

Privacy Policy

Effective Date: June 9, 2020

The Pac-12 Entities (which includes Pac-12 Enterprises, LLC, Pac-12 Network, LLC, Pac-12 Broadband Network, LLC, and the Pac-12 Conference) (collectively, “Pac-12”, “we”, “us” or “our”) is a diversified and integrated media company dedicated to Pac-12 sports and related content.

This Privacy Policy (“Policy”) describes the information we collect on the sites where this privacy policy is posted, including Pac-12.com (the “Sites”). This Policy also applies to programs or services operated by us (or on our behalf) that may be displayed on various online, mobile or other platforms and environments, including those operated by third parties, which permits us to interact directly with our guests that post this Policy, including the Pac-12 Now App (“Applications”). We follow this privacy policy in accordance with local law in the places where we operate. By visiting our Sites and using our Applications, you agree that your personal information will be handled as described in this Policy, which is incorporated by reference into the Terms and Conditions the Sites or Applications, as applicable.

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1. Types of Information We Collect

Information We Collect Directly From You

We collect information you provide to us when you request products, services or information from us, register with us, participate in public forums or other activities on our Sites and Applications, respond to customer surveys, or otherwise interact with us. Generally, we collect information about you directly from you or your use of our Site, but in some cases we may collect information about you from third parties.

We may collect the following information directly from you:

- Registration information you provide when you download our Applications or create an account at the Sites, including your name, zip code, email address, school and sport preference, username and password;
- Transaction information you provide when you request information or purchase a product or service from us, whether on our Sites or through our Applications, including your postal address, telephone number and payment information;
- Information you provide in public forums that we may make available on our Sites and Applications;
- Information sent either one-to-one or within a limited group using our message, chat, post or similar functionality, where we are permitted by law to collect this information;
- Information you provide to us when you use our Sites and Applications, our Applications on third -party sites or platforms such as social networking sites, or link your profile on a third-party site or platform with your registration account;

- Location information when you visit our Sites or use our Applications, including location information either provided by a mobile device interacting with one of our Sites or Applications, or associated with your IP address, where we are permitted by law to process this information; and
- Usage, viewing and technical data, including your device identifier or IP address, when you visit our Sites, use our Applications on third-party sites or platforms or open emails we send, and aggregate data such as the total number of users that view content through the Sites or Applications, the type of content they are viewing, the length of time spent viewing the content.

User Generated Content

Any information that you post to public areas of our Sites or Applications may be viewable by other visitors to our Sites. If you post content to public areas of our Sites or Applications, we may collect and use that information. We are not responsible for the privacy of any information that you choose to post to public areas of our Sites or Applications or for the accuracy of any information contained in those postings. Any information that you disclose becomes public information. We cannot prevent such information from being used in a manner that may violate this Policy, the law or your personal privacy. You should have no expectation of privacy in the information you post to the Sites or Applications.

Information We Collect About You From Third Parties

We also may collect information, including personally identifiable information, about you from affiliated and non-affiliated third parties to identify products and services that might be of interest to you. We will follow the requirements imposed by those parties with respect to use of the information they provide to us.

Information We Collect Automatically

We may use cookies, web beacons, and other automated devices to collect information, including personally identifiable information, about you when you visit our Sites and Applications and receive emails from us. Specifically, we may collect the following information about your use of our Sites or Applications via these technologies: your browser type and operating system; web pages you view; links you click; your IP address; your mobile device ID; your interaction with the Sites or Applications; length of time you are logged in to our Sites or Applications; and websites visited before our Sites. Please see the section "What About Cookies and Other Tracking Devices" below for more information about our use of cookies. We may use the information gathered through these methods in anonymous or aggregated form to analyze ways to improve our Sites or Applications. This information also is associated with your username and may be combined with other information, including personally identifiable information that we collect about you.

Please keep in mind that when you provide information to us on a third-party site or platform (for example, via our Applications), the information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this privacy policy and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our Applications.

2. Use of Your Information

We use the information that we gather about you for the following purposes:

- Provide you with the products and services you request;
- Respond to inquiries and requests;
- Communicate with you about your account or transactions with us and send you information about features on our Sites and Applications or changes to our policies;
- Send you offers and promotions for our products and services or third-party products and services;
- Conduct contests, sweepstakes and other competitions through our Sites and Applications/
- Personalize content and experiences on our Sites and Applications;
Provide you with advertising based on your activity on our Sites and Applications and on third-party sites and applications;
- Optimize or improve our products, services and operations; and
- Detect, investigate and prevent activities that may violate our policies or be illegal.
- Confirm that the user is an authenticated user for certain TV Everywhere content or other content made available through the Pac-12 Now application.

3. Sharing Your Information

We may share your information, including personally identifiable information, with other users and affiliated and non-affiliated third parties as described in this section.

- We may disclose the information we collect from you to the Pac-12 Entities and our affiliates and subsidiaries to assist us in providing our services to you and for marketing products and services that we believe would be of interest to you.
- We may disclose the information we collect from you to third party vendors, service providers, contractors or agents who perform functions on our behalf. For example, these providers may help us administer our Sites or Applications.
- We may disclose the information we collect from you in connection with the sale of a business, if we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the acquiring company.
- We may disclose the information we collect from you where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of our Terms and Conditions or this Policy.
- We may disclose the information we collect from you to enforce our Terms of Use or rules, to protect our rights and property and the rights and property of our guests and third parties, or in other cases if we believe in good faith that disclosure is required by law.
- We may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order or other legal process, such as in response to a subpoena.
- We may share aggregate or anonymized information about users with third parties for marketing, advertising, research or similar purposes. For example, if we display advertisements on behalf of a third party, we may share aggregate, demographic information with that third party about the users to whom we displayed the advertisements.

4. Your Controls and Choices

We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your information. In accordance with local law, your controls and choices may include:

- You may correct, update and delete your registration account.
- You may change your choices for subscriptions, newsletters and alerts. For example, you can opt-out of receiving newsletters and marketing emails by using the unsubscribe mechanism contained within them.
- You may choose whether we share your personal information with other companies so they can send you offers and promotions about their products and services by requesting that we do not do so.
- You may choose whether to receive targeted advertising from many ad networks, data exchanges, marketing analytics and other service providers by following the directions in the “Advertising” section below.
- You may request access to the personal information we hold about you and that we amend or delete it and we request third parties with whom we have shared the information do the same.

5. Exercising Access, Data Portability, and Deletion Rights

You may exercise your controls and choices, or request access to your personal information, by accessing your account profile if you have an account, contacting us as set forth in Section 15 below, or following instructions provided in communications sent to you. We will use reasonable efforts to accommodate your requests and will explain when we are not able to do so. Please be aware that, if you do not allow us to collect personal information from you, we may not be able to deliver certain products and services to you, and some of our services may not be able to take account of your interests and preferences. If you have questions regarding the specific personal information about you that we process or retain, please contact us. For additional rights under applicable EU data protection laws, please see Section 14 below.

6. Non-Discrimination

We will not discriminate against you for exercising any of your controls and choices regarding our collection, use and sharing of your information. Unless permitted by local law in the places where we operate, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

7. What About Cookies and Other Tracking Technologies?

When you interact with the Sites and Applications, we strive to make your experience easy and meaningful. We or our third-party service providers use cookies, web beacons (including clear GIFs), Flash LSOs, and similar technologies to track user activity and collect website and application data. We may combine this data with the personal information we have collected from you. Currently, our systems do not recognize browser “do-not-track” requests. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies), but such disabling will impair use of the Sites and Applications.

Cookies. Cookies allow a web server to transfer data to a computer for recordkeeping and other purposes. We and our third-party service providers may use “cookies” on our Sites and Applications to, among other things, better serve you with tailored information and facilitate your ongoing access to and use of the Sites and Applications. There are two types of cookies: session-based and persistent cookies. In addition, we also allow vendors to use cookies on our Sites and Applications.

- Session Cookies. Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged in to the Sites and Applications. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Sites and Applications.

- Persistent Cookies. Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity, which may be combined with other user information.
- Third Party Cookies. We may also engage third parties to track and analyze non-personally and personally identifiable website data and to serve advertisements. To do so, we may permit third parties to apply cookies to users of our Sites and Applications, where permitted by law, and, subject to your right to opt-out through the Network Advertising Initiative and About Ads (as discussed below). We use the data collected by such third parties to help us administer and improve the quality of the Sites and Applications and to analyze site usage. Such third parties may combine the information that we provide about you with other information that they have collected. These third parties are required to use your information in accordance with this Policy.

Disabling Cookies. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Sites and Applications who disable their web browsers' ability to accept cookies will be able to browse the Sites and Applications; however, many site features, such as the shopping cart, will not function if you disable cookies. For more information on our cookies and opt-out features, please see our Cookies Statement.

Local Storage Objects. We and our third-party service providers may use Flash Local Storage Objects ("Flash LSOs") in order to store your Site preferences, to personalize your visit or to display content based upon what you view on our Site. Flash LSOs are different from browser cookies because of the amount and type of data stored. In addition, you cannot control, delete or disable the acceptance of Flash LSOs through your browser. For more information on Flash LSOs, or to learn how to manage your settings for Flash cookies, go to the [Adobe Flash Player Help Page](#), choose "[Global Storage Settings Panel](#)" and follow the instructions. To see the Flash LSOs currently on your computer, choose "[Website Storage Settings Panel](#)" and follow the instructions to review and, if you choose, to delete any specific Flash LSO.

Web Beacons, Pixel Tags and Other Technologies. We may use web beacons, such as clear GIFs, web bugs or pixel tags, which are tiny graphics with a unique identifier similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs in connection with our Sites and Applications to, among other things, track the activities of website visitors, help us manage content, and compile statistics about website usage. We and our third-party service providers also use clear GIFs in HTML e-mails to our customers, to help us track e-mail response rates, measure the success of our marketing campaigns, identify when our e-mails are viewed and track whether our e-mails are forwarded. For more information on the types of such tracking technologies we use, please see our Cookies Statement.

Site Analytics. We use automated devices and applications, such as Google Analytics, to evaluate usage of our Sites and Applications. We also may use other analytic means to evaluate our Sites and Applications. We use these tools to help us improve our Sites and Applications, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your personal information with these third parties. For the privacy policies and mechanisms for opting out of Google Analytics, please see <https://tools.google.com/dlpage/gaoptout>.

Third-Party Ad Networks. We may use third parties such as network advertisers to serve advertisements on our Sites and Applications. Please see the section entitled "Advertisements" for additional information about our practices and your choices with regard to receiving such advertisements.

Advertisements

We display advertisements on our Sites and Applications. Some of the advertisements are based on the collection of personal information and others are based on the collection of aggregate information. Please see the bottom of this section for opt-out information.

We use third parties such as network advertisers to serve advertisements on our Sites and Applications. Network advertisers are third parties that display advertisements based on your visits to our Sites and Applications and other websites and applications you have visited. This enables us and these third parties to target advertisements to you for products and services in which you might be interested. Third party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs),

Flash LSOs and other technologies to measure the effectiveness of their ads and to personalize advertising content to you.

These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one. We may provide these third-party advertisers with information about your usage of our Sites and Applications and our Services, both personally identifiable and non-personally identifiable information.

Opt-out of Third-Party Ad Networks. You may opt-out of many third-party ad networks. The website http://www.networkadvertising.org/optout_nonppii.asp provides information regarding this practice by Network Advertising Initiative ("NAI") members, and your choices regarding having this information used by these companies, including how to "opt-out" of third-party ad networks operated by NAI members. You also may contact About Ads at <http://www.aboutads.info/choices/> for information about opting out of targeted advertising and your choices regarding having information used by About Ads member companies, including how to "opt-out" of third-party ad networks operated by About Ads members. Opting out of one or more NAI members or About Ad members (many of which will be the same) only means that those members no longer will deliver targeted content or ads to you, but it does not mean you will no longer receive any targeted content or ads on our Sites and Applications or other websites and applications. You may continue to receive advertisements, for example, based on the particular website that you are viewing. Also, if your browsers are configured to reject cookies when you visit this opt-out page, or you subsequently erase your cookies, use a different computer or change web browsers, your NAI or About Ad opt-out may no longer, be effective. Additional information is available on NAI's and About Ad's websites and applications accessible by the above links.

8. Children and Privacy

Our Sites and Applications are not designed for children under 13 and we do not knowingly collect information from children under 13.

9. Data Security and Integrity

The security, integrity and confidentiality of your information are extremely important to us. We have implemented technical, administrative and physical security measures that are designed to protect personal information from unauthorized access, disclosure, use and modification. From time to time, we review our security procedures to consider appropriate new technology and methods. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable.

10. Data Transfers, Storage, and Processing

If you are located outside of the United States, please note that information we collect will be transferred to and processed in the United States. By using our Sites or Applications, you consent to the transfer and processing of your information in the United States, which does not have data protection laws that provide the same level of protection that exists in countries in the European Economic Area (EEA) or your country of residence. Your consent is voluntary. If, however, you do not consent, then we may not be able to provide you with our Services or Applications.

11. Third Party Links (Including Individual University Sites)

At times, our Sites and Applications may contain links to other third party websites. Any access to and use of such linked websites is not governed by this Policy, but, instead, is governed by the privacy policies of those third party websites, and we are not responsible for the information practices of such third party websites. In addition, you will see links on the Pac-12.com website to individual Pac-12 member institutions websites, which manage ticket purposes to sporting events and other activities. Each of those individual websites are separately operated and maintained and governed by their own privacy policies. We are not responsible for the information practices of these Pac-12 member institutions websites. In addition, certain of the content streaming services offered through our Sites and Applications require you to register with your third-party cable or satellite provider. Any information you provide to register for such services is subject to the privacy policies of such third-party providers; we are not responsible for their information practices.

12. Privacy Policy Changes

From time to time, we may change this Policy to accommodate new Services, Applications, technologies, industry practices, regulatory requirements or for other purposes. We will post such changes on the Sites and where feasible notify users through the Applications and e-mail addresses in their accounts with us.

13. Terms and Conditions

Your use our Sites or Services, as well as any dispute over privacy, is subject to this Policy and our Terms and Conditions, including applicable limitations on damages and the resolution of disputes.

14. Special Information for California Consumers

This section serves to supplement this Privacy Policy, and applies solely to California Residents. This notice is adopted to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this notice.

A) Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES

H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website (www.pac-12.com). For example, from submissions through our website portal or website usage details collected automatically.
- From third-parties that interact with us in connection with the services we perform. For example, from government agencies when we prepare readiness assessments for projects that receive government funding.

B) Use of Personal information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to prepare a tax return, we will use that information to prepare the return and submit it to the applicable taxing authorities.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

C) Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A:	Identifiers.
Category B:	California Customer Records personal information categories.
Category C:	Protected classification characteristics under California or federal law.
Category I:	Professional or employment-related information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service Providers.
- Third Parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

Note that Service Providers and Third Parties may independently collect personal information, subject to their own Privacy Policies. As an example, and not meant as an exhaustive list, the Pac-12 currently engages with the following Service Providers and Third Parties for different use cases:

- Campaign Monitor, used for managing emails. (Privacy Policy: <https://www.campaignmonitor.com/policies>).
- K2, a channel finder software tool. (Privacy Policy: <https://www.k2.com/legal/privacy-policy>).
- CleverTap, used for push notifications. (Privacy Policy: <https://clevertap.com/privacy-policy/>).
- Amazon Web Services, for general cloud services. (Privacy Policy: <https://aws.amazon.com/privacy/>).
- Fanatics, the official online store of the Pac-12 Conference. (Privacy Policy: <https://www.fanatics.com/partners-privacy-policy/>).
- Freewheel, a Comcast company facilitating advertising on our platforms. (Privacy Policy: <https://www.freewheel.com/privacy-policy>).

In the preceding twelve (12) months, we have not sold any personal information.

D) Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by: <https://pac-12.com/ccpa>.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we

cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

E) Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

F) Changes to our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

15. Data Retention

As a general rule, your personal information will not be stored longer than permitted by applicable law or longer than necessary to fulfil our purposes for processing your personal data, which are stated above in the section “How we use your personal data, unless we are required or believe it necessary to keep such information legal, accounting, audit or back-up purposes, such as to respond to claims. For example, if you sign up for our newsletter we will keep your email address for as long as you wish to receive the newsletter. If you opt-out of receiving the newsletter, we will no longer use the email for that purpose, although we may retain the address if necessary for compliance purposes.

16. Special Information for EU Data Subjects

For those persons whose personal information is subject to the protections of the European Union General Data Protection Regulation (“EU Law”), we rely on the following legal bases for processing of your personal information: (1) to provide our Services or perform our contracts or legal obligations with you. For example, we collect your personal information to be able to provide and authenticate you as user of the Pac-12 Now App; (2) if we have received your consent, such as your consent to use your email address to send you newsletters. You may withdraw that consent at any time, provided such withdrawal does not affect our use of your personal information prior to such withdrawal; and (3) _as necessary for our legitimate interest in providing the Services and Applications where those interests do not override your fundamental rights and freedom related to data privacy.

If your Personal Information is subject to the protections offered by EU Law, you may:

- Access, correct, update or request deletion of your personal information at any time by accessing your account online or by contacting us as set forth in Section 17 below;
- Object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information as provided under EU law;
- Withdraw your consent at any time if we have collected and process your personal information with your consent, provided that such withdrawal will not affect any processing conducted prior to receipt of the withdrawal;
- Complain to a data protection authority about our collection and use of your personal information.

To exercise any of these rights please contact us in accordance with the contact details set forth in Section 15 below. Please note that if you are not entitled to the protections of EU Law, these rights do not apply to you.

17. Comments and Questions

If you have a comment or question about this privacy policy, please contact us at: privacy@pac-12.org or Pac-12 Enterprises, ATTN: Legal Department, 360 Third St., 3rd Floor, San Francisco, CA 94107.