

This policy was last updated on **December 31, 2019**.

### **Globe Privacy Policy**

Boston Globe Media Partners (“Boston Globe”), including our affiliates and subsidiaries, respects your privacy and are committed to protecting your Personal Information (defined below). This Privacy Policy will let you know how we collect, use, process, maintain, and share your Personal Information, as well as your choices regarding the use, access, and correction of your Personal Information.

We encourage you to read this Privacy Policy together with any other privacy policy or fair processing notice we may provide when we are collecting or processing Personal Information about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other policies and is not intended to override them.

### **I. IMPORTANT INFORMATION AND WHO WE ARE**

Boston Globe Media Partners is made up of different legal entities, including our affiliates and subsidiaries. These entities include our websites (including Boston.com, BostonGlobe.com, statnews.com, statplus.com, and other websites controlled by the Boston Globe or our affiliates), mobile applications or “apps” (including Boston Globe ePaper, Boston.com, and any current or future apps of Boston Globe Media Partners or our affiliates), social media channels, electronic newsletters, and other Boston Globe digital properties (the “Digital Properties”), the Boston Globe newspaper and our other print publications, and any of our other products or services (podcasts, classified ads, events, contests and promotions, surveys, and the like). These are collectively referred to as “Services.”

“Personal Information” is information that can be used to identify you, directly or indirectly, alone or together with other information. Personal Information may include, but is not limited to, your name, physical addresses, telephone numbers, e-mail addresses, company affiliations, and associated interests. Personal Information does not include anonymous data, such as where the identity of an individual has been irretrievably removed. “Aggregated Data”, such as statistical or demographic data, may be derived from your Personal Information, but does not reveal your identity.

#### **Children’s Online Privacy Protection.**

In accordance with the Children’s Online Privacy Protection Act we do not knowingly collect or store any Personal Information for children under the age of 13. If you are under 13, please do not provide us any personally identifying information.

#### **Third party links and applications.**

Our Digital Properties may include links to third party websites, platforms, plug-ins, and applications. We do not control these third party websites, platforms, and applications and are not responsible for their privacy policies. We encourage you to read the privacy notice of every website you visit or application you use when you leave our Digital Properties.

### **II. WHAT CATEGORIES OF PERSONAL INFORMATION DO WE GATHER ABOUT YOU?**

We may collect, use, store and transfer different kinds of Personal Information about you which we have grouped together follows:

- **Identity Data** (for example, your first name, last name, username or similar identifier, birth year, gender, or other basic demographic information).
- **Contact Data** (for example, your billing address, delivery address, email address, and phone numbers).
- **Financial Data** (for example, your bank account, payment methods, and transaction details).
- **Technical Data** (for example, your internet protocol (IP) address, internet service provider (ISP), login data, browser type and version, browser language, operating system, date/time stamp, clickstream data, time zone setting and basic geolocation, device type, and other technology on the devices you use to access our Services and Digital Properties).

- **Mobile Device Location Data** (if you use our mobile applications and permit certain precise location settings and permissions, you consent to providing us with access to your precise geolocation information. You may withdraw this consent at any time by turning off those same settings and permissions, but information collected before such withdrawal remains lawful to process.
- **Usage Data** (information about how you use our Digital Properties and Services, including, for example, the time and duration of your use or your reading history.).
- **Profile Data** (for example, your unique login details, purchases, orders, interests, preferences, feedback, and survey responses).
- **Marketing and Communications Data** (for example, your preferences in receiving marketing from us and our third parties, if any, and your communication preferences).

**If you fail to provide Personal Information.**

Where we need to collect Personal Information by law, under the terms of a contract we have with you, or for our legitimate interests, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time. We do, however, ask that you do not send us any sensitive personal information, such as a race, health or social security numbers.

**III. HOW IS YOUR PERSONAL INFORMATION RECEIVED, COLLECTED, AND USED?**

We may collect and receive your Personal Information from you, third parties, and online or offline public resources. Additionally, we may combine your Personal Information from multiple sources. For information on how we share Personal Information, see Section IV. We use your Personal Information in different situations, **including:**

- 1. To Provide Services/Products.** We may collect and use your Personal Information to process your order and provide Services, including in order to maintain, support, personalize, and improve our Services and Digital Properties, deliver and provide the requested Services, communicate with you about those Services, discuss your account or renew your subscription, and comply with and enforce contractual obligations.
- 2. To Provide Relevant Personalized Information about Boston Globe Services.** We may collect and use your Personal Information in order to provide you with information about a Globe Service that may be of interest to you, major changes to Boston Globe properties, an upcoming event, or other marketing communications on our behalf, and we may share your information between Boston Globe entities, affiliates and third party service providers (who have your permission) for these purposes.
- 3. To Deliver Targeted Advertising from the Boston Globe and Our Partners.** We may collect and use your Personal Information to communicate with you about products and services that may be of interest to you, and which may be provided by the Boston Globe, or by our advertisers, partners, third party marketing partners, or other third parties. You can manage which communications you would prefer to receive, or elect to not receive these direct marketing communications by: a) not initially selecting the option provided to receive such communications, b) using the unsubscribe link in a direct marketing email, or c) emailing us at support@bostonglobe.com. Subscribers to The Boston Globe may also adjust their newsletter preferences within the Member Center. Please note that some Boston Globe and third party advertising is contained within newsletters to which you can subscribe that contain editorial content. This advertising is not targeted at you, but is sent to all subscribers to the particular newsletter. If you would like to avoid this advertising, you must opt out of the newsletter. If you wish to opt out of receiving any direct mail or telephone solicitations from the Boston Globe, you may notify us by calling 617-929-2233 or mailing csadvocate@globe.com. In such cases, it will remain necessary for us to process your Personal Information to the extent it is needed to maintain a suppression list, and we may also be required to disclose your opt-out information to third parties so they can suppress your name from future solicitations. Also, if you are a subscriber to our products or services, you will continue to receive information and communications pertaining to your Boston Globe account and/or Boston Globe services even where you have opted out of marketing communications.
- 4. Inquiry/Request Response.** We may collect your Personal Information when you contact us for information or support for our Digital Properties, Services, or other information, in order to respond and provide the appropriate assistance and response.
- 5. Purchasing a Classified Ad.** We may collect Personal Information from you, for example your Contact and Financial Data, when processing your purchase of a classified ad.
- 6. Participating in Promotions.** We may need to collect your Personal Information, such as your name and email, from you when you participate in sweepstakes, contests or special offers.
- 7. Surveys, Feedback, Testimonials, and Exemplars.** We may collect your Personal Information when you choose to engage with us in a consumer panel, survey, or otherwise give us feedback. Also, we may use reader testimonials

or exemplars in or on our Digital Properties, publications, or other Boston Globe marketing materials, which may require the inclusion of Personal Information, such as your name, photograph, or other Profile Data.

**8. Monitor Digital Properties Usage, Trends, and Experience.** When you interact with our digital properties, or by email, we may automatically collect, or facilitate the collection of, Personal Information on your interactions with us and our Digital Properties and about your equipment. For example, we may collect Personal Information by using first and third party cookies, Flash cookies, HTML5 local storage, server logs, web beacons, clear gifs, and other similar technologies. We use these automated technologies to collect Personal Information because some are strictly necessary for the core functionality of our Digital Properties and providing our Services, including performance analytics, personalization, and online security. For certain Digital Properties, we may tailor your interactions with our Digital Properties when you are logged in using your user account by remembering information you entered on our websites or to provide information you requested on our Digital Properties, including subscriber content access. These cookies also help us know where you have indicated certain advertising preferences to ensure they are honored. We also use functional cookies and technologies to help us improve our reader experience with our Digital Properties and Services. Finally, with your consent (depending on your settings), we may use cookies for advertising purposes, which could include helping us collect your Technical, Usage, and Profile Data if you visit other websites employing our cookies, or to allow us to deliver relevant, personalized advertisements and content to you on our Digital Properties, Services, and other third party sites. For more information about our use of cookies and how you can manage your settings, please see Frequently Asked Questions about Cookies for [bostonglobe.com](#) and [Boston.com](#) and for STAT. In addition to disabling cookies and other tracking technologies, you may learn about targeted advertising generally and opt out of receiving targeted advertising by visiting websites operated by the Digital Advertising Alliance.

**9. Vendors, Consultants, and other Service Providers.** We may use your Personal Information in connection with the operation of our business and the Services we provide you, including for the functionality and security of our Digital Properties and other Boston Globe properties, to improve our Digital Properties, Services, and content, and to provide you with enhanced experiences. These third parties and public sources could include: our business partners, subcontractors in technical, payment, and delivery services, advertising networks, analytics providers, marketing partners, search information providers, social media platforms, or credit reference agencies. A third party service provider may, for example, use cookies to build individual reader profiles, which we use to provide you with tailored content, advertising, and messaging. You may also manage some of the automated technologies being used for these purposes, and your preferences, which is explained further in our Cookie FAQ.

**10. Third Party Sites.** We may allow you to register and pay for third party products and services or otherwise interact with a third party's website, mobile application, or digital property (collectively "Third Party Sites") through our own Digital Properties. For example, listening to podcasts on our website is done through SoundCloud. When you do so, we may collect Personal Information you share with Third Party Sites depending on that Third Party's privacy practices, practices for which we are not responsible and do not control.

**11. Marketing and Advertisers.** We may collect your Personal Information to inform advertisers, sponsors or affiliates about the number and nature of our subscribers and readers or unique views to ads or webpages.

**12. When we provide you geographically relevant Services, offers, or advertising.** With your consent, which may be provided when you enable certain features on your mobile or electronic device, we may collect your Mobile Device Location Data, and use such data to provide you with content, Services, offers, or advertising through your app or device that are relevant to your precise location. We may also use such information to improve our Digital Properties, content, and Services. This location data is stored on your mobile device, unless you elect to have it saved to your search history and stored on our servers. You may withdraw your consent at any time by changing the settings on your apps but such withdrawal will have no impact on the lawfulness of the prior processing. Please note some features and functions may not work properly if location services are disabled.

**13. Social Media Platforms.** If you log into our Services with a social media service or connect a social media account with the Services, we may share your information with that social media service. The social media services' use of the shared information will be governed by the social media services' privacy policy and your social media account settings. If you do not want your information shared in this way, do not connect your social media service account with your Services.

**14. Events.** We may collect or receive your Personal Information when you register for or attend an event hosted or sponsored by us. If the event is in partnership with a third party, we may share your Personal Information with that interested party, so they can, for example, maintain an attendance list, or contact you with event details. We will not share your information with them for their marketing purposes without your consent, which may be obtained at the time of your registration or through a supplemental privacy notice, but will not be required in order to attend.

**15. Creating a Public Profile.** We may collect your Personal Information, such as content ID, and Profile Data, when you create a "Public Profile" or when you provide information in order to comment on any of our Digital Properties.

If you create a Public Profile with us to comment on articles or share content on our forums or discussion groups, the information that you share becomes public.

**16. Online Forum Engagement.** Whether or not you created a Public Profile, we may collect your Personal Information when you engage with our websites, digital properties, and online communities. This may occur when you click on advertisements, interact with our social media pages, submit content, leave reviews, or otherwise enter information into comment fields, blogs, message boards, events, and other online forums sponsored by or affiliated with the Boston Globe. Please note that our online forums are public. For additional information, please view the Terms of Service.

**17. To verify and/or authenticate an identity, access rights, privileges, etc.** For example, we may use Personal Information to authenticate and permit online access to subscriber and/or user account information.

**18. At your Direction.** We may collect and use your Personal Information at your direction or as otherwise needed to fulfill the purposes for which you provided the Personal Information.

**19. Other Business-Related Purposes.** For other business-related purposes permitted or required under applicable local law and regulation or to enforce our agreements, policies, and terms of service.

**20. Government Reporting/Audit/Requests Requirements.** We may use or share Personal Information in order to satisfy governmental reporting, tax, and other requirements, as required by law. This may include having to meet U.S. national security or law enforcement, regulatory, or self-regulatory requirements.

**21. As otherwise obligated by law.** For example, pursuant to a subpoena or similar legal process compliance, if we have a good faith belief the disclosure is legally necessary for the protection of rights, safety, or fraud investigations, to protect the Boston Globe, you, our readers and subscribers, or the public from harm or illegal activities.

**22. Emergency.** To respond to an emergency which we believe in good faith requires us to assist in preventing the death or serious bodily injury of any person.

**23. Consent.** If we otherwise notify you and you consent to the sharing.

### **Third Party Personal Information.**

Before you disclose the Personal Information of another person, you must obtain that person's consent to both the disclosure and the processing of that information in accordance with this Privacy Policy. If you choose to provide us with that Personal Information, you represent that you have that other person's permission to do so.

### **Change of purpose.**

We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us, as set forth in Section X of this Privacy Policy.

## **IV. WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

Except as set out in this Privacy Policy or as required by law, we do not sell, license, rent, or swap your Personal Information without your permission. We may have to share your Personal Information with the categories and types of parties set out herein for the purposes outlined in Section III. We require all third parties to respect the security of your Personal Information and to treat it in accordance with the applicable law. Here are some examples of how we may share your information:

**1. Boston Globe entities.** Your Personal Information may be shared among Boston Globe entities to provide our Services and to better understand our business, analyze our operations, improve the Services, and to develop new Services to support our business and journalism goals.

**2. Service Providers and Vendors.** We contract with service providers to help us with credit card and bill processing, shipping, email distribution, list processing, analytics and promotions management, and ad serving. We provide service providers only with the information they need to perform their services. We prohibit them from sharing, reselling, or using our data for their own marketing purposes. For example, if you are a print subscriber or registered member of The Boston Globe, we may share your email address with a service provider necessary to send you emails (including newsletters) on our behalf. That service provider may not share your email address or Personal Information with other companies, and may only send you emails on behalf of the Boston Globe.

**3. Social Media Platforms.** We may use widgets and tools from third party social media platforms on our Digital Properties to enable sharing and other functions through social media platforms, which facilitates the collection and sharing of your Personal Information by these social media platforms governed by their privacy policies.

**4. Promotions, Contests, Surveys, and Events.** We may facilitate the collection of, or share your Personal Information with a third party service provider, vendor, co-host, co-sponsor, or the like when we conduct, administer, host, or

co-sponsor promotions, contests, surveys, or events.

**5. Marketing and Advertising Partners.** We share personal data with third parties for marketing and advertising, such as Google and Facebook, so they can assist us in promoting our Services on and off our Digital Properties to current and future readers and subscribers through targeted advertisements.

**6. Third Party Advertisers.** We may use your Personal Information to share aggregated statistical, demographic and marketing analyses of readers and their browsing and purchasing patterns with third party advertisers to inform them about the nature of our reader base. Such aggregated data does not contain Personal Information.

**7. Merger or Acquisition Partners.** We may share your Personal Information with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may acquire other businesses or merge with them. If a merger or acquisition occurs, then the new owners may use your Personal Information in the same way as set out in this Privacy Policy.

**8. With other third parties, as required for legal compliance, law enforcement, public safety, or security purposes.** For example, we may disclose your Personal Information if we have a good faith belief that disclosure is necessary to comply with the law or with legal process, such as to comply with a subpoena, protect and defend our rights and property, to protect against misuse or unauthorized use of our websites, or to protect the personal safety or property of our users or the public.

### **9. California Privacy Rights.**

To the extent we sell your personal information as the term “sell” is defined under the California Consumer Privacy Act, you have the right to opt-out of the sale of your personal information by us to third parties at any time. You may submit a request to opt-out by clicking Do Not Sell My Personal Information. You may also submit a request to opt-out by mailing your request to us at Boston Globe Media Partners, LLC, 39B Teed Drive, Randolph, MA 02368-4201, attn: “CCPA Request”. We participate in the IAB CCPA Compliance Framework for Publishers & Technology Companies (“IAB Framework”). This means that where you exercise your right to opt-out of the sale your personal information by clicking Do Not Sell My Personal Information, to the extent we sell your personal information in order to deliver ads tailored to your interests, we will notify downstream participants of the IAB Framework that receive personal information about you to only use your personal information for those specific and limited purposes that are permitted under the IAB Framework. Please note that the scope of the IAB Framework opt-out may only apply to personal information from the specific browser or device from which you opt-out. In addition, exercising your right to opt-out of the sale of your personal information does not mean that you will stop seeing ads or that you will stop seeing interest-based ads. To learn more about interest-based advertising across sites and additional opt-out choices, you should visit one or more of the following industry opt-out links: <http://optout.aboutads.info/#/>, <http://optout.networkadvertising.org/#/>, and <http://www.aboutads.info/appchoices>). Where you opt-out of the sale for purposes of the CCPA, but do not opt-out of interest-based advertising more generally, you may continue to receive ads tailored to your interests based upon personal information not sold by us, sold to other IAB participants at least 90 days before you opted out, or sold by other sources from which you have not opted out. We are not responsible for any downstream participants’ compliance with the IAB Framework or the accuracy of their privacy policies or statements regarding their opt-out options or programs. If you are a California resident, you also have the right, under California Civil Code Section 1798.83, to request and obtain from us, once a year and free of charge, a list of the third parties to whom we have disclosed Personal Information for their direct marketing purposes in the prior calendar year. Please email requests for such information to [feedback@boston.com](mailto:feedback@boston.com).

## **V. INTERNATIONAL TRANSFERS (EU/EEA, UK, AND OTHER APPLICABLE JURISDICTIONS)**

The Boston Globe is headquartered and operates in the United States, and many of our external third parties are based outside the EU/EEA. In order to perform our contractual obligations with you, if any, as well as for operational and other legitimate interest reasons, we may process, store, and transfer Personal Information in a country which may be outside of your own, such as the United States. By providing us with your Personal Information you acknowledge such transfer of information out of your jurisdiction. If you do not wish for certain Personal Information to be so transferred, please do not provide your Personal Information to us and/or take such steps described herein to prevent the collection of your Personal Information. Please note in your doing so, and without such information, we may be unable to provide Services to you. If you have any questions, please contact us.

## **VI. DATA INTEGRITY AND SECURITY**

We have put in place commercially appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed, and to maintain its accuracy and integrity. While no security is impenetrable, we implement and maintain commercially appropriate technical, physical, administrative, and organizational measures to ensure a level of security appropriate to the risk for our use

of the Personal Information, taking into account the state of the art, the costs of implementation, and the nature, scope, context, and purposes of processing. For Personal Information of EU/EEA and UK residents, we also take into account the risk of varying likelihood and severity for the rights and freedoms of individuals. Boston Globe personnel receive training, as applicable, to effectively implement our privacy policies. We have put in place procedures to deal with any suspected personal information breach and will notify you and/or any applicable regulator of a breach where we are legally required to do so.

## **II. MINIMIZATION, RETENTION, AND DELETION OF PERSONAL INFORMATION**

We will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including, for example, for so long as we provide you with Services, and for the purposes of satisfying any legal (including but not limited to enforcement of agreements or resolving disputes), accounting, or reporting requirements.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymize your Personal Information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **VIII. EU/EEA AND UK SPECIFIC CLAUSES**

### **Lawful Basis for Processing (EU/EEA; UK)**

Regardless of your jurisdiction, we will only use your Personal Information when the law allows us to. That said, if you are a resident of the EU/EEA or the United Kingdom, our lawful basis for collecting and using your Personal Information will depend on the Personal Information concerned and the specific context in which we collect it. Generally, we will not collect or access any Personal Information other than in the manner described above.

What we mean by legitimate interests is the interest of our business in conducting, managing, and growing our business to enable us to give you the best and most secure experience with our Services or Digital Properties. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your information. If you would like to get more information on how we balance legitimate interests or the specific legal ground we are relying on, please contact us.

Where we rely upon your consent to process the Personal Information, you have the right to withdraw or decline your consent at any time. We do not generally rely on consent as a legal basis other than in relation to sending third party direct marketing communications to you via email. You may withdraw consent to marketing at any time by contacting us at [support@bostonglobe.com](mailto:support@bostonglobe.com), or by using any of the relevant methods described in Section III. Please note that this does not affect the lawfulness of the processing based on consent before its withdrawal.

### **Your Data Subject Rights (EU/EEA and UK)**

Under certain circumstances, you have rights under applicable data protection laws with respect to Personal Information we knowingly collected.

We will try to comply with any of these requests pertaining to your Personal Information in accordance with applicable law. As a security measure, we may need to verify your identity before acting on your request. We may also contact you to ask you for further information in relation to your request to speed up our response. Please recognize that in certain circumstances we may be unable to provide the access or information sought, or correction or deletion requested. This may be because a request would require us to release commercial confidential information, disclose Personal Information relating to another person that is not the requestor, or would result in impractic-

cability, excessive redundancy, and/or an undue burden or expense to the Boston Globe.

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if it is clear that your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

- **Choice.** The Boston Globe enables its readers and subscribers to determine certain privacy preferences and settings that can serve to modify the Personal Information collected. These are described in detail in Section III of this policy.
- **Right to Access.** A person who has provided his or her Personal Information directly to us may have certain access to their Personal Information and to check that we are lawfully processing it.
- **Correction.** You may request correction of any incorrect or inaccurate Personal Information that we hold about you. Any such corrections must be truthful, complete, and accurate. In your request, please be as clear as possible what Personal Information you have provided to us and what Personal Information you would like corrected.
- **Erase.** You may request that we will delete the Personal Information that we hold about you. In your request, please be as clear as possible what Personal Information you have provided to us and what Personal Information you would like deleted. If you ask us to delete your information before we have used it for the necessary purposes set out in this policy, we may not be able to do so, due to technical, legal, regulatory and contractual constraints.
- **Object to processing.** You may object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override the potential impacts.
- **Restriction.** You may request restriction of processing of your personal data which enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (c) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Transfer.** You can request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent.** You may withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our privacy manager at:

**Email:** [feedback@boston.com](mailto:feedback@boston.com) or [support@bostonglobe.com](mailto:support@bostonglobe.com).

**Phone:** 617-929-7900 (between 9:00am and 5:30pm EST)

**Fax:** 617-929-7975, Attention Privacy Manager

**Mail:** 1 Exchange Place, Boston, MA 02109, Attention Privacy Manager

### **Complaints in the first instance.**

Subject to applicable law, EU/EEA residents, including the United Kingdom, who believe we maintain their Personal Information within the scope of the applicable privacy laws have a right to make a complaint at any time to their local supervisory authority or to the Information Commissioner's Office, the UK Supervisory Authority, for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## **IX. ACCEPTANCE AND CHANGES TO THIS POLICY**

By using the Boston Globe's Services and Digital Properties, and/or submitting any of your Personal Information to us, you agree to the terms of this Privacy Policy. Please do not send us any Personal Information you do not want used in this way. This Privacy Policy may be amended from time to time, consistent with the applicable data protection and privacy laws and principles. We will make you aware of changes to this Privacy Policy either by posting to our intranet, through email, or other means, particularly prior to any material changes becoming effective. We reserve the right to modify this Privacy Policy at any time, so please review it frequently. If you do not wish your information to be subject to the revised Privacy Policy, you will need to deactivate any accounts with us and stop using our Digital Properties and Services. Your continued use of our Digital Properties and Services after the posting of such changes will constitute your consent to such changes.

## **X. WHO SHOULD YOU CONTACT IF YOU HAVE QUESTIONS?**

For questions or concerns about this Privacy Policy or our security practices: If you have any questions or concerns about this Privacy Policy, or are seeking to exercise any of your statutory rights, please contact the data privacy manager using the details below.

**Email:** [feedback@boston.com](mailto:feedback@boston.com) or [support@bostonglobe.com](mailto:support@bostonglobe.com).

**Phone:** 617-929-7900 (between 9:00am and 5:30pm EST)

**Fax:** 617-929-7975, Attention Privacy Manager

**Mail:** 1 Exchange Place, Boston, MA 02109, Attention Privacy Manager

**Updates to Personal Information:** If you would like to update your Personal Information, or if you no longer desire our services, you can contact our privacy manager at the above contact information. Subscribers to The Boston Globe may also revise their Personal Information within the Member Center and subscribers to STAT Plus may revise their Personal Information within the "My Account" page.

**Unsubscribe Requests:** If you would like to unsubscribe from our email lists, you can do so by clicking the link to "unsubscribe" at the bottom of any email from us or by emailing [support@boston.com](mailto:support@boston.com) and providing all of your email addresses that could appear on our email lists, as well as the name of the newsletter from which you would like to unsubscribe. Subscribers to The Boston Globe may also manage their newsletters choices within the Member Center.