

## Privacy Policy

Last Updated: ~~March 12, 2013~~ July 22, 2024

~~ADstruc, Inc.~~

Vistar Media, Inc. on behalf of itself and its subsidiaries, including Adstruc, Inc. ("ADstruc") respects your privacy and is committed to protecting it through compliance with this policy. This Privacy Policy ~~tells you about ADstruc's policies and practices for the collection~~ describes how we collect, use, disclose, and disclosure of protect your personal information ~~we collect about you~~ through our sites and services, including the website at ~~www.adstruc.com~~ www.adstruc.com ("Website"), electronic ~~messages~~ communications between you and ADstruc, and ADstruc applications on third-party websites. This Privacy Policy does not apply to information collected by ADstruc offline or through other means, or by any third party (including, ~~without limitation, through~~ any application or content that may link to or be accessible from the Website). By using our sites and services, you accept and agree to the terms of this Privacy Policy ~~and you consent to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy. Your continued use of our sites or services after we make changes is deemed to be acceptance of those changes, so please check this policy periodically for updates. No one under age 13 may use, in any manner, or provide any personal information to or on our sites or services. This Privacy Policy is effective upon acceptance for new users and is otherwise effective on April 11, 2013.~~

### Information Collection

You can browse parts of our sites without telling us who you are or revealing any personal information about yourself. ~~Once you give us your personal information, you are not anonymous to us.~~ If you choose to provide us with personal information, you consent to the transfer and storage of that information on our servers. We may collect and store the following types of personal information:

~~We may collect and store several types of information about you, including the following personal information:~~

- Identifiers such as name, employer's name, email address, telephone numbers, email address, and physical contact information, login, password, and (depending on the service used) sometimes financial information.
- Financial information such as credit card or bank account numbers; depending on the service used.
- transactional Transactional information based on your activities on our sites, ~~including the Website,~~
- Device information such as ~~bidding, buying~~ device identifiers, IP addresses, and selling browser types.
- Location information associated with device identifiers.
- Commercial information and other content you generate or that relates to your account); such as buying preferences and transaction history.
  - ~~correspondence through our sites and correspondence sent to us;~~
  - ~~other information from your interaction with our sites, services, content (including, without limitation content provided by third parties), and advertising, including computer, browser and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;~~
  - ~~additional information we ask you to submit to authenticate yourself;~~

- ~~information~~Information from other companies, such as demographic and navigation data; and
- ~~other supplemental~~Publicly available information ~~from third parties~~.

We may obtain information from or about you in other ways. For example, we may verify user information with a service provider or combine your information with information we collect from other companies. Also, you may send us correspondence, testimonials, photos, writings, customer satisfaction surveys or customer service communications. You also may provide information to be published or displayed on public areas of our sites, or transmitted to other users of our sites or third parties. All such information you provide to be published or displayed on public areas of our sites is done so at your own risk.

## **Marketing**

~~We don't sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your information with information we collect from other users and use it to improve and personalize our services, content and advertising.~~

## **Information Use**

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient and customized experience. You agree that we may use your personal information to:

- ~~present~~Present our sites and services to you;
- ~~provide~~Provide the services and customer support you request;
- ~~fulfill~~Fulfill any purpose for which you provide it;
  - ~~provide you with notices about our site or services and/or about your account;~~
- ~~carry~~Carry out our obligations and enforce our rights;
- ~~resolve~~Resolve disputes, collect fees, and troubleshoot problems;
- ~~prevent~~Prevent potentially prohibited or illegal activities, ~~and enforce our Terms and Conditions and other policies;~~
- ~~customize~~Customize, measure and improve our sites, services, content and advertising;
- ~~tell~~Communicate with you about our services, ~~targeted~~ marketing, ~~service updates~~, and promotional offers ~~based on your communication preferences;~~ and
  - ~~compare information for accuracy, and verify it with third parties.~~
  - ~~For any other purpose with your consent.~~

## **~~How We Share Your~~ Information Sharing and Disclosure**

~~We share information between our buyers, sellers and/or vendors (as applicable) that allow them to complete a sale, like name, email address, phone number, physical address and other information that might be included in connection with a sale. We may disclose personal information to respond to legal requirements, enforce our policies, respond to claims that a listing or other content violates the rights of others, or protect anyone's rights, property, or safety. Such information will be disclosed in accordance with applicable laws and regulations.~~

~~We may also share your personal information with:~~

~~service~~We share information with:

- ~~Service~~ providers under contract who help with our business operations (e.g., fraud investigations and bill collection);
- ~~our~~Our subsidiaries and affiliates;
- ~~any~~Any person or entity necessary to fulfill the purpose for which you provide it;
- ~~other~~Other third parties to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and consent to when using a specific service);
- ~~law~~Law enforcement or other governmental officials, in response to a verified request relating to a criminal investigation or alleged illegal activity (In such events, we will disclose information relevant to the investigation, such as name, city, state, zip code, telephone number, email address, user ID history, IP address, fraud complaints, and bidding and listing history.); legal requirements.
- ~~other~~Other business entities, should we plan to merge with or be acquired by that business entity (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to in case of mergers or acquisitions.
- Any other parties with your prior consent.

### **User Rights and Choices**

Depending on your location, you may have the following rights regarding your personal information:

- Access: You can request a copy of the personal information we hold about you.
- Correction: You can request that we correct any inaccurate personal information.
- Deletion: You can request that we delete your personal information, subject to certain exceptions.
- Opt-out: You can opt out of the sale or sharing of your personal information. If
- Data Portability: You can request a copy of your personal information will be used contrary to this policy, you will receive prior notice.); and in a usable format.
  - anyone you approve with prior consent.
- Without limiting the above, in an effort to respect your privacy and our ability to keep the community free from bad actors, we will not otherwise disclose your personal information to law enforcement, other government officials, or other third parties without a subpoena, court order or substantially similar legal procedure, except when we believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss or to report suspected illegal activity. Non-discrimination: You will not be discriminated against for exercising your privacy rights.

### **Information You Share on ADstruc**

Information you post to ADstruc's websites regarding you and your property is displayed throughout ADstruc (and so may be available to the public). Your user ID and company name is also displayed throughout ADstruc's websites and is connected to all of your ADstruc activity (and so may be available to the public). If you access our sites from a shared computer, a computer in an internet cafe, or an unsecure network, certain information about you, such as your user ID, may also be visible to other individuals who use the computer after you or have access to such unsecure network.

### **Cookies**

We use "cookies" (small files placed on your hard drive) on certain pages of our pages website to help analyze our web page flow; traffic, customize our services, content, and advertising; ; measure promotional effectiveness; ; and promote trust and safety. When you first use our sites and

services, ADstruc may send a cookie to your computer ~~that identifies to identify~~ you as a unique user. We ~~may~~ use session cookies (which expire once you close your web browser) and persistent cookies (which ~~stay remain~~ on your computer until you delete them) to store your preferences, identify you ~~and~~, maintain your signed-in status, and provide ~~you with a more personal~~ personalized and interactive experience. You can set your browser to refuse cookies or delete persistent cookies by following your browser's help instructions. ~~If you choose to disable~~ However, disabling cookies, ~~may impair the functionality of some of our services may not work properly and you may not be able to buy prevent you from buying and sell selling~~ items on ADstruc.

We ~~work collaborate~~ with companies ~~who that~~ may use cookies and web beacons to collect anonymous information ~~that helps us to~~ measure and improve our content and advertising effectiveness. We may share some anonymous, aggregated demographic information (~~like such as~~ zip codes) with ~~some of~~ our partners, but we do not share any personally identifiable information. You may encounter cookies from third parties on certain pages of ~~the sites our site~~ that we do not control.

### **Account Protection**

~~Your password is the key to your account. Use unique numbers, letters and special characters, and do not disclose your ADstruc password to anyone. If you do share your password or your personal information with others, remember that you are responsible for all actions taken in the name of your account. If you lose control of your password, you may lose substantial control over your personal information and may be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason, you should immediately notify ADstruc and change your password.~~

### **Accessing, Reviewing and ~~Changing~~ Modifying Your Personal Information**

You can ~~see access~~, review, and ~~change update~~ most of your personal information by ~~signing on to ADstruc. You must logging into your ADstruc account. It is your responsibility to~~ promptly update ~~your any~~ personal information ~~if it changes or that~~ is inaccurate. ~~or has changed~~. Upon your request, we will ~~close deactivate~~ your account and remove your personal information from ~~public~~ view as soon as reasonably ~~possible, based on practicable, considering~~ your account activity and in ~~accordance compliance~~ with applicable laws. ~~We do~~ However, we ~~may~~ retain personal information from ~~closed deactivated~~ accounts to comply with ~~law legal obligations~~, prevent fraud, collect any fees owed, resolve disputes, troubleshoot ~~problems issues~~, assist with ~~any~~ investigations, enforce our Terms and Conditions, and ~~take for~~ other ~~actions otherwise permitted by law lawful purposes~~. ~~We may communicate with you at various times, with administrative emails or phone calls, about transactions and service announcements, customer service responses, and promotional emails like special offers, newsletters and updates. You can choose to stop receiving promotional emails at any time by simply using an email's unsubscribe function. You may not opt out of receiving administrative messages or customer service responses.~~

### **Data Security**

Your information is stored on our servers. ~~We treat data as an asset that must be protected and We use lots of tools (e.g., encryption, passwords, physical a variety of security, etc.) measures to protect your personal information against unauthorized access and disclosure. However, as you probably know, third parties may unlawfully intercept or access transmissions or private communications, and~~

~~other users may abuse or misuse your personal information that they. However, no security system is impenetrable, and we cannot guarantee the security of our systems 100%.~~

### **Children's Privacy**

~~Our services are not intended for children under 13. We do not knowingly collect from the site. Therefore, although we work very hard to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private. personal information from children under 13.~~

### **Third Parties**

Except as otherwise expressly included in this Privacy Policy, this document addresses only the use and disclosure of information we collect from you. If you disclose your information to others, whether they are bidders, buyers, sellers or vendors on our sites or other sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them. ADstruc does not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. We encourage you to ask questions before you disclose your personal information to others.

### **General**

~~We may amendupdate this Privacy Policy at anyfrom time by posting the amended terms on the Website. All amended terms automatically take effect 30 days after they are initiallyto time. Any changes will be posted on the Website. In addition, we will notify you of material changes by posting thethis page with an updated revision date this. Your continued use of our sites and services after such changes indicates your acceptance of the updated Privacy Policy was last modified on the Website or a communication to you.~~

### **Questions**

~~ShouldIf~~ you have any questions or concerns regarding this ~~policy~~Privacy Policy, please contact us at: [legal@adstruevistarmedia.com](mailto:legal@adstruevistarmedia.com) or by writing to us at the following address:

ADstruc

Vistar \_\_\_\_\_ Media, \_\_\_\_\_ Inc.

Attn: \_\_\_\_\_ Chief \_\_\_\_\_ Legal \_\_\_\_\_ Officer

Church \_\_\_\_\_ St. \_\_\_\_\_ Station

P.O. \_\_\_\_\_ Box \_\_\_\_\_ 3486

Department

149 Fifth Avenue, Sixth Floor

New York, NY 1000810010