

Website Privacy Policy

Introduction

Entertainment Benefits Group, LLC d/b/a ebg (“**ebg**” or “**We**”) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website www.ebgsolutions.com (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email and other electronic messages between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.
- Offline, in accordance with relevant law, including, but not limited to, the California Consumer Privacy Act of 2018 (“**CCPA**”).

It does not apply to information collected by:

- Any other website operated by ebg or any third party (including our affiliates and subsidiaries); or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see *Changes to Our Privacy Policy*). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children

Our Website is not intended for children, as defined under applicable law. Children may not provide any information to or on the Website. We do not knowingly collect personal information from children. If we learn we have collected or received personal information from a child without verification of parental consent, we will delete that information

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, e-mail address, telephone number, and other identifiers by which you may be contacted online or offline ("**personal information**"); and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, talent acquisition software providers.

Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide when you contact us, including your first name, last name, company, job title, email address, telephone number, information related to what you are interested in, and records and copies of your correspondence with us.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). See *Choices about How We Use and Disclose Your Information* for information on how we respond to web browser signals and other mechanisms that enable users to exercise choice about behavioral tracking.

The information we collect automatically helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit ebg, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain Website content and verifying system and server integrity).

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across devices and different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see *Choices about How We Use and Disclose Your Information*.

Information that We Collect from Third Parties

We may also collect information from third parties, such as talent acquisition software providers and background screening providers, for the purposes of enabling you to apply for employment opportunities with ebg and monitoring equal opportunity. This information may include your name, address, email address, telephone number, contact information, employment details (including employment history, employment references, and salary and other compensation requests), educational background, credit history and criminal background screenings (both where relevant to your application and permitted under applicable law), salary history, race, ethnicity, gender, disability status, and any other information you may provide in connection with the hiring process.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To collect and process applications for employment and monitor for equal opportunity.
- To facilitate advertising and marketing activities.
- To understand how our visitors use the Website and to improve and optimize its content, function, services, and presentation.
- To maintain the Website and troubleshoot problems.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including our Terms of Use, located *here*.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please see *Choices about How We Use and Disclose Your Information*.

Our legal bases for processing your information include:

- your consent;
- exercising our rights and performing our obligations in connection with entering into or performing under any contract we make with you;
- compliance with our legal obligations; and
- our legitimate interests that are not overridden by your interests or your fundamental rights and freedoms, like research and development, to market and promote our services, and to protect our legal rights and interests.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business, including customer relationship management platforms, data analytics providers, social networks (including links to our Facebook, Instagram, and Twitter pages), and technology providers.

- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of ebg's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by ebg about our Website users is among the assets transferred.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use, located *here*.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of ebg, our customers, or others.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. ebg does not respond to Do-Not-Track signals at this time; however, we have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.

Google Analytics collects personal data through the Website, including through the use of cookies. For information about how Google Analytics collects and processes data, please visit: <https://policies.google.com/technologies/partner-sites>. To opt out of having your information used by Google Analytics, please visit: <https://tools.google.com/dlpage/gaoptout/>. For more information, please visit Google's privacy policy at: <https://policies.google.com/privacy?hl=en&fg=1>.

California residents may have additional personal information rights and choices. Please see *Your California Privacy Rights* for more information.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request *here*. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Accessing and Correcting Your Information

You may contact us *here* to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Your California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us *here*, or write us at: Attn: Privacy and Compliance, Legal Department, 19495 Biscayne Boulevard, Suite 300 Aventura, FL 33180.

International Data Transfers

When you use the Website and provide information through the Website, we may transfer your information to a destination outside your jurisdiction, including to the United States. The United States has not received a finding of “adequacy” from the EU under Article 45 of the GDPR (or other analogous international data protection regulations, such as the UK GDPR). ebg relies on the safeguards set forth in Article 46 of the GDPR or derogations for specific situations set forth in Article 49 of the GDPR (or other analogous data transfer mechanisms) in order to transfer personal information across international borders.

Individuals in the European Economic Area (“EEA”) and the UK may request a copy of applicable Article 46 agreements by contacting us at: Attn: Privacy and Compliance, Legal Department, 19495 Biscayne Boulevard, Suite 300 Aventura, FL 33180.

Your Rights

To the extent required by law, ebg provides you with:

- reasonable access to the personal information collected through the Website;
- the ability to review, correct, export, and delete such personal information; and
- the ability to restrict processing of your personal information, or object to its processing.

When the processing of your personal information is based on your consent, you have the right to withdraw your consent at any time, but this will not affect any processing we have already performed. If you withdraw your consent, refuse to provide certain information, or provide inaccurate information, you may not be able to access or utilize all of the features or content available on or through the Website, and we may not be able to fulfill your requests for products or information.

Please contact us using any of the methods identified in the *Contact Information* section if you would like to exercise your individual rights. We may need to obtain or confirm certain personal information in order to accommodate your request. We will not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Individuals in the EEA and UK: In addition to the above rights, you also have the right to lodge a complaint with a supervisory authority (EEA) or the Commissioner (UK) if you believe we have

processed your personal information in a manner inconsistent with your privacy rights. We kindly request that you contact us first so that we may address your concern.

Data Security and Retention

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

We retain your information for as long as needed: (i) to conduct business with you; (ii) as needed for the purposes outlined in this Privacy Policy; and (iii) as necessary to comply with our legal obligations, resolve disputes, and enforce any agreements.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you in accordance with applicable law. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

ebg
Attn: Privacy and Compliance, Legal Department
19495 Biscayne Boulevard, Suite 300
Aventura, FL 33180

Or you may contact us *here*.

CCPA Privacy Notice

The following disclosures are made pursuant to the CCPA. These disclosures supplement any privacy notices we previously or contemporaneously provided to you. The below charts reflect the categories of personal information we have collected from California consumers over the past twelve months, the categories of sources from which the information was collected, the business purpose for which the information was collected, and the categories of third parties with whom we shared that information.

Categories of Personal Information Collected	Sources of Collection	Business Purpose for Collection	Categories of Third Parties Receiving Personal Information
Personal identifiers, including your name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, physical characteristics or description, telephone number, education, employment, employment history, or other similar identifiers.	You; Affiliates; Background screening providers; Data analytics providers; Devices you use to access our Website; Social networks; Talent acquisition software providers.	Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; Debugging to identify and repair errors that impair existing intended functionality; Providing you with our products and services; Providing customer service; Providing analytic services; Providing advertising or marketing services; Undertaking internal research for technological development and demonstration; Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by ebg, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by ebg; Collecting and processing applications for employment.	Affiliates; Customer relationship management platforms; Data analytics providers; Social networks; Technology providers.
Characteristics of protected classifications under California or federal law.	You; Affiliates; Background Screening Providers; Data analytics providers; Devices you use to access our Website; Social networks; Talent acquisition software providers.	Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; Debugging to identify and repair errors that impair existing intended functionality; Providing you with our products and services; Providing customer service; Providing analytic services; Undertaking internal research for technological development and demonstration; Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by ebg, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by ebg; Collecting and processing applications for employment.	Affiliates; Data analytics providers; Social networks; Technology providers.
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	You; Data analytics providers; Devices you use to access our Website; Social networks.	Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; Debugging to identify and repair errors that impair existing intended functionality; Providing you with our products and services; Providing customer service; Providing analytic services; Providing advertising or marketing services; Undertaking internal research for technological development and demonstration; Undertaking activities to verify or maintain the quality or safety of a	Affiliates; Customer relationship management platforms; Data analytics providers; Social networks; Technology providers.

Categories of Personal Information Collected	Sources of Collection	Business Purpose for Collection	Categories of Third Parties Receiving Personal Information
Internet and other electronic network activity information including, but not limited to, browsing history, search history, and information about your interactions with internet websites, applications, or advertisements.	You; Affiliates; Data analytics providers; Devices you use to access our Website; Social networks; Talent acquisition software providers.	<p>service or device that is owned, manufactured, manufactured for, or controlled by ebg, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by ebg.</p> <p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; Debugging to identify and repair errors that impair existing intended functionality; Providing you with our products and services; Providing customer service; Providing analytic services; Providing advertising or marketing services; Undertaking internal research for technological development and demonstration; Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by ebg, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by ebg.</p>	Affiliates; Customer relationship management platforms; Data analytics providers; Social networks; Technology providers.
Geolocation data.	You; Data analytics providers; Devices you use to access our Website.	<p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; Debugging to identify and repair errors that impair existing intended functionality; Providing you with our products and services; Providing analytic services; Undertaking internal research for technological development and demonstration; Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by ebg, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by ebg.</p>	Affiliates; Data analytics providers; Social networks; Technology providers.
Professional or employment-related information.	You; Affiliates; Background Screening Providers; Data analytics providers; Devices you use to access our Website; Social networks; Talent acquisition software providers.	Providing you with our products and services; Providing customer service; Collecting and processing applications for employment.	Affiliates; Technology providers.
Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	You; Devices you use to access our Website.	Providing analytic services; Providing advertising or marketing services; Undertaking internal research for technological development and demonstration; Undertaking activities to verify or maintain the quality or safety of a service or device that is	Affiliates; Customer relationship management platforms; Data analytics providers; Social networks.

Categories of Personal Information Collected	Sources of Collection	Business Purpose for Collection	Categories of Third Parties Receiving Personal Information
		owned, manufactured, manufactured for, or controlled by ebg, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by ebg.	

In the past twelve months, we have disclosed personal information to third parties for business purposes. The categories of personal information we have disclosed to third parties for business purposes are identified in the “Categories of Personal Information Collected” columns above. We have disclosed those categories of personal information to the categories of third parties identified in the “Categories of Third Parties Receiving Personal Information” columns above.

Right to Opt Out of Sale

In the past twelve months, we have shared the following categories of information with affiliates, data analytics providers, and social networks, which could be considered a “sale” under California law:

Personal identifiers, characteristics of protected classifications under California or federal law, commercial information, Internet and other electronic network activity information, geolocation data, and inferences drawn from any of the information identified above to create a profile about you.

While we do not sell personal information in exchange for any monetary consideration, we do share personal information for other benefits that could be deemed a “sale,” as defined by the CCPA. The CCPA broadly defines “sale” in a way that may include activities such as the delivery of targeted advertising on websites or allowing third parties to receive certain information, such as cookies, IP address, and/or browsing behavior.

You may also submit a request by calling 888-217-9565 or by completing our webform, available *here*.

You can also control certain of the sharing described above through the choices outlined in *Choices about How We Use and Disclose Your Personal Information* of our Privacy Policy.

An authorized agent can submit a request to opt out on your behalf if you provide the authorized agent your signed written permission to do so or if the authorized agent utilizes your browser to modify your cookie or GPC settings.

We have no actual knowledge of selling the personal information of minors under 16 years of age.

Right to Know

California residents have the right to request that we disclose the categories and specific pieces of personal information we collected, used, disclosed, and sold during the past twelve months, the categories of sources from which their personal information was collected, our business or commercial purposes for collecting their personal information, and the categories of third parties with whom we shared their personal information. California residents or their authorized agents may submit a request by calling 888-217-9565 or by completing our webform, available *here*. In order to process your request, we will need to verify your identity and residency by matching certain personal information you provide with information we have on file, including your first name, last name, email address, telephone number, and address. The personal information that we use to verify your identity and residency will not be used for any other purpose.

Right to Delete

California residents have the right to request deletion of the personal information we have collected from them. California residents or their authorized agents may submit a request by calling 888-217-9565 or by completing our webform, available *here*. In order to process your request, we will need to verify your identity and residency by matching certain personal information you provide with information we have on file, including your first name, last name, email address, telephone number, and address. The personal information that we use to verify your identity and residency will not be used for any other purpose.

Non-Discrimination

California residents have the right to not receive discriminatory treatment by exercising CCPA privacy rights. We do not discriminate against California residents who exercise their CCPA privacy rights.

Questions?

Last Revised: February 25, 2022