

# Privacy Policy

## A Privacy Policy Statement from The Erie Radio Company (“WEHP, HAPPI 92.7”)

The following discloses our information gathering and dissemination practices for WEHP’s website HAPPI927.com (including without limitation our websites and mobile/tablet applications).

### —The Information We Collect

When you browse the WEHP web site, you do so anonymously. On the WEHP, HAPPI 92.7 website you can enter contests, vote in polls or otherwise express an opinion. In connection with such activities, we may request that you voluntarily supply us with personally identifiable information. The types of personally identifiable information that may be collected at these pages include: name, address, zip code, e-mail address, telephone number, fax number, gender, birth date and information about your interests in and use of various products, programs, and services. In addition, the WEHP, HAPPI 92.7 web site offers the ability to integrate with third party social media sites, in which case you may have an opportunity to voluntarily provide additional identifiable information (e.g. your third party social network profile name).

At certain parts of the WEHP, HAPPI 92.7 web site, only persons who provide us with the requested personally identifiable information will be able to participate in programs and services or otherwise participate in the site’s activities and offerings.

We also may collect certain non-personally identifiable information when you visit many of our web pages such as the type of browser you are using (e.g., Firefox or Internet Explorer), the type of operating system you are using, (e.g., Windows XP or Mac OS), the domain name of your Internet service provider (e.g., America Online or Comcast) and the search engine from which you were directed (e.g., Google or Yahoo).

### —How We Use the Information

If you provide us with your e-mail address, or have done so in the past, we may send you e-mail offers, surveys, newsletters or other types of contacts. These are based on information you provided in your membership application, registration forms, in surveys, from information that may indicate purchasing preferences and lifestyle, as well as information available from external sources, such as census bureau data. If you have signed up to receive our e-mails and prefer not to receive marketing information from this site, follow the “unsubscribe” instructions provided on any marketing e-mail you receive from this site.

We sometimes use this information to communicate with you, such as to notify you when you have won one of our contests, to fulfill a request by you for an online newsletter, or to contact you about your account with us.

We also use information generally to compile statistical and user profile data, to perform research using the compiled, to keep in contact with users and provide them with a better interactive experience. We may use your information specifically for the following purposes: to provide easy access every time you return to the site without requiring re-entry of registration information; to keep you informed about products and services in which you may have interest; to complete business transactions; to contact you as part of a promotion; to allow you to make a posting on the site; to administer individual accounts; to provide customer support; to meet legal requirements; to provide Internet security; and/or to analyze the collected information and use this data for contacts by research firms.

For the WEHP, HAPPI 92.7 website which integrates with social media sites (e.g. Facebook), your profile picture and profile name may be displayed on the WEHP, HAPPI 92.7 website.

We sometimes use the non-personally identifiable information that we collect to improve the design and content of our site and to enable us to personalize your Internet experience. We also may use this information in the aggregate to analyze site usage, as well as to offer you products, programs, or services.

We work closely with our business partners and certain other third parties who may perform functions on our behalf, such as fulfilling orders, providing promotional materials to our users, sending e-mail, managing data, processing credit card payments or providing customer service. They have access to your personal information only to the extent necessary to perform their functions and may not use it for any other purpose.

Further, these business partners and other third parties may from time to time wish to extend special offers to you on their own behalf. We may use your personal information to assist our business partners in offering you these products, services and information, either directly or as an intermediary (e.g., sending you an e-mail on their behalf). In addition, information collected by WEHP in connection with entering, voting or otherwise participating in any contest, may be shared with sponsors of such contests. By entering, voting or otherwise participating in such contests, you are consenting to us sharing this information with such contest sponsors who may contact you directly.

Notwithstanding any provision of this Privacy Policy to the contrary, we will not sell or rent such information to any third party unless you otherwise specifically consent.

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that personally identifiable information that we collect will never be disclosed in a manner that is inconsistent with this Privacy Policy.

The data you provide is used to enhance the services we offer. As a result of providing personal information, WEHP can provide a more customized online experience, making your interaction with us more productive, helpful and fun. You can also expect to receive occasional communications targeted directly toward your lifestyle interests.

Finally, We may disclose personally identifiable information in response to legal process, for example, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law. In addition, we may transfer information about you if we are acquired by or merged with another company.

### **—Cookies & Web Beacons**

To enhance your experience with our sites, many of our web pages use “cookies.” Cookies are text files we place in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at one of our sites. Once you choose to furnish the site with personally identifiable information, however, this information may be linked to the data stored in the cookie.

We use cookies to understand site usage and to improve the content and offerings on our sites. For example, we may use cookies to personalize your experience at our web pages (e.g., to recognize you by name when you return to our site) and save your password in password-protected areas. We also may use cookies to offer you products, programs or services.

“Web beacons” or clear .gifs are small pieces of code placed on a web page to monitor the behavior and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page. We may use web beacons on this site from time to time for this and other purposes.

### **Collection of Information by Third-Party Sites, Ad Servers, and Sponsors**

The WEHP, HAPPI 92.7 web site may contain links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy policies as WEHP has no control over information that is submitted to, or collected by, these third parties.

The WEHP, HAPPI 92.7 site covered by this Privacy Policy sometimes may offer content (e.g., contests, sweepstakes, or promotions) that are sponsored by or cobranded with identified third parties. Information collected by WEHP in connection with entering, voting

or otherwise participating in any contest, sweepstakes, or promotions, may be shared with sponsors of such contests. By entering, voting or otherwise participating in such contests, you are consenting to us sharing this information with such contest sponsors who may contact you directly. WEHP has no control over these third parties' use of this information.

The WEHP, HAPPI 92.7 site covered by this Privacy Policy may use a third party to present or serve the advertisements that you may see on our web sites. These third party ad servers may use cookies, web beacons, clear .gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness. The use of these technologies by these third party ad servers is subject to their own privacy policies and is not covered by our privacy policy. For more about third-party ad servers generally visit the Network Advertising Initiative's web site at [www.networkadvertising.org](http://www.networkadvertising.org). One of our these third-party ad servers is Triton Digital. You can opt-out from being targeted by Triton Digital through AppNexus Platform Opt Out, by clicking on the following URL address: <http://appnexus.com/platform-policy#choices> and follow the relevant instructions.

#### **—Note for Parents**

WEHP does not knowingly solicit data from children, and we will not knowingly market to children. WEHP adheres to the Children's Online Privacy Protection Act ("COPPA"). WEHP, HAPPI 92.7 website is a general audience website which is not directed to children generally, including children under the age of 13. It is our policy to discard any information which is obtained from any child who is under the age of 13.

#### **How to Contact Us**

For instructions on how you can access the personally identifiable information that this WEHP site has collected about you online, how to correct factual errors in such information, or if you have any questions or concerns about this Privacy Policy or its implementation you may contact us at:

Erie Radio Company  
WEHP, HAPPI 92.7  
1229 State Street  
Erie, PA 16501  
Attn: General Manager

Or via email at [info@happi92.7.com](mailto:info@happi92.7.com) [*For spam filtering purposes, only email with the subject line "WEHP Privacy Request" will be read*]

#### **—Updates & Effective Date**

From time to time, we may update this Privacy Policy. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it.