news groups becomes public information. You should exercise caution when deciding to disclose personal information in public forums.

**Forwarding:** Forwarding an article found on a MediaNews Web site generally requires that you disclose the name and e-mail address of the person to whom you are forwarding the article. MediaNews will retain this information only to provide the forwarding services.

**Special Circumstances:** MediaNews may disclose and use the information collected where required to do so by law, or where MediaNews, in good faith, believes the use or disclosure of the information collected is necessary to (1) comply with the law or legal processes; (2) protect and defend MediaNews rights and property; (3) protect against misuse or unauthorized use of any MediaNews Web site; or to (4) protect the personal safety or property of our users or the public. MediaNews may also use the information collected when, in its sole discretion, it believes necessary or appropriate in connection with a sale or transfer of some or all of MediaNews' assets in our Web site.

#### Computer Identifying Information (CIN)

The information personal to your computer and your computer use that is automatically collected through the use of electronic tools is referred to as Computer Identifying Information (CIN).

The CIN gathered by MediaNews generally includes cookies, specific Web site page requests, the domain name (e.g., www.medianewsgroup.com) and Internet Provider (e.g., Comcast, American Online, NetZero) from which you access the Internet, the Internet Protocol address of your computer, the browser software (e.g. Internet Explorer or Netscape) and operating system (e.g., Windows XP, 2000, OS/2 or MacOS) you are using, your geographic location, the time and date you accessed the site, and the Internet address you visited prior to visiting the site.

**Cookies and Web Beacons:** Cookies are used to store and track information about you. A cookie is a small amount of data that is sent to your browser from Web sites and stored on your computer's hard drive. Cookies are used to deliver targeted advertising based on your behavior and demographics and to track your entries in promotions and contests. Cookies may be linked to PIN. In addition, MediaNews uses web beacons

provided by third-party advertising companies to help manage our online advertising. Web beacons enable us to recognize a browser's cookie when a browser visits a MediaNews Web site, and to learn which banner ads bring users to MediaNews Web sites. MediaNews websites have two third-party web advertising companies, Yahoo! and DoubleClick, which may place or recognize a unique cookie on your browser. Yahoo! also may use information regarding its own users to select which ads to display. Click here to learn more about Yahoo!'s ad practices, including how to opt out of using anonymous information to select which ads to show you. For more information about DoubleClick, cookies, and how to "opt-out", please click here.

**Internet Protocol (IP) Address:** An IP address is your computer's location on the Internet. MediaNews Web sites log IP addresses for systems administration and trouble shooting purposes, to gather demographic and other information about you and to link information about a user's computer session to PIN.

**Aggregate information:** Aggregate information is user information not linked to PIN.

#### **USE OF INFORMATION COLLECTED**

In general, MediaNews uses your PIN and CIN that is collected to administer the MediaNews Web sites and to provide services you request. When you provide PIN information and access MediaNews Web sites, you are sharing PIN and CIN with MediaNews and MediaNews Group affiliates and MediaNews reserves the right to use and disclose the PIN and CIN it collects. If you do not want to share your PIN, do not provide it. If you do not want to share CIN, do not access MediaNews Web sites. In addition, MediaNews may share PIN, CIN and/or aggregate information with third parties such as advertisers and business partners. PIN and CIN may also be used to perform statistical, demographic and marketing analysis of subscribers and their subscribing and purchasing patterns, to target advertisements and to help diagnose problems with our services and our Web sites.

For example, MediaNews uses or may use the PIN and CIN collected to do the following:

**Web Site Use & Registration:** MediaNews uses PIN and CIN that is collected to fulfill subscriptions, change addresses, suspend delivery, confirm and process transactions and to contact the user regarding his or her account, new or existing products and services and special offers.



**Personalization:** MediaNews uses PIN and CIN that is collected to personalize the content and advertising that users see based on personal characteristics and preferences, enhance products and services and develop new products and services, and share user information with select advertisers or other third parties whose products or services may be of interest to you.

**Advertising & Third Parties:** MediaNews may share PIN and CIN that is collected with third parties hired to perform services on our behalf, including, but not limited to, fulfilling subscription requests, sending e-mails and assisting in the provision of the MediaNews Web sites and services. The ads appearing on MediaNews Web sites are delivered to you by Yahoo! and DoubleClick, our third party web advertising company's. Information about your visits to this site, such as the number of times you have viewed an ad and other information is used to serve ads to you. A MediaNews Group affiliate participates in the APT from Yahoo! platform and Yahoo! is an ad network partner to display ads on our sites. Yahoo! is an ad network partner that displays ads on MediaNews websites. To improve your ad experience on MediaNews websites and elsewhere on the Internet, we may send non-personal information to Yahoo! based on your browser's activities, such as type of pages viewed and categories of interests, so that the advertising you see is relevant to you. Yahoo! also may use information regarding its own users to select which ads to display. [Click here to learn more about Yahoo!'s ad practices, including how to opt out of using anonymous information to select which ads to show you.](#) Yahoo! is an ad network partner that displays ads on MediaNews Web sites. To improve your ad experience on MediaNews Web sites and elsewhere on the Internet, we may send non-personal information to Yahoo! based on your browser's activities, such as type of pages viewed and categories of interests, so that the advertising you see is relevant to you. Yahoo! also may use information regarding its own users to select which ads to display. [Click here to learn more about Yahoo!'s ad practices, including how to opt out of using anonymous information to select which ads to show you.](#)

**Program & Product Offerings:** MediaNews may use the PIN and CIN that is collected in order to offer you the opportunity to receive information and offers about products or services from our business partners or third parties.

In some cases, MediaNews Group, Inc., MediaNews Group Interactive, Inc. or MediaNews Group affiliates, are affiliates of the CareerBuilder online careers service. Through the cooperative relationship with

CareerBuilder, we are able to provide you with access to the CareerBuilder products and services through a co-branded CareerBuilder site. Because of this relationship, CareerBuilder requests that we post the following language regarding our co-branded CareerBuilder site in our privacy policy: "You may have arrived at this Web site by following a link from a CareerBuilder newspaper affiliate or other affiliate. If so, please be aware that CareerBuilder may share your information with that affiliate and the affiliate may use the information consistent with its privacy policy instead of this one."

MediaNews Group, Inc., MediaNews Group Interactive, Inc. or MediaNews Group affiliates may buy or sell various assets. In the event that MediaNews Group, Inc., MediaNews Group Interactive, Inc. or MediaNews Group affiliates sells some or all of its assets, or another company acquires one or more of its Web sites, information on users may be among the transferred assets.

### **OPTING-OUT**

If you do not wish to share your PIN, you always have the option to not provide the information or use the MediaNews Web sites that require it.

#### **Opting-Out**

If you are a current MediaNews registered Web site user or would like to become one, but do not want your PIN shared with third parties or do not want to receive promotion and/or marketing information about other products, services and offerings from MediaNews and/or any third parties, please review the following:

**Third Party Opt-Out:** If, at any time, you do not want us to share your information with third parties who wish to send you information about their products and services, you may opt-out of such messages by going to the "Manage an Account" page and simply unclicking an opt-in box or you may email us at [privacycoordinator@medianewsgroup.com](mailto:privacycoordinator@medianewsgroup.com) or write to us at: Privacy Coordinator, MediaNews Group Interactive, 101 W. Colfax Ave., Suite 950, Denver, CO 80202. If you choose to opt-out via email, please put "THIRD PARTY OPT-OUT" in the subject line, along with the name of the applicable site.

**MediaNews Opt-Out:** If, at any time, you do not want to receive information about special offers and new products and features from MediaNews, you may opt-out of such messages by going to the "Manage an Account" page and simply unclicking an opt-in box or you may e-mail us at [privacycoordinator@medianewsgroup.com](mailto:privacycoordinator@medianewsgroup.com) or write to us at: Privacy Coordinator, MediaNews Group Interactive, 101

W. Colfax Ave., Suite 950, Denver, CO 80202. Please reference the name of the applicable site. If you choose to opt-out via email, please put “MEDIANEWS OPT-OUT” in the subject line.

Opt-Out Exception: Even if the registered user chooses to opt-out of receiving e-mails from both MediaNews and third parties, MediaNews reserves the right to contact a registered user regarding account status, changes to this policy, the terms of use, license agreements and other matters relevant to the use of the MediaNews Web sites, services or software provided through the Web sites and/or the information collected.

#### Review & Update Your PIN

A registered user of MediaNews Web sites may review and change his or her PIN and/or e-mail preferences by clicking on the Manage Account link after signing in. A registered user may also review and request an update of the PIN and/or e-mail preferences which he or she provided to MediaNews at any time by e-mailing us at [privacycoordinator@medianewsgroup.com](mailto:privacycoordinator@medianewsgroup.com) or write to us at: Privacy Coordinator, MediaNews Group Interactive, 101 W. Colfax Ave., Suite 950, Denver, CO 80202. Please include the name of the applicable site.

#### **SECURITY**

MediaNews uses procedures to safeguard and help prevent unauthorized access to the information collected on the MediaNews Web sites. Although such protective measures have been put in place, MediaNews cannot ensure that the information collected will never be disclosed in a manner inconsistent with this Privacy Policy.

#### **CALIFORNIA PRIVACY RIGHTS**

Under California law, California residents may request once a year, free of charge, certain information regarding MediaNews’ disclosure of personal information to third parties for direct marketing purposes. To make such a request, please write to us at: Privacy Coordinator, MediaNews Group Interactive, 101 W. Colfax Ave., Suite 950, Denver, CO 80202.

Please include the name and the address to which you would like us to respond, along with the name of the applicable site.

#### **PRIVACY COORDINATOR**

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices, please contact the Privacy Coordinator using the contact information provided below. Please reference the name of the applicable site.

Privacy Coordinator MediaNews Group, Interactive 101 W. Colfax Ave.,  
Suite 950 Denver, CO 80202  
**privacycoordinator@medianewsgroup.com** ()-

### **CHILDREN'S PRIVACY POLICY**

This policy describes the privacy practices of MediaNews Group, Inc. and MediaNews Group Interactive, Inc., as well as MediaNews Group affiliates ("MediaNews") relating to information collected from children. This privacy policy does not apply to third party web sites, or to companies and persons that are not controlled by, affiliated with or managed by MediaNews. For most MediaNews Web sites, MediaNews does not knowingly collect information from children under 13 years of age. In the event that MediaNews collects information from children under 13 years of age, this Children's Privacy Policy shall apply.

### **INFORMATION COLLECTED FROM CHILDREN**

MediaNews does not ask children to disclose more personal information than is necessary for them to participate in a particular activity. We urge children to check with their parents before entering information on any web site and we urge parents to discuss with their children restrictions regarding the online release of personal information. MediaNews limits its collection of information from children to what is known as non-personally identifiable information (e.g. first name, screen names, age, gender, city, state, zip code and country of residence). This information is collected so children can participate in activities (e.g. completing polls or online surveys, posting jokes, book reviews, movie reviews, toy reviews, video reviews, concert reviews, game reviews, artwork or questions/comments online, or playing online games) without giving unnecessary personal information. From time to time, however, we may request personally identifiable information (e.g. child's email address and/or parent's or guardian's email address), as explained below, in order to conduct online contests or sweepstakes, email newsletters and offers, provide subscriptions, participate in chat rooms and message boards, or offer other online activities. MediaNews does not and cannot condition a child's participation in any of our online activities on the disclosure of more information than is reasonably necessary to participate in the activity. Information is collected actively, such as through registration forms, and passively, such as through cookies.

### **USE OF PERSONAL INFORMATION FROM CHILDREN**

MediaNews occasionally offers contest and sweepstakes, which may be entered online. When a child under thirteen 13 enters a contest or sweepstakes, or participates in another activity that requires the use of personal information, we will ask for a parent's email address so that we can

notify the parent of the child's participation, obtain the parent's consent and give the parent the option to have the child's information deleted. All of the child's personal information collected by MediaNews is securely maintained and used only for the specified purpose such as conducting the contest or sweepstakes and awarding prizes. MediaNews does not keep any of the child's personal information after the particular event is completed. Sometimes, MediaNews uses agents or contractors to provide services that support the internal operations of the site, such as helping us conduct a sweepstakes or sending prizes to winners. In these cases, MediaNews requires the agent or contractor to maintain the confidentiality, security and integrity of the information and limit use to the specific services they are performing on our behalf.

MediaNews may disclose information maintained as required by law, for example, in response to a court order or a subpoena. MediaNews may also disclose such information in response to a specific law enforcement agency's request. Personal information is not disclosed to third parties except those who provide support for the internal operations of the site. Parents can consent to the collection and use of their child's personal information without consenting to the disclosure of the information to third parties.

#### **PARENTAL ACCESS**

MediaNews Group and MediaNews Group affiliates are the operators collecting information at this web site. Please send an email or letter to our Privacy Coordinator at the email or mailing address provided below if you would like to do any of the following:

Access personally identifiable information that MediaNews has collected from your child, Correct factual errors in such information, Request to have this information deleted, or Request that we no longer collect or maintain such information about your child.

Please include your email address and telephone number where we can reach you. MediaNews takes steps to verify the identity of anyone requesting information about a child to ensure that the person is in fact the child's parent or legal guardian.

MediaNews may change this privacy policy from time to time. The revised policy will be posted on the MediaNews Web site. Please check this page periodically for changes. If you have any questions, comments or concerns regarding our privacy policy and/or practices, please contact the Privacy Coordinator using the contact information provided below. Please reference the applicable site.

Privacy Coordinator MediaNews Group, Interactive 101 W. Colfax Ave.,  
Suite 950 Denver, CO 80202  
**privacycoordinator@medianewsgroup.com ()-**

## **The New York Times Company (1/2/2011)**

The New York Times Privacy Policy  
*Last Updated on December 22, 2010*

This Privacy Policy discloses the privacy practices for The New York Times newspaper and NYTimes.com. For the purposes of this Privacy Policy, unless otherwise noted, all references to “The New York Times” include NYTimes.com and The New York Times newspaper.

In this Privacy Policy, you will find answers to the following questions:

- Which sites are covered by this policy?
- What information do we gather about you?
- What do we do with the information we gather about you?
- What is our e-mail policy?
- With whom do we share the information that we gather?
- How do I change or update my personal information?
- How do I opt-out from receiving promotional offers?
- How do I disassociate my NYTimes.com registration account from third party accounts?
- Is my information protected?
- Other information: Compliance with legal process
- Other information: Children's Guidelines
- Other information: Changes to this Privacy Policy

**TRUSTe:** The New York Times is a licensee of the TRUSTe Privacy Program. TRUSTe is an independent, non-profit organization whose mission is to build user trust and confidence in the Internet by promoting the use of fair information practices. This privacy policy covers www.nytimes.com (see below). Because The New York Times wants to demonstrate its commitment to your privacy, it has agreed to disclose its information practices and have its privacy practices reviewed for compliance by Truste.

If you have questions or concerns regarding this statement, you should first contact Customer Service by sending an e-mail to [feedback@nytimes.com](mailto:feedback@nytimes.com). If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should contact TRUSTe at [www.truste.org/consumers/watchdog\\_complaint.php](http://www.truste.org/consumers/watchdog_complaint.php). TRUSTe will then serve as a liaison with The New York Times to resolve your concerns. The TRUSTe program covers only information that is collected through this Web site, and does not cover information that may be collected through

software downloaded from this site. TRUSTe has not certified the disclosures in this Privacy Policy that relate to the Times Reader software.

### **WHICH SITES ARE COVERED BY THIS POLICY?**

This Privacy Policy applies to the following New York Times Web sites: NYTimes.com (including global.nytimes.com, the online edition of The International Herald Tribune) The New York Times Home Delivery The New York Times Store The New York Times Learning Network The New York Times Replica Edition, which is maintained by Libre Digital, Inc., maintains its own Privacy Policy. The New York Times advertising portal, for advertisers of The Times, also maintains a separate Privacy Policy.

Please note, our Web sites may contain links to other Web sites for your convenience and information. We are not responsible for the privacy practices or the content of those sites. We encourage you to review the privacy policy of any company before submitting your personal information.

### **WHAT INFORMATION DO WE GATHER ABOUT YOU?**

The information we gather falls into two categories: 1) Personally identifiable information, which includes personal information you voluntarily supply when you subscribe, order, complete a survey, register for an online discussion, enter a contest or provide your e-mail address and 2) Non-personally identifiable information, which includes tracking information collected as you navigate through our sites.

#### ***Personally Identifiable Information***

##### **Registration for our Web sites**

Anyone can view our sites, but a free registration process is required to access the full range of information and services offered across our different sites.

**NYTimes.com** requires that you supply certain personally identifiable information, including a unique e-mail address and demographic information (zip code, age, sex, household income (optional), job industry and job title) to register. By using NYTimes.com, you are agreeing to our Terms of Service.

##### **Registration for our Web sites via Third-Party Tools**

You may choose to log-on, create an account or enhance your profile at NYTimes.com with the Facebook Connect feature on nytimes.com. By doing this, you are asking Facebook to send us that information from your Facebook profile. We treat that information as we do any other information you give to us when you log on, register or create a profile. After you have connected, Facebook also sends us additional information from your profile

that allows us to display a Facebook module on the pages you view. We do not store this additional information.

**The New York Times Home Delivery Web site** requires that you supply your name, address, telephone number, e-mail address, credit card number or other billing information to process your print subscription request as well as to transact with The Times and manage your account on the Web.

**The New York Times Store** requires you to register only if you purchase an item. Registration requires that you supply your mailing address, e-mail address and a password.

### **Paid Products and Services**

While the majority of our Web sites are free, we do charge fees for select premium content, products and services, such as the Archive: 1851-Present, purchases at The New York Times Store, print subscriptions to The New York Times newspaper, among others. To enable the purchase of these and other products, 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.

### **Contests, Sweepstakes and Special Offers**

On occasion, The New York Times collects personal information from readers in connection with optional sweepstakes, contests or special offers. If this information is to be shared with a third party other than The New York Times, we will notify you at the time of collection. 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**

The New York Times may collect personal information from readers in connection with voluntary surveys. Data may be collected on our Web sites, on the phone or through the mail. The information you provide in answer 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.

Some of our readers are invited to be members of optional Reader Panels that are administered through a third party we have hired for that purpose. Panel members agree to participate in surveys, polls or discussions about their readership of The New



York Times, their household/personal characteristics and their purchase behavior. Readers are primarily contacted via e-mail, which link to online surveys, polls or discussions, but may occasionally be contacted by telephone or mail. All survey data is reported and/or used in aggregate form only, and no personally identifiable information is released. From time to time, we may use different technologies, including cookies, to better understand answers to our surveys. As a panel member, we require that you supply us with your e-mail address and name. Home address and telephone number are optional. Our panels are currently administered by Vision Critical and Beta Research.

### **Special Events and Promotions**

We often receive information regarding readers who may attend Times Talks, Arts & Leisure Weekend and other New York Times Special Events and Promotions. Such information will be used as indicated at the time of collection.

### **Mobile Messaging Service**

The New York Times uses the information collected from your interaction with The New York Times by Text Messaging Service (SMS) (“SMS Service”) solely for the purposes of improving the SMS Service. The information will not be provided, sold, licensed, rented, assigned or disclosed to Third Parties, except as required by law, nor will we use your phone number to initiate a call or SMS text message to you without your express prior consent. Your wireless carrier and other service providers also collect data about your SMS Service usage, and their practices are governed by their own privacy policies.

The New York Times collects the mobile phone number you use to send us a text message and the content of the messages sent between you and The New York Times. When you send a text message to The New York Times or via The New York Times, we log the incoming phone number, the wireless provider associated with the number, and the date and time of the transaction. The only information we automatically collect is that related to the use of our Mobile Services. The New York Times uses this data to analyze the message traffic in order to operate, develop and improve our SMS Service.

### ***Non-personally Identifiable Information***

#### **Information Collected by Us using Technology**

As is standard practice on many Web sites, 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 NYTimes.com, if your computer does not accept cookies from us. For more detailed information about our use of cookies, see Frequently Asked Questions About Cookies in our Help section.

The New York Times Home Delivery Web site also transmits 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. For more information about our third-party ad server, or to learn your choices about not having this non-personal information used to target ads to you, please [click here](#).

### **Information Collected by Third Parties using Technology**

Some of the services and advertisements on certain of our Web sites (including NYTimes.com) are delivered or served by third-party companies that may place or recognize cookies or Web beacons to track certain non-personally identifiable 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 non-personally identifiable information about your visits to our Web sites and other Web sites. 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' cookies or how they may be used.

Please [click here](#) to see a list of third parties that may be using cookies to serve advertising on our Web sites. For example, Google is one of the companies that serves advertisements onto NYTimes.com. It uses the DART cookie to serve ads based on your visit to NYTimes.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 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 will not be affected if you do not accept cookies served by third parties.

### **Analytics Technologies**

We have hired WebTrends, a third party, to track and analyze non-personally identifiable usage and volume statistical information from our visitors and customers on NYTimes.com . All data collected by WebTrends on our behalf is owned and used by us. We may publish non-personally identifiable, summary information regarding our Web site visitors for promotional purposes and as a representative audience for advertisers. Please note that this is not personally identifiable information, only general summaries of the activities of our visitors and customers. For more information about how WebTrends collects data, please read their privacy policy at <https://ondemand.webtrends.com/privacypolicy.asp#PSFV>

NYTimes.com is currently contracted with Audience Science, a third party, to track and analyze anonymous usage and browsing patterns of our visitors and customers. All data collected by Audience Science on behalf of our Web sites is owned and used by The New York Times alone. We use this information to help provide our advertisers with more targeted advertising opportunities, which means that 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. For more information about Audience Science's privacy policy, including how to opt out, go to <http://www.audiencescience.com/privacy.asp>.

We reserve the right to change the vendors who provide us with usage data.

### **IP Addresses**

The New York Times 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**

We use log file data in the aggregate to analyze usage of our Web

sites. If you download and install the Times Reader software application, the log files will be collected by the application and sent to our servers when your computer syncs up for the latest news.

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

### **Statistical Analysis**

The New York Times may perform statistical, demographic and marketing analyses of subscribers, and their subscribing and purchasing patterns, for product development purposes and to generally inform advertisers about the nature of our subscriber base. We also use such information to allow advertising to be targeted, in aggregate, to the users for whom such advertising is most pertinent. NYTimes.com may share personal information with The New York Times Company for analysis purposes, including analysis to improve customer relationships.

### **Banner Advertising**

We may use demographic and preference information to allow advertising on our Web sites to be targeted, in aggregate, 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 will disclose information to third parties only in aggregate form.

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

We offer opportunities for you to engage in public activities on NYTimes.com, including submitting comments, recommendations, reader reviews and ratings in a number of areas throughout NYTimes.com. "Public activities" are any actions you take on NYTimes.com that are designed to be visible to other users, including comments, recommendations, reader reviews, ratings or any other items that you submit. You must register for a NYTimes.com account in order to engage in public activities. 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 The New York Times for online and offline promotional or commercial uses in any and all media. If you chose to engage in public activities, you should be aware that any personally identifiable 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 The New York Times 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. For more information, see the Comments FAQ and read the Forums, Discussions and User Generated Content section of the Terms of Service.

When you share or recommend (with or without adding your own comments) any NYTimes.com 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 signed up for a NYTimes.com registration account, we will track and aggregate your public activities on NYTimes.com. If you choose to participate in public activities, you are electing to share and display such public activities via NYTimes.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 personally identifiable information you choose make public via your public activities. Please see our Comments FAQ for additional information.

#### **E-Mail Newsletters**

If you choose to receive them, The New York Times will periodically send you e-mail newsletters or promotional e-mail about services offered by The New York Times and its advertisers. For details about New York Times e-mail, please see the next section, “What Is Our E-mail Policy?”.

#### **WHAT IS OUR E-MAIL POLICY?**

**The New York Times complies fully with the federal CAN-SPAM Act of 2003.** We will not share, sell, rent, swap or authorize any third party to use your e-mail address without your permission. If you feel you have received an e-mail from us in error, please contact [feedback@nytimes.com](mailto:feedback@nytimes.com).

**Account and Service-Related E-mail:** The New York Times 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 our Web sites 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:** The New York Times 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. To manage your NYTimes.com e-mail preferences, please [click here](#).

**Promotional E-mail:** If you choose to receive them, The New York Times 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 either (1) following the "unsubscribe" instructions located near the bottom of each e-mail, or (2) you can opt-out.

From time to time, The New York Times 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 either (1) following the "unsubscribe" instructions located near the bottom of each e-mail, or (2) you can opt-out.

**Survey E-mail:** We may send you an e-mail inviting you to participate in user surveys, asking for feedback on NYTimes.com and existing or prospective products and services, as well as information to better understand our users. User surveys greatly help us to improve our Web site, and any information we obtain in such surveys will not be shared with third parties, except in aggregate form. (Effective as of August 21, 2002.)

**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. The New York Times 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.

**E-mail This Article Feature:** NYTimes.com readers may use this feature to e-mail links to articles (or other content such as slideshows). The e-mail addresses that you supply to this service are saved for your

convenience for future articles you may wish to e-mail; these addresses are not used for any other purpose, and will not be shared with any third parties.

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

### **The New York Times**

If you have registered to one of our sites, The New York Times will not sell, rent, swap or authorize any third party to use your e-mail address or any information that personally identifies you without your permission. We do, however, share information about our audience in aggregate form.

If you are a print subscriber to The New York Times newspaper and subscribed either by mail, phone or online, we may exchange or rent your name and mailing address (but not your e-mail address) with other reputable companies that offer marketing information or products through direct mail. If you prefer that we do not share this information, you may opt-out.

### **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 restricted from using this data in any way other than to provide services for The New York Times, and they may not share or resell this data.

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. (For more information, see the “Compliance with legal process” section of this policy.)

## **HOW DO I CHANGE OR UPDATE MY PERSONAL INFORMATION?**

**The New York Times Home Delivery Web account:** You may update and/or edit your Home Delivery account information online at the Home Delivery Web site by clicking on the link for Update Account. Should you require assistance, please call our toll free number, 1-800-NYTIMES.

**Manage your NYTimes.com account at Member Center:** You

may review and update your NYTimes.com membership or account information and access your transaction history in the Member Center.

There are a number of things you can do in the Member Center to ensure your personal information is accurate and up to date. For one, you can update the information you provided during the free registration process. The E-mail Preferences tab is the place to go to sign up for our e-mail newsletters and manage your delivery options.

To gain access to the areas of the Member Center containing personal information, you will be asked to re-enter your password. If you do not remember your password, you can reset your password here. If you need further assistance, please contact Customer Service.

**Manage your New York Times Online Store account:** Manage and update your account by logging in at [www.nytimes.com](http://www.nytimes.com). Simply click on the "My Account" section at the top of the navigational bar and proceed to "Edit Profile". You may securely update your shipping information, e-mail address and password registered to the account. Should you require assistance, please call us at 800-671-4332.

**Manage your New York Times Events account:** Events include TimesTalks, Great Read in the Park, Arts and Leisure Weekend, Sunday with The Magazine, The New York Times Travel Show. To subscribe or unsubscribe from The New York Times Events e-mail newsletter, please visit [www.nytimes.com/events](http://www.nytimes.com/events). Enter your e-mail address in the field provided, select "unsubscribe" and click "submit."

## **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. Or,

1. Click here to remove your e-mail address from any future promotional e-mail campaigns originated by The New York Times Home Delivery Department and its third party affiliates.
2. Click here to manage your e-mail subscriptions from NYTimes.com. These include Today's Headlines, Ticketwatch, DealBook, Sophisticated Shopper, Movies Update, etc.
3. Click here to e-mail The New York Times Online Store Tech Support. Please write the word "opt-out" in the message field to no longer receive e-mail communications from The Store.



4. Click here to manage your subscription to The New York Times Events Newsletter (TimesTalks, Great Read in the Park, Arts and Leisure Weekend, Sunday with The Magazine, The New York Times Travel Show).

If you experience difficulty with the unsubscribe process, feel free to contact us at [feedback@nytimes.com](mailto:feedback@nytimes.com) and provide your e-mail address along with the name of the newsletter from which you would like to unsubscribe.

### **Offline Promotions**

If, at any time, you prefer not to receive traditional mail or telephone solicitations originated by The New York Times Home Delivery Department and its third party affiliates, please e-mail us at [opt-out@nytimes.com](mailto:opt-out@nytimes.com) or write to us at Customer Care, P.O. Box 217, Northvale, NJ 07647-0217. If you are a current newspaper subscriber, please remember to include your account number and phone number in the body of your e-mail or letter, and if you choose to opt-out via e-mail, please put "Opt-out" in the subject line.

### **HOW DO I DISASSOCIATE MY NYTIMES.COM REGISTRATION ACCOUNT FROM THIRD PARTY ACCOUNTS?**

You can disassociate your NYTimes.com registration account from a third-party registration account at any time.

#### *Facebook*

To disassociate your Facebook account from your NYTimes.com registration account, click the "Disconnect" button on our Social Media FAQ page here:

<http://timespeople.nytimes.com/packages/html/timespeople/faq/social/#q11>.

You must be logged into your NYTimes.com registration account to make this change.

#### *Twitter*

To disassociate your Twitter account from your NYTimes.com registration account, log in to <http://twitter.com>. Click "Settings," and then click the "Connections" tab. Locate "TimesPeople" in the list of approved connections and click "Revoke Access."

Please see our Social Media FAQ for additional information.

### **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 physical, electronic and managerial procedures to protect the information we collect online. When you enter sensitive information (such as a credit card number) on our order forms, we encrypt that information using secure socket layer technology (SSL).

**OTHER INFORMATION: Compliance with Legal Process**

We may disclose personal information if we are required to do so by law or we in good faith believe 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 our Web sites; 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).

**OTHER INFORMATION: Children's Guidelines COPPA**

**Compliance:** Except for The Learning Network (see below), The New York Times does not knowingly collect or store any personal information, even in aggregate, about children under the age of 13.

**The Learning Network:** The Learning Network is a free service for parents, teachers and students, and does not require registration. The Student Connections section is specifically directed at students, grades 6 to 12. Within this section, the Ask a Reporter page and the Student Letters page allow students to either send a question to a Times reporter or submit a letter to the editor, providing their first name, grade, state/country and, optionally, their e-mail address. The information requested on these pages is used solely for participation in these activities, and is not shared or sold to third parties. If an e-mail address is provided, it will only be used for a one-time response back to the child. After responding to the child, the e-mail address is deleted. Access to the above services is not conditioned on more information than is reasonably necessary to provide the services. Because we're concerned about a parent's right to consent to the collection and use of their child's personal information, when a question or letter is published, only the student's first name, grade and state/country appear on the site. To request removal of this information (non-personally identifiable) or to review or remove the optional e-mail address (personal information collected), please use this form to contact the Learning Network.

These children's guidelines have been developed with the recognition that Internet technology evolves rapidly and that underlying business models are still not established. Accordingly, guidelines are subject to change. In the unlikely event of such changes they will be posted on this page. If the changes represent a material departure from our current practice with

respect to the use of children's personal information, the changes will be posted on this page thirty days prior to taking effect and will not affect children's personal information previously collected.

For any questions concerning The Learning Network, please contact Katherine Schulten, NYTimes.com, 620 Eighth Avenue, 9th floor, New York, NY 10018. Telephone: (212) 556-8391.

**OTHER INFORMATION: Changes to This Policy**

This Privacy Policy may be amended from time to time. Any such changes will be posted on this page. If we make a significant or material change in the way we use your personal information, the change will be posted on this page thirty (30) days prior to taking effect and registered users will be notified via e-mail.

**E.W. Scripps Company (2/7/2011)**

PRIVACY POLICY (Effective July 1, 2008)

Welcome to VenturaCountyStar.com ("Website"), an interactive online service operated by The E.W. Scripps Company and its subsidiaries ("us", "we", or "our"). Please read the following to learn more about our Privacy Policy, which includes compliance with California Privacy Rights (see also <http://www.privacyprotection.ca.gov>).

We respect your privacy and are committed to protecting personally identifiable information you may provide us through our Website. We have adopted this Privacy Policy ("Privacy Policy") to explain what information may be collected on our Website, how we use this information, and under what circumstances we may disclose the information to third parties. This Privacy Policy applies only to information we collect through our Website and does not apply to our collection of information from other sources. This Privacy Policy, together with the Terms of Use posted on our Website, sets forth the general rules and policies governing your use of our Website. Depending on your activities when visiting our Website, you may be required to agree to additional terms and conditions.

We generally keep this Privacy Policy posted on our Website and you should review it frequently, as it may change from time to time without notice. Any changes will be effective immediately upon the posting of the revised Privacy Policy. WHEN YOU ACCESS OUR WEBSITE, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP ACCESSING OUR WEBSITE. If, at any point, we

decide to use your personally identifiable information in a manner materially different than what was stated at the time it was collected, we will notify you of this change by e-mail to the last e-mail address provided to us. You will have a choice (by means of an “opt out” opportunity) as to whether we use the information in this different manner. We will use information in accordance with the Privacy Policy under which your information was collected if you opt out of the new policy.

#### **A. INFORMATION WE COLLECT**

Our Website typically collects two kinds of information about you: (a) information that you provide that personally identifies you; and (b) information that does not personally identify you, which we automatically collect when you visit our Website or that you provide us.

**(1) Personally Identifiable Information:** Our definition of personally identifiable information includes any information that may be used to specifically identify or contact you, such as your name, postal address, phone number, etc. As a general policy, we do not automatically collect your personally identifiable information when you visit our Website. In certain circumstances, we may request, allow or otherwise provide you an opportunity to submit your personally identifiable information in connection with a feature, program, promotion or some other aspect of our Website. For instance, you may: (a) provide your name, postal/shipping address, email address, credit card number and phone number when registering with our Website, using our online store, or in connection with a contest entry; (b) provide certain demographic information about you (e.g., age, gender, purchase preference, usage frequency, etc.) when participating in a survey, poll or joining a club; or (c) post a general comment and/or recommendation on our Website. Certain information may not be personally identifiable when standing alone (e.g., your age), but may become so when combined with other information (e.g., your age and name). Whether or not you provide this information is your choice; however, in many instances this type of information is required to participate in the particular activity, realize a benefit we may offer, or gain access to certain content on our Website.

**(2) Non-Personal Information:** Our definition of non-personal information is any information that does not personally identify you. Non-personal information can include certain personally identifiable information that has been de-identified; that is, information that has been rendered anonymous. We obtain non-personal information about you from information that you provide us, either separately or together with your personally identifiable information. We also automatically collect certain non-personal information from you when you access

our Website. This information can include, among other things, IP addresses, the type of browser you are using (e.g., Internet Explorer, Firefox, Safari, etc.), the third party website from which your visit originated, the operating system you are using (e.g., Vista, Windows XP, Mac OS, etc.), the domain name of your Internet service provider (e.g., America Online, NetZero, etc.), the search terms you use on our Website, the specific web pages you visit, and the duration of your visits.

## **B. HOW WE USE & SHARE THE INFORMATION COLLECTED**

**(1) Personally Identifiable Information:** The personally identifiable information you submit to us is generally used to carry out your requests, respond to your inquiries, better serve you, or in other ways naturally associated with the circumstances in which you provided the information. We may also use this information to later contact you for a variety of reasons, such as customer service, providing you promotional information for our products or those of our parent company, subsidiaries or other affiliated companies (“affiliated companies”), or to communicate with you about content or other information you have posted or shared with us via our Website. You may opt-out from receiving future promotional information from us or our affiliated companies, or direct that we not share your information with any affiliated companies, as set forth below.

In certain instances we may also share your personally identifiable information with our third party vendors performing functions on our behalf (or on behalf of our affiliated companies) – e.g., vendors that process credit card orders, deliver our merchandise, administer our promotions, provide us marketing or promotional assistance, analyze our data, assist us with customer service, etc. Our vendors agree to use this information, and we share information with them, only to carry out our requests. In addition, we may share your personally identifiable information with participating sponsors to a program or promotion (e.g., a sweepstakes or contest) you enter via our Website, and with third parties who assist us in using the content or other information you have posted or shared with us via our Website (e.g., production companies we may use). Further, we may share your personally identifiable information with third parties such as our promotional partners and others with whom we have marketing or other relationships. Except as provided in this Privacy Policy, our Terms of Use, or as set forth when you submit the information, your personally identifiable information will not be shared or sold to any third parties without your prior approval.

**(2) Non-Personal Information:** We use non-personal information in a variety of ways, including to help analyze site traffic, understand customer needs and trends, carry out targeted promotional activities, and to improve our services. We may use your non-personal information by itself or aggregate it with information we have obtained from others. We may share your non-personal information with our affiliated companies and third parties to achieve these objectives and others, but remember that aggregate information is anonymous information that does not personally identify you.

### **C. OTHER USES & INFORMATION**

**(1) IP Addresses:** An IP address is a number that is automatically assigned to your computer whenever you are surfing the Internet. Web servers (computers that "serve up" web pages) automatically identify your computer by its IP address. When visitors request pages from our Website, our servers typically log their IP addresses. We collect IP addresses for purposes of system administration, to report non-personal aggregate information to others, and to track the use of our Website. IP addresses are considered non-personal information and may also be shared as provided above. It is not our practice to link IP addresses to anything personally identifiable; that is, the visitor's session will be logged, but the visitor remains anonymous to us. However, we reserve the right to use IP addresses to identify a visitor when we feel it is necessary to enforce compliance with our Website rules or to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Website, or other users; or (d) in an emergency to protect the health and safety of our Website's users or the general public.

**(2) Cookies, etc.:** "Cookies" are small text files from a website that are stored on your hard drive. These text files make using our Website more convenient by, among other things, saving your passwords and preferences for you. Cookies themselves do not typically contain any personally identifiable information. We may analyze the information derived from these cookies and other technological tools we employ (such as clear gifs/web beacons) and match this information with data provided by you or another party. We may provide our analysis and certain non-personal information to third parties (who may in turn use this information to provide advertisements tailored to your interests), but this will not involve disclosing any of your personally identifiable information. Please note that advertisers that serve advertisements on our Website and third-party content providers that serve content on our Website may also use their own cookies and other technological tools which are subject to the advertiser's privacy policies, not this

Privacy Policy. If you are concerned about the storage and use of cookies, you may be able to direct your internet browser to notify you and seek approval whenever a cookie is being sent to your hard drive. You may also delete a cookie manually from your hard drive through your internet browser or other programs. Please note, however, that some parts of our Website will not function properly or be available to you if you refuse to accept a cookie or choose to disable the acceptance of cookies.

**(3) Email Communications:** If you send us an email with questions or comments, we may use your personally identifiable information to respond to your questions or comments, and we may save your questions or comments for future reference. For security reasons, we do not recommend that you send non-public personal information, such as passwords, social security numbers, or bank account information, to us by email. However, aside from our reply to such an email, it is not our standard practice to send you email unless you request a particular service or sign up for a feature that involves email communications, it relates to purchases you have made with us (e.g., product updates, customer support, etc.), we are sending you information about our other products and services, or you consented to being contacted by email for a particular purpose. In certain instances, we may provide you with the option to set your preferences for receiving email communications from us; that is, agree to some communications but not others. You may "opt out" of receiving future commercial email communications from us by clicking the "unsubscribe" link included at the bottom of most emails we send, or as provided below; provided, however, we reserve the right to send you transactional emails such as customer service communications.

**(4) Transfer of Assets:** As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all (or substantially all) of our assets, the personally identifiable information and non-personal information we have about you will be transferred to and used by this acquiring entity, though we will take reasonable steps to ensure that your preferences are followed. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

**(5) Other:** Notwithstanding anything herein to the contrary, we reserve the right to disclose any personally identifiable or non-personal information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a

government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Website, or other users; or (d) in an emergency to protect the health and safety of our Website's users or the general public.

**(6) Your California Privacy Rights:** Residents of the State of California, under certain provisions of the California Civil Code, have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed certain personally identifiable information as defined under California law during the preceding year for third party direct marketing purposes. You are limited to one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. You may request the information in writing at: [VenturaCountyStar.com](http://VenturaCountyStar.com), c/o Ventura County Star, P.O. Box 6006; Camarillo, CA 93010.

#### **D. PUBLIC FORUMS**

We may offer chat rooms, blogs, message boards, bulletin boards, or similar public forums where you and other users of our Website can communicate. The protections described in this Privacy Policy do not apply when you provide information (including personal information) in connection with your use of these public forums. We may use personally identifiable and non-personal information about you to identify you with a posting in a public forum. Any information you share in a public forum is public information and may be seen or collected by anyone, including third parties that do not adhere to our Privacy Policy. We are not responsible for events arising from the distribution of any information you choose to publicly post or share through our Website.

#### **E. CHILDREN**

The features, programs, promotions and other aspects of our Website requiring the submission of personally identifiable information are not intended for children. We do not knowingly collect personally identifiable information from children under the age of 13. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us please contact us at [webmaster@venturacountystar.com](mailto:webmaster@venturacountystar.com). A parent or guardian of a child under the age of 13 may review and request deletion of such child's personally identifiable information as well as prohibit the use thereof.

#### **F. KEEPING YOUR INFORMATION SECURE**

We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while we



strive to protect your personally identifiable information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your personally identifiable information. In the unfortunate event that your "personally identifiable information" (as the term or similar terms are defined by any applicable law requiring notice upon a security breach) is compromised, we may notify you by e-mail (at our sole and absolute discretion) to the last e-mail address you have provided us in the most expedient time reasonable under the circumstances; provided, however, delays in notification may occur while we take necessary measures to determine the scope of the breach and restore reasonable integrity to the system as well as for the legitimate needs of law enforcement if notification would impede a criminal investigation. From time to time we evaluate new technology for protecting information, and when appropriate, we upgrade our information security systems.

#### **G. OTHER SITES/LINKS**

Our Website may link to or contain links to other third party websites that we do not control or maintain, such as in connection with purchasing products referenced on our Website and banner advertisements. We are not responsible for the privacy practices employed by any third party website. We encourage you to note when you leave our Website and to read the privacy statements of all third party websites before submitting any personally identifiable information.

#### **H. CONTACT & OPT-OUT INFORMATION**

You may contact us as at [webmaster@venturacountystar.com](mailto:webmaster@venturacountystar.com) if: (a) you have questions or comments about our Privacy Policy; (b) wish to make corrections to any personally identifiable information you have provided; (c) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (d) wish to withdraw your consent to sharing your personally identifiable information with others. We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Please note that we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our Website.

#### **I. YAHOO! ADS AND OPT-OUT POLICIES**

Yahoo! is an ad network partner, operating through the APT from Yahoo! platform, that displays ads on VenturaCountyStar.com sites. To improve your ad experience on VenturaCountyStar.com sites and elsewhere on the Internet, we may send non-personal information to Yahoo! based on your browser's activities, such as type of pages viewed and categories of interests, so that the advertising you see is relevant to you. Yahoo! also may use

information regarding its own users to select which ads to display. To learn more about Yahoo!'s ad practices, including how to opt out of using anonymous information to select which ads to show you, see [http://info.yahoo.com/privacy/us/yahoo/opt\\_out/targeting/details.html](http://info.yahoo.com/privacy/us/yahoo/opt_out/targeting/details.html). Yahoo! is a member of the Network Advertising Initiative. See <http://www.networkadvertising.org>.

#### **J. AP NEWS REGISTRY**

We use services provided by AP News Registry for a variety of reasons, including, but not limited to, understanding how our content is used across the Internet, improving news coverage and to protect our intellectual and other property rights. AP News Registry collects non-personally identifiable content usage information and may use cookies in conjunction with this activity. Please refer to the AP News Registry privacy policy at <http://www.apnewsregistry.com/privacycenter/servicepolicy.aspx> for further information, including how to opt-out of certain AP News Registry collection activities. Your continued readership of the site means you accept the privacy policy of the AP News Registry.

#### **K. SOLE STATEMENT**

This Privacy Policy as posted on this Website is the sole statement of our privacy policy with respect to this Website, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy to the Website.

### **Tribune Company (1/2/2011)**

#### **Privacy Policy**

ORLANDOSENTINEL.COM strives to offer its visitors the many advantages of Internet technology and to provide an interactive and personalized experience. This policy covers how we treat personally identifiable information and other information that we collect, store, and receive, including information related to your use of our products and services. Personally identifiable information is information about you that is personally identifiable, such as your name, address, email address, or phone number, and that is not otherwise publicly available. Please note this policy applies only to information collected by ORLANDOSENTINEL.COM online and does not impact information collected or obtained by ORLANDOSENTINEL.COM or its affiliates through other means. This policy does not apply to the practices of companies that ORLANDOSENTINEL.COM does not control.

#### **How we gather information from users.**

How we collect and store information depends on the page you are visiting, the activities in which you elect to participate and the services provided. You can visit many pages on our site without providing any information. Other pages may prompt you to provide information, such as when you register for access to portions of our site, sign up for membership, request certain features (e.g., newsletters, updates, and other products), or make a purchase. You may also provide information when you participate in sweepstakes or contests, voting and polling activities, and other interactive areas of our site. ORLANDOSENTINEL.COM may combine information that we collect with information we obtain from third parties and affiliates.

Like most Web sites, ORLANDOSENTINEL.COM also collects and stores information automatically and through the use of electronic tools that may be transparent to our visitors. For example, we may log the name of your Internet Service Provider, your IP address, and information provided by and about your Internet browser. We may also use "cookie" technology. Among other things, we may use cookies or other tracking technology for the purposes of storing your user name and password, to spare you from having to re-enter that information each time you visit, or to control the advertising you see on our site. Moreover, we may collect and store data concerning the pages on the site that you view, as you navigate to various pages on our site. Because we are aware of the content appearing on the pages that you view, it is possible that we will be able to make relatively accurate assumptions about your interests and preferences from this navigational information that we collect. As we adopt additional technology, we may also gather information through other means.

In certain cases, you can choose not to provide us with information, for example by setting your browser to refuse to accept cookies, but doing so may limit your ability to access certain portions of the site or may require you to re-enter your user name and password, if applicable. Additionally, we may not be able to customize the site's features according to your preferences. Finally, information you post to public areas of the site is not private, and such information is not covered by this policy. Do not post personal information to public areas of the site unless you intend to make that information public.

#### **What we do with the information we collect.**

We collect information to enhance your visit and deliver more individualized content and advertising. For example, we may use personally identifiable information collected on ORLANDOSENTINEL.COM to communicate with you regarding our **Terms of Service** and privacy policy, products and services offered by ORLANDOSENTINEL.COM, other Tribune Company affiliates and partners, or third-party advertisers or contractors; to administer sweepstakes and contests; to process e-commerce

transactions; to attribute content that you make available through the Web site; to contact you about your content; to customize the advertising and content you see, including the display of targeted and contextual advertisements; for the purpose for which the information was collected; to process and respond to inquiries; to improve the content and navigability of the Web site; to alert you to new Web site features, special events, products and services; to generate anonymous and/or aggregated reporting; to enforce the legal terms that govern your use of the Web site; or to engage you in any other topics or matters we think you might find of interest. We may also use the navigational information we collect and store on your viewing habits, along with any additional information you supply to us, to supply you with services you request or to modify advertising or site content that you view in order to enhance your visit (e.g., we may tailor content or advertisements to better suit your interests or needs). We reserve the right to share this information with other Tribune Company business units and affiliates, including for example their affiliated Web sites, and with any entities which Tribune Company or one of its subsidiaries operates or in which Tribune Company or one of its subsidiaries has an ownership interest or which are commonly managed by or with a Tribune Company subsidiary (collectively, "Affiliates"); with agents who may provide services or communicate with you on our behalf; and with third-party advertisers and/or contractors with which ORLANDOSENTINEL.COM or an Affiliate have a relationship. This policy does not apply to any Affiliate's, third-party advertisers', or third- party contractors' use of such information.

Personally identifiable information collected by ORLANDOSENTINEL.COM may also be used for other purposes including but not limited to site administration and troubleshooting. Certain third parties who provide technical support for the operation of our site (our Web hosting service or ad serving services, for example), or who provide email management, third-party content, billing, processing, shipping, promotions management or other services also may access such information.

ORLANDOSENTINEL.COM may aggregate and/or anonymize information collected by ORLANDOSENTINEL.COM or through the site, so that the information does not identify you. As one example, we may combine information about your navigation or usage patterns with similar information obtained from other users to learn which pages are visited most or what features on our site are most attractive. We may use aggregated and/or anonymized information, and may disclose it to Affiliates and third parties, without limitation.

### **Information sharing and disclosure.**

We may rent, sell, or share personally identifiable information about you with non-Affiliated companies in order to provide services or products that

you have requested, when we have your permission, or as described in this policy, including under the circumstances provided below. Please note that we may not provide you with any notice prior to the types of disclosures listed below.

We may share your information with any Affiliate or our agents who may provide services or communicate with you on our behalf.

We may disclose your information in response to subpoenas, court orders, or other legal process, or to establish or exercise our legal rights or to defend against legal claims.

We may disclose your information when we believe it necessary or desirable in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations or our **Terms of Service**, and/or to protect our rights and property.

We may also share your information, whether aggregated and/or anonymized or not, with any third-party advertisers and/or contractors with which ORLANDOSENTINEL.COM or an Affiliate may have a relationship. As we continue to develop our business, we may sell, buy, merge or partner with other companies or businesses. In such transactions, user information may be among the transferred assets.

**How we protect information.**

ORLANDOSENTINEL.COM attempts to protect against the loss, misuse and alteration of your personal information. Our servers are protected by reasonable physical and electronic security measures.

**Your choice to opt out.**

The quality content and information on ORLANDOSENTINEL.COM is supported by advertising revenue, and a controlled program of email marketing is an important element of our online publishing business. Like other Web publishers, we sometimes permit our advertising and promotional partners or other third parties to email you about services, features, products, special offers and unique content we believe might interest you. If you prefer not to receive email communications sent directly from our advertisers or promotional partners, you will be given an opportunity to decline before you provide us information we might use for this purpose. If you decline at the time you provide us such information, we will not share the Personally Identifiable Information you provide with non-Affiliated advertisers for such purposes, though we may send you information on their behalf. You may also change your email preferences by logging into your profile, if applicable.

**Affiliated sites, linked sites and advertisements.**

ORLANDOSENTINEL.COM expects its partners, advertisers and third-party contractors to respect the privacy of our users. However, third parties, including our partners, advertisers, Affiliates and other content providers accessible through our site, may have their own privacy and data collection policies and practices. For example, during your visit to our site you may link to, or view as part of a frame on a ORLANDOSENTINEL.COM page, certain content that is actually created or hosted by a third party. Also, through ORLANDOSENTINEL.COM you may be introduced to, or be able to access, information, Web sites, advertisements, or features offered by other parties. ORLANDOSENTINEL.COM is not responsible for the actions or policies of such third parties. You should check the applicable privacy policies of those third parties when providing information on a feature or page operated by a third party.

While on our site, our advertisers, promotional partners, service providers, or other third parties may use cookies or other technology to attempt to identify some of your preferences or retrieve information about you. For example, some of our advertising is served by third parties and may include cookies that enable the advertiser to determine whether you have seen a particular advertisement before. Through features available on our site, third parties may use cookies or other technology to gather information. ORLANDOSENTINEL.COM does not control the use of this technology or the resulting information and is not responsible for any actions or policies of such third parties.

We use persistent and session cookies to analyze and enhance your experience on the site, and we use third-party technology to serve advertisements to you. The data that is collected is generally the property of ORLANDOSENTINEL.COM, not the third party. We also allow third parties called ad networks or ad servers to serve ads to you on ORLANDOSENTINEL.COM, and to access their own cookies on your computer. ORLANDOSENTINEL.COM does not have access to the cookies that may be placed on your computer by third-party ad technology, ad servers or ad networks, and use of cookies by third parties is subject to their privacy policies and not this policy. ORLANDOSENTINEL.COM maintains relationships with a number of third-party networks, including without limitation Doubleclick and Tacoda. Those parties that use cookies may offer you a way to opt out of ad targeting. You may find more information at the Web site of the individual ad network or the **Network Advertising Initiative**.

Please be careful and responsible whenever you are online. Should you choose to voluntarily disclose personally identifiable information on our

site, such as in message boards, chat areas or in advertising or notices you post, that information can be viewed publicly and can be collected and used by third parties without our knowledge and may result in unsolicited messages from other individuals or third parties. Such activities are beyond the control of ORLANDOSENTINEL.COM and this policy.

**Contact us.**

We can be reached by contacting: We can be reached by contacting:  
OrlandoSentinel.com 633 N. Orange Ave. Orlando, FL 32801 Email:  
feedback@orlandosentinel.com **Your California Privacy Rights.**

If you are a California resident, you are entitled to prevent sharing of your personal information with third parties for their own marketing purposes through a cost-free means. If you send a request to the address above, ORLANDOSENTINEL.COM will provide you with a California Customer Choice Notice that you may use to opt- out of such information sharing. To receive this notice, submit a written request to the address above under the "Contact us" section, specifying that you seek your "California Customer Choice Notice." Please allow at least thirty (30) days for a response.

**Changes to this policy.**

ORLANDOSENTINEL.COM reserves the right to change this policy at any time. Please check this page periodically for changes. Your continued use of our site following the posting of changes to this policy will mean you accept those changes.

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