



PRIVACY POLICY

The terms, “Us”, “We”, “Our”, or “HBCUCollegeDay.com” used herein, shall mean 3815 Media Inc., HBCUCollegeDay.com and each of their employees, affiliates, attorneys, agents, successors, assigns and parent companies.

This Privacy Policy covers data that we collect through the HBCUCollegeDay.com website, directly from data subjects, or that we obtain from third parties. HBCUCollegeDay.com uses different types of information in order to provide our websites’ services, products, and features to you. The Personal Data we collect, and process may vary, depending on how you use the HBCUCollegeDay.com website.

We offer services through a wide range of businesses and under many different brands. When you use or visit the HBCUCollegeDay.com website, you agree to the collection, use, and sharing of your information as described in this Privacy Policy. If personal data is required, to provide particular HBCUCollegeDay.com services or features to you, it will be indicated at the time of collection. If personal data is required and you choose not to provide it, then the particular feature or service may not be available to you.

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1. TYPES OF INFORMATION THAT WE COLLECT

We, or our service providers on our behalf, may collect the following information about you or your use of the HBCUCollegeDay.com services or website:

INFORMATION YOU PROVIDE TO US

- Contact and registration information: such as your name, address, telephone number, email address, resume data, internship application data, internship application screening data, job application data, job application screening data, username, and password.
- Information about you or your friends and family: such as demographic or biographical information, gender, interests, photos, videos, or any other information about you that you provide to us, including information about friends, contacts, job application references, intern application references or referrals.
- Video recordings: pre-recorded (aka one-way interviews) and live internship or job interviews on HBCUCollegeDay.com.
- Competition, sweepstakes, and survey information: any information provided when entering competitions, prize draws and sweepstakes we, or a third party on our behalf, may run. We may carry out surveys and panel discussions, which may request that you voluntarily provide additional information.
- Customer care, technical support, and other feedback: questions and other messages you address to us directly through online forms and social media platforms. If you contact us by phone, we may record the conversation and/or keep a summary of the call.
- Other information you provide: any other information that you provide to us including, posts, date of birth, content, photos, booking times or biometric identifiers such as facial scans or fingerprints.

INFORMATION WE COLLECT AUTOMATICALLY

- Device Information: including your IP address, browser types, browser language, operating system, platform type, gaming platform, device types, and device IDs such as unique identifiers, advertising identifiers, or gaming platform identifiers.
- Usage Information: including files you download, domain names, landing pages, your browsing activity, what you click, scrolling and keystroke activity, pages viewed, advertising viewed or visited, forms or fields you complete or partially complete, search terms, whether you open an email and your interaction with the content, access times, error logs, and other similar information.
- Location Information: including the city, state and zip code associated with your IP address, information derived through Wi-Fi triangulation, and precise location information from GPS-based functionality on your mobile devices or from your use of our mobile apps, and with your consent, your precise GPS information.
- Viewing Behavior: including the content you view, how long you watch each video, the quality of the service you receive (e.g. buffering, load times) as well as advertisements you have been shown or interacted with.
- Offline Information. Certain information may also be stored while you are offline and transmitted to us when you next connect to the internet, regardless of where you connect from or the device you use to connect.

ADDITIONAL PURPOSES AND DISCLOSURES OF INFORMATION

RESUME DATA

By creating a resume through HBCUCollegeDay.com or uploading a file resume on HBCUCollegeDay.com, you



are requesting and authorizing HBCUCollegeDay.com to make available your resume to third parties. When you create a profile on HBCUCollegeDay.com, your resume is searchable by default. This means that profile data and resume data (searchable), except as otherwise indicated on HBCUCollegeDay.com, may be available to third parties, such as Employers.

Please note Employers/Internships and Employer/Internship representatives who access your resume data, may choose to share your resume with additional parties. HBCUCollegeDay.com is not responsible for such sharing. Similarly, when you share your searchable resume directly with a personalized link, we cannot control who sees your resume when you share that link.

If you do not want HBCUCollegeDay.com to make your resume data (searchable) available to third parties without your direction or if you do not want Employers/Internships to contact you, you should remove your resume on HBCUCollegeDay.com or refrain from posting your resume on HBCUCollegeDay.com.

AUTOMATED PROCESSING OF YOUR PERSONAL DATA

We perform automated processing of personal data to evaluate specific aspects relating to a user and to analyze and predict a user's preferences and interests. Where we perform this processing, we do so either based on user consent or performance of a contract, whereby such processing is necessary for us to provide our services to job/intern seekers, internship seekers and employers. For example, such processing allows us to match job/intern seekers with employers effectively, to provide job/intern seekers with employment/internship alerts, recommended jobs/internships, and invitations to take action on jobs/intern that the job/intern seeker is likely to be more interested in, to send particular job/intern seeker applications to an employer, to display search results, to send application status notifications on behalf of employers, or to perform certain spam and fraud detection activities to protect our users.

SITE ACTIVITY RECORDING: WHAT WE DO WITH THE DATA.

We collect, record, process, analyze, and store any and all activities you take on HBCUCollegeDay.com and on the affiliated sites, and any and all interactions and communications you have with, on, or through HBCUCollegeDay.com and affiliated sites. We may also use third parties to collect and process this data on HBCUCollegeDay.com's behalf, in connection with our operations to improve HBCUCollegeDay.com, protect our users, and optimize our services as described further in this policy. This activity data includes: which areas of HBCUCollegeDay.com you visit (including URLs), which content you view, which information you input, whether and where you click, scroll, hover-over, mouseover, or otherwise interact with or communicate with or through HBCUCollegeDay.com and affiliated sites, the timing of each activity, and time spent on each activity. We collect this data from everyone using HBCUCollegeDay.com and affiliated sites, including users of private browsing mode, "incognito mode," or similar modes. We use vendors as an extension of HBCUCollegeDay.com and affiliated sites to collect, record, process, analyze, and store this data.

We process your activity on the HBCUCollegeDay.com and affiliated sites to help us better understand how you use them. This helps us improve and inform the products and services we offer. All of which allows us to help you seek internships and employment.

Because it's critical to how our sites operate, if you do not want your actions to be collected, recorded, processed, analyzed, or shared in this way, you may need to cease using the HBCUCollegeDay.com website.

RETENTION OF YOUR INFORMATION

Where HBCUCollegeDay.com acts as a controller of your personal data, we retain such data until it is no longer necessary to fulfill the purpose it is being used for, as required by applicable laws, or until you ask us to delete it.

In determining these appropriate retention periods, we consider the purposes for which we process personal data and whether we can achieve those purposes through other means. We also consider the extent, nature, and sensitivity of personal data and our legal obligations with respect to data. Where possible and relying on



our legitimate interest in improving our sites, HBCUCollegeDay.com anonymizes or aggregates personal data, so that it can no longer be associated with or identify a user, in which case HBCUCollegeDay.com can further process the information. For example, we may use anonymized job seeker data, such as your resume or profile data to test the accuracy of our products and services. Another way we may use anonymized data is to make sure our technology is helping all people gain employment or internships in a way that is fair.

Where HBCUCollegeDay.com acts as processor of your personal data, we store such data until instructed to delete it by you.

2. HOW WE USE YOUR INFORMATION

Depending on the service you use through HBCUCollegeDay.com, we, or our service providers, may use your information to HBCUCollegeDay.com services including:

- Responding to your requests or inquiries
- Providing technical support
- Sending you service-related communications, including announcements and administrative messages
- Displaying certain content, such as content you upload and make available, and comments
- Generating suggestions on the type of video you might enjoy
- Understanding how you use the hbcucollegeday.Com website and its services so we can improve them

Personalize your experience including:

- Providing you with advertising based on your activities and interests
- Creating and updating audience segments that can be used for targeted advertising and marketing on thehbcucollegeday.Com website, television, third party services and platforms, mobile apps and/or websites, and offline
- Creating profiles about you, including adding information we obtain from third parties, which may be used for analytics, marketing and advertising
- Sending you newsletters, surveys and information about products, services and promotions offered by 3815 media inc., hbcucollegeday.com, our partners, and other organizations with which we work

Recognize your devices and associate the information with your profile including:

- Using data collected or received from hbcucollegeday.Com affiliates, service providers, advertisers, and other third parties, such as your device information, to match mobile advertising and cookie identifiers
- Matching your devices if you log into the same online service on multiple devices or web browsers or if your devices share similar attributes that support an inference that they are used by the same user or household
- Using this information to match your interests across devices, as well as for analytics, ad serving or reporting, or to improve the services
- Identifying you or your device or associated information with you, your device, or your profile whenever you visit the hbcucollegeday.com website, even if you do so when logged out or without intentionally identifying yourself.
- Prevent fraud and defend our legal rights including:
 - Protecting the safety of our users and others
 - Enforcing our terms of service
 - Preventing fraud or any other potentially illegal activities.



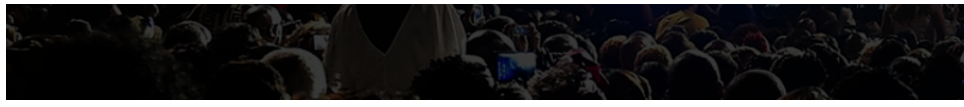
We may combine all the information we collect from or receive about you for any of the foregoing purposes. Please see Your Rights and Choices section herein below for further information.

We may aggregate or de-identify your information and may use, share, rent or sell aggregated or de-identified information for any purpose and such information is not subject to this Privacy Policy.

3. HOW WE SHARE YOUR INFORMATION

We may share your information with:

- **Related Companies:** HBCUCollegeDay.com, as well as our company and affiliates to help better tailor services, products, marketing, and advertising to you.
- **Service providers** that perform certain business-related functions on our behalf such as: research and analytics, website hosting, transaction fulfillment, payment, processing database maintenance, fraud prevention, technology services and platforms, identity management and acquisition and conversion services.
- **Advertisers, Advertising Networks, and Other Third Parties:** Information about how you use the HBCUCollegeDay.com website or services and how you interact with content or ads to better tailor services, products, marketing, and advertising on our service or on third party platforms. These third parties may use their own tracking technologies/cookies to collect or request information about you including through surveys.
- **Hashed/Masked Information:** We may share information about you along with a hashed or masked identifier, with third parties so they may better personalize your experience with them and the offers they send you.
- **Social Networks:** Certain features on the HBCUCollegeDay.com website may be published to your social networks. For example, if you click on a Facebook “like” button on a HBCUCollegeDay.com website, the “like” may appear on your Facebook account. To control this sharing of information, please review the relevant social network’s privacy policy.
- **Other Users and Search Engines:** Depending on the HBCUCollegeDay.com service, you may provide certain information including your name, resume, photo, and other information to create an account (“Account Profile”). Some information in your Account Profile may be available publicly to other members of that service, or the general public, and may be searchable by search engines. When we display your user submissions, they will be identified by information in your Account Profile. We may distribute user submissions to third parties, and if we do, we may include any information in your Account Profile or submissions.
- **Research and Measurement Companies:** We share information about content you view on the HBCUCollegeDay.com website with video measurement services as well as other analytics providers. See Your Rights and Choices section herein below for more information.
- **Law Enforcement Agencies, Regulators, Content Protection Organizations, Anti-fraud Coalitions and other groups to:**
 - ◇ Protect our legal rights, privacy or safety, and that of hbcucollegeday.Com and our affiliates, employees, agents, contractors, or other individuals
 - ◇ Protect the safety and security of visitors to the hbcucollegeday.Com website or other properties
 - ◇ Protect against fraud or other illegal activity or for risk management purposes
 - ◇ Respond to inquiries or requests from government, regulatory, law enforcement, or public authorities
 - ◇ Permit us to pursue available remedies, commence, participate in, or defend litigation, or limit the damages that we may sustain



- ◇ Comply with the law including with subpoenas, search warrants, court orders, and other legal process or
- ◇ Enforce applicable terms of service.

VIDEO VIEWING BEHAVIOR

With your appropriate consent, and consistent with applicable law, we may share your video viewing behavior with third parties including advertising companies, analytic partners, and social media sites.

SALE OR TRANSFER OF ALL OR PART OF OUR BUSINESS OR ASSETS

In the event that HBCUCollegeDay.com, or any HBCUCollegeDay.com affiliate is involved in a merger, acquisition, transfer of control, bankruptcy, reorganization or sale of assets, or diligence associated with such matters, we may sell or transfer the information described in this Privacy Policy as part of that transaction.

4. WHO WE SHARE YOUR DATA WITH

TRANSFERS OF INFORMATION TO OUR AFFILIATES

HBCUCollegeDay.com shares information with its affiliates for providing personalized experience, improving our services, products, and features, as well as protecting users. The services provided to you and the functionality of the site could not be provided without such transfers. If you do not wish your information to be transferred in this way, you should not use the HBCUCollegeDay.com website.

Transfers of Information to Employers

HBCUCollegeDay.com sends job/intern seeker’s personal data to employers. Such transfers are performed in the course of the job/intern search, application, and interview process. This transfer may include sending your application and/or additional candidate information, such as your contact details, to other platforms that process job/intern seeker’s personal data for the employer or scheduling platform.

Employers agree to comply with all their responsibilities under applicable data protection rules with respect to the collection, processing, and storage of personal data, as well as providing adequate protection of all data subject rights provided for under all applicable data protection rules.

TRANSFERS OF INFORMATION TO JOB/INTERN SEEKERS

HBCUCollegeDay.com sends certain Employer-related information to Job Seekers. This includes publishing job ads, company pages, and salary information on HBCUCollegeDay.com and publishing job listings on third-party websites. HBCUCollegeDay.com may also make available certain Employer-related information to Job Seekers, such as information about an Employer’s activity and responsiveness on HBCUCollegeDay.com. This can include the Employer representative’s name, the Employer’s city/state location, whether the Employer has taken or has chosen not to take an action with regard to the Job Seeker’s resume or application such as opening, viewing, responding to or making a decision in regard to it, whether the Employer has engaged with other Job Seekers or viewed other Job Seekers’ resumes, and whether the Employer has taken an action in regard to a job listing such as pausing or closing it. We do this in order to help Job Seekers evaluate employment opportunities. As an Employer, when you use HBCUCollegeDay.com you agree that HBCUCollegeDay.com may provide this information to Job Seekers.

TRANSFERS OF INFORMATION TO SERVICE PROVIDERS AND OTHER THIRD PARTIES

We use third parties to perform services in connection with our operations, to improve HBCUCollegeDay.com and our services, products, and features, to protect our users and better understand their needs, and to optimize our services and our users’ experiences. By using HBCUCollegeDay.com, you acknowledge



HBCUCollegeDay.com’s use of such third parties, including, but not limited to, for the purpose of collecting, processing, analyzing, and recording your activity on, interaction with, and communications with, or through HBCUCollegeDay.com. This includes which areas of the website you visit (including URLs), which content you view, which information you input, whether and where you click, scroll, hover-over, mouseover, or otherwise interact with or communicate with or through the Site, the timing of each activity, and time spent on each activity. Our third parties collect this data from everyone using the HBCUCollegeDay.com website, including users of private browsing mode, “incognito mode,” or similar modes.

We process your activity on the HBCUCollegeDay.com directly or through third parties to help us better understand how you use the website’s services and features. This helps us improve and inform the products and services we offer.

TRANSFERS OF PUBLICLY AVAILABLE INFORMATION

When users post content on the HBCUCollegeDay.com website in a manner that is intended to make that content searchable by individuals, HBCUCollegeDay.com reserves the right to aggregate and share that information with third parties. For example, if an Employer posts a job on the HBCUCollegeDay.com website, HBCUCollegeDay.com may share that job listing or information contained within that job listing with third parties, at HBCUCollegeDay.com’s discretion and subject to agreement with such third parties. HBCUCollegeDay.com also reserves the right to share information aggregated from public sources in this capacity.

LINKS TO THIRD-PARTY SITES

The HBCUCollegeDay.com website may make available links to other third-party websites. When you click on such links, you may leave the HBCUCollegeDay.com website. Your web browser may also disclose to the third-party website the URL of the HBCUCollegeDay.com website page you clicked from, and this URL may include search terms and filters you used on the HBCUCollegeDay.com website. The Sites may also make available Company Pages, which may contain information provided by third-party Employers.

In cases where you follow a link to a third-party website, you are no longer covered by our Privacy Policy, and any data collection or processing activity that takes place on that website will be governed by that website’s own privacy policy.

HBCUCollegeDay.com are not responsible for the privacy practices of third parties. Please consult their individual privacy policies to learn more.

5. CHILDREN

The HBCUCollegeDay.com website is only for use by people aged 16 or over. If you are under the age of majority in your jurisdiction, you must use the HBCUCollegeDay.com website under the supervision of your parent, legal guardian, or responsible adult. Please note that data will be deleted on accounts created by those who self-confirm to be under 13 years old. If you are a parent or guardian and believe your child under 13 has provided us with personal information without consent, please contact us at Rushion@3815Media.com.

MINORS UNDER 18

Minors under 18 years old, or their parents, may request the removal of information that they posted to the HBCUCollegeDay.com website by contacting Rushion@3815Media.com. Upon such request, HBCUCollegeDay.com will remove any content posted by a minor, unless required by law to retain such content or information.



SCHOOLS

Schools and other organizations that are covered by state student privacy laws will be able to control the collection and processing of student data when they create and utilize certain solutions we make available to them.

6. YOUR RIGHTS AND CHOICES

COMMUNICATION PREFERENCES AND OPT-OUTS

You may unsubscribe from our email newsletters or promotional emails by following the opt-out instructions contained in the email. You cannot unsubscribe from service-related, transactional, or emails related to your HBCUCollegeDay.com, services.

COOKIES AND SIMILAR TECHNOLOGIES

We, and our service providers, advertisers, and other partners, use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across different HBCUCollegeDay.com services and websites.

The HBCUCollegeDay.com website's cookies and tracking settings provides certain opt-out choices. However, we may still allow collect usage data for certain other purposes (e.g., contextual advertising, research, analytics, and internal operations).

ACCESS, CORRECTION AND DELETION

Depending on the HBCUCollegeDay.com service you use, you may be able to access and correct certain information through the features provided by the service. In addition, where legally required, we will provide users with access to their information and the ability to review, update, correct, and/or delete it. We will take reasonable steps to verify your identity, such as requiring a password and user ID, and possibly photo ID before granting access to your information. For more information, please contact Rushion@3815Media.com.

7. LOCATION OF YOUR INFORMATION

HBCUCollegeDay.com, is headquartered in the United States and may from time to time transfer your information to other countries and make it accessible to other HBCUCollegeDay.com affiliates, service providers and advertisers regardless of where they are located. We will take steps to ensure that your information receives an appropriate level of protection.

8. HOW WE PROTECT YOUR INFORMATION

We maintain procedural, technical, and physical safeguards for the HBCUCollegeDay.com services to help protect against loss, misuse or unauthorized access, disclosure, alteration, or destruction of the information you provide via HBCUCollegeDay.com. These safeguards vary depending upon the sensitivity of the information we collect and store. Please be aware that no security solutions are infallible.

9. UPDATES TO OUR PRIVACY POLICY

If we make material changes to the way we collect or use your information, we will notify you by posting a revised version of this Privacy Policy online, and we may also notify you by other means. You should check the HBCUCollegeDay.com website periodically for updates.

The date at the top of the Privacy Policy tells you when it was last updated. Any changes to this Privacy Policy will become effective when the revised Privacy Policy is posted. If you use this online service after the changes



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are posted, you have agreed the changes. If you do not agree with this Privacy Policy or any changes we make, please do not continue to use the HBCUCollegeDay.com website or any services associated therewith.

10. CONTACT US

For any questions or complaints about this Privacy Policy or our privacy practices, please contact us at Rushion@3815Media.com, Chief Privacy Officer, 3815 Media Inc., or their Legal Department, Ricky@AttorneyRickyAnderson.com.