Author's Republic Privacy Policy

Effective as of December 10, 2023.

Please click here to view the previous version of our Privacy Policy.

<u>California Notice at Collection</u>: See the California Notice at Collection below for important information about your rights under California law.

Author's Republic and our subsidiaries and affiliates ("Author's Republic", "we", "us" or "our") provides a platform to help authors, publishers, and rights holders produce and distribute audiobooks. This Privacy Policy describes how Author's Republic processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website, mobile application, and social media pages) as well as our marketing activities, live events and other activities described in this Privacy Policy (collectively, the "Service")). The Service is only intended to be used by authors, narrators, publishers, and rights holders, not readers nor listeners of the audiobooks they create.

NOTICE TO EUROPEAN USERS: Please see the Notice to European Users section for additional information for individuals located in the European Economic Area or United Kingdom (which we refer to as "Europe", and "European" should be understood accordingly) below.

You can download a printable copy of this Privacy Policy <u>here</u>.

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, email address, billing and mailing addresses, professional title and company name, and phone number.
- Demographic data, such as your city, state, country of residence, postal code, and age.
- **Profile data**, such as the username and password that you may set to establish an online account on the Service, biographical details, photograph or picture, links to your profiles on social networks, interests, preferences, and any other information that you add to your account profile.

- **Communications data** based on our exchanges with you, including when you contact us through the Service, communicate with us via social media, or otherwise.
- Marketing data, such as your preferences for receiving our marketing communications and details about your engagement with them.
- Audiobook data, such as the eBook format of your audiobook, text files, audio files, narration information, cover art, metadata, proof of rights, and other information you may provide us to assist in the distribution and production of your audiobook.
- **Financial data**, such as your financial account numbers and escrow data, including information needed to pay you.
- Government-issued identification data, such as national identification number (e.g., Social Security Number, tax identification number, passport number), state or local identification number (e.g., driver's license or state ID number), date of birth, and an image of the relevant identification card.
- Payment data needed to process payments to Author's Republic, including payment card information or bank account number. We use third-party vendors to collect and process your payment data, as described further below.
- **Transactional data,** such as information about orders and sales initiated through the Service, along with pricing history and complaints and escalations.
- Other data not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information falling within one of the categories identified above that we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Service providers** that provide services on our behalf or help us operate the Service or our business.
- **Business transaction partners**. We may receive personal information in connection with an actual or prospective business transaction. For example, we may receive your personal information from an entity we acquire or are acquired by, a successor, or assignee or any party involved in a business transaction such as a merger, acquisition, sale of assets, or similar transaction, and/or in the context of an insolvency, bankruptcy, or receivership.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- Device data, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- Online activity data, such as pages or screens you viewed, how long you spent on a page or screen,

the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.

• Communication interaction data such as your interactions with our email or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

For more information concerning our automatic collection of data, please see the <u>Tracking technologies</u> section below.

Cookies and Other Technologies

Some of the automatic collection described above is facilitated by the following technologies:

- Cookies, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our third-party business partners and service providers place.
- Local storage technologies, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

For information concerning your choices with respect to the use of the above technologies, see the <u>Your choices</u> section, below.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and operations. We may use your personal information to:

- provide the Service, including to provide services and fulfill contractual obligations to authors, narrators, publishers, and rights holders, such as paying these individuals and facilitating the recording of their audiobooks;
- enable security features of the Service;
- establish and maintain your user profile on the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages; and
- provide support for the Service, and respond to your requests, questions and feedback.

Service personalization, which may include using your personal information to:

- understand your needs and interests;
- personalize your experience with the Service and our Service-related communications; and
- remember your selections and preferences as you navigate webpages.

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services. For example, we use Google Analytics for this purpose. You can learn more about Google Analytics and how to prevent the use of Google Analytics relating to your use of our sites here:

https://tools.google.com/dlpage/gaoptout?hl=en. We also use Microsoft Clarity to capture how you use and interact with our website. For more information about how Microsoft collects and uses your data, visit the

We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market the Service. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the Microsoft Privacy Statement.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services. Unless otherwise agreed to in writing, we do not use audio file data uploaded by you to develop or train our AI Voice Technology, which is our text-to-speech software that utilizes computergenerated (i.e., "AI") voice technology, including development of any AI training or modeling for such software.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

Direct marketing. We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the <u>Opt-out of marketing</u> section below.

• Interest-based advertising. We and our third-party advertising partners may use cookies and other technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms.

Events, promotions and contests. We may use your personal information to:

- administer promotions and contests
- communicate with you about promotions or contests in which you participate
- contact or market to you after collecting your personal information at an event

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

Data sharing in the context of corporate events, we may share certain personal information in the context of actual or prospective corporate events – for more information, see How we share your personal information, below.

To create aggregated, de-identified and/or anonymized data. We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you and we will not attempt to reidentify any such data. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Further uses, in some cases, we may use your personal information for further uses, in which case we will ask for your consent to use of your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

Retention

We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, aggregate, deidentify, anonymize it, or isolate it from further processing.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

Affiliates. Our corporate parent, subsidiaries, and affiliates.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, consumer research and website analytics).

Payment processors. Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as Stripe, PayPal, and Tipalti. Stripe, PayPal, and Tipalti, may use your payment data in accordance with their privacy policies, available at https://stripe.com/en-gb/privacy, https://stripe.com/en-gb/privacy, https://stripe.com/en-gb/privacy, <a href="https://stripe.com/privacy

Advertising partners. Third-party advertising companies for the <u>interest-based advertising purposes</u> described above.

Third parties designated by you. We may share your personal information with third parties where you have instructed us or provided your consent to do so.

Partners. Third parties with whom we partner, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Linked third-party services. If you log into the Service with, or otherwise link your Service account to, a social media or other third-party service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the <u>Compliance and protection purposes</u> described above.

Business transferees. We may disclose personal information in the context of actual or prospective business transactions (*e.g.*, investments in Author's Republic, financing of Author's Republic, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Author's Republic as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Other users. Our narrators' profile and other user-generated content data (except for messages) may be visible to other users of the Service. For example, other users of the Service may have access to narrator information if a narrator chooses to make their profile or other personal information available to other users through the Service, such as a narrator's name, photo, hourly rate, biography, audio samples, genres, languages and accents. Narrator users generate their own information. This is only visible to logged in users. When a narrator is working with an author, the narrator user may see the author's name, biography, username, and publisher's name. This information can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of this information. Moreover, we may publish your cover art and audio tracks on our accounts in social media platforms or on the Service.

Your choices

In this section, we describe the rights and choices available to all users. Users who are located in California, can find additional information about their rights below.

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into your My Account section, and update

information such as email address, tax information, and personal identification.

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by <u>contacting us</u>. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive Service-related and other non-marketing emails.

Cookies and other technologies. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org. You can also configure your device to prevent images from loading to prevent web beacons from functioning.

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

Privacy settings. We make available certain privacy settings on the Service, including options to enable multifactor authentication.

Advertising choices. You may be able to limit use of your information for interest-based advertising through the following settings/options/tools:

- Browser settings. Changing your internet web browser settings to block third-party cookies.
- **Privacy browsers/plug-ins.** Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
- Platform settings. Certain platforms offer opt-out features that let you opt-out of use of your information for interest-based advertising. For example, you may be able to exercise that option for Google and Facebook, respectively, at the following websites:
 - o Google: https://adssettings.google.com/
 - o Facebook: https://www.facebook.com/about/ads
- Ad industry tools. Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
 - Network Advertising Initiative:
 http://www.networkadvertising.org/managing/opt_out.asp
 - o Digital Advertising Alliance: optout.aboutads.info.
 - o AppChoices mobile app, available at https://www.youradchoices.com/appchoices, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- Mobile settings. Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes.

We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" signals. To find out more about "Do Not Track," please visit http://www.allaboutdnt.com.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Linked third-party platforms. If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Delete your content or close your account. You can choose to delete certain content through your account. If you wish to request to close your account, please <u>contact us.</u>

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Users in Europe should read the important information provided below about transfer of personal information outside of Europe.

Children

The Service is not intended for use by anyone under 13 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified

version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

• Email: info@authorsrepublic.com

• Mail: 8400 Corporate Drive, Landover MD 20785, USA

Important information for California residents

This section applies only to California residents. It describes how we collect, use and share Personal Information of California residents in operating our business, and their rights with respect to that Personal Information. The Privacy Notice describes the personal information that we collect, the sources from which we collect it, the purposes for which we use it, the limited circumstances under which we disclose personal information, and with whom we disclose it. For purposes of this section, "Personal Information" and "Sensitive Personal Information" have the meanings given in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, "CCPA") and do not include information exempted from the scope of the CCPA.

Your California privacy rights. As a California resident, you may have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law. We have no actual knowledge that we have sold or shared the personal information of California residents under 13 years of age in the past twelve months. We also do not use or disclose Sensitive Personal Information for purposes that California residents have a right to limit under the CCPA, nor do we engage in automated decision making or profiling, as defined under the CCPA.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - o The categories of Personal Information that we have collected.
 - o The categories of sources from which we collected Personal Information.
 - o The business or commercial purpose for collecting and/or selling Personal Information.
 - o The categories of third parties with whom we share Personal Information.
 - o Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third-party recipient.
 - o Whether we've sold your Personal Information, and if so, the categories of Personal Information received by each category of third-party recipient.
- Access. You can request a copy of the Personal Information that we have collected about you.
- **Correction.** You can ask us to correct inaccurate Personal Information that we have collected about you.
- Opt-out of Sharing. You can opt-out of certain processing of personal information for targeted advertising purposes. however, we do not sell or share your Personal Information for monetary consideration.
- **Deletion.** You can ask us to delete certain Personal Information that we have collected from you.
- Nondiscrimination. You are entitled to exercise the rights described above free from
 discrimination in the form of legally prohibited increases in the price or decreases in the quality of
 our Service.

How to exercise your rights

You may exercise your California privacy rights described above as follows:

- **Right to information, access, correct and deletion.** You can request to exercise your information, access, correct and deletion rights by:
 - o Visiting: www.authorsrepublic.com
 - o Emailing: info@authorsrepublic.com

• Exercising your right to opt-out of the "sharing" of your Personal Information. While we do not sell personal information for money, like many companies, we use services that help deliver interest-based ads to you as described above. The CCPA may classify our use of some of these services as the "sharing" your Personal Information with the advertising partners that provide the services. You can by submit requests to opt-out of tracking for targeted advertising purposes or other similar sharing of Personal Information here: contact us link, or via email to info@authorsrepublic.com. You can also broadcast the Global Privacy Control (GPC) to opt-out for each participating browser system that you use. Learn more at the Global Privacy Control website.

Verification of Identity or Authorized agents. We reserve the right to confirm your California residence to process your requests and will need to confirm your identity to process your requests to exercise your information, access or deletion rights. As part of this process, government identification may be required. Consistent with California law, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government-issued identification, and the authorized agent's valid government issued identification. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

Retention. The criteria for deciding how long to retain Personal Information is generally based on whether such period is sufficient to fulfill the purposes for which we collected it as described in this notice, including complying with our legal obligations.

Personal information that we collect, use and disclose.

We have summarized the Personal Information we collect and may disclose to third parties by reference below to both the categories defined in the "Personal information we collect" section of this Privacy Policy above and the categories of Personal Information specified in the CCPA (Cal. Civ. Code §1798.140(v)) and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy.

Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of Personal Information not described below.

While we have not sold your personal information in the preceding 12 months for monetary consideration, like many companies, we use services that help deliver interest-based ads to you as described above.

Personal Information ("PI") we collect	CCPA statutory category	Categories of third parties to whom we "disclose" Pl for a business purpose	Categories of third parties to whom we "share" PI
Contact data	 Identifiers (online) Identifiers (other) Commercial information California customer records 	 Service providers Payment processors Advertising partners Linked Third Parties Professional advisors Authorities and others Business transferees Business and marketing 	 Advertising partners (to facilitate online advertising) Business and marketing partners

		partners	
		 Other users and the public 	
• Demographic data	 Identifiers (online) Identifiers (other) California customer records 	 Service providers Payment processors Advertising partners Linked Third Parties Professional advisors Authorities and others Business transferees Business and marketing partners Other users and the public 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Profile data	 Identifiers (online) Identifiers (other) Commercial information California customer records 	 Service providers Payment processors Advertising partners Linked Third Parties Professional advisors Authorities and others Business transferees Business and marketing partners Other users and the public 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Communications data	 Identifiers (online) Identifiers (other) Commercial information California consumer records Internet or Network Information 	 Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	• None
• Marketing data	 Commercial information Financial information California consumer records 	 Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Audiobook data	 Commercial information California consumer records 	 Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	Business and marketing partners

• Payment data	 Commercial information Financial information California consumer records 	 Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees 	• None
• Financial data	 Commercial information Financial information California consumer records 	 Business and marketing partners Service providers Payment processors Professional advisors Authorities and others Business transferees Business and marketing partners 	• None
Government issued identification number data	IdentifiersCalifornia consumer records	 Service providers Payment processors Professional advisors Authorities and others Business transferees Business and marketing partners 	• None
• Device data	 Identifiers (other) Internet or Network Information 	 Service providers Payment processors Advertising partners Linked Third Parties Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
Online activity data	 Identifiers (other) Commercial information Internet or Network Information 	 Service providers Payment processors Advertising partners Linked Third Parties Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
Communication interaction data	 Identifiers (online) Identifiers (other) Commercial information California consumer records 	 Service providers Payment processors Advertising partners Linked Third Parties Professional advisors Authorities and others 	• None

	• Internet or Network Information	Business transfereesBusiness and marketing partners	
Data derived from the above	• Inferences	 Service providers Advertising partners Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners

Contact Us. If you have questions or concerns about our Privacy Policy or information practices, please contact us using the contact details set forth in the How to contact us section, above.

Notice to European Users

General

Where this Notice to European users applies. The information provided in this "Notice to European users" section applies only to individuals located in the EEA or the UK (EEA and UK jurisdictions are together referred to as "Europe").

Personal information. References to "personal information" in this Privacy Policy should be understood to include a reference to "personal data" (as defined in the GDPR) – i.e., information about individuals from which they are either directly identified or can be identified. It does not include "anonymous data" (i.e., information where the identity of individual has been permanently removed). The personal information that we collect from you is identified and described in greater detail in the section "Personal information we collect".

Controller. Author's Republic Inc is the controller in respect of the processing of your personal information covered by this Privacy Policy for purposes of European data protection legislation (i.e., the <u>EU GDPR</u> and the so-called '<u>UK GDPR'</u> (as and where applicable, the "**GDPR**")). See the How to contact us section above for our contact details.

Our legal bases for processing. In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a "legal basis" for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to process your personal information to deliver our Services to you (including our Site) ("Contractual Necessity").
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests ("Legitimate Interests"). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.

- Where we need to comply with a legal or regulatory obligation ("Compliance with Law").
- Where we have your specific consent to carry out the processing for the Purpose in question ("Consent").

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see How we use your personal information above.

Purpose	Categories of personal information involved	Legal basis
Service delivery and operations	 Contact data Demographic data Profile data Communications data Audiobook data Governmentissued identification number data Payment data Financial information data 	Contractual Necessity
Research and development	Any and all data types relevant in the circumstances	Legitimate interest. We have legitimate interest in understanding what may be of interest to our customers, improving customer relationships and experience, delivering relevant content to our customers, measuring and understanding the effectiveness of the content we serve to customers. Consent, in respect of any optional cookies used for this purpose.
Direct marketing	 Contact data Account data Profile data Payment data Communications data Marketing data 	this purpose. Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organization and sending marketing communications for that purpose. Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.

Purpose	Categories of personal information involved	Legal basis
Compliance and protection	Any and all data types relevant in the	Compliance with Law.
	circumstances	Legitimate interest. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.
Further uses	Any and all data types relevant in the circumstances	The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the Personal Information was collected. Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.

Other information

No obligation to provide personal information. You do not have to provide personal information to us. However, where we <u>need</u> to process your personal information either to comply with applicable law or to deliver our Services to you, and you fail to provide that personal information when requested, we may not be able to provide some or all of our Services to you. We will notify you if this is the case at the time.

No sensitive personal information. We ask that you not provide us with any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services, or otherwise to us. If you provide us with any sensitive personal information to us when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Services.

No Automated Decision-Making and Profiling. As part of the Services, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects. We will let you know if that changes by updating this Privacy Policy.

Security. We have put in place procedures designed to deal with breaches of personal information. In the event of such breaches, we have procedures in place to work with applicable regulators. In addition, in certain circumstances (including where we are legally required to do so), we may notify you of breaches affecting your personal information.

Your rights

General. European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take any of the following actions in relation to your personal information that we hold:

- Access. Provide you with information about our processing of your personal information and give you access to your personal information.
- Correct. Update or correct inaccuracies in your personal information.
- Delete. Delete your personal information where there is no lawful reason for us continuing to store or process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that will be notified to you, if applicable, at the time of your request.
- **Portability**. Port a machine-readable copy of your personal information to you or a third party of your choice, in certain circumstances. Note that this right only applies to automated information for which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Restrict. Restrict the processing of your personal information, if, (i) you want us to establish the personal information's accuracy; (ii) where our use of the personal information is unlawful but you do not want us to erase it; (iii) where you need us to hold the personal information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use.
- **Object.** Object to our processing of your personal information where we are relying on legitimate interests (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedom you also have the right to object where we are processing your personal information for direct marketing purposes.
- Withdraw Consent. When we use your personal information based on your consent, you have the right to withdraw that consent at any time. This will not affect the lawfulness of any processing carried out before you withdraw your consent.

Exercising These Rights. You may submit these requests by email to legal@recordedbooks.com. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions. Typically, you will not have to pay a fee to exercise your rights; however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We try to respond to all legitimate requests within a month. It may take us longer than a month if your request is particularly complex or if you have made a number of requests; in this case, we will notify you and keep you updated.

Your Right to Lodge a Complaint with your Supervisory Authority. In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- For users in the European Economic Area the contact information for the data protection regulator in your place of residence can be found here: https://edpb.europa.eu/about-edpb/board/members en.
- For users in the UK the contact information for the UK data protection regulator is below:

The Information Commissioner's Office Water Lane, Wycliffe House Wilmslow - Cheshire SK9 5AF Tel. +44 303 123 1113

Website: https://ico.org.uk/make-a-complaint/

Data Processing outside Europe

We are a US-based company and many of our service providers, advisers, partners or other recipients of data are also based in the US. This means that, if you use the Services, your personal information will necessarily be accessed and processed in the US. It may also be provided to recipients in other countries outside Europe.

It is important to note that that the US is not the subject of an 'adequacy decision' under the GDPR — basically, this means that the US legal regime is not considered by relevant European bodies to provide an adequate level of protection for personal information, which is equivalent to that provided by relevant European laws.

Where we share your personal information with third parties who are based outside Europe, we try to ensure a similar degree of protection is afforded to it in accordance with applicable privacy laws by making sure one of the following mechanisms is implemented:

- Transfers to territories with an adequacy decision. We may transfer your personal information to countries or territories whose laws have been deemed to provide an adequate level of protection for personal information by the European Commission or UK Government (as and where applicable) (from time to time).
- Transfers to territories without an adequacy decision.
 - We may transfer your personal information to countries or territories whose laws have <u>not</u> been deemed to provide such an adequate level of protection (e.g., the US, see above).
 - o However, in these cases:
 - we may use specific appropriate safeguards, which are designed to give personal information effectively the same protection it has in Europe for example, standard-form contracts approved by relevant authorities for this purpose; or
 - in limited circumstances, we may rely on an exception, or 'derogation', which
 permits us to transfer your personal information to such country despite the
 absence of an 'adequacy decision' or 'appropriate safeguards' for example,
 reliance on your explicit consent to that transfer.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.