

*Effective Date: September 1, 2019*

This Privacy Policy explains the types of information that Spectra Holdco, LLC and its subsidiaries, including, without limitation, Global Spectrum, L.P. d/b/a Spectra Venue Management and Ovations Food Services, L.P. d/b/a Spectra Food Services & Hospitality (“Spectra,” “we” or “us”) collects, as well as our policies and practices regarding the use and disclosure of that information through the web pages, mobile applications, and other interactive features that display this policy (collectively, our “Platform”).

By using the Platform, you consent to the practices described in this Privacy Policy. If you have any questions about the Policy, please contact us at [legal@spectrap.com](mailto:legal@spectrap.com) or as set out under “Contact Us” below.

## 1. Information We Collect

**Information You Give Us.** When you interact with our Platform, you may choose to provide information that could reasonably be used to identify you specifically (“Personal Information”), such as your contact information (e.g., name, e-mail address, postal address, and telephone number), and credit card number. You may also choose to provide information that is demographic, aggregated, or does not otherwise identify you specifically (“Non-Personal Information”), such as your gender, ZIP/postal code, or other information when that information is not used with Personal Information.

**Information We Automatically Collect or Receive When You Use Our Platform.** Whenever you interact with our Platform, we as well as any of our third-party advertisers and/or service providers, may use a variety of technologies that automatically or passively collect information about how the Platforms are accessed and used (“Usage Information”). Usage Information may include, among other things:

- Your browser type and operating system;
- Your geographic location (if you consent to that) (for example, when you check-in or walk-in to a location); which may be collected using various technologies such as Wi-Fi, GPS or Bluetooth, while you are actively using the Platform and/ or while the Platform is running in the background of your Device;
- Sites you visited before and after visiting the Platform;
- Pages you view and links you click on within the Platform; and
- Information about your interactions with e-mail messages sent by us, such as the links clicked on and whether the messages were opened or forwarded.

Usage Information does not typically identify you (and thus we treat it as Non-Personal Information), but if we associate it with you as a specific and identifiable person, we will treat it as Personal Information.

**Device Identifiers** In the course of collecting Usage Information, we may also automatically collect your IP address, Wi-Fi MAC address, Bluetooth MAC address, or other unique identifier (“Device Identifier”) for the computer, mobile device, Wi-Fi card, technology or other device (collectively, “Device”) you use to access the Platform.

A Device Identifier could also be a randomly-generated group of numbers and letters that is automatically assigned to your Device when you access a website or its servers.

When you visit the Platform, we may collect your Device Identifier. A Device Identifier does not typically identify you, but if we associate it with you as a specific and identifiable person, we will treat it as Personal Information.

**Cookies and Similar Technologies.** We may use cookies, pixel tags, and similar technologies to automatically collect this information. Cookies are small bits of information that are stored by your Device's web browser. Pixel tags are very small images or small pieces of data embedded in images, also known as "web beacons" or "clear GIFs," that can recognize cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your Device.

We may allow third parties to place and read their own cookies, web beacons, and similar technologies to collect information through the Platform. For example, our third-party service providers may use these technologies to collect information that helps us with traffic measurement, research, and analytics.

By using the Platform, you consent to our use of cookies and similar technologies. Depending on the configuration options offered by the operating system, web browser, and other software on your Device, you may be able to decide if and how your Device will accept a cookie by configuring your preferences or options in your Device or web browser. If you choose to refuse, disable, or delete these technologies, some of the functionality of the Platform may no longer be available to you.

You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org), which includes additional, useful information on cookies and how to block cookies using different types of web browsers. For more information on advertising using cookies and how to opt-out of advertising cookies specifically, please see **Targeted Advertising** below.

**Location-Based Services and Related Technologies.** We may use additional methods to collect information about you when you are physically visiting one of our events or venues, based on presence location data gleaned from a mobile Device you have registered with us. This includes, without limitation, collection of information about you when you use wifi service at one of our events or venues.

The Platform may use geolocation and location presence awareness technology and functionality that is intended to make the Platform useful at the particular location it is being used. For example, the Platform may offer event-specific promotions, content and services based on your presence at a particular event. To offer those benefits, we must of course be able to determine that the Platform is being used in a particular venue. To do that, we may use your Device's GPS capabilities, or the signal of our BLE presence technology devices (or another geolocation or presence technology) which are located in various locations. Those devices and technologies broadcast signals that can be received by a mobile Device on which the Platform is used or installed. When the mobile Device receives such geolocation signals, if consent has been provided to receive notifications or messages from the Platform, we may send you a message or other information through the Platform.

**Information From Other Sources.** We may receive additional information about you from other sources and may combine that information with the other information we collect or receive about you. For example:

- The Platform may enable you to sign in using your username or other identifier from another Internet service, such as Google or Facebook. This other Internet service will authenticate your identity and provide you the option to share certain information with us, such as your name or email address;
- We may receive information from you off-line, such as when you visit Spectra venues or participate in Spectra-sponsored events;
- We may receive information about you from our "affiliates," which are entities that are legally part of the same group of companies that Spectra is part of, or that become part of that group;

- If you are on another website and you opt-in to receive information from Spectra, that website will forward to us your e-mail address and other information about you so that we may contact you as requested; and
- We may receive information from third-party partners and service providers, including partners and service providers that provide us information that is publicly or commercially available.

We may match the information we collect about you through the Platforms with information collected from such third parties in order to enhance our ability to serve you, to tailor our content to you and/or to offer you opportunities to purchase products or services that we believe may be of interest to you.

**How We Use the Information We Collect or Receive.** We may use the information we collect and receive for the following general purposes:

- Provide you with the products, promotions, services, newsletters, and information you request and respond to correspondence that we receive from you;
- Complete a transaction related to a purchase of products or services through the Platform or conduct another transaction you request;
- Compile demographic statistics about our users;
- Provide you with information and advertisements about our own and third-party products or services;
- Contact you via email and otherwise about products, services, and events that we think might be of interest to you;
- Contact you with surveys, legal notices, and other information that may be relevant to your use of the Platform;
- Maintain or administer the Platform, perform business analyses, or for other internal purposes to improve the quality of our business, the Platform, and other products and services we offer;
- Publish comments, images, video submissions and other information posted in our interactive online features; and
- As otherwise described to you at the point of collection or pursuant to your consent or as otherwise permitted or required by applicable law.

2. **How We Share the Information We Collect and Receive.** We are committed to maintaining your trust, and we want you to understand how we may share the information we collect.

- **Service Providers.** We may share your information with third party service providers that perform certain functions or services on our behalf, such as to host the Platform, manage databases, host a store or other e-commerce platform, sweepstakes or promotion, perform analyses, or send communications for us.
- **Select Business Partners.** We may share your information with select business partners so that they can provide you with special offers and promotional materials that may be of interest to you. However, Spectra is not responsible for the privacy practices of these business partners, which may use your information for their own purposes.
- **Our Clients.** When Spectra Venue Management has been engaged by a client to operate a web site associated with that client's venue, Spectra may share your information with the applicable client in connection with the services provided by Spectra for that client. If Spectra Venue Management is no longer engaged by the applicable client, Spectra will no longer share your information with that client or otherwise make use of your information for the benefit of that client.
- **Other Parties When Required By Law or as Necessary to Protect the Platform.** We may disclose your information to third parties in order to protect the legal rights, safety, and security of Spectra, our member organizations and the users of our Platform; enforce our Terms of Use; prevent fraud (or for risk

management purposes); and comply with or respond to law enforcement or legal process or a request for cooperation by a government or other entity, whether or not legally required.

- **In Connection With a Reorganization or Transfer of Assets.** If we sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a merger or business transfer, or in the event of bankruptcy, we may transfer your information to one or more third parties as part of that transaction.

- **Other Parties With Your Consent.** We may share information about you with third parties when you consent to such sharing, including when you post information to a user profile or a public area of the Platform, such as a chat room, forum, blog, or other community tool.

- **Aggregate Information.** We may disclose to third parties information that does not describe or identify individual users, such as aggregate website usage data or demographic reports.

4. **Your Choices** You have a number of choices about how we handle information we collect or receive about you.

- **Your Choice Not to Share Your Information or Receive Promotional Messages.** You may always direct us not to share your Personal Information with third parties (other than our service providers), not to use your Personal Information to provide you with promotional information or offers, or newsletters, emails or other communications by: (i) sending us an email at [website@spectrap.com](mailto:website@spectrap.com); (ii) contacting us by mail at Spectra, 150 Rouse Blvd., Philadelphia, PA 19112, Attn: General Counsel; or (iii) following the removal instructions in the communication that you receive.

- **Your Choice to Access/Correct/Delete/Modify Your Information.** If you wish to access, modify, verify, correct, or delete any of your Personal Information collected through the Platform, you may edit your registered user information or contact us at the above address or email. In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the Platforms. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information. It may not always be possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons.

- **Cookies.** To learn how you may be able to reduce the number of cookies you receive from us, or delete cookies that have already been installed in your web browser's cookie folder by us, please refer to your web browser's help menu or other instructions related to your web browser. If you do disable or opt out of receiving cookies from us, please be aware that some features and services on the Platform may not work properly because we may not be able to recognize and associate you with your account(s). You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes additional useful information on cookies and how to block cookies using different types of web browsers.

- **Location-Based Services.** If you do not want the Platform to use your specific location-based information, please refrain from using a location-based service, click "DON'T ALLOW" (or a similar response) when your mobile Device requests your location-based information, or turn off of the Platform's access to your location-based information through the settings on your mobile Device. You understand, however, that if you turn off the Platform's location-based services, you may not have access to all features of the Platform.

- **"Do Not Track" Signals.** Please note that while you may have the opportunity to opt-out of targeted advertising and you may be able to control the use of cookies through your web browser as described above, some web browsers may also give you the ability to enable a "do not track" setting. This setting sends a special signal to the websites you encounter while web browsing. Because there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, Spectra currently does not take action in response to these signals. If and when a final standard is

established and accepted, we will reassess how to respond to these signals. For more information about “do not track,” visit [www.allaboutdnt.org](http://www.allaboutdnt.org).

5. **Targeted Advertising.** We may use third party ad network providers to help present ads on the Platforms, as well as other service providers to evaluate and provide us with information about the use of the Platforms and viewing of our content. Such providers may place and access cookies, pixel tags, or similar technologies on your Device to serve you ads or other content personalized to your interests which they infer from your browsing on the Platform and other sites you have visited. In doing so, the provider collects or has access to Non-Personal Information such as your Usage Information. The use of cookies, pixel tags, or similar technologies by these providers is subject to their own privacy policies, not ours.

If you do not want to receive the benefits of targeted advertising, you may opt out of some network advertising programs that use your information by visiting: (i) for U.S. residents, the **NAI Opt-Out page** and the **DAA Opt-Out Page**; and (ii) for Canadian residents, the **DAAC Opt-Out Page**. Please note that even if you choose to remove your information (opt-out), you will still see advertisements while you’re browsing online, including advertisements that are relevant to the content of the webpage or application page on which they are displayed and advertisements that are relevant to your current location (for more information regarding controlling location-based services, please see the section above on “**Your Choices**”). However, the advertisements you see may be less relevant to you and your interests. Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The NAI Opt-Out Page and the DAA Opt-Out Page each provide a tool that identifies its member/participating companies that have cookies on your browser and provides a mechanism to opt out of receiving cookies from those companies. Please note that if you opt-out of targeted advertising, we may still track your visits to the Platforms for our own analytics, operations and security purposes.

**Data Security.** We have adopted security procedures to help protect against loss, misuse, and unauthorized access to the information we collect and receive. Please note that no data transmission or storage can be guaranteed to be 100% secure. As a result, while we strive to protect the information we maintain, we cannot guarantee or warrant the security of any information you disclose or transmit to our Platform and cannot be responsible for the theft, destruction, or inadvertent disclosure of information.

You are responsible for maintaining the confidentiality of your account password and for any access to or use of the Platform using your password, whether or not authorized by you. Please notify us immediately of any unauthorized use of your password or account or any other breach of security.

7. **Children’s Privacy.** Our Platform is directed to a general audience. Our Platform does not knowingly collect, use, or disclose personal information from children under the age of 13. If you are under 13 years of age, please do not submit any personal information through our Platform.
8. **Links to Third Party Sites and Services.** The Platform may contain links to other websites or online services that are operated and maintained by third parties and that are not under the control of or maintained by Spectra. Such links do not constitute an endorsement by Spectra of those other websites, the content displayed therein, or the persons or entities associated therewith. This Privacy Policy does not apply to this third-party content. We encourage you to review the privacy policies of these third-party websites or services.

9. **Transferring Your Information.** Spectra is based in the United States, and, regardless of where you use our Platform or otherwise provide information to us, the information may be transferred to and maintained on servers located in the U.S. Under United States law, your information may be subject to access requests from governments, courts, or law enforcement in the United States.

We may also from time to time transfer your information to other countries and make it accessible to any of our affiliates and third-party service providers internationally. Please note that some countries do not afford the same legal protection to personal information as you might enjoy in your country of residence.

By using our Platform and providing your information to us, you understand and agree that your information may be sent to other countries including those which do not provide an equivalent level of information protection as the laws in your country of residence.

10. **Privacy Policy Updates.** We may modify this Privacy Policy at any time by posting revisions to the Platform and revising the effective on this policy date, or by providing other appropriate notice. We encourage you to periodically review this statement to be informed of how we are protecting your Personal Information.
11. **Contact Us.** If you have any comments or questions, you may send an e-mail to our Legal Department at [legal@spectrarp.com](mailto:legal@spectrarp.com) or write to us at: Spectra, 150 Rouse Blvd., Philadelphia, PA 19112, Attn: Legal Department.