

PRIVACY POLICY AND YOUR CALIFORNIA PRIVACY RIGHTS

This is the official privacy policy ("Privacy Policy") for this Internet Website (the "Site"), offered in cooperation with the Daily Trojan, the University of Southern California's student newspaper.

Overview

This Privacy Policy is intended to explain our privacy practices and inform you as to:

- The kinds of Personal Information we collect from users of the Site and how that information is collected;
- How we use your Personal Information;
- The circumstances under which we disclose Personal Information to third parties;
- How you can access, update or delete any Personal Information collected about you by us; and
- The mechanisms we have implemented to protect your Personal Information.

This Site is offered and made available only to users 16 years of age or older who reside in the United States of America, its territories and possessions ("U.S."). **If you are not yet 16 years old, or do not reside in the U.S., please discontinue using the Site immediately, or if, for any reason, you do not agree with this Privacy Policy, please do not participate in the features, activities and services that require you to provide your Personal Information.** This Privacy Policy is a part of the terms and conditions which are set forth herein. This Privacy Policy is legally binding on all users.

We reserve the right to revise this Privacy Policy at any time by updating this posting without advance notice to you. Such revisions shall be effective to you immediately upon posting. Notice of material changes to either document will be posted on the Site's homepage. However, we encourage you to check this Privacy Policy often for updates. We may also e-mail you, at our discretion, about these changes.

We are committed to protecting users' privacy. Keeping the Personal Information you share with us on the Site secure and ensuring your understanding of how we collect, use, disclose and maintain your Personal Information is important to us. We maintain reasonable physical, electronic and procedural safeguards to protect your Personal Information and while no data transmission over the Internet is 100% secure from intrusion, we have used and will continue to use commercially reasonable efforts to ensure the protection of your Personal Information.

YOUR CALIFORNIA PRIVACY RIGHTS

If you are a resident of the State of California, under the California Civil Code, you have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed Personal Information during the preceding year for direct marketing purposes. Alternatively, the law provides that if a company has a Privacy Policy that gives either an opt-out (which we may sometimes refer to as "unsubscribe") or opt-in choice for use of your Personal Information by third parties (such as advertisers or affiliated companies) for marketing purposes, the company may instead provide you with information on how to exercise your disclosure choice options.

This Site qualifies for the alternative option; it has a comprehensive Privacy Policy and provides you with details on how you may either opt-out or opt-in to the use of your Personal Information by third parties for direct marketing purposes. Therefore, we are not required to maintain or disclose a list of the third parties that received your Personal Information for marketing purposes during the preceding year.

If you are a California resident and request information about how to exercise your third party disclosure choices you must send a request to the following address with a preference on how our response to your request should be sent (email or postal mail). Send an email to the Privacy Administrator at unsubscribe@dailytrojan.com or you may contact us via regular mail at:

*Daily Trojan
University of Southern California
3601 Trousdale Parkway
Student Union 404 - MC 0895
Los Angeles CA 90089-0895
c/o Privacy Administrator*

All requests sent via regular mail must be labeled "Your California Privacy Rights" on the envelope or post card and clearly stated on the actual request. For all requests, please include your name, street

address, city, state, and zip code. Please include your zip code for our own recordkeeping). **We will not accept requests via the telephone or by facsimile.** We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

To all other users of this Site, if you have other questions about this Privacy Policy, please contact our Privacy Administrator at unsubscribe@dailytrojan.com or:

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clo Privacy Administrator

GENERAL PRIVACY INFORMATION

The Site is designed and targeted to U.S. audiences and is governed by and operated in accordance with the laws of the U.S. We make no representation that this Site is operated in accordance with the laws or regulations of, or governed by, other nations. By your participation in our Site activities, you certify that you are at least 16 years of age and a resident of the U.S. If you are located in the European Union or elsewhere outside of the U.S. and you participate in activities on this Site contrary to our policy that only U.S. residents are eligible for certain activities, you do so at your own risk and initiative, and you, not us, are responsible for compliance with any applicable local and national laws. Please be aware that any Personal Information you provide to us or we obtain as a result of your use of this Site will be transferred to the U.S. and subject to U.S. law. By using this Site, participating in any Site activities, and/or providing us with your Personal Information, you consent to this transfer and processing of Personal Information to and in the U.S., and in other countries that may not have an equivalent level of protection or a level of data protection considered adequate in the European Union or European Economic Area. Consequently, you hereby waive any claims that may arise under the laws and regulations that apply to you in or of any other country or jurisdiction. All users of the Site are required to provide true, current, complete and accurate Personal Information when prompted and we will reject and delete any entry that we believe in good faith to be false, fraudulent, or inconsistent with this Privacy Policy.

Your continued use of the Site indicates your acceptance of this Privacy Policy and of the collection, use, disclosure, management and storage of your Personal Information as described below. We may from time to time, transfer or merge any Personal Information collected off-line to our online databases or store off-line information in an electronic format. We may also combine Personal Information we collect online with information available from other sources, including information received from our Affiliates, marketing companies, or Advertisers. This Privacy Policy covers all such Personal Information and will remain in full force and effect as long as you are a user of the Site, even if your use of or participation in any particular service, feature, function or promotional activity terminates, expires, ceases, is suspended or deactivated for any reason.

1. Collection and Use of Personal Information: When we use the term "Personal Information" we mean information such as your first/middle initial or name and last name, street address, town or city, state, zip code, telephone number, instant-messenger nickname, blog or other personal website URL, university, status, e-mail address and any other information that would allow someone to identify you or contact you. Personal Information also includes information about your personal preferences, survey responses and your transactions or relationship with us, if you have been a user of the Site or you have provided this type of information to any Daily Trojan website. For example, to the extent we offer such services, if you order any of our various Products (in addition to your name and contact information) we will also collect and maintain your billing address, shipping address, Product selections, your credit card or other payment instrument information, your order number, and information about your computer's internet address and website which may have referred or directed you to the Site (e.g., the referring URL). Your credit card or debit card number is classified as "Sensitive Personal Information" and is collected via a secure transmission.

We collect Personal Information about you when you visit the Site and input information, whether you are registering to use any services, features or functions of the Site, participating in Promotions ordering or purchasing Products or in the course of any other exchanges of information, transactions and activities. We may use the information we obtain from you, including Personal Information, to tailor your experience on

the Site, to display content we think may be of interest to you, or to let us customize what you see when you visit the Site according to your preferences.

a. Collection of Personal Information During Registration. Company operates and provides email and database services that enable users to receive information, news, content and services that they are interested in receiving. During registration (and possibly at certain other times to enable your use of other features or functions or for security purposes), you will be required to provide us with certain information about you in order for us to allow you to use the features and functions of the Site, which may include access to college newspapers, news feeds, chat rooms, message boards, advertisements, registration and member profile pages. To register as a member of the Site, you are required to select a user name and password (together, the "User ID"), plus an email address, first and last name. Additional Personal Information requested during the registration process (but not required) may include, but is not limited to college or university name, affiliation, class year, certain contact or demographic information, gender, zip code, cable/satellite provider, ethnic information, and annual income. We will allow you to change your password, as well as certain Personal Information or Sensitive Personal Information you have given us in order to keep this information current. Among other things, this information helps us securely identify you as a registered or permitted user of those features and functions, and helps us to present selected content to you and to send you information, service enhancements, and/or promotional materials that you have agreed to receive from our Advertisers.

All member benefits are free. As a registered user of the Site, from time to time, we may also provide you with certain options to subscribe to a selection of free email newsletters and other periodic information. You may select such options by opting-in at the time of registration or by responding to an offer or invitation at a later date. You will also have the right to opt-out (unsubscribe) or change your preferences at any time by email unsubscribe@dailytrojan.com or contacting us by writing to the address above.

If you are a registered user, you acknowledge, understand and hereby agree that you are giving us your consent to track your activities and your use of the Site in connection with your registration. You also agree to this Privacy Policy.

b. Collection of Personal Information During Registration or In Connection with Certain Features and Functions. During registration (and possibly at certain other times to enable your use of other features or functions or for security purposes), you will be required to provide us with certain information about you in order for us to allow you to use the features and functions that we may offer on the Site, such as chat rooms, message boards, registration and member profile pages.

c . Collection of Personal Information in Connection with Promotions such as Contests and Sweepstakes. To the extent we offer user registration on the Site, registration as a member of the Site is not always required to enter Promotions such as contests and sweepstakes. There may be a separate registration process which will require the submission of your first and last name, street address, city, state and zip code, email address, telephone number. Additional Personal Information may be requested depending on the specific Promotion, but submission of such information may be optional. The Promotion's entry page and/or Rules will provide the specific requirements. You may also have the opportunity to opt-in to special Promotions or offers from our Advertisers in connection with many of these types of Promotions.

d. Use of Personal Information in Connection with Promotions and Offers; Opt-out Procedures. We and/or our Affiliates, may contact the Site's registered users or other users that have registered for or participated in various Site events, Promotions, or transactions, or we may send offers for the purchase of goods and/or services that may be of interest to users.

You may "opt out" of receiving marketing and promotional e-mails or text messages from us at any time by logging into the Site as a registered user with your User ID and editing the preferences and selections available to you and the information associated with your account. You can also use the opt-out mechanism that is contained in the e-mails we or our affiliates send you, or you can opt-out by sending an email to unsubscribe@dailytrojan.com

or written mail to:

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and including your name, email address and the specifics of your request. However, **after you opt-out** we or our Affiliates may continue to contact you via email for administrative or informational purposes, including follow-up messages regarding the administration of your account, any services, features or functions you have enrolled in or registered to use, any Promotions you have participated in or have entered, goods and/or services you have ordered, or other transactions you have undertaken with the Site. In the event that we, or our Affiliates, unknowingly sends an email or text message to a child (a person under the age of 13 years) who has registered with the Site in violation of the Site's Agreement, the child or the child's parent or legal guardian always have the right to unsubscribe (opt-out) from receiving future emails or text messages via the unsubscribe mechanism contained in the email or message, or to request termination of the child's registration and status as a registered user with the Site. The same unsubscribe process is available to a parent or legal guardian of a minor (a person under the age of 18 years old, or the age of majority in your state). Please see the "Review, Update, or Delete Your Personal Information" Section for details.

e. Sharing of Aggregate Information with Third Parties. Some of the aggregate user data we collect may be shared with Advertisers, our Affiliates, and other business partners of the Site, its Parent Companies, and/or its Affiliates, but we do not give any Personal Information to them as part of the relationship except as described in this Privacy Policy. Use of their tracking technology is subject to their own privacy policies.

2. Wireless Marketing Services and Promotional Opportunities: This section is intentionally left blank.

3. Accuracy and Confidentiality: It is your responsibility to give us current, complete, truthful and accurate information, including Personal Information, and to keep such information up to date. **We cannot and will not be responsible for any problems or liability that may arise if you do not give us accurate, truthful or complete information or Personal Information or you fail to update such information or Personal Information.**

You are solely responsible for maintaining the strict confidentiality of your User ID, if applicable, and for any charges, costs, expenses, damages, liabilities and losses we incur or may suffer as a result of your failure to do so. You, and not us, are solely responsible and liable for your activity, behavior, use and conduct on the Site and for any use of the Site or any other activity or conduct in connection with the Site, by any others who use your User ID, unless and until you notify us that your User ID may have been compromised, misappropriated or improperly taken or used by another party.

Bear in mind that when you submit information to us, it does not guarantee that we will permit you to use any or all of the features or functions of the Site.

4. Cookies and Other Aggregate Data: Cookies are pieces of information that a web site transfers to your computer's hard disk for record-keeping purposes. Cookies in and of themselves do not personally identify users, although they do identify a user's computer. We may use cookie technology to collect data regarding your visits to the Site. This data is stored in aggregate form and is not used to identify any particular user or individual. Most browsers are initially set up to accept cookies. If you prefer, you can set your browser to notify you each time a cookie is received or to refuse all cookies. However, you may not be able to take full advantage of our Site if you do so. We may use cookies and similar tracking technologies in a variety of ways, including:

- Keeping count of your return visits to the Site or, Affiliates', Advertisers' or partners' sites;
- Accumulating and reporting aggregate, statistical information in connection with the Site;
- Determining which features users like best; and
- Saving your user name, your password or other information so you don't have to re-enter it each time you visit the Site.

This Site may contain advertisements, references and links to other websites and organizations. We may also use third parties to display or serve advertising on the Site and our web-based newsletters or other communications which you may choose to receive. Often these third party Advertisers employ cookies and web bug technologies to measure advertising effectiveness. You should be aware that different rules might apply to the collection, use or disclosure of your information by third parties in connection with their advertisements, promotions and other websites you encounter on the Internet. We have no access to or control over these cookies. The use of such technology by these third parties is within their control and not ours. Even if we have a relationship with the third party, we do not control those sites or their policies and practices regarding your information. **This Privacy Policy does not cover any use of Personal Information that a third party Advertiser or ad server may collect from you.** We encourage you to investigate and ask questions directly of them in this regard. Use of Advertisers' tracking technology is

subject to their own privacy policies. Although we may track the numbers of users to inform us on how best to update the Site and enhance the experience for all users, Personal Information is not extracted in this process. We use tracking information on an aggregated basis to help us operate the Site, enhance and improve our services, improve the look of the Site and display advertising and marketing information. You can choose to have your computer warn you each time a cookie or image tag is being sent, or you can choose to turn off all such devices. This is done through your browser. If you turn cookies off, you may not have access to many features of the Site that make your Internet experience more efficient and enjoyable – like the features mentioned above – and some of our other services will not function properly.

5. Privacy of Your Postings: We respect the privacy of the contents of any Personal Information related to or contained in a Posting, unless the information is intended to be disclosed (such Personal Information, except as intended to be disclosed, is called “Confidential Personal Information”). However, we reserve the right to monitor, edit, and disclose your use of the Site or Confidential Personal Information to a third party, if we believe such action is required by law or is necessary to protect and defend our rights, to enforce this Privacy Policy, or to protect the interests of our users, Advertisers, Affiliates, suppliers, operational service providers, and others.

6. Disclosure to Third Parties: We do not sell, rent, lease or disclose your Personal Information to unaffiliated entities or entities that are not our Advertisers or that are not colleges and universities participating in or in connection with the Site (the “Colleges”), except in the limited circumstances listed below. As stated above, we will disclose Personal Information related to or contained in a Posting in connection with the display of and other services relating to such Posting as such Personal Information is intended to be disclosed. When we plan to disclose your Personal Information to Advertisers, we ask for you to opt in to do so, in which case their use of your information is subject to the Advertisers’ own privacy policies. **For opt-out procedures, please see the section of this Privacy Policy above entitled “Use of Personal Information in Connection with Promotions and Offers; Opt-Out Procedures”.**

a. Co-Branded Services and Features. The Site may also offer co-branded services and features, such as events and Promotions that we put together with another company or our Affiliates (“Co-Branded Partner”). Such services and features may be hosted on the Site and/or our Co-Branded Partner’s website. We may share your Personal Information with our Co-Branded Partner and your voluntary use of or participation in a co-branded service or feature means that you opt-in and give your affirmative consent to both the Site and our Co-Branded Partner to collect and use your Personal Information provided during the registration process and/or in connection with the specific co-branded feature or service for the fulfillment of the feature or service and for marketing or administrative purposes. If you wish to opt-out of a Co-Branded Partner’s future use of your Personal Information for marketing purposes, you will need to contact the Co-Branded Partner directly. The Co-Branded Partner will be identified on the co-branded feature or service. Registered or other users that participate in certain services relating to Postings, such as user video uploads, agree to have certain Personal Information posted on the Site or if such feature is offered in connection with a Co-Branded Partner, on our Co-Branded partner’s website in connection with the display of the uploaded video and posted on any platform that the uploaded video may be posted. Registered or other users that upload videos may also be required to submit additional Personal Information.

b. Operational Service Providers. We also have the right to disclose your Personal Information to third parties for the purpose of administering and maintaining the Site’s services, features, functions and operations. We will refer to these third parties as “operational service providers”. We use operational service providers to efficiently provide the full range of content, activities, services, features and functions we bring you and we request that our operational service providers also protect your privacy and not disclose your Personal Information or Sensitive Personal Information to third party marketers that are not associated with the Site. Additionally, such operational service providers are not permitted to use your Personal Information or Sensitive Personal Information for their own marketing or promotional purposes.

c. Other Non-Affiliated Third Parties. We will make your Personal Information and Sensitive Personal Information available to non-affiliated third parties in the following limited circumstances:

- When we are compelled to do so by a governmental agency, court or other entity (e.g., to respond to subpoenas, court orders or legal process);
- If we believe your actions violate any law, regulation, including, without limitation, this Privacy Policy, or any of our other terms and conditions, Rules, offerings or any other services, features or functions of the Site, or if you threaten the rights, property or safety of the Site, the Affiliates, or any of its or their operational service providers, suppliers, Advertisers, customers, users, or any other party;

- If, in our sole discretion, we believe such disclosure to be necessary or appropriate to investigate or resolve possible problems or inquiries, to protect our business and assets, to defend our interests and/or to comply with our legal and regulatory obligations; or
- In the event of a bankruptcy, merger, acquisition, transfer of control, joint venture or other business combination involving us, or our Affiliates.

7. Security & Protection of Personal Information: We maintain reasonable standards of security and confidentiality. However, for most Internet sites, it is possible that third parties may unlawfully intercept or access transmissions or private communications over an unsecured transmission. We conduct financial transactions via secured transmissions but may not always secure other parts of the Site. We also limit access to the Site by our own employees to those individuals who are authorized for the proper handling of such information and any employee found violating our standards of security and confidentiality will be subject to our disciplinary processes. We request that our operational service providers follow the same policy.

8. Phishing: Phishing attacks attempt to steal consumers' personal identity data and financial account credentials. "Phishers" use 'spoofed' e-mails to lead consumers to counterfeit websites designed to trick recipients into divulging Personal Information such as credit card numbers, account usernames, passwords, and social security numbers. **WE DO NOT SEND EMAILS ASKING YOU TO PROVIDE OR CONFIRM SENSITIVE PERSONAL INFORMATION OR YOUR USERNAME OR PASSWORD!** If you receive such email communication, please forward it immediately to the Site's Privacy Administrator at unsubscribe@dailytrojan.com and then immediately delete the fraudulent email from your computer.

9. Review, Update or Delete Your Personal Information: Generally, you may review, update or delete your Personal Information or Sensitive Personal Information collected by this Site. You may also correct factual inaccuracies. However, Personal Information that is necessary to check eligibility, such as your email address, cannot be deleted and can only be modified with sufficient verification of the correct information; certain Personal Information, such as email address, cannot be deleted but can be modified. Deletion of certain Personal Information, such as username, may result in suspension of your account or termination of any registration you may have made. To review, update or delete your Personal Information or Sensitive Personal Information collected by the Site, please send an e-mail to unsubscribe@dailytrojan.com or written mail to

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Los Angeles CA 90089-0895, including your name, email address and the information to be changed.

If you wish to review Personal Information collected for Promotions such as contests and sweepstakes, you will need to contact the Site's Privacy Administrator via email with a request at

unsubscribe@dailytrojan.com and be prepared to provide verification of your identity. Personal Information collected for certain entries are subject to corporate and regulatory recordkeeping requirements and will not be deleted upon the user's request, unless the entrant is a child under the age of 13 years old. Children under the age of 13 that are unknowingly registered on the Site are in violation of this Agreement. Parents (including legal guardians) of children that registered on the Site in violation of the Agreement who wish to terminate their child's membership must use their child's User ID to gain direct access to the account, and select "EDIT ACCOUNT" or alternatively, you can send us an email to the Site's Privacy Administrator and provide us with your child's User ID and request to terminate your child's account and registration. We will not allow direct access to a user's account and Personal Information by any person without the user's User ID (please see above for how to change your preferences or the information associated with your account). If a parent does not have his or her child's User ID, the parent will be required to send an email to the Privacy Administrator that includes the parent's name, address, telephone and email address, in addition to the child's name and email address as registered on the Site, plus the child's date of birth. The parent must also provide verifiable identification that they are the parent of the ineligible child. Company will send a confirming email to the parent via the email address provided to verify that the parent wishes to terminate his or her child's account and registration. The parent must then confirm by sending a reply email to the designated return address. Company will then terminate the child's account but will notify the child of the termination request via email and will identify the name, address and email address of the person making the request.

We reserve the right to deny access, use and registration privileges to any user, including without limitation, a registered user, of any services, features or functions of the Site if we believe there is a question about the identity of the person trying to access the user's account or any services, features or functions. And if the burden or expense of providing access to your Personal Information is disproportionate to the risks to your privacy, or if the legitimate rights of others would be violated, we may decide not to provide access to such information. In such cases, we will provide to you an explanation of why access cannot be provided and contact information for further inquiries.

10. Questions: If you have questions about this Privacy Policy or if you do not understand any information about how we collect, maintain, use or share your Personal Information, you may contact us directly by sending an email to unsubscribe@dailytrojan.com.

11. Sole Statement: This document is the sole statement of the Site's Privacy Policy and no summary, restatement or other version thereof, or other privacy statement or policy, in any form, including, without limitation, machine-generated, is valid.

This Privacy Policy was last modified on September, 2009 and is effective immediately.