

SMITH ENTERTAINMENT GROUP – PRIVACY POLICY

Last Updated and Effective: June 13, 2024

1. WELCOME!

This is the Privacy Policy (“**Policy**”) of Smith Entertainment Group, LLC, a Delaware Limited Liability Company (collectively, “**we**,” “**us**,” “**our**,” or “**SEG**”). This Policy is here to help you understand how we [collect](#), [process](#), and [share](#) your Personal Information (as defined below). We also describe our security practices with respect to your Personal Information, as well as your [Rights & Choices](#) with respect to how we process that Personal Information. Please read this Policy carefully.

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3. WHO WE ARE

SEG, its affiliates, subsidiaries and related companies under the SEG brands described below (collectively, “**SEG Companies**,”) own and operate various sports and live entertainment properties and professional sports teams (collectively, “**SEG Properties**”). References to SEG Companies include (without limitation):

- SEG-owned and/or operated facilities and venues (such as the Delta Center and Vivint Arena);
- SEG-owned sports teams (such as Utah Hockey Club, Utah Jazz, and Salt Lake City Stars); and
- Other current and future SEG affiliates and subsidiaries.

4. SCOPE & ACKNOWLEDGMENT

This Policy applies to our “**Services**,” which include the following:

Our “**Offline Services**”

- In-person services you use when you visit our SEG Properties, purchase a ticket in person or over the phone, or visit a venue owned, operated, promoted, or serviced by any SEG Companies.

Our “**Digital Services**”

- Products, services, or other technologies in venues (“**Venues**”) and events we own or operate; and
- Websites, mobile applications (“**Mobile Apps**”), social media pages, and other online services.

This Policy **does not** apply to Personal Information processed by third parties, for example, when you visit a third-party website or interact with third-party sites, except to the extent those parties collect or process information on our behalf. Please review any relevant third party’s privacy policy for information regarding their privacy practices.

Your use of our Services indicates your acknowledgement of the notices provided in this Policy.

5. CONTROLLER; CONTACT US

The controller of your Personal Information under this Policy is Smith Entertainment Group, LLC. You may contact our Data Privacy Team as follows:

General Inquiries: privacy@smithentertainmentgroup.com

Data Rights Requests: Email us at privacy@smithentertainmentgroup.com, or mail to the address below.

Direct Marketing Disclosure Inquiries: Mail to the address below or email privacy@smithentertainmentgroup.com

Physical Address: Smith Entertainment Group, LLC
Attn: Privacy
1420 S 500 W
Salt Lake City, UT 84115

6. CATEGORIES AND SOURCES OF PERSONAL INFORMATION

6.1. Categories of Personal Information We Process

In order to provide our Services, we may collect and process information that relates to identified or identifiable individuals (“**Personal Information**”). We collect and process the following categories of Personal Information (note, specific Personal Information elements are examples and may change):

Audio/Visual Data- Recordings and images collected from surveillance cameras, as well as audio files and records, such as voicemails, call recordings, and the like.

Biographical Data- Data relating to professional and employment history, qualifications, and similar biographic information.

Contact Data- Identity Data used to contact an individual, e.g. email address, physical address, or phone number.

Device/Network Data- Personal Information relating to your device, browser, or application e.g. device identifiers, identifiers from cookies, session history and website navigation metadata, and other data generated through applications and browsers, including via cookies and similar technologies.

General Location Data- Non-precise location data, e.g. location information derived from IP addresses.

Identity Data- Personal Information about you and your identity, such as your name or IP address.

Inference Data- Personal Information we create or use as part of a profile reflecting your preferences, characteristics, aptitudes, market segments, likes, favorites or your interests.

Sensitive Personal Information- Personal Information deemed “sensitive” under California or other laws. In certain cases, we may collect the following categories of Sensitive Personal Information:

- “**Government ID Data**” Data relating to official government identification, such as driver’s license or passport numbers, including similar Identity Data protected as Sensitive Data under applicable law.
- “**Health Data**” Information about your health (e.g. data relating to health-related incidents at our facilities).
- “**Payment Data**” Information such as bank account details, payment card information, including similar data protected as Sensitive Data under applicable law, and relevant information in connection with a financial transaction.
- “**Precise Location Data**” data from GPS, WiFi triangulation, certain localized Bluetooth beacons, or technologies used to locate you at a precise location and time.
- “**Race or Ethnic Origin**” data relating to your race, ethnic, or national origin.

Transaction Data- Information about the Services we provide to you and about transactions you make with us or other companies for goods and services at our SEG Properties, and similar information.

User Content- Personal Information included in content provided by users of our websites in any free-form or unstructured format, such as in a “contact us” box, free text field, in a file or document, or messages to us.

6.2. Sources of Personal Information

We collect Personal Information from various sources based on the context in which the Personal Information will be processed:

You- We collect Personal Information from you directly, for example, when you book a service, input information into an online form, or contact us directly.

Automatic Collection- We may collect certain Personal Information automatically. For example, we collect Device/Network Data automatically using cookies and similar technologies when you use our websites, access our websites, or when you open our marketing communications.

Service Providers- We receive Personal Information from service providers performing services on our behalf.

Data we create or infer- We, certain partners, and third parties operating on our behalf create and infer Personal Information such as Inference Data based on our observations or analysis of other Personal Information processed under this Privacy Policy, and we may correlate this data with other data we process about you.

Promoters and event partners- We collaborate with various entities to put on events, which may include promoters, artists, sports teams or leagues, venues, and other parties (“Event Partners”). We receive Personal Information from Event Partners if you purchase relevant products and services from them, or when you express an interest in SEG Companies or SEG Properties when interacting with Event Partner (e.g. indicating a team preference when you create an account with a league, or sign up for marketing communications relating to any SEG Companies or SEG Properties).

Aggregators and advertisers- We receive Personal Information from ad networks, data brokers, Targeted Advertising vendors, market research, and social media companies or similar companies who provide us with additional Personal Information, e.g. Inference Data.

Social Media Companies- We receive Personal Information from social media companies, such as Facebook, TikTok or Instagram when you interact with us on that social media company’s platform (e.g. our company page or account) on or in connection with our Services.

7. DATA PROCESSING CONTEXTS / NOTICE AT COLLECTION

We process Personal Information in the contexts described below. Click the following link to review our disclosure relating to [Data Sharing](#) and [Data Retention](#).

7.1. Account Registration

We process Identity Data, Inference Data, and Contact Data when you register and create an account for our Services. We process Payment Data if you associate payment information with your account.

We use this Personal Information to create and maintain your account, to provide the products and services you request, and for our [Business Purposes](#). We may process Identity Data, Inference Data, and Contact Data for [Commercial Purposes](#) (which may include data sales/sharing). We do not sell or “share” Payment Data or use it for Business Purposes not permitted under applicable law.

7.2. Transactions and Purchases

We process Transaction Data, Identity Data, Payment Data, Inference Data, and Contact Data when you complete a purchase or sale transaction. We do not permanently store your Payment Data, except at your request. If provided, we process Health Data, such as accommodations for accessible seating. In some cases, Inference Data may reveal Race or Ethnic Origin (see [Profiles](#) for more information). Please note, tickets may be sold by a third party service provider, and we may receive purchase information from them; however, please note that this Privacy Policy does not apply to data collected independently by that ticketing provider (e.g. ticketing account information).

We process this Personal Information as necessary to perform or initiate a transaction with you, process your order, payment, or refund, carry out fulfillment and delivery, document transactions, validate your ticket, and for our [Business Purposes](#).

We may process Identity Data, Transaction Data, Contact Data, Race or Ethnic Origin, and Device/Network Data for [Commercial Purposes](#) (which may include data sales/sharing). We do not sell or “share” Payment Data or Health Data or use it for Business Purposes not permitted under applicable law.

Third party businesses/controllers may receive your information. Third Party data controllers/businesses (such as Event Partners) provide, either directly or jointly with SEG or other Event Partners, many products and services you purchase through our Services (e.g. leagues and other teams). We may disclose Identity Data, Transaction Data, Contact Data, and Device/Network Data to those third parties. You may also direct us to disclose this data to or interact with these Event Partners as part of visiting one of our SEG Properties, receiving premium upgrades, or making a purchase (which does not involve a data sale by the SEG Companies). For example, when you purchase a ticket to a Utah Hockey Club game or other event involving Utah Hockey Club and the NHL, you direct us to share your Identity Data, Contact Data, and Transaction Data relating to the ticket purchase with NHL Interactive CyberEnterprises, LLC, and its affiliates, including NHL Enterprises, L.P., NHL Enterprises Canada, L.P., and the National Hockey League (“NHL”). We share this with the NHL so that they can conduct analysis to better understand NHL fans and fan engagement across the NHL, including its member clubs. NHL may also use and share insights to enable the NHL, including its member clubs, to customize and improve their services, advertising and communications, as further set forth in the [NHL Privacy Policy](#).

7.3. Visiting SEG Properties

We process Identity Data, Transaction Data, Payment Data, Inference Data, General Location Data, and Contact Data when you attend a game, concert, event, or otherwise visit our SEG Properties. In limited cases, (e.g. due to an incident at our SEG Properties), we may also process Health Data. We may collect Audio/Visual Data in relation to the use of CCTV cameras in our venues.

We may also collect Personal Data when you use [Digital Tickets](#) or interact with our other [Digital Services](#) at our SEG Properties. See below for more information.

We process Identity Data, Transaction Data, Payment Data, Inference Data, General Location Data Audio/Visual Data, and Contact Data as necessary to operate our SEG Properties and provide our services to you, for our [Business Purposes](#), and our other legitimate interests, including:

- verifying your identity for authentication and security purposes;
- helping us to ensure our customers are genuine and to prevent fraud;
- to help us to return lost property to its rightful owner; and
- managing access to specific areas of our SEG Properties.

We process Health Data only as necessary to provide you with appropriate services (for example, a wheelchair accessible space, a sign language interpreter, or in the event of a medical emergency) or to help us investigate an incident which may have taken place at our SEG Properties, and for certain [Business Purposes](#).

We use Identity Data, Transaction Data, Inference Data, and Contact Data collected in this context for our [Commercial Purposes](#) (which may include data sales/sharing). We do not sell or “share” Payment Data, Health Data, or Audio/Visual Data.

7.4. Digital Services

Generally

When you use our Digital Services, we automatically collect and process Identity Data, Inference Data, General Location Data, and Device/Network Data. We use this data as necessary to initiate or fulfill your requests for certain features or functions through our Digital Services, such as operating our website or Mobile App, delivering webpages, or logging activities for security purposes. We may also process this Personal Information for our [Business Purposes](#) and [Commercial Purposes](#) (which may include data sales/sharing).

Mobile Apps

If you use our Mobile Apps, we may process Identity Data, Device/Network Data, Inference Data, General Location Data, and, with your consent, Precise Location Data. We process Payment Data if you associate payment information with a registered user account in the app.

We process this Personal Information to provide our Mobile Apps, for our [Business Purposes](#), and our other legitimate interests, such as:

- optimizing the display and functionality of the Mobile App on your device;
- determining your location or proximity within our SEG Properties,
- providing directions and contextual information to you; and
- delivering features that require the use of Precise Location Data.

We may process this Personal Information for our [Commercial Purposes](#) (which may include data sales/sharing). You have the right to limit our use of Precise Location Data by withdrawing consent to or disabling the collection of Precise Location Data.

Digital Tickets, Passes & Payments

We process Identity Data, Transaction Data, Payment Data, Inference Data, General Location Data, and Contact Data when you use digital tickets or passes at one of our SEG Properties. See above for information collected in connection with original [ticket purchases](#).

We process Identity Data, Transaction Data, Payment Data, Inference Data, General Location Data, and Contact Data to authenticate your access to an SEG Property, complete a transaction you request, for our [Business Purposes](#), and our other legitimate interests, including:

- verifying your identity for authentication and security purposes;
- helping us to ensure ticket purchasers are genuine and to prevent fraud;
- to help us to return lost property to its rightful owner;
- to share data with partners in accordance with user direction/authorizations;
- managing access to specific areas of Events; and
- to create market research and statistical analysis of guest engagement, movement, or other matters.

We may process Identity Data, Transaction Data, Inference Data, General Location Data, and Contact Data for our [Commercial Purposes](#) (which may include data sales/sharing). We do not sell or “share” Payment Data or use it for Business Purposes not permitted under applicable law.

Cookies and Similar Tracking Technologies

We process Identity Data, Device/Network Data, Contact Data, Inference Data, and General Location Data in connection with our use of cookies and similar technologies on our Digital Services. We may collect this data automatically. We and authorized third parties may use cookies and similar technologies to process such data for the following purposes:

- or “essential” purposes necessary for our Digital Services to operate (such as maintaining user sessions, CDNs, and the like);
- for “functional” purposes, such as to enable certain features of our Digital Services (for example, to allow a customer to maintain an online shopping cart);
- for “performance” or “analytics” purposes and to improve our Digital Services, such as to analyze the traffic to and on our Digital Services (for example, we can count how many people have looked at a specific page, or see how visitors move around the website when they use it, to distinguish unique visits/visitors to our Digital Services, and what website they visited prior to visiting our website, and use this information to understand user behaviors and improve the design and functionality of the website);
- for [Targeted Advertising](#), or other advertising and marketing purposes, including technologies that process Inference Data or other data so that we can deliver, buy, or target advertisements which are more likely to be of interest to you; and
- for “social media” integrations e.g. to enable [Targeted Advertising](#) on social media cookies, to integrate with your profiles on social media, or to allow you to share content when social media sharing button or “like” button on our Services or you link your account or engage with our content on or through a social networking website such as Facebook, TikTok, Instagram or X.

We also process this Personal Information for our [Business Purposes](#) and [Commercial Purposes](#) (which may include data sales/sharing). See the your “Rights and Choices” section below for information regarding opt-out rights for cookies and similar technologies.

Please note, in some cases, third parties may view, edit, or set their own cookies or place web beacons on our Digital Services. We, or third party providers, may be able to use these technologies to identify you across websites, devices, sites, and services. Third parties have their own privacy policies and their processing is not subject to this Policy.

7.5. [Newsletters and Marketing Communications](#)

We and the SEG Companies may process Identity Data, Device/Network Data, Inference Data, and Contact Data in connection with email newsletters, SMS marketing, push notifications, or other marketing communications that we send in relation to our Services, SEG Properties, and the business of the SEG Companies (“**Marketing Communications**”). For example, we send Marketing Communications to you if you subscribe to a newsletter through our Services, or express an interest in or request to learn more about SEG Companies, SEG Properties, or our other products, services, or initiatives.

You may receive Marketing Communications if you contact us, choose to receive them, or interact with us in way that allows us to send you those Marketing Communications. We may also automatically collect Device/Network Data when you open or interact with those Marketing Communications so that we can better understand whether users read or engage with our Marketing Communications.

We generally use this Personal Information as necessary to send and manage our promotional communications. We may also process this Personal Information for our [Business Purposes](#) and [Commercial Purposes](#) (which may include data sales/sharing). You can opt out of promotional communications at any time as specified in the “[Your Choices](#)” section below.

7.6. [Social Media Posts](#)

We process Identity Data, Contact Data, and User Content if you interact with or identify us on social media or communications platform (e.g. if you post User Content that engages with or tags our official accounts). We process this Personal Information to engage with you on the social media platform, and for our [Business Purposes](#) and [Commercial Purposes](#) (which may include data sales/sharing).

Please note: Content you provide may be publicly available when you post it on our Service, or in some cases, if you reference, engage, or tag our official social media accounts or communications platform. This activity may also involve the collection of Personal Data via Social Media cookies and similar technologies as described above.

7.7. [Contests and Promotions](#)

We may collect and process Identity Data, Inference Data, certain Contact Data, and User Content when you enter a contest/sweepstakes or take part in a promotion.

We process this Personal Information as necessary to provide the contest/promotion, notify you if you have won, or to process delivery of a prize, for our [Business Purposes](#), and other legitimate interests, such as:

- verifying your identity for authentication, anti-fraud, and security purposes (in which case we may process Government ID Data to complete verification);
- to improve our Services and to create a personalized user experience; and
- to contact you about relevant products or services, and in connection with marketing communications and Targeted Advertising.

We may process Identity Data, Contact Data, and User Content information for our [Commercial Purposes](#) (which may include data sales/sharing).

Some programs and offers are operated/controlled by our third-party partners or their affiliates or partners. We may receive this data from third parties to the extent allowed by the applicable partner; otherwise, this Privacy Policy will not apply to data processed by third parties.

Your Personal Information may be public. If you win a contest/sweepstakes, we may publicly post some of your data. We do not post Personal Information without consent where required by law. See any program agreement(s) for additional details and terms.

7.8. Support; Direct Contact

We process Identity Data, Device/Network Data, as well as any Personal Information contained within any User Content when you contact us via a contact us, email, or other support channel to request in relation to SEG Companies, SEG Properties, our products, services, or initiatives, or to ask for support. We use Identity Data, Contact Data, User Content, and Audio Data as necessary to communicate with you about the subject matter of your request. If related to your request, we may send you Marketing Communications. We also process this Personal Information for our [Business Purposes](#).

7.9. Feedback and surveys

We process Identity Data, Contact Data, Inference Data, and User Content collected in connection with surveys or questionnaires. We process this Personal Information as necessary to respond to guest/visitor requests and concerns, for our [Business Purposes](#), and other business interests, such as analyzing interest in or satisfaction with SEG Companies, SEG Properties, our products, services, or initiatives, or to improve your experience with our products and services.

7.10. Professional Engagements

We process Identity Data, Contact Data, Government ID Data, Biographical Data, Inference Data, User Content, Payment Data, and Health Data in connection with your application for employment, engagement as a vendor, or other professional engagement.

We process this Personal Information as necessary to evaluate, establish, and maintain the professional relationship, and for our [Business Purposes](#). We do not sell or share Personal Information processed in this context. We process Sensitive Personal Information only for Business Purposes permitted under applicable law.

8. PURPOSES OF PROCESSING

8.1. Business Purposes

In addition to the processing described above, we generally process Personal Information for several common purposes in connection with our business. Please see below for more information regarding the purposes for which we process your Personal Information.

Operate our Services and Fulfill Obligations

We process any Personal Information as is necessary to provide our Services, and as otherwise necessary to fulfill our obligations to you, e.g. to provide you with the information, features, and services you request.

Internal Processes and Service Improvement

We may use any Personal Information we process through our Services as necessary in connection with our improvement of the design of our Services, understanding how the Services are used or function, for customer service purposes, in connection with the creation and analysis of logs and metadata relating to use of our Services, and for ensuring the security and stability of the Services. Additionally, we may use Personal Information to understand what parts of our Services are most relevant to users, how users interact with various aspects of our Services, how our Services perform or fail to perform, etc., or we may analyze use of the Services to determine if there are specific activities that might indicate an information security risk to the Services or our users.

Security and Incident Detection

We may process Personal information in connection with our legitimate interest in ensuring that our Services is secure, identify and prevent crime, prevent fraud, and verify or authenticate users/individuals, and ensure the safety of our guests. Similarly, we process Personal information as necessary to detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns, and characteristics, maintain and analyze logs and process similar Personal information in connection with our information security operations and related.

Aggregate Analytics

We process Personal Information as necessary in connection with our creation of aggregate analytics relating to how our Services is used, the pages and content users view, and to create other reports regarding the use and performance of our Services, and other similar information and metrics. The resulting aggregate data will not contain information from which an individual may be readily identified.

Compliance, Safety & Public Interest

Note that we may, without your consent or further notice to you, and to the extent required or permitted by law, process any Personal Information subject to this Policy for purposes determined to be in the public interest or otherwise required by law. For example, we may process information as necessary to fulfil our legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest or as required by a public authority. Please see the data sharing section for more information about how we disclose Personal Information in extraordinary circumstances.

Corporate Events

Your Personal Information may be processed as part of routine corporate operations, as part of corporate reorganizations, or any business transition, such as a merger, acquisition, liquidation, or sale of assets, or in due diligence relating to such transactions.

8.2. Commercial Purposes

We and certain third parties process Personal Information to further our commercial or economic interests (“Commercial Purposes,”) depending on the context of collection and your [Rights & Choices](#).

Please Note – We may require your consent, or we may not engage in processing of Personal Information for Commercial Purposes in some jurisdictions, or certain contexts (e.g., as a result of your enrollment in SMS campaigns). See the “[Regional Supplement](#)” section below for more information.

Profiles

Entertainment is personal, and we are always working to help you find the best concerts, festivals, sports, and other events for you to enjoy. In order to understand our customers’ preferences, and better recommend products and services that are personalized to our customers, we may create a “Profile” by linking together and analyzing Personal Information processed in the following contexts:

- [Account Registration](#)
- [Transactions and Purchases](#)
- [Visiting SEG Properties](#)
- [Digital Services](#)
- [Newsletters and Marketing Communications](#)
- [Contest and Promotions](#)
- [Contact Us](#)
- [Feedback and Surveys](#)
- [Social Media Posts](#)

We may augment Profiles with Personal Information that we receive from other SEG Companies, Event Partners or other third parties (including social media companies), e.g. information about Services you have used or purchased previously, SEG Properties you visited, or locations at those Venues, or demographic data and data from your publicly available social media profiles.

In some cases we process Inference Data that reveals Race or Ethnic Origin as part of our Profiles. We typically process this information in relation to marketing for certain Events (e.g. cultural or heritage events.). Depending on applicable laws, we may not collect this information, and we may require your consent before collecting it. We will limit the use and disclosure of your Race or Ethnic Origin according to applicable law. See the “[Regional Supplement](#)” section below for more information about your rights in Sensitive Data.

We use Profiles for our legitimate interests in market research and statistical analysis in connection with the improvement of our Services. For example, we may analyze the Personal Information of customers who have purchased tickets for a future event, and then compare them with other customers in our database. If we identify other customers in our database who have similar Personal Information to the original purchasers, we may direct marketing about that event to the similar customers. We may conduct the profiling and send the direct marketing emails automatically.

Profiles involve processing that is automated, in whole or in part.

Personalized Marketing Communications

We may personalize [Marketing Communications](#) based on your [Profile](#). If consent to Consumer Profiling or Targeted Advertising is required by law, we will seek your consent.

Targeted Advertising

In some jurisdictions, SEG Companies, and certain third parties operating on or through our Services, may engage in advertising targeted to your interests based on Personal Information that we or those third parties obtain or infer from your activities across non-affiliated websites, applications, or services in order to predict your preferences or interests (“**Targeted Advertising**”). This form of advertising includes various parties and service providers, including third party data controllers, engaged in the processing of Personal Information in connection with advertising. These parties may be able to identify you across sites, devices, and over time.

The parties that control the processing of Personal Information for Targeted Advertising purposes may create or leverage information derived from [Personalization](#), [Profiles](#), and [Marketing Communications](#). In some cases, these parties may also develop and assess aspects of a Profile about you to determine whether you are a type of person a company wants to advertise to, and determine whether and how ads you see are effective. These third parties may augment your profile with demographic and other Inference Data, and may track whether you view, interact with, or how often you have seen an ad, or whether you purchased advertised goods or services.

We generally use Targeted Advertising for the purpose of marketing our Services and third-party goods and services, and to send marketing communications, including by creating custom marketing audiences on third-party websites or social media platforms.

Data Sales

We may engage in “sales” of data as defined by applicable law. For example, we may “sell” certain Personal Information when we engage in marketing campaigns with or on behalf of sponsors, conduct Targeted Advertising, or we may sell or grant access to Personal Information to our marketing partners, Event Partners, and other advertisers in relation to Targeted Advertising, joint promotions, and other marketing initiatives. See the “[Regional Supplement](#)” section for a list of categories of Personal Information sold or shared.

9. DATA SHARING

Personal Information we collect may be shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We generally transfer data to the categories of recipients or in connection with specific business purposes, described below.

SEG Companies

In order to streamline certain business operations and develop products and Services that better meet the interests and needs of our visitors and guests, we may share your Personal Information with any of our current or future affiliated entities, subsidiaries, and parent companies. For example, we share Personal Information with other SEG Companies in support of our Business Purposes, and in connection with our Marketing Communications.

Service Providers

In connection with our general business operations, product improvements, to enable certain features, and in connection with our other lawful business interests, we may share Personal Information with service providers or subprocessors who provide certain services to us, or process data on our behalf. For example, we may use third party hosting providers to host our sites or content, and we may disclose information as part of our own internal operations, such as security operations, internal research, etc.

Sponsors and Advertisers

We may share certain Personal Information with social media platforms, advertisers, ad exchanges, data management platforms, or sponsors in support of our [Commercial Purposes](#). We may allow these third parties to operate through our Services. We do not share Contact Data collected in connection with SEG’s SMS Marketing Communications with these parties.

Public Disclosure

If you use any social media plugin, API, or other similar feature, use an event hashtag or similar link, or otherwise interact with us or our Services via social media, we may make your post available on our Services or to the

general public. We may share, rebroadcast, or redisplay Personal Information or other information in the post to the extent permitted by the relevant social media service.

Event Partners

Where allowed by law, or with your consent, we will share your Personal Information with Event Partners, e.g. promoters, venues, sports teams, leagues (such as the NHL), artists, or sponsors that perform, promote, or operate one of our SEG Properties. Through your use of our Service, you may direct us to disclose this data to or interact with these third parties, e.g. by attending an event hosted, performed, or promoted by an Event Partner, or making a purchase involving these parties (in which cases, such transfers do not involve a data sale by us). However, in other cases, these parties may also receive data for [Business Purposes](#) and in connection with [Data Sales](#). We do not share Contact Data collected in connection with SEG's SMS Marketing Communications with these parties.

Data Aggregators

We may share Personal Information with data aggregators in support of our [Commercial Purposes](#) and in connection with [Data Sales](#). These disclosures/sales can help better personalize our Services, the services of third parties, enrich [Profiles](#), and help ensure that you see advertisements that are more relevant to your interests.

Social Media Companies

We may share certain Personal Information with social media companies when you interact with SEG on social media. We may allow these third parties to operate through our Service, such as through a social media icon link on our homepage.

Corporate Events

Your Personal Information may be disclosed to a third party in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Information may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

Legal Disclosures

In limited circumstances, we may, without notice or your consent, access and disclose your Personal Information, our correspondence with you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, or in the vital interests of us or any person. Note, these disclosures may be made to governments that do not ensure the same degree of protection of your Personal Information as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Information to such parties.

10. YOUR RIGHTS & CHOICES

10.1. Your Rights

Applicable law may grant you rights in your Personal Information. These rights vary based on your location, state/country of residence, and may be limited by or subject to our own rights in your Personal Information. You may submit requests to exercise rights you may have by contacting us at privacy@smithentertainmentgroup.com. See the [Regional Supplement](#) for more information regarding your rights/choices in specific regions.

Note: We are able to fulfill rights requests regarding Personal Information that we control or process. We may not have access to or control over Personal Information controlled by third parties. Please contact the third party directly to exercise your rights in third party-controlled information.

10.2. Verification of Rights Requests

We verify all rights requests to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Information. For example, we may require that you verify that you have access to the email on file in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.

10.3. Your Choices

You may have the following choices regarding the Personal Information we process, to the extent required under applicable law:

Consent

If we rely on your consent to our processing of Personal Information, you may withdraw your consent at any time. You may be required to close your account in order to withdraw consent where your consent is necessary to perform essential aspects of our Services. You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email (for email), by responding with "OPT-OUT", "STOP", or other supported unsubscribe message (for SMS), by adjusting the push message settings for our Mobile Apps using your device operating system (for push notifications), or for other communications, by contacting us using the information below. To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

Email Marketing

You have the choice to opt-out of or withdraw your consent to email marketing communications. You may exercise your choice via the links in our communications.

Cookies & Similar Technologies

If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser's settings menu or our "Manage Cookie Preferences" page. You may need to opt out of third-party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Policy](#), or [Google Analytics Opt-out](#).

Targeted Advertising You may opt out or withdraw your consent to Targeted Advertising by visiting [Your Privacy Choices](#). In some cases, you may be able to opt-out by submitting requests to third party partners, including for the vendors listed below:

- [Google Ads](#)
- [DoubleClick](#)
- [Facebook Custom Audience Pixel](#)
- [X Audience Pixel](#)
- [TikTok](#)
- [Digital Advertising Alliance's opt-out](#)
- [Network Advertising Initiative opt-out](#)

Do Not Track

Our Services does not respond to your browser's do not track signal.

11. SECURITY

We implement and maintain reasonable security measures to safeguard the Personal Information you provide us. However, we sometimes share Personal Information with third parties as noted above, and though we may take certain measures to help ensure the security of your Personal Information, we do not control third parties' security processes. We do not warrant perfect security and we do not provide any guarantee that your Personal Information or any other information you provide us will remain secure.

12. DATA RETENTION

We retain Personal Information for so long as it is reasonably necessary to achieve the relevant processing purposes described in this Privacy Policy, or for so long as is required by law. What is necessary may vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established under applicable law;
- Industry best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and
- The costs associated continued processing, retention, and deletion.

We will review retention periods periodically and may pseudonymize or anonymize data held for longer periods.

13. INTERNATIONAL TRANSFERS

We operate in and use service providers located in the United States. If you are located outside the U.S., your Personal Information may be processed in the U.S. The U.S. may not provide the same legal protections guaranteed to Personal Information in foreign countries. Contact us for more information regarding transfers of data to the U.S.

14. CHILDREN

Our Services are neither directed at nor intended for use by persons under the age of 13 in the US. We generally collect information relating to this age group only from parents or with parental consent and we only knowingly collect Personal Information from such individuals directly in limited circumstances where reasonably necessary to provide the Service. We do not otherwise knowingly collect information from such individuals. If we learn that we have inadvertently done so, we will promptly delete such Personal Information if required by law. Do not access or use our Services if you are not of the age of majority in your jurisdiction unless you have the consent of your parent or guardian. Please note, we may operate age-specific camps or clinics, which may be subject to separate privacy notices.

15. CHANGES TO OUR POLICY

We may change this Policy from time to time. Please visit this page regularly so that you are aware of our latest updates. Your use of the Services following notice of any changes indicates acceptance of any changes.

16. SUPPLEMENTAL DISCLOSURES AND REGIONAL DATA RIGHTS

16.1. US States / Your California Privacy Rights

Scope

This section applies to individuals located in the United States. Click the following link to review our disclosure relating to [Data Retention](#).

Data Rights

Under the California Consumer Privacy Act (“**CCPA**”), Utah Consumer Privacy Act (“**UCPA**”), and other state privacy laws, residents of certain US states may have the following rights, subject to your submission of an appropriately verified request:

- Confirm- Right to confirm whether we process your Personal Information.

Access/Know- Right to request any of following: (1) the categories of Personal Information we have collected, sold or “shared,” or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Information was collected; (3) the purposes for which we collected or sold or “shared” your Personal Information; (4) the categories of third parties to whom we have sold or “shared” your Personal Information, or disclosed it for a business purpose; and (5) the specific pieces of Personal Information we have collected about you.

Portability- Right to request that we provide certain Personal Information in a common, portable format.

Deletion- Right to delete certain Personal Information that we hold about you.

Correction- Right to correct certain Personal Information that we hold about you.

Opt-Out (Sales, Sharing, Targeted Advertising, Profiling)- Right to opt-out of the following:

- If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal Information.
- If we engage in Targeted Advertising (aka “sharing” of Personal Information or cross-context behavioral advertising,) you may opt-out of such processing.

- If we engage in certain forms of “profiling” (e.g. profiling that has legal or similarly significant effects), you may opt-out of such processing.

Opt-out or Limit Use and Disclosure of Sensitive Personal Information- right to opt-out of the processing of certain Sensitive Data, or request that we limit certain uses of Sensitive Personal Information. This right does not apply in cases where we only use Sensitive Personal Information where necessary, or for certain business purposes authorized by applicable law.

Opt-in/Opt-out of Sale/Sharing of Minors’ Personal Information- To the extent we have actual knowledge that we collect or maintain personal information of a minor under age 16 in California, those minors must opt in to any sales or “sharing” of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales or “sharing” of personal information. All minors have the right to opt-out later at any time.

Non-Discrimination- California residents have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.

List of Direct Marketers- California residents may request a list of Personal Information we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.

Remove Minors’ User Content- Residents of California under the age of 18 can delete or remove posts using the same deletion or removal procedures described above, or otherwise made available through the Services. If you have questions about how to remove your posts or if you would like additional assistance with deletion, contact us using the information below. We will work to delete your information, but we cannot guarantee comprehensive removal of that content or information posted through the Services.

Submission of Requests

You may submit requests, as follows (please our review [verification requirements](#) section). If you have any questions or wish to appeal any refusal to take action in response to a rights request, contact us at privacy@smithentertainmentgroup.com. We will respond to any request to appeal within the time period required by law:

- Send mail to the address listed [here](#).
- Contact us via email to our privacy team at privacy@smithentertainmentgroup.com.

Categories of Personal Information Disclosed for Business Purposes

For purposes of the CCPA, we have disclosed to Service Providers for “business purposes” in the preceding 12 months the following categories of Personal Information, to the following categories of recipients:

Category of Personal Information	Category of Recipients (see “ Data Sharing ” above for more information)
Audio/Visual Data Biographical Data Contact Data Device/Network Data General Location Data Identity Data Inference Data Transactional Data	SEG Companies; Service Providers; Event Partners; Corporate Events; Legal Disclosures
User Content	SEG Companies; Service Providers; Public Disclosure; Event Partners; Corporate Events; Legal Disclosures
Health Data Payment Data	SEG Companies; Service Providers

Categories of Personal Information Sold, “Shared,” or Disclosed for Commercial Purposes

For purposes of the CCPA, we have “sold” or “shared” in the preceding 12 months the following categories of Personal Information in the, to the following categories of recipients:

Category of Personal Information	Category of Recipients (see “Data Sharing” above for more information)
Contact Data Device/Network Data General Location Data Identity Data Inference Data Transaction Data User Content	Sponsors and Advertisers; Event Partners; Data Aggregators; Social Media Companies

Categories of Sensitive Personal Information Used or Disclosed

For purposes of CCPA, we may use or disclose the following categories of Sensitive Personal Information: Government ID Data, Health Data, Payment Data, Precise Location Data, Race or Ethnic Origin Data. We do not sell or “share” Sensitive Personal Information.