



SPONSORSHIP



PRIVACY STATEMENT

The ETS Sponsorship Program (“ETS-SP,” “we,” or “us”) cares about your privacy and wants you to be familiar with how we collect, use, and disclose data. This Privacy Statement covers the collection, use, and disclosure of data collected via [etssponsorship.com](https://etssponsorship.com) and any other ETS-SP website where this Privacy Statement is posted or linked (collectively, this “Site”). This Privacy Statement also describes your legal rights in relation to such data.

Please note that this Privacy Statement addresses the data collection and handling practices associated with this Site only. Other websites, including those provided by members of the ETS-SP are governed by their own privacy statements. Additionally, ETS-SP products and services may be subject to their own statements specific to the product or service. We encourage you to review these privacy statements to understand how ETS-SP products and services use data. More information about the ETS-SP can be found here.

By using this Site, you are subject to the terms and conditions of this Privacy Statement.

## DATA COLLECTION

We collect or obtain data relating to you in a variety of ways, as described below. Such data may include personal data, i.e., information that alone or in combination with other information identifies you as an individual or can be reasonably linked to your identity.

- Data You Provide

When you login, subscribe, submit questions, request information, or give us feedback via this Site, we may ask you for data, your name, postal address, telephone number, and email address so we can respond, provide access or follow up. We may also ask you to provide other data relevant to your experience, question, request, or feedback, such as your geographical location, industry, and preferred contact method.

You may also make requests through this Site to exercise your individual rights under applicable privacy laws. We will collect and maintain data related to such requests to respond to you and for our audit and legal compliance purposes.

We generally do not seek data that may be considered “special” or “sensitive” personal data (e.g., government-issued identification numbers or information related to an individual’s racial or ethnic origin, political opinions, religious or other beliefs, health, criminal background, or trade union membership) from *visitors* of this Site, and we ask that you do not provide such data. However, *users* of this Site, the above mentioned data may be requested to verify login credentials and or update your profile for use of this Site. If we specifically require “special” or “sensitive” personal data in connection with one or more of the uses described below, we will request your consent to use the data in accordance with this Privacy Statement and/or in the ways described at the point where you were asked to disclose the data. If you voluntarily share with us or post/upload any “special” or “sensitive” personal data to this Site for any other reason,

you consent that we may use such data in accordance with applicable law and this Privacy Statement.

- Data Collected from your Use of this Site

We automatically receive certain data about the computer or device you are using when you visit this Site, including: your Internet Protocol (IP) address; information about the browser or type of device you are using; data collected through cookies, pixel tags, and other similar technologies (as described below in the *Cookies and Other Internet Technologies* section); the date and time of your visit; and, the web page you visited immediately prior to visiting this Site. We also collect data about videos or other content you view on this Site, such as the type and name of the content and time viewed.

## DATA USE

We use data about you for the purpose(s) for which it was collected or provided to us (as stated at the point of collection) or as otherwise obvious from the context of collection. We may also use data to:

- Administer and manage this Site, communicate with you about this Site, process your request for information, or otherwise complete a transaction or service you request or authorize;
- Customize or personalize your user experience and the content we deliver to you, including to provide you with content that is more relevant to you;
- Contact you about products and services provided by the ETS-SP, provide you with promotional materials or offers for products/services from ETS-SP, or send you other communications about ETS-SP business and events, including communications based on your interests, personal and business characteristics, and location, (collectively, “marketing communications”). We may provide these communications and offers via email, postal mail, online, social media platforms, text messages, and other means;
- Carry out our internal business purposes, such as corporate transactions, audits, and data analysis; conduct research and analytics about your use of this Site and interaction with us; develop new products; improve this Site and our existing products and services; identify usage trends; assess the performance of our advertisements; optimize our advertising campaigns; and determine the effectiveness of our communications;
- Protect the rights, safety, property, or operations of the ETS-SP, you, or others;
- Comply with applicable law and/or respond to requests and communications from law enforcement authorities or other government officials.

Note that you may unsubscribe from an ETS-SP mailing list or service at any time by clicking on the ‘unsubscribe’ link in any of our marketing communications to you or by the services themselves. After you unsubscribe, the ETS-SP will not send you further marketing

communications, but may continue to contact you to the extent necessary for the purposes of any services you have requested or are still utilizing.

We will never use your personal data to advertise, promote, or market third-party goods or services to you. Additionally, we will not license or publish any of your personal data. We do not and will not sell any personal data to third parties for their own commercial use.

## BASIS FOR PROCESSING PERSONAL DATA

Applicable law in certain countries requires us to set out in this Privacy Statement the legal basis upon which we rely to process personal data.

**Consent:** We may rely on the consent that you provide us at the point of data collection or disclosure to us to process such data for the purposes outlined herein.

**Legitimate interests:** We may rely on our legitimate interests to process your personal data, provided that our interests are not overridden by your interests, fundamental rights, or freedoms. We may process your personal data in reliance on a legitimate interest in the effective and lawful operation of this Site and our businesses, as well as the effective delivery of information and services to you. We may have other legitimate interests and, if so, we will make clear what those interests are at the relevant point in time.

**Compliance with legal obligations:** We may process your personal data if necessary, for us to comply with a legal obligation arising under an applicable law to which we are subject.

To the extent that we process any “special” or “sensitive” categories of personal data relating to you, we will do so because either: (i) you have given us your explicit consent to carry out such processing; (ii) the processing is necessary for the establishment, exercise, or defense of legal claims; or (iii) you have made the data manifestly public.

If you have questions or concerns about the legal basis upon which the ETS-SP collects and uses your personal data, please contact us at [privacy.department@etssponsorship.com](mailto:privacy.department@etssponsorship.com).

## DISCLOSURES OF PERSONAL DATA

In connection with one or more of the purposes outlined in the Data Use section above, we may disclose your data to:

- Other entities within the ETS organization;
- Third parties that provide services to us, such as system hosting, management, and support; data analysis; facilitation of advertisements; data backup; and data security and storage services;
- Relevant third parties as part of a corporate transaction, such as a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with a bankruptcy or similar proceeding);
- Competent governmental and public authorities, in each case to comply with legal or regulatory obligations or requests; and,
- Other third parties as we believe necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to enforce our terms and conditions; (d) to protect our operations and those of any of our affiliates; (e) to protect our rights, privacy, safety, or property, and/or those of our affiliates, you, or others; and (f) to allow us to pursue available remedies or limit damages that we may sustain.

In addition, this Site may contain content and plugins from social media platforms, i.e., Facebook (“Like” button), Twitter (“Share to Twitter”), LinkedIn, and others. These plugins allow you to share information from this Site to your timeline or account. When you connect to these services, the third parties may store and/or access data (including through the use of cookies and other similar technologies) over which we do not have control. If you are logged into one of your social media accounts while visiting a webpage on this Site that contains a social media plugin, the social media plugin may allow the relevant social media platform to receive information that you visited this Site and link it to your social media account. We do not control these third-party platforms, and information collected is governed by the privacy statement of the third party that provides the relevant platform. We encourage you to review these platforms’ privacy statements for more information.

The disclosures described in this section may result in the transfer of your data to countries or regions with data protection laws that differ from those in your country of residence. By providing us with your data and using this Site, you are acknowledging that your data may be transferred to countries outside your country of residence.

In cases where your data is transferred outside your country of residence, we take steps to ensure that appropriate safeguards are in place to protect such data. If you are based in the EU/EEA, such safeguards may include a data transfer agreement with the data recipient based on standard contractual clauses or such other mechanism as is approved by the European Commission for transfers of personal data to third countries. For further details relating to the transfers described above and the adequate safeguards used with respect to such transfers, please contact us at [privacy.department@etssponsorship.com](mailto:privacy.department@etssponsorship.com).

## COOKIES AND OTHER INTERNET TECHNOLOGIES

This Site uses cookies (small text files placed on your device) and similar technologies (pixels and pixel tags, ad tags, clear GIFs, and JavaScript) – including cookies and technologies from third-party providers – to enable certain features and functionality and to collect additional information that helps us improve this Site and our services. This Site may use session cookies (which expire when you close your browser) and persistent cookies (which remain on your device after you close your browser until you delete them, or they expire). We use these technologies for security purposes, to help you navigate this Site, to display information more effectively, to better serve you with tailored information on this Site, and to gather statistical information about how visitors and users use this Site in order to continually improve its design and functions.

If you do not want data to be collected from your device via cookies, most browsers have a setting that allows you to decline the use of cookies. Some features of this Site may not work properly if you decline the use of cookies. To learn more about cookies, please visit <http://www.allaboutcookies.org/>

- Google Analytics. We use Google Analytics, a web analytics tool that may set cookies in your browser to help us understand how visitors engage with this Site. To learn more about Google Analytics' data practices, please visit <https://support.google.com/analytics/answer/6004245?hl=en>. For opt-out options specific to Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout>.
- Other Third Party Cookies and Technologies. We enable third-party cookies and other similar technologies to collect or receive data from this Site and elsewhere for use in advertising, including for the purposes of serving advertisements targeted to users' interests, retargeting visitors to this Site, conversion tracking (i.e., tracking the actions users take after viewing or engaging with our advertisements), measuring ad effectiveness, and ensuring that you do not see the same ad repeatedly. These cookies and similar technologies collect data about your browsing habits and online behavior, including across different browsers and devices used by you, to serve advertisements that may be of interest to you. For example, ETS-SP's third-party providers may use the fact that you visited this Site to place online ads for ETS-SP on non-ETS-SP websites.

Third parties may also use data about your use of this Site to help target non-ETS-SP advertisements based on your online behavior and/or interests in general. Data collected generally includes actions you take on this Site (e.g., URL, previous website visited), device and browser data (e.g., IP address, operating system, browser type), timestamp, and events (e.g., page views). In some cases, this data is connected to your social network ID. Please note that ETS is not responsible for practices by such third parties, and those practices are subject to those companies' own policies.

You may use industry platforms to opt out of interest-based advertising. To learn more about opting out of receiving interest-based advertisements and how to exercise your options, please visit: <http://optout.aboutads.info> and [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices). These tools use

cookies to record and implement your preferences. If you disable or delete cookies on your device after using these tools, you will need to complete the opt-out process again.

## THIRD-PARTY WEBSITES

This Privacy Statement does not address, and we are not responsible for, the privacy practices of any third parties, including those that operate websites to which this Site links. The inclusion of a link on this Site does not imply that we or our affiliates endorse the practices of the linked website.

## DATA SECURITY

We use reasonable organizational, technical, and administrative measures to protect data under our control. Unfortunately, no data transmission over the internet or data storage system can be guaranteed to be 100% secure. If you feel that the security of any data that we hold concerning you has been compromised, please immediately contact us in accordance with the *Contact Us* section below.

## EXERCISING YOUR RIGHTS

You have choices about how your personal data is handled, and we are committed to providing you with reasonable access to your personal data and the ability to review and limit the use of such data in accordance with applicable law.

If you no longer wish to receive electronic newsletters or correspondence you signed up to receive or other marketing communications from the ETS-SP, click on the 'unsubscribe' link at the bottom of such communications.

Depending on your country (or U.S. state) of residence, you may also have the right to:

- request confirmation that we are processing your personal data;
- request a copy of the personal data we hold about you; request that we update the personal data we hold about you or correct such data that is inaccurate or incomplete;
- restrict the way in which we use your personal data (e.g., if we have no legal right to keep using it) or limit our use of your personal data (e.g., if your personal data is inaccurate or unlawfully held);
- object to our processing of your personal data;
- withdraw the consent that you have given us to process your personal data (where we process your personal data on the basis of your consent);

- request that we delete the personal data we hold about you; and,
- lodge a complaint with the data protection or privacy authority in your country of residence regarding our processing of your personal data.

If you are interested in exercising one or more of the rights described above, please contact us at [privacy.department@etssponsorship.com](mailto:privacy.department@etssponsorship.com). Note that we may require proof of your identity before we can give effect to these rights.

We will not discriminate against you if you decide to exercise your rights under applicable law.

Only you or an Authorized Agent permitted to act on your behalf may submit a request. An Authorized Agent is a natural person or a business entity you have authorized to act on your behalf by providing your written permission. Please note, we may deny a request from an Authorized Agent if they do not submit proof that they have been authorized by you to act on your behalf.

Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal data or an Authorized Agent; and,
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal data if we cannot verify your identity or authority to make the request and confirm the personal data that we maintain relates to you. To verify your identity, we will seek to match any personal data you provide when you (or an Authorized Agent) submit your request to any personal data we already maintain. If we are unable to verify your identity based on the data we maintain, we will let you know.

### ***Additional information for EU/EEA residents***

If you have any questions or concerns about our collection or use of your personal data, you can contact our Data Protection Officer at [privacy.department@etssponsorship.com](mailto:privacy.department@etssponsorship.com).

If you are unsatisfied with the way in which we have handled your personal data or any privacy query or request that you have raised to us, you have a right to complain to the appropriate National Data Protection Authority (“DPA”). For contact details of the DPA in your country of residence, please visit [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

### ***Special Notice to California Residents***

If you are a resident of the state of California, you are entitled to request information regarding the disclosure of your personal data to third parties for direct marketing purposes. Please note that we do not share your personal data with non-affiliated third parties for such purposes.



## DO NOT TRACK SIGNALS

“Do Not Track” (“DNT”) is a preference you can set in your web browser to let the websites you visit know that you do not want them collecting data about you. Currently, this Site does not respond to DNT or similar signals. Please refer to the *Cookies and Other Internet Technologies* section of this Privacy Statement for more information about how you can decline the use of cookies on your device.

## DATA RETENTION

We will retain your personal data only for those periods necessary to fulfill the various purposes outlined in this Privacy Statement unless a longer retention period is required or allowed by law.

## USE OF THIS SITE BY MINORS

We understand the importance of protecting the privacy of minors, especially in the online environment. This Site is not designed for or intentionally targeted at minors under the age of 18, and we request that minors not use this Site. We do not knowingly collect data from minors on this Site. If we become aware that we have received data from a person under the age of 18, we will take reasonable steps to delete such data from our records.

## UPDATES TO THIS PRIVACY STATEMENT

We may make changes to this Privacy Statement as required. The Effective Date at the top of this page indicates the most previous revision of this Privacy Statement. Any changes will become effective when we post a revised version of this Privacy Statement on this Site. Your use of this Site is subject to the terms in the version of this Privacy Statement that is posted on this Site at the time of your visit. We encourage you to review this Privacy Statement periodically to remain informed about how we are protecting your data.

## CONTACT US

If you have any comments or questions regarding this Privacy Statement or our data handling practices, or wish to contact our Data Protection Officer, please contact us at [privacy.department@etssponsorship.com](mailto:privacy.department@etssponsorship.com).