

Privacy Policy

Effective as of January 1, 2020.

Welcome!

We take your privacy seriously and know you do too. This Privacy Policy is here to help you understand how we process your Personal Data (defined below). We also describe your choices and rights with respect to how we process your Personal Data. Please read this Privacy Policy carefully.

Who We Are

This is the Privacy Policy of The Gazette, which is owned by Colorado Springs Gazette. LLC ("**Gazette**," "**us**," "**our**," or "**we**"). You can contact us [here](#).

Scope of This Privacy Policy

This Privacy Policy applies to our "**Services**" which include our:

- "**Digital Services**" including:
 - websites that link to/post this Privacy Policy, including any subdomains (including but not limited to gazette.com, outtherecolorado.com, and coloradopolitics.com) or mobile versions (the "**Site(s)**"); and
 - mobile applications ("**Mobile App(s)**").
- "**Offline Services**" including:
 - print publications ("**Publications**") and data you may provide in connection with your subscription to and receipt of our Publications
 - offline events we may host or in which we may participate ("**Events**"); and
 - customer service telephone lines, and other offline means of providing Personal Data to us.

This Privacy Policy does not apply to information collected by third parties, for example, when you visit a third-party website or interact with online advertisements, unless and until we receive your information from those parties. Please review those third parties' privacy policies before disclosing information to them.

This Privacy Policy is incorporated into the Terms of Use governing your use of any of our Digital Services. Any capitalized terms not defined in this Privacy Policy will have the definitions provided in our Terms of Use.

Collection and Use of Personal Data

Categories of Personal Data We Collect

We may collect and process information that relates to identified or identifiable individuals ("**Personal Data**"). We collect and process the following categories of Personal Data (note, specific Personal Data elements listed in each category are only examples and may change):

<i>Identity Data:</i>	Personal Data about you and your identity, such as your name, and other Personal Data you may provide on various forms or in an account profile (e.g., biographical information), or during an interview with our reporters.
<i>Commercial Data:</i>	Personal Data we collect in connection with a transaction or purchase, such as the item or subscription purchased, the price, the delivery location, what has been provided to you, and other similar information.
<i>Contact Data:</i>	Personal Data used to contact an individual, e.g., email address, physical address, phone number, social media, or communications platform username, as well as a name or other salutation.
<i>Financial Data:</i>	Personal Data relating to financial accounts or services, e.g., a credit card or other financial account number, and other relevant information you provide in connection with a financial transaction.
<i>Device/Network Data</i>	Personal Data relating to your device, browser, or application e.g., IP addresses, MAC addresses, application ID/AdID/IDFA, session navigation history and similar browsing metadata, search history, and other data generated through applications and browsers, including cookies and similar technologies.
<i>Inference Data:</i>	Personal Data used to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes, market segments, likes, favorites and other data or analytics provided about you or your account by social media companies or data aggregators, including household data such as income, number of children, occupation, social grade, home ownership status, the products and services you use or intend to use or purchase, and your interests.
<i>User Content:</i>	Unstructured/free-form data that may include any category of Personal Data, e.g., data that you give us in free text fields such as comment boxes, answers you provide when you participate in sweepstakes, contests, votes and surveys, including any other Personal Data which you may provide through or in connection with our Services.
<i>Audio/Visual Data:</i>	Audio files and records, such as voicemails and, call recordings; audio-visual recordings of interviews or events by our reporters or staff, and the like.

Sources of Personal Data

We collect Personal Data from various sources, which vary depending on the context in which we process that Personal Data:

<i>Data you provide us</i>	We will receive your Personal Data when you provide it to us, when you subscribe to our Publications, complete a transaction via our Services, or when you otherwise use our Services, or when you communicate with our reporters or other staff.
<i>Data we collect automatically</i>	We collect Personal Data about or generated by any device you have used to access our Services.
<i>Data we receive from service</i>	We receive Personal Data from service providers performing services on our behalf.
<i>Data we receive from aggregators and advertisers</i>	We receive Personal Data from ad networks, behavioral advertising vendors, market research, and social media companies or similar companies that provide us with additional Personal Data such as Inference Data.
<i>Data we receive from social media companies</i>	We receive Personal Data from Facebook and other social media companies who may transfer Personal Data to us when you register for one of our Services or interact with that social media company on or in connection with our Services.
<i>Data we create and infer</i>	We, certain partners, social media companies, and third parties operating on our behalf create and infer Personal Data such as Inference Data based on our observations or analysis of other Personal Data processed under this Privacy Policy, and we may correlate this data with other data we process about you. We may combine any Personal Data about you that we receive from you, and from third parties.

How We Process Personal Data

We or our service providers typically collect and process Personal Data in several contexts when you use our Services, including:

When you make a purchase or other transaction through our Service

We generally process Identity Data, Financial Data, Commercial Data and Contact Data when you engage in a purchase transaction with our Services, or when you otherwise create an account and register with our Service, whether through our Digital Services or our Offline Services. We process this Personal Data as necessary to perform or initiate a contract with you, process your order and payment, engage in customer service functions, and carry out fulfillment and delivery. In addition, we may also collect or create Device/Network Data and Inference Data. This data, together with other data we collect in this context is used as necessary in connection with certain legitimate business interests, such as:

- ensuring the security of our Services and to prevent fraud.
- providing you with information about our Services, to contact you about administrative matters, to manage and respond to any queries or complaints you make or any correspondence you send us.

We may also use this Identity Data, Commercial Data, Contact Data, and Device/Network Data collected in this context for our Commercial Purposes.

When you access or use our Digital Services

When you use our Digital Services, we automatically collect and process Device/Network Data. We use this data as necessary to initiate or fulfill your requests for certain features or functions through our Services, such as keeping you logged in, delivering pages, etc. In addition to Device/Network Data, we may also collect and process Contact Data, Identity Data and Inference Data that we collect, create, and/or receive (including through the use of cookies and similar technologies), including if you sign up to receive our emails or other content. We typically use this data as necessary in connection with certain legitimate business interests, such as:

- ensuring the security of our websites and other technology systems.
- analyzing the use of our Services, including navigation patterns, clicks, etc. to help understand and make improvements to the Services.

Some Digital Services, such as our mobile apps, may, with your consent, process Location Data. We use this data, together with Inference Data, and Device/Network Data in order to provide contextual information to you, and other features that require the use of location. We may also use this information in connection with our legitimate business interests, such as, creating aggregate information about users' location and patterns, which we use to help improve our Services. We may also process Identity Data, Contact Data, and User Content if you interact with or identify us on social media platforms.

We may also use Identity Data, Device/Network Data, Location Data, Inference Data and Contact Data collected in this context for Commercial Purposes.

Cookies and other tracking technologies

We use cookies and similar technologies on our Digital Services. These technologies can be used to collect or create Identity Data, Device/Network Data, Contact Data, or Inference Data. Third parties may be allowed to view, edit, or set their own cookies or place web beacons on our websites. Cookies and web beacons allow us and third parties to distinguish you from other users of our Digital Services, and some of these technologies can be used by us and/or our third-party partners to identify you across platforms, devices, sites, and services. Third parties may engage in targeted advertising using this data.

We and authorized third parties may use cookies and similar technologies for the following purposes:

- for "essential" or "functional" purposes, such as to enable certain features of our Digital Services (for example, to allow a customer to maintain a basket when they are shopping at an online store);
- for "analytics" purposes, such as to analyze the traffic to and on our Digital Services (for example, we can count how many people have looked at a specific page, or see how visitors move around the website when they use it, what website they visited prior to visiting our website, and use this information to understand user behaviors and improve the design and functionality of the website);
- for "retargeting" or similar advertising or commercial purposes, such as:
 - for social media integration e.g. via third-party social media cookies, or when you share information using a social media sharing button or "like" button on our Services or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter;
 - to collect information about your preferences and demographics to help target

advertisements which are more likely to be of interest to you using behavioral advertising; and

- to allow us to carry out retargeting (this includes, for example, when advertisements are presented to you for products or services which you have previously looked at on a website but have not purchased).

The use of these technologies by third parties may be subject to their own privacy policies and is not covered by this Privacy Policy, except as required by law.

We may also use your Identity Data, Device/Network Data, Inference Data and Contact Data collected in this context for Business Purposes and Commercial Purposes.

When you enter a contest or other promotion

We collect and process Identity Data, Contact Data, and User Content as necessary to process your request to enter the contest, or take part in a promotion, notify you if you have won or to process delivery of a prize or for other related purposes.

In addition, we may process this information in connection with our legitimate business interests, such as:

- verifying your identity for authentication and security purposes; and
- helping us to ensure our customers are genuine and to prevent fraud.

Note, if you win a contest/sweepstakes, we may publicly post some of your Personal Data on our website. Where required by law, your information will not be posted without your consent. Unless prohibited by law, we may use this Identity Data, Contact Data, and User Content information for Commercial Purposes.

When you contact us or submit information to us

We collect and process Identity Data, Contact Data, and User Content as necessary to process your request to enter the contest, or take part in a promotion, notify you if you have won or to process delivery of a prize or for other related purposes.

Feedback and Surveys

We generally process Identity Data, Contact Data, Inference Data, and User Content collected in connection with feedback you provide to us, or surveys or questionnaires. We generally process this Personal Data as necessary to respond to your requests/concerns and create aggregate analytics regarding customer satisfaction. We may also use the Identity Data, Contact Data, Inference Data, and User Content collected in this context for Business Purposes and Commercial Purposes.

How we Process Personal Data for Business Purposes

We and our service providers process Personal Data we hold for numerous business purposes, depending on the context of collection, your rights and choices, and our legitimate business interests. For example, we generally process Personal Data in connection with:

Service Provision and Contractual Obligations

We process any Personal Data as is necessary to provide our Services, to provide you with the products and services you purchase or request, to authenticate users and their rights to access the Services, or various data, features, or functionality, and as otherwise necessary to fulfill our contractual obligations to you, and provide you with the information, features, and Services you request. Additionally, we use information to authenticate your right to access our Services, deliver products and Services, and for other related matters. Similarly, we may use Personal Data as necessary to audit compliance, and log or measure aspects of service delivery (e.g., to document ad impressions).

Internal Processing and Service Improvement

We may use any Personal Data we process through our Services as necessary in connection with our legitimate business interests in improving the design of our Services, understanding how our Services are used or function, for customer service purposes, in connection with logs and metadata relating to service use, and for debugging and similar purposes relating to our identification of errors and improving the stability of the Services, and for editorial purposes, including creating content for our Services. Additionally, we may use Personal Data to understand what parts of our Services are most relevant to users, how users interact with various aspects of our Services, how our Services perform, etc., or we may analyze use of the Services to determine if there are specific activities that might indicate an information security risk to the Services or our users.

Security and Incident Detection

We may process any Personal Data in connection with our legitimate business interest in ensuring that our Services are secure, and identify and prevent fraud, detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns and characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.

Compliance, safety, public interest

We may also process any Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law and make requests, for the establishment and defense of legal claims, or where we must comply with our legal obligations, lawful requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process Personal Data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent allowed under applicable law. Please see the data sharing section for more information about how we disclose Personal Data in extraordinary circumstances.

Aggregated data

We process Personal Data about our customers and users in order to identify trends (to create aggregated and anonymized data about our customers/users, use of our Services, and other similar information ("**Aggregated Data**"). We may pass Aggregated Data to the third parties referred to in the section below to give them a better understanding of our business and to bring you a better service. Aggregated Data will not contain information from which you may be personally identified.

Personalization

We process certain Personal Data as necessary in connection with our legitimate business interest in personalizing our Digital Services. For example, aspects of the Digital Services may be customized to you, to display content that you have interacted with in the past, or to display content that we think may be of interest to you based on your interactions with our Digital Services and other content. This processing may involve the creation and use of Inference Data relating to your preferences.

Other Business Purposes

If we process Personal Data in connection with our Services in a way not described in this Privacy Notice, this Privacy Notice will still apply generally (e.g., with respect to your rights and choices) unless otherwise stated at collection. We will process such information in accordance with the notice provided at the time of collection or in a manner that is necessary and proportionate to achieve the operational purpose for which the personal information was collected or processed or for another operational purpose that is compatible with the context in which the personal information was collected.

How We Process Personal Data for Commercial Purposes

We and certain third parties process Personal Data we hold for certain purposes, depending on the context of collection and your rights and choices, including:

Personalization & Consumer Profiles

In order to understand our customers' preferences, and better recommend content and Services that are personalized to our customers, we may create a "**Consumer Profile**" by linking together and analyzing Personal Data collected in the following contexts:

- When you make a purchase or other transaction through our Services
- When you access or use our Digital Services
- Cookies and other tracking technologies
- When you enter a contest or other promotion
- When you contact us or submit information to us
- Feedback and Surveys

We may also augment Consumer Profiles with Personal Data that we create (such as Inference Data) or that we receive from our affiliated companies or third parties, and may include Personal Data such as information about Services you have used or purchased previously, and demographic data.

We use Consumer Profiles for our legitimate interests in market research and statistical analysis in connection with the improvement of our Services. For example, we may analyze the Personal Data of people who have subscribed to our Publications in the past and compare them with other people in our database. If we identify people in the database who have similar Personal Data to the subscribers, we may then target marketing to the new people we have identified in our database, for example by sending marketing emails. We may conduct the profiling and send the direct marketing emails automatically. We may also use this information for other Commercial Purposes.

Marketing Communications

Consistent with our legitimate business interests, we (or if appropriate, our third-party partners) may send you marketing and promotional communications if you sign up for such communications or purchase products or services from us. Where allowed, we may also send you these communications if you register for our Services or for a promotion, or in connection with your communications with or submission of User Content to us. These communications may be personalized or customized based on your user profile.

Similarly, we may also collect Device/Network Data and Contact Data so that we can determine whether you have opened an email or otherwise interacted with our communications, and we may generate Inference Data based on these interactions.

We may also process this Personal Data for targeted advertising. However, where consent to processing is required by law, we will link and process this information for targeted advertising with appropriate consent.

Targeted Advertising

We, and certain third parties operating on or through our Services, may engage in targeted advertising. This form of advertising includes various parties and services providers, including third party data controllers, engaged in the processing of Personal Data in connection with advertising. These parties may be able to identify you across sites, devices, and over time.

The parties that control the processing of Personal Data for behavioral advertising purposes may create or leverage information derived from personalization and profiling. In some cases, these parties may also develop and assess aspects of a profile about you to determine whether you are a type of person a company wants to advertise to and determine whether and how ads you see are effective. These third parties may augment your profile with demographic and other Inference Data derived from these observations, and may also track whether you view, interact with, or how often you have seen an ad, or whether you complete a purchase for a good or services you were shown in an advertisement.

We generally use targeted advertising for the purpose of marketing our Services and third-party goods and services, to send marketing communications, including by creating custom marketing audiences on third-party websites (such as Facebook).

Data Sales

Certain Commercial Processing purposes involve "sales" of data as defined by applicable law. For example, we may "sell" (as defined by applicable law) certain Personal Data when we engage in marketing campaigns with or on behalf of sponsors, when we conduct targeted advertising, or we may sell or grant access to Personal Data to our marketing partners, promoters, and other advertisers. See the [California Rights & Disclosures](#) section for a list of categories of Personal Data sold.

Data Sharing/Transfers

Information we collect may be shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We generally transfer data to the following categories of recipients:

Service Providers: In connection with our general business operations, product/service improvements, to enable certain features, and in connection with our other legitimate business interests and our Business Purposes, we may share your Personal Data with service providers who provide certain services or process data on our behalf.

Affiliates: In order to streamline certain business operations, improve personalization, share promotions and content we believe would be of interest to you, and develop products and services that better meet the interests and needs of our customers, we may share your Personal Data with any of our current or future affiliated entities, subsidiaries, and parent companies for our Business Purposes and Commercial Purposes.

Partners: We may share your Personal Data with business or marketing partners in connection with promotions, events, products, and services that are promoted, managed, supported, or otherwise undertaken with that third party, and other Commercial Purposes. If appropriate, these parties may engage in direct marketing or behavioral advertising.

Marketing In order to improve personalization, deliver more relevant information and advertisements to you, and develop better products and services, we may share certain Personal Data with our affiliates and trusted third parties for marketing, advertising, or other Commercial Purposes, and we may allow our affiliates and other third parties (such as Facebook, ad exchanges, data management platforms, or ad servers) to operate on our Digital Services and process data for behavioral advertising.

- Social Media:* If you use any social media plugin, API, or other similar feature, use a hashtag or similar link, or otherwise interact with us or our Digital Services via social media, we may make your post available on our Digital Services or to the general public. We may share, rebroadcast, or redisplay Personal Data or other information in the post to the extent permitted by the relevant social media service and otherwise use the data for our Commercial Purposes. In addition, in order to improve personalization, deliver more relevant advertisements, and develop better products and services, we may share certain Personal Data with current or future affiliated entities and trusted third parties for marketing, advertising, or other commercial purposes, and we may allow third parties (such as Facebook and social media advertisers, ad exchanges, data management platforms, or ad servers) to operate on our Services and process data for targeted advertising. These transfers may be made for Commercial Purposes and in connection with Data Sales.
- Data Aggregators:* In connection with our marketing operations, and subject to your rights and choices, we may share certain Personal Data with data aggregators for Commercial Purposes and in connection with Data Sales. These disclosures/sales can help better personalize our Services, the services of third parties, enrich Consumer Profiles and help ensure that you see advertisements that are more relevant to your interests.
- Successors:* Your Personal Data may be processed if we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.
- Lawful Recipients:* In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use, or in the vital interests of us or any person. Note, these disclosures may be made to governments that do not ensure the same degree of protection of your Personal Data as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Data to such parties.
- International:* We operate in and use service providers located in the United States. If you are located outside the U.S., your Personal Data will be transferred to the U.S. by necessity in order to deliver the Services to you. The U.S. does not provide the same legal protections guaranteed to Personal Data in the European Union or certain other regions. Accordingly, your Personal Data may be transferred to the U.S. pursuant to the EU-U.S. Privacy Shield Framework, the Standard Contractual Clauses, or other adequacy mechanisms, or pursuant to exemptions under EU law.

How we protect your Personal Data

We follow and implement reasonable security measures to safeguard the Personal Data you provide us. However, we sometimes share Personal Data with third parties as noted above, and we do not have control over third parties' security processes. Please note, we do not warrant perfect security and we do not provide any guarantee that your Personal Data or any other information you provide us will remain secure. Where we have given you (or where you have chosen) a password which enables you to access one of our Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Data Retention

We retain information for so long as it, in our discretion, remains relevant to its purpose, and in any event, for so long as is required by law. We will review retention periods periodically, and may sometimes pseudonymize or anonymize data held for longer periods, if appropriate and requested.

Minors

Our Services are neither directed at nor intended for use by minors under the age of 16. Further, we do not knowingly collect Personal Data from such individuals. If we learn that we have inadvertently done so, we will promptly delete it. Do not access or use the Services if you are not of the age of majority in your jurisdiction unless you have the consent of your parent or guardian.

Your Rights & Choices

You may have certain rights and choices regarding the Personal Data we process. Please note, these rights may vary based on the country or state where you reside, and our obligations under applicable law.

- Additional information regarding individuals' rights in California are available [here](#).
- Additional information regarding individuals' rights in the EU/EEA/Switzerland/Cayman Islands are available [here](#).

Your Rights

To the extent applicable law grants you the right to do so, and subject to any necessary verification, you may have the right to:

- request that we provide you with a copy of the Personal Data which we hold about you;
- request that we update any of your Personal Data which are inaccurate or incomplete;
- request that we delete any of your Personal Data which we are holding; or
- request that we provide your Personal Data to you or a third-party provider of services in a structured, commonly used and machine-readable format.

To submit a request, you may [contact our Data Privacy Team](#). Your request must include your name, email address and postal address and we may require proof of your identity.

Your Choices

Marketing Communications.

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email. You can also withdraw your consent to receive marketing communications or any other consent you have previously provided to us by [contacting us](#). To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

Withdrawing Your Consent/Opt-Out

Where we are processing your Personal Data based on your consent, you may change your mind and withdraw your consent at any time. The consequence of you withdrawing consent might be that we cannot perform certain services for you, such as location-based services, personalization or providing certain types of advertising, or other services conditioned on your consent or choice not to opt-out.

Location Preferences

You may control or limit location data that we collect through our Services by changing your preferences in your device's location services preferences menu, or through your choices regarding the use of Bluetooth, WiFi, and other network interfaces you may use to interact with our Services. However, please note that use of RFID technologies may be necessary for the functioning of hardware required for certain processing of Personal Data. Note, general location data may still be collected if you opt out of specific location services.

Do-not-Track

Our Services do not respond to your browser's do-not-track request. If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser's settings menu. You must opt out of third party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Privacy Policy](#), or [Google Analytics Opt-out](#).

Advertising

You may opt out or withdraw your consent to behavioral advertising. In some cases, we may be able to process third party opt-out requests directly (e.g. when you click the "do not sell my personal information" link on our website), however in some cases, you must opt out of third party services directly via the third party. For example, to opt out of Google's use of cookies, visit Google's Ads Settings, [here](#). If you wish to take steps to opt-out of tracking by certain online advertisers, you can visit the Digital Advertising Alliance's opt-out page at <http://www.aboutads.info/choices> or the Network Advertising Initiative at www.networkadvertising.org/optout_nonppii.asp. You can limit or opt out of our processing for behavioral advertising by [contacting us](#).

Data Sales

If you are a California Resident, or otherwise have the right to opt out of data sales, you may do so through the Gazette Rights Portal. You may be required to validate your identity to ensure your request is not fraudulent.

Regional Rights

See the [Your California Privacy Rights](#) section for additional information regarding data sale opt-out, and other privacy rights under California law.

Residents and others in the EU, EEA and Cayman Islands may have rights under EU and other law. See the [Your EU/Other Privacy Rights](#) section for additional information.

Additional Rights and Disclosures: EU/EEA, Switzerland, Cayman Islands, etc.

Your EU/Other Privacy Rights

Under the GDPR and analogous legislation, you may have the following rights notwithstanding those set forth in the Rights & Choices section above, subject to your submission of an appropriately verified request:

Additional Rights and Disclosures: EU/EEA, Switzerland, Cayman Islands, etc.

Your EU/Other Privacy Rights

Under the GDPR and analogous legislation, you may have the following rights notwithstanding those set forth in the Rights & Choices section above, subject to your submission of an appropriately verified request:

Access: You may receive a list of your Personal Data we process to the extent required and permitted by law.

Rectification: You may correct any Personal Data that we hold about you to the extent required and permitted by law. For Registration Data, you may be able to make changes via your account settings menu.

<i>Erasure:</i>	To the extent required by law, you may request that we delete your Personal Data from our systems.
<i>Data Export:</i>	To the extent required by applicable law, we will send you a copy of your Personal Data in a common portable format of our choice.
<i>Objection:</i>	You may have the right under applicable law to object to our processing of your Personal Data that we undertake without your consent as in connection with our legitimate business interests (including any processing specified as such, or processed under this Privacy Policy for a Business Purpose). You may do so by contacting us . Note that we may not be required to cease, or limit processing based solely on that objection, and we may continue processing cases where our interests in processing are balanced against individuals' privacy interests.

You may also object to processing for direct marketing purposes. We will cease processing upon your objection to such processing.

Additional Rights and Disclosures: California

Your California Privacy Rights

Under the California Consumer Privacy Act ("CCPA") and other California laws, California residents may have the following rights in addition to those set forth in the [Rights & Choices](#) section above, subject to your submission of an appropriately verified request where required by applicable law (see below for verification requirements):

<i>Right to Know</i>	You may request any of following, for the 12 month period preceding your request: (1) the categories of Personal Data we have collected about you, or that we have sold, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the business or commercial purpose for which we collected or sold your Personal Data; (4) the categories of third parties to whom we have sold your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.
<i>Right to Delete</i>	You have the right to delete certain Personal Data that we hold about you, subject to exceptions under applicable law
<i>Right to Non-Discrimination</i>	You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.
<i>Direct Marketing</i>	You may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.
<i>Opt-Out of Sale</i>	If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal Data to third parties.
<i>Minors'</i>	To the extent we have actual knowledge that we collect or maintain personal information of a minor under age 16, those minors between the age of 13 and 16 must opt in to any sales of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales of personal information (as defined under CCPA); all minors have the right to opt-out later at any time.

Minors' User Content Individuals under the age of 18 in California can delete or remove posts using the same deletion or removal procedures described above, or otherwise made available through the Services. If you have questions about how to remove your posts or if you would like additional assistance with deletion, you can [contact us](#). We will work to delete your information, but we cannot guarantee comprehensive removal of that content or information posted through the Services.

Submission of Requests

You may submit requests, as follows:

*Opt-Out of Sale,
Right to Know,
Right to Delete:* You may visit the Gazette Rights Portal

*Direct
Marketing;
Remove User
Content:* You may request a list of any relevant direct marketing disclosures, or may request deletion applicable law, via email to our privacy team at privacy@gazette.com.

Verification of Requests

All rights requests must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Data. We may require that you provide the email address we have on file for you (and verify that you can access that email account) as well as an address, phone number, or other data we have on file, in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.

Data Processing

Categories of Personal Data Disclosed for Business Purposes

For purposes of the CCPA, we may disclose to Service Providers for "business purposes" the following categories of Personal Data: Identity Data, Contact Data, Location Data, Device/Network Data, Commercial Data, Inference Data, Financial Data, Audio/Visual Data, Health Data, Government ID Data, and User Content.

Categories of Personal Data Sold

For purposes of the CCPA, we may "sell" the following categories of Personal Data processed through our Services: Identity Data, Contact Data, Location Data, Device/Network Data, Commercial Data, Inference Data, and User Content.

Right to Know

Category of Data	Context	Category of Sources	Business Purposes	Commercial Purposes	Category of Recipients
Identity Data	<ul style="list-style-type: none"> When you make a purchase or other transaction through our Service When you access or use our Digital Services Cookies and other tracking technologies Feedback and Surveys Contests or promotions <ul style="list-style-type: none"> When you submit information to us 	From you; Automatic collection; Service providers; Agents and partners; Aggregators and advertisers; Social media companies; Data we create/infer	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance; Aggregated data; Personalization; Other Business Purposes	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising; Data Sales	Affiliates; Service Providers; Partners, Marketers, Agents; Data Aggregators; Successors; Lawful Recipients
Financial Data	<ul style="list-style-type: none"> When you make a purchase or other transaction through our Service 	From you; Service Providers	Service Provision and Contractual Obligations; Security and Incident Detection; Compliance; Aggregated data; Other Business Purposes	Personalization & Consumer Profiles; Targeted advertising	Affiliates; Service Providers; Agents; Successors; Lawful Recipients
Device/ Network Data	<ul style="list-style-type: none"> When you make a purchase or other transaction through our Service When you access or use our Digital Services Cookies and other tracking technologies 	From you; Automatic collection; Service providers; Agents and partners; Aggregators and advertisers; Social media companies; Data we create/infer	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance; Aggregated data; Personalization; Other Business Purposes	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising; Data Sales	Affiliates; Service Providers; Partners, Marketers, Agents; Data Aggregators; Successors; Lawful Recipients
Inference Data	<ul style="list-style-type: none"> When you make a purchase or other transaction <ul style="list-style-type: none"> When you access or use our Digital Services Cookies and other tracking technologies Feedback and Surveys 	From you; Automatic collection; Service providers; Agents and partners; Aggregators and advertisers; Social media companies; Data we create/infer	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance; Aggregated data; Personalization; Other Business Purposes	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising; Data Sales	Affiliates; Service Providers; Partners, Marketers, Agents; Data Aggregators; Successors; Lawful Recipients
User Content	<ul style="list-style-type: none"> When you access or use our Digital Services Contests or promotions Feedback and Surveys When you submit information to us 	From you; Service providers; Social media companies	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Personalization; Other Business Purposes	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising; Data Sales	Affiliates; Service Providers; Partners, Marketers, Social Media Platforms; Agents; Data Aggregators; Successors; Lawful Recipients

Location Data	When you access or use our Digital Services	From you; Service Providers Social media companies	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance; Aggregated data; Personalization; Other Business Purposes	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising; Data Sales	Affiliates; Service Providers; Partners, Marketers, Agents; Data Aggregators; Successors; Lawful Recipients
Audio /Visual Data	When you call us or our service providers	From you; Automatic collection; Service Providers	Service Provision and Contractual Obligations; Other Business Purposes	none	Service Providers; Successors; Lawful Recipients

Changes to Our Privacy Policy

We may change this Privacy Policy from time to time. Changes will be posted on this page with the effective date. Please visit this page regularly so that you are aware of our latest updates. Your use of the Digital Service following notice of any changes indicates acceptance of any changes.

Contact Us

Feel free to contact us with questions or concerns, to exercise your privacy choices:

Physical address:

the Gazette, Attn: Privacy
30 E. Pikes Peak Avenue, Suite #100 Colorado
Springs, CO 80903

General Inquiries, Marketing Choices, and Data Updates: privacy@gazette.com

Data Rights Inquiries: visit the Gazette Rights Portal.

Opt-Out of Data Sales: visit the Gazette Rights Portal

Direct Marketing Disclosure Requests: privacy@gazette.com