

## Privacy Policy

**Effective Date: December 16, 2022**

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 platforms where this privacy policy is posted, including Pac-12.com (the “Sites”), the Pac-12 Now App, and the programs, products, 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 (collectively referred to as “Applications”). Our Policy is in accordance with federal and state laws, including California, Virginia, Colorado, Connecticut, and Utah laws relating to consumer privacy and data protection. By visiting our Sites and using our Applications, you agree that your personal information and sensitive personal information will be handled as described in this Policy, which is incorporated by reference into the Terms and Conditions of 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 and Applications, but in some cases, we may collect information about you from third parties.

We may collect the following types and categories of personal information and sensitive personal information directly from you:

- Registration information you provide when you download our Applications or create an account on the Sites or Applications, including your name, zip code, e-mail 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 credit card information;
- Information you provide on social media sites or 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 media, social networking sites, or link your profile on a third-party site or platform with your registration account;
- Geolocation information when you visit our Sites or use our Applications, including city, zip code, and IP address 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 access this information; and
- Usage, viewing and technical data, including your device identifier or IP address, when you visit our Sites, use our Applications, use third-party sites or platforms, or open e-mails we send. We may aggregate data such as the total number of users that view content through the Sites or Applications, the type of content

users are viewing, or the length of time spent viewing the content.

### *User Generated Content*

Any information, including personal information and sensitive personal information, that you post to public areas of our Sites or Applications may be viewable by other visitors to our Sites or Applications. 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 available to the public. 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 publicly to the Sites or Applications.

### *Information We Collect About You From Third Parties*

We also may collect information, including personal information and sensitive personal 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 the 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 personal information and sensitive personal information, about you when you visit our Sites and Applications and receive e-mails 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 "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 personal information and sensitive personal information, that we collect about you.

Please keep in mind that when you provide information to us on a third-party site or platform, the information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this Policy and the information that the third-party site or platform collects is subject to the third-party site or platform's privacy policies. 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 Sites and Applications.

## **2. Purpose and Use of Your Information**

We may use the personal information and sensitive personal 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;
- Detect, investigate, and prevent activities that may violate our policies or be illegal; and/or
- Confirm that you are 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 personal information and sensitive personal 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 and Conditions, to protect our rights and property and the rights and property of our users 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 Rights**

We provide you the ability to exercise certain rights regarding our collection, use, processing, and sharing of your information. In accordance with state laws, you have the right to do any of the following:

- You may access and obtain a copy of your personal information and sensitive personal information;
- You may correct inaccurate personal information and sensitive personal information;
- You may confirm whether or not we process your personal information and sensitive personal information;
- You may opt-out of the sale of personal information and sensitive personal information to third parties and the use of personal information and sensitive personal information for targeted advertising; and/or
- You may delete your personal information and sensitive personal information and request third parties with whom we have shared the personal information and sensitive personal information to do the same.

You may exercise your rights regarding your personal information and sensitive personal information, by accessing your account profile if you have an account, contacting us as set forth in Section 17 below, filling out the form at <https://pac-12.com/ccpa>, 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 and sensitive 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.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded, and state law allows us to do so. 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.

If you have questions regarding the specific personal information and sensitive personal information about you that we process or retain, please contact us at [privacy@pac-12.org](mailto:privacy@pac-12.org). For additional rights under applicable European Union data protection laws, please see Section 16 below.

#### **5. Exercising Your Rights**

You may exercise your rights regarding your personal information and sensitive personal information, by accessing your account profile if you have an account, contacting us as set forth in Section 17 below, filling out the form at <https://pac-12.com/ccpa>, or following instructions provided in communications sent to you. We will respond to your request within 45 days and will use reasonable efforts to accommodate your request and will explain when we are not able to do so. If we require more time (up to 45 additional days), we will inform you of the reason and extension period in writing within 45 days of our receipt of the request. If we cannot complete your request, then we will contact you with the reason why we cannot comply with your request. If you believe that our failure to comply with your request was inaccurate, you may submit an appeal by sending an e-mail to [privacy@pac-12.org](mailto:privacy@pac-12.org) with an explanation of your reasoning why our denial was inaccurate. We will respond to your appeals request within 45 days of our receipt of your appeal. Please be aware that, if you do not allow us to collect personal information and sensitive 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 and sensitive personal information about you that we process or retain, please contact us at [privacy@pac-12.org](mailto:privacy@pac-12.org). For additional rights under applicable European Union data protection laws, please see Section 16 below.

## 6. Non-Discrimination

We will not discriminate against you for exercising any of your rights regarding our collection, use, processing, and sharing of your information. Unless permitted by state 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; or
- 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. Cookies and Other Tracking Technologies

When you interact with our Sites and Applications, we strive to make your experience easy and meaningful. We and our service providers and third-party vendors use cookies, web beacons (including clear GIFs), Flash Local Storage Objects (“Flash LSOs”), and other similar technologies to track user activity and collect website and application data. We may combine this data with the personal information and sensitive 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 service providers and third-party vendors 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. We use session-based cookies, persistent cookies, and we also allow third party 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 and 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-party vendors to track and analyze non-personal information, non-sensitive personal information, personal information, sensitive personal information, website data, and to serve advertisements. To do so, we may permit third-party vendors 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-party vendors to help us administer and improve the quality of the Sites and Applications and to analyze site usage. Such third-party vendors may combine the information that we provide about you with other information that they have collected. These third-party vendors 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 the 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 and Other Tracking Technologies statement in this section.

*Local Storage Objects.* We and our third-party service providers may use Flash LSOs in order to store your site preferences, to personalize your visit or to display content based upon what you view on our Sites. 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 LSOs.

*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, web beacons are embedded invisibly on web pages. We may use web beacons in connection with our Sites and Applications to, among other things, track the activities of

visitors, help us manage content, and compile statistics about website usage. We and our service providers and third-party vendors also use web beacons 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 and Other Tracking Technologies statement in this section.

*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 or sensitive 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-party vendors 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 may be based on the collection of personal information, sensitive personal information, and other information based on the collection of aggregate information. Please see the bottom of this section for opt-out information.

We use third-party vendors such as network advertisers to serve advertisements on our Sites and Applications. Network advertisers are third-party vendors that display advertisements based on your visits to our Sites and Applications and other websites and applications you have visited. This tool enables us and these third-party vendors 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, including personal information, sensitive personal information, non-personal information, and non-sensitive personal information.

**You may opt-out of many third-party ad networks. The Network Advertising Initiative (“NAI”) website <https://thenai.org/opt-out/browser-opt-out/> provides information regarding browser opt-outs, and your choices regarding having this information used by these companies, including how to “opt-out” of third-party advertising 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 advertising 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 will no longer deliver targeted content or advertisements to you, but it does not mean you will no longer receive any targeted content or advertisements 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 an opt-out page, or you subsequently erase your cookies, use a different computer, or change web browsers, then 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 the age of 13 and we do not knowingly collect personal information or sensitive personal information from children under the age of 13.

## **9. Data Security and Integrity**

The security, integrity and confidentiality of your personal information and sensitive personal information are extremely important to us. We have implemented technical, administrative and physical security measures that are designed to protect personal information and sensitive 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 personal information and sensitive personal information we collect about you 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 Union or that your country of residence may provide. Your consent is voluntary. If, however, you do not consent, then we may not be able to provide you with our services, Sites 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 and privacy 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 sales 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 and privacy practices of these Pac-12 member institutions websites. In addition, certain 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 and privacy practices.

#### **12. Privacy Policy Changes**

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

#### **13. Terms and Conditions**

Your use of our Sites, Applications, or services, as well as any dispute over our privacy practices, 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 Policy and applies solely to California Residents. This notice is adopted to comply with the California Consumer Privacy Act of 2018 and as amended by the California Privacy Rights Act of 2020 (collectively referred to as the "CCPA"). Any terms defined in the CCPA have the same meaning when used in this notice.

##### **A) Information We Collect**

We collect personal information and sensitive personal information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. The table below shows the categories of personal information and sensitive personal information that we have and have not collected 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, e-mail address, account name, account login information, 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.   | YES       |
| 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, for example:
  - 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; and
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), 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 and sensitive 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](http://www.pac-12.com)). For example, from submissions through our website portal or website usage details collected automatically.
- From service providers and third-party vendors that interact with us in connection with the services we perform.

#### B) Use of Personal Information and Sensitive Personal Information

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

- To fulfill or meet the reason for which the personal information or sensitive personal information is provided. For example, if you provide us with personal information or sensitive personal information in order for us to prepare a tax return, we will use that personal information or sensitive personal 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 e-mail 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, sensitive 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 and sensitive personal information held by us is among the assets transferred.

#### C) Sharing Personal Information and Sensitive Personal Information

We may disclose your personal information and sensitive personal information to a third-party service provider or vendor for a business purpose. When we disclose personal information and sensitive personal information for a business purpose, we enter a contract with terms and conditions that meets the requirements of third party contracts under the CCPA, including data processing instructions, describing the purpose of the processing, type and duration of personal information and sensitive personal information processed, confidentiality, security, audit inspections, the return of personal information and sensitive personal information, and subcontractor compliance.



In the preceding twelve (12) months, we have disclosed the following categories of personal information and sensitive personal information with service providers and third-party vendors 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 and sensitive personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third-Party vendors to whom you or your agents authorize us to disclose your personal information and sensitive personal information in connection with products or services we provide to you.

Note that service providers and third-party vendors may independently collect personal information and sensitive 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-party vendors for different use cases, each of which may control collection of your personal information and sensitive personal information:

- Campaign Monitor, used for managing e-mails. (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 or sensitive personal information or processed personal information and sensitive personal information for targeted advertising.

## D) Your Rights

The CCPA provides consumers that are California residents with specific rights regarding their personal information and sensitive 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 and obtain certain information about our collection and use of your personal information and sensitive personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information and sensitive personal information we collected about you.
- The categories of sources for the personal information and sensitive personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information and sensitive personal information.
- The categories of service providers and third-party vendors with whom we share that personal information and sensitive personal information
- The specific pieces of personal information and sensitive personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information or sensitive personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information and sensitive personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information and sensitive personal information categories that each category of recipient obtained.

### *Correct Information*

You have the right to request that we correct any incorrect personal information or sensitive personal information about you that we collect.

### *Confirm Processing of Information*

You have the right to confirm if we process personal information and sensitive personal information about you.

### *Opt-Out of the Sale and Use*

You have the right to opt-out of our sale of your personal information and sensitive personal information and opt-out of our use or our service providers or vendors use of your personal information and sensitive personal information for targeted ads.

### *Deletion Request Rights*

You have the right to request that we delete any of your personal information or sensitive 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 and vendors to delete) your personal information and sensitive 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 or sensitive 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 Your Rights*

To exercise your rights and submit a request as described above, please submit a verifiable consumer request to us at <https://pac-12.com/ccpa> or e-mail us at [privacy@pac-12.org](mailto:privacy@pac-12.org).

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 or sensitive 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 or an authorized representative of the person about whom we collected personal information or sensitive personal information; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond.

We cannot respond to your request or provide you with personal information or sensitive 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 and sensitive personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the 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; or
- 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 Policy

We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will provide a notice on our Sites and Applications, as applicable.

### 15. Information Retention

As a general rule, your personal information and sensitive personal information will not be retained longer than permitted by applicable law or longer than necessary to fulfil our purposes for processing your personal information or sensitive personal information, which are stated above in Section 2 "Purpose and Use of Your Information", unless we are required or believe it necessary to retain such personal information or sensitive personal information for legal, accounting, audit, compliance, or back-up purposes. For example, if you sign up for our newsletter, we will keep your e-mail 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 e-mail for that purpose, although we may retain the e-mail address if necessary for compliance purposes in accordance with state law.

### 16. Special Information for EU Data Subjects

For those persons whose personal information and sensitive 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 and sensitive personal information: (1) to provide our services or perform our contracts or legal obligations with you (for example, we collect your personal information and sensitive personal information to be able to provide and authenticate you as a user of the Pac-12 Now App); (2) if we have received your consent (such as your consent to use your e-mail 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 and sensitive personal information prior to such withdrawal); and (3) as necessary for our legitimate interest in providing the services, Sites, and Applications where those interests do not override your fundamental rights and freedom related to data privacy laws.

If your personal information and sensitive personal information is subject to the protections offered by EU Law, you may:

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

personal information.

To exercise any of these rights please contact us in accordance with the contact details set forth in Section 17 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 Policy or your consumer request, please contact us at: [privacy@pac-12.org](mailto:privacy@pac-12.org).

Last Updated: December 16, 2022