



Clear Channel Estonia Privacy and Cookies Notice

CCI Policy Control

- All CCI Policies should be read with reference to the Code of Conduct.
- Amendments to this Policy are only to be made by Finance or Compliance (and recorded above).
- Local policies developed by Business Units must be in line with this Policy.
 - Queries on the scope or operation of this policy should be directed to compliance@clearchannel.com

Clear Channel Privacy and Cookies Notice

Contents

Which Clear Channel entity does this Notice apply to?	2
Why is this Notice important?	2
What does this Notice do?	3
How do we collect Personal Data and why?	3
What Personal Data do we collect?	4
Sensitive Personal Data	5
Your Rights	5
Third Party Goods and Services	7
Security of Personal Data	7
Transfer of Personal Data	7
Retention of Personal Data	8
Cookies	8
Contact us	10
Changes to this Notice	10
Applicable Law	10

Which Clear Channel entity does this Notice apply to?

This Privacy and Cookies Notice (“**Notice**”) applies to the website(s) of [insert Clear Channel business name] found at [insert web link] with the registered address: [insert registered business address] including www.clearchannelinternational.com and any other website of Clear Channel International group subsidiary or affiliated companies which can **be viewed here** (“**Clear Channel**”, “**we**,” “**us**,” or “**our**”) as well as any Mobile Apps, online forms and subscriptions, products or services, and social media channels controlled by Clear Channel where a link to this Notice is provided (each, the “**Platform**” and together, the “**Platforms**”).

Each Platform is controlled by an individual Clear Channel entity as defined in its terms of use or otherwise.

Why is this Notice important?

Depending on how you use our Platforms and/or otherwise interact with us, we may ask you to provide us with certain Personal Data which identifies you (whether by itself or together with other information that we hold).

Clear Channel are committed to protecting your Personal Data in accordance with our internal policies and applicable European legislation.

“Personal Data” means personal information that identifies you as an individual or relates to an identifiable individual as defined under applicable European legislation (and in particular, the European General Data Protection Regulations 2016).

What does this Notice do?

This Notice informs you of our practices from 25 May 2018 with respect to the collection, use and disclosure of Personal Data which you provide to us via our Platforms.

We may ask you for this Personal Data so we can effectively provide our products and/or services (together, **“Products and Services”**) to you.

It also covers how we may use your Personal Data in relation to any promotions, competitions, offers or marketing campaigns (together, **“Marketing and Promotions”**) we may undertake in whatever medium, or under our contractual obligations or other legitimate interests.

There may be occasions where it may be reasonably necessary for us to contact you for administrative or operational reasons in relation to your registration or use of our Platforms, your potential employment with us or use of or access to our Products and Services.

How do we collect Personal Data and why?

The **Data Controller** is , Clear Channel Estonia

We may collect your Personal Data in the following circumstances (this is not a definitive list):

1. Marketing and Promotions

We may collect your Personal Data based on your **consent** or our **legitimate business interests** which include Marketing and Promotions:

- when you receive communications in relation to aspects of our business as a customer/client; you or we think you may be interested in;
- when you register to attend a Clear Channel event, or receive invitations to future events;
- where that Personal Data is specifically and voluntarily provided by you when you visit our Platforms (**see “Cookies”, below**);
- when you sign up with our Sales Representative at the point of an initial discussion or sale;
- when you subscribe to our direct or indirect marketing lists (Marketing and Promotional communications may be provided to you by Social Media Channels, email, post or other communication channels);
- if you have consented to receive Marketing or Promotions previously, for example through expressing an interest in our Products or Services; or
- when you provide feedback and contributions to customer surveys, competitions, offers or questionnaires.

2. Accessing, using or purchasing our products or services (“Products or Services”)

We may collect your Personal Data based on your **consent** or our **legitimate business interest**:

- when you request specific materials or information from our Platforms, or by other media;

- if you register to access secure or otherwise restricted parts of our Platforms e.g. to access your customer account, marketing preferences control panel;
- through an 'opt-in' consent mechanism;
- when you are managing your contact preferences on our Platforms;
- by submitting your details to our sales database; or
- if you are an existing or potential customer, with information about Products or Services similar to those in which you have expressed an interest.

3. To perform our **contractual obligations, which include:**

- whilst accepting our terms when registering for our Products or Services;
- to verify an identity for compliance purposes; or
- to process a payment, communicate regarding a payment, and provide related customer service.
- if you apply to work for a Clear Channel business;

4. **Otherwise** in our **legitimate business interests, which include:**

- if you contact us in respect of your Personal Data;
- when we review and improve the accuracy of the Personal Data we hold;
- when we record telephone calls with you for training and/or monitoring purposes;
- when you contact us with queries so we can better help you; or
- when we investigate any complaints received by you;
- to help diagnose problems with our service;
- to analyse trends;
- to track users's webpage movements (see "**Cookies**", below);
- to administer our Platforms;
- to help identify you;
- to report any activity which we suspect breaches any relevant laws or regulations to the appropriate authority; and
- to gather broad demographic information for aggregate use.

What Personal Data do we collect?

Types of Personal Data

Personal Data we ask for may include but is not limited to combinations of information about:

- [your name, postal address, email address (which may reveal your IP address), phone number, occupation and other contact information;
- secure login details when accessing secure parts of the website;
- any information you may voluntarily submit to us by completing any form on our Platforms; and, such as a "free text" boxes on our Platforms (i.e. blank spaces where you are free to insert comments);
- your dealings with us including information regarding your personal or professional interests, needs or opinions, demographics, experiences with our Products or Services and contact preferences;

- details of financial or accounting transactions carried out on our Platforms or otherwise, including credit/debit card information, billing information and/or delivery address information (if you pay for anything on our websites); and/or
- information from other sources, such as public databases, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected) and from other third parties;
- technical information, including location information, the Internet Protocol (**IP**) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Where we use IP addresses, we do not link your IP address(es) to your other Personal Data;
- your online browsing behaviour on our Platforms; including the Uniform Resource Locators (**URL**) clickstream to, through and from our Platforms or Social Media Channels (including date and time), download errors, lengths of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page;
- your online purchases (for example, what you have bought, when and where you bought it and how you paid for it); or
- any devices you have used to access our Products and Services (including the make, model and operating system, IP address, browser type and mobile device identifiers).

In some circumstances, we may request additional Personal Data to help us to provide you with the most appropriate response. If you do not provide the Personal Data where requested, your access to the service, or our ability to assist you, may be restricted.

Sensitive Personal Data

We will not ask for your Sensitive Personal Data except as part of the Clear Channel recruitment process.

“**Sensitive Personal Data**” means Personal Data which may relate to: race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record. Where you do provide Sensitive Personal Data, we will ask you for explicit consent to Clear Channel to use that information solely in connection with the purpose for which it has been provided.

Your Rights

Under the European General Data Protection Regulations 2016, you have rights over your Personal Data in certain circumstances. Those rights may include for example the right to request we amend or delete your Personal Data; the right to withdraw consent; the right to know the purposes for which your Personal Data is being processed and the recipients to whom your Personal Data may be disclosed (subject to legal and regulatory requirements).

If you do not agree to your Personal Data being used in accordance with this Notice please do not submit your Personal Data to us through the Platform or any other means.

If you require further information on your rights or our use of your Personal Data, please contact us at mydata@clearchannel.com.

Right to Rectification of Personal Data

We assume responsibility for keeping an accurate record of Personal Data once you have submitted the information, but not for confirming the on-going accuracy of your Personal Data if you do not update us.

If you advise us that your Personal Data is no longer accurate, we will amend or update it (where practical and lawful to do so).

Right to Erasure or Restriction of Personal Data

You can ask us to delete or restrict your Personal Data in some circumstances such as where we no longer need it or you withdraw your consent (if consent is applicable). If we've shared it with others, where possible, we'll let them know about the erasure.

Right to Withdraw Consent

If, at any time, you have consented to us processing your Personal Data in the circumstances or purposes described above, and you no longer wish to have your Personal Data processed in this way, you may unsubscribe by contacting us or Opting Out by pressing unsubscribe on emails that we send to you.

Right to Opt-Out of Marketing and Promotions

You have the right to opt out of receiving direct Marketing and Promotions communications you have previously consented to, by:

- clicking on the relevant 'unsubscribe' link in the email;
- contacting us at info@clearchannel.ee
- letting us know at the time that you provide your Personal Data.

If you withdraw your consent to receive any further Marketing and Promotions communications from us, we will not contact you further for the purpose of direct marketing. However, we will not necessarily remove your Personal Data from our database(s) if we consider it is fair and necessary to retain the Personal Data for legitimate and legal reasons. This may include our obligations to comply with regulatory requirements.

Rights in relation to Automated Decision-making and Profiling

You have the right not to be subject to a decision when it's based on automatic processing or profiling. We only carry out this type of decision-making where the decision is necessary for the entry into or performance of a contract; or authorised by Union or Member state law applicable to us; or based on your explicit consent.

We will always tell you if we do any such activity using your Personal Data.

Right to Copies of Personal Data

Where permitted by law, you may have the right to contact us to request a copy of Personal Data that we hold about you. Before responding to your request we may ask you to (i) verify your identity and (ii) provide further details so we can better respond to your request.

Children's Personal Data

Our Platforms are not intended to target children under the age of 13. We will not knowingly collect or process Personal Data belonging to children via our Platforms.

Third Party Goods and Services

We will not send you information relating to third party goods and services from outside Clear Channel unless specifically requested.

Third Party websites

Where links from our Platforms are provided to non-Clear Channel websites, we are not responsible for those websites and nor do we imply endorsement of the linked websites. These third-party websites will be governed by different terms of use (including privacy notices) and you are solely responsible for viewing and using each such website in accordance with the applicable terms of use. We are not responsible for how your Personal Information is handled by such third-party websites. These websites are not covered by this Notice.

Security of Personal Data

Your Personal Data (and commercial information) will be kept as confidential and as secure as possible. We employ appropriate technical and organizational measures consistent with our legal obligations and standard industry practice. Further, as required by the European General Data Protection Regulations 2016 we follow strict security procedures in the storage and disclosure of Personal Data which you have given to us, to prevent unauthorised access as far as reasonably possible.

We use industry standard practices to safeguard the confidentiality of your Personal Data, including “firewalls” and Secure Socket Layers. We treat your Personal Data as an asset that must be protected against loss, alteration, destruction and unauthorised access and which our employees must keep confidential, and we use many different security techniques to protect your Personal Data from unauthorised access by users’ inside and outside of Clear Channel. We also use internal protections to limit access to users’ Personal Data to only those employees who need the Personal Data to perform a specific function. It is impossible to guarantee security but we commit to taking appropriate action in the event of a breach.

Transfer of Personal Data

Third Parties

Other than to Third Party Data Processors governed by a data processing agreement which replicates the terms of this Notice, as elsewhere provided for in this Notice, where it is necessary to involve a third party service provider for the performance of our contractual obligations or by operation of law, we will not transfer identifiable, non-aggregated Personal Data to third parties.

Data Controller Intragroup Transfer

Clear Channel sits amongst a group of businesses which are governed by a lead entity, Clear Channel International Limited, registered address, 33 Golden Square, London W1F 9JT. The Parent companies of Clear Channel International are iHeart Media Communications and Clear Channel Outdoor Holdings, both US publically listed Companies. From time to time, it may be

necessary to transfer Personal Data collected by Clear Channel to the lead entity and its US parent companies together with their data processors, in our legitimate interests.

Transfers outside the European Union

Non-European countries may have data protection laws that are less protective than the legislation where you live. Where this is the case, (such as the United States), our transfers of data will be regulated by standard contractual clauses relating to the transfer of Personal Data outside of the European Union (or outside of jurisdictions deemed “adequate” for data privacy by the European Union). We will not transfer your data outside of the European Union for any other reason than described in this Notice, unless we are required to do so by operation of law.

Sale or Merger

If Clear Channel or its assets are sold to or merge with another entity outside Clear Channel, you should expect that some or all of the Personal Data collected by Clear Channel may be transferred to the buyer/surviving company. If so, we will seek to obligate the acquiring company to use any Personal Data transferred in a manner consistent with applicable legislation and this Notice, but cannot guarantee that it will be able to impose that requirement or that the acquiring company will comply.

Retention of Personal Data

If you have provided us with Personal Data, your Personal Data will be retained for the duration of your relationship with us, the length of time required by applicable legislation, or otherwise a reasonable period of time (and we or our third party data processors will amend or dispose of your Personal Data when no longer necessary).

Cookies

What Cookies we use, why we use them, and how they impact you

A cookie is a small text file, typically of letters and numbers (with an ID tag), which may be placed on your computer or mobile when you access our Platforms. Cookies generally allow a website to recognize your device and browsing activity if you return to it, or if you visit another website which recognizes the same cookies.

Different cookies perform different functions. Some help you navigate through pages, “storing preferences” information and generally making the website easier to use. Others identify products, goods or services you may be interested in and are used to provide you with tailored advertising

When you visit our Platforms:

Persistent cookies allow our website to recognize you when you return to our site another time. This provides us with useful analytics that help us optimize our website and your visits.

Session cookies exist just for the life of your current visit whilst you have your browser open. They are not stored on your hard disk and are erased when you exit your web browser.

For general information on cookies, please see <http://data.consilium.europa.eu/doc/document/ST-5419-2016-INIT/en/pdf>

[LIST COOKIES FOR EXAMPLE: Google Analytics

We use this type of cookie to understand how our website is being used in order to improve the user experience. User data is all anonymous.

Persistent cookie: visitor repetition tracking

Session cookie: Google analytics

Social buttons

On many of the pages of our website you will see 'social buttons'. These allow you to share or bookmark pages on our site.

Social media sites such as Twitter, Google, Facebook, and LinkedIn may collect information about your internet activity. They may record if you visit our Platforms and the specific pages you are on if you are logged into their services, even if you don't click on the button.

You should check the privacy and cookies policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

Further information

1. [Facebook cookies](#)
2. [Twitter cookies](#)
3. [Google cookies](#)
4. [LinkedIn cookies](#)

Manually managing cookies

There are a number of ways you can manually manage cookies on your computer/device. Read more on the [About Cookies website](#).

If you access the Internet from more than one computer/device it is important to ensure each browser is configured to suit your cookie preferences.

Do Not Track

If you wish to block all cookies all the time you can set your browser to do this. It is important to note that blocking cookies may result in some parts of our site not working properly. This may affect your browsing experience.

Our Platforms respect a DNT:1 signal as a valid browser setting communicating your preference.

How does Clear Channel ask for Cookies consent?

Clear Channel comply with applicable legislation on cookies. A popup box will appear when you first access our Platform. This asks you whether you consent to cookies. If you do not consent to cookies then you are free to disable cookies at any time through your browser's settings (for more information on how to do this please see "how to delete cookies" tab at www.allaboutcookies.org/cookies)

If you choose to disable cookies, please be aware that some parts of our Platforms may not work properly and it is likely that your Platform usage won't be counted and measured as described

above, so we won't be able to take your actions into account when analysing data or when seeking to improve our service based on that analysis.

Contact us

Should you wish to make any comments, complaints, enquiries or if you have any questions relating to this Notice, your rights, the Platform, our Marketing and Promotion materials or Products or Services we provide, you may contact the Clear Channel Chief Data Privacy Officer by emailing or writing to the Privacy Office:

The Chief Data Privacy Officer

Privacy Office

Clear Channel International

33 Golden Square

London, UK

W1F 9JT

Email: mydata@clearchannel.com

You may also contact the Data Protection Authority. Clear Channel's governing Data Protection Authority is the [UK Information Commissioner's Office](#) you may contact them [here](#).

Changes to this Notice

This **Notice** is subject to periodic review to ensure it is in line with applicable legislation.

We retain all applicable ownership rights to information we collect. We reserve the right to change, modify, add or remove provisions of this Notice. Any changes to this Notice will be posted here, and we encourage you to check back from time to time.

Applicable Law

This Notice is governed and construed in accordance with English law.