

## **Gardner Business Media, Inc. Privacy Policy**

Last updated: May 2018

### **Introduction**

Gardner Business Media, Inc. (GBMI) is a business to business media company focused primarily on manufacturing industries. We

- Produce websites (that include relevant technical content, advertisements and supplier directories.)
- Produce magazines (both print and digital.)
- Conduct research through a division called Gardner Business Intelligence.
- Create subject matter e-newsletters.
- Produce a suite of events including webinars, conferences and tradeshow.

We also collaborate and promote events and research with key related association partners. Our products contain content from third party advertisers in the markets we serve.

GBMI considers your privacy and data security important. We are committed to protecting the data you share with us. This privacy policy explains how GBMI processes and stores information that can be used to directly or indirectly identify your (“Personal Data”) and the company you work for collected through use of or registration for our websites, products and platforms.

For the purposes of this policy, GBMI defines the following terms:

1. A “Visitor” is an individual who visits our front-end websites (including [www.Gardnerweb.com](http://www.Gardnerweb.com) and the affiliated brand websites found on that page.)
2. A “Subscriber” is an individual who has established a relationship with GBMI to subscribe to magazines (print or digital), e-newsletters or other subscription- based content.
3. A “Respondent” is any individual who responds to surveys powered by GBMI.
4. An “Attendee” is an individual who attends a Gardner sponsored event or webinar.
5. An “Advertiser” or “Company” is an organization who utilizes GBMI to promote its products.

Any information stored on GBMI’s platforms are treated as confidential. All information is stored securely and is accessed by authorized personnel only. GBMI implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

### **General Information**

When we collect Personal Data, it may include your IP address, first and last name, your postal and email address, your telephone number, your job title, data for social networks, your areas of interest, interest in GBMI products, and certain information about the company you are working for (company name and address), as well as information as to the type of relationship that exists between GBMI and yourself. We may also connect existing and third-party data about the company you work for including company name, address, phone number, and other data we may have including operations performed, plant size, and NAICS codes.

The following section covers the specific ways we may contact you and use your Personal Data depending on how you choose to interface with us:

#### **1. Visitors**

By visiting any of our suite of websites, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not visit this website. If required by applicable law, we will seek your explicit consent to process Personal Data collected on this website or volunteered by you. Please note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.

Actions that may be taken on your personal data when you visit our sites, download white papers, sign up for webinars, comment on articles, participate on forums, or complete surveys include:

- GBMI may collect, record and analyze information of Visitors to its website.
- We may record your IP address and use cookies. GBMI may add information collected by way of pageview activity.
- GBMI may collect and process any Personal Data that you volunteer to us in our website’s forms, such as when you register for events or sign up for information and newsletters.

- GBMI may retrieve publicly available information about you from social media and other third-party sources.
- GBMI may supplement your personal data with behavioral information, subscriber information, event information or website information we have about you.
- GBMI gathers data about your visits to our suite websites, including numbers of Visitors and visits, Geo-location data, length of time spent on the site, pages clicked on or where Visitors have come.
- GBMI uses collected data to communicate, customize content, display ads on other websites, and to improve our websites by analyzing how visitors navigate its website.
- GBMI may use Google Analytics and other tools, like Blueconic and Swifttype on our sites to understand and analyze the behaviors of site visitors.
- GBMI uses tools to track behavior to IP addresses, with the intention of being better able to serve content and advertisements that will be useful and relevant to our visitors.
- GBMI shares aggregate statistics about Visitors with our Advertisers, but not information that could identify you specifically.
- GBMI may also share such information with service vendors or contractors to provide a requested service or transaction or in order to analyze the Visitor behavior on its website.
- Please be aware that while visiting our site, Visitors can follow links to other sites that are beyond our sphere of influence. When you click on third party advertisements on our site, they may have tracking capabilities. GBMI is not responsible for the content or privacy policy of these other sites.

Public Disclosure: Visitors should be aware that in responding to surveys or survey invitations, commenting on articles or forums, participating in questions on webinars, or downloading whitepapers or other content on our websites may disclose information that could make you personally identifiable to other GBMI Users and Advertisers. The security and privacy protection implemented on GBMI's platform does not cover this type of transfer or disclosure of personal information. Visitors participating in these activities on our sites should understand that their information will be used by these other parties.

## 2. Subscribers

By subscribing to our publications in print or digitally, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not subscribe to our publications. If required by applicable law, we will seek your explicit consent to process Personal Data collected on this website or volunteered by you. Please note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.

Actions we may take on your personal data:

- GBMI will send you magazines or emails containing our digital editions.
- GBMI may send you related e-newsletters as a benefit of subscribing to our brands.
- GBMI occasionally will send you email and mail invitations to participate in industry-related events or to learn more about products or services. This would include relevant webinars, trade shows, conferences and meetings.
- GBMI will send you e-mail and/or use a third party to call the phone number you provide us to reconfirm your subscription. This includes renewal / expiration notifications, new subscription solicitations and account information e-mails. As our products are offered free of charge but supported by advertisements, accurate and current subscription information is important to us.
- GBMI may occasionally send invitations to participate in industry-related surveys including our annual Capital Spending Forecasting survey. All survey responses are compiled and reported anonymously.
- GBMI may retrieve publicly available information about you from social media and other third-party sources.
- GBMI may supplement your personal data with behavioral information, subscriber information, event information or website information we have about you.
- We may sell your information to relevant third parties for direct mail purposes.
- We may send you relevant third-party emails from our domains.
- We may offer your address data to interested third parties for a fee.

## 3. Respondents

When you respond to a survey we send you in print or digitally, you are consenting to the collection and use of your Personal Data as described here. If you do not agree with the terms set out here, please do not respond to our surveys. If required by applicable law, we will seek your explicit consent to process Personal Data collected volunteered by you. Please note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.

Actions we may take on your personal data:

- GBMI may send you the results of our survey.
- GBMI may solicit you to receive our publications.
- GBMI may send you related e-newsletters as a benefit of subscribing to our brands.
- GBMI may send you marketing materials for events and products related to subjects we believe will be of interest to you.
- GBMI may solicit you for other surveys.
- GBMI may retrieve publicly available information about you from social media and other third-party sources.
- GBMI may supplement your personal data with behavioral information, subscriber information, event information or website information we have about you.
- GBMI may send you third party related mailings or emails.
- GBMI may offer your address data to interested third parties for a fee.

#### **4. Attendees**

When you register for our events such as conferences, tradeshows, webinars or other events, we ask for personal information about you and your company. We may use this information in certain ways, including:

- GBMI may share your information with sponsors and exhibitors of an event.
- GBMI may share your information with other attendees at the event for networking purposes.
- GBMI may use your information to encourage you to attend other GBMI events.
- GBMI may use your information to encourage you to subscribe to our publications.
- GBMI may use your information to encourage you to complete market research surveys.
- GBMI may supplement your personal data with behavioral information, subscriber information, or website information we have about you.
- GBMI may use your information for other marketing related purposes.

#### **5. Companies/Advertisers**

Our business model is one where our media products are supported by advertisements and sponsorships. In working with companies and advertisers, we may use your Personal Data. Here are the ways we may use your personal data:

- We will send out annual surveys to validate information about your company we would publish in print or digitally.
- We may use your data to contact you related to billing your organization about advertisements, exhibits or sponsorships.
- We may contact you to complete market research surveys.
- We may contact you via mail or email with marketing information about products you may be interested through advertising, exhibiting, or sponsorship models.

#### **Additional Information**

If you choose to share your email address with us in any of the above capacities, please have an expectation that we may use it in the following ways:

#### **How we will use your information:**

- To contact you in response to your requests related to products and services, comments and suggestions.
- To contact you when otherwise necessary.
- For the specific purpose for which it was volunteered.
- To improve the site and the services we promote or provide through the site.
- To improve and customize the content and/or layout of our site for you.
- To ask for your participation in surveys.
- To contact you for marketing purposes, including offers sent on behalf of third parties.
- To complete any purchases or other transactions you may perform on the site.
- To notify you about updates to the site or related services.

- To notify you about promotions, special offers, etc. regarding products and services provided by Gardner’s brands or its affiliates or partners.
- To provide to our affiliates or third parties about the legitimate business purposes of our brands or products.
- To track our visitors' use of the site for internal market research, recordkeeping and reporting purposes.
- To generate aggregate statistical studies to share with our advertisers.
- As required by law or regulation, or as requested by government authorities, or for the protection of persons or property.
- In connection with an acquisition, merger, restructuring, sale or other transfer involving all or any portion of the business associated with the site.
- For other business purposes.

### **Use of Cookies on our Websites**

Cookies are small pieces of information sent by a website to a Visitor’s hard disk. Cookies cannot be used to run programs or deliver viruses to your computer. By continuing to visit the website, you agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your experience will be as fulfilling as it would otherwise be. We may also place cookies from third parties for functional and marketing purposes. The use of cookies is widespread and benefits the Visitor.

### **E-Mail Unsubscribe / Opt-Out**

All GBMI e-mail recipients are given the opportunity to unsubscribe (opt-out) at any time by selecting a list removal link in our e-mail messages. Recipients may also contact GBMI directly to unsubscribe from any / all e-mail lists or may respond to any e-mail message with the subject line “unsubscribe” or by calling us at +513-527-8800 and asking to speak with someone in our Audience Team. They will be glad to help you.

### **E-Mail Tracking**

GBMI e-mail embeds HTML and link detectors in all email transmissions to help gauge the effectiveness of our e-mail campaigns. The detectors track recipients' capability of receiving HTML messages and the number of HTML messages opened. The detectors also track the links that recipients click on within the email. The detectors do not collect any other information.

### **When We Would Share Your Information**

GBMI may share information collected through our Properties with other parties, including:

- Service providers, agents, or contractors authorized to perform services on our behalf, such as providing support for our internal operations or providing website analytics to improve our Properties.
- With trade associations we partner with.
- Pursuant to a court order, subpoena, or other legal or government process or inquiry.
- If we believe in good faith that we are required to do so by law, or that disclosure is necessary to prevent a crime, or to protect personal property, the public, or our Properties.
- As part of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Gardner.
- As otherwise disclosed at the time of collection or use.

From time to time, GBMI may also share information collected through our Properties with other reputable third-party organizations, whose products or services we feel may be of interest to you or to deliver on our behalf GBMI Property advertisements to you on other websites you visit. We may occasionally send you messages from third-parties on their behalf, and you will be able to opt-out of future third-party offers if you choose to opt-out as set forth below.

We allow advertisements to be placed on our Properties by third-party organizations. These organizations may collect web-reporting data on their placed advertisements.

### **Third-Party Links**

Our Properties may provide links to third-party websites or apps that we do not control and that maintain their own privacy policies. You should review the privacy policy and terms of use of all third-party websites that you access.

## **GBMI's Commitment to Children's Privacy**

Our Site is intended for use by adults over the age of 18. If you are a parent or legal guardian and think your minor child has given us information, you can call, email, or contact us in writing as indicated at the end of this policy.

### **Acceptance of These Conditions**

We assume that all Visitors of our website, Respondents to surveys powered by GBMI and users of GBMI's platform have carefully read this document and agree to its contents. If you do not agree with this privacy policy, they should refrain from using our website and platform. We reserve the right to change our privacy policy as necessity dictates. Continued use of GBMI website and platform after having been informed of any such changes to these conditions implies acceptance of the revised privacy policy.

### **Our Legal Obligation to Disclose Personal Information**

We will reveal a user's personal information without his/her prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to GBMI or to others who could be harmed by the user's activities or of persons who could (deliberately or otherwise) transgress upon these rights and property. We are permitted to disclose personal information when we have good reason to believe that this is legally required.

### **Data Breaches**

We will promptly and accurately notify affected parties if at any time we believe their data has been compromised.

### **GBMI's Data Protection Officer**

GBMI has a "Data Protection Officer" who is responsible for matters relating to privacy and data protection. This Data Protection Officer can be reached at the following address:

GBMI  
Attn: Data Protection Officer  
6915 Valley Avenue, USA  
Cincinnati, OH 45230  
513-527-8800  
dataprotectionofficer@gardnerweb.com

### **For Further Information**

If you have any further questions regarding the data GBMI collects, or how we use it, then please feel free to contact us by email at: [info@gardnerweb.com](mailto:info@gardnerweb.com), or in writing at:

GBMI  
6915 Valley Avenue  
Cincinnati, OH 45230, USA  
513-527-8800

## **Policy Brief & Purpose**

Our **Company Data Protection Policy** refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

### **Scope**

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us.

### **Who is covered under the Data Protection Policy?**

Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

### **Policy Elements**

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

### **Our data will be:**

- Accurate and kept up-to-date.
- Collected fairly and for lawful purposes only.
- Processed by the company within its legal and moral boundaries.
- Protected against any unauthorized or illegal access by internal or external parties.

### **Our data will not be:**

- Communicated informally.
- Stored for more than a specified amount of time.
- Transferred to organizations, states or countries that do not have adequate data protection policies.
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities.)

### **Obligations we have towards people to whom the data belongs:**

- Let people know which of their data is collected.
- Inform people about how we'll process their data.
- Inform people about who has access to their information.
- Have provisions in cases of lost, corrupted or compromised data.
- Allow people to request that we modify, erase, reduce or correct data contained in our databases.

### **To exercise data protection, actions we are committed to:**

- Restrict and monitor access to sensitive data.
- Develop transparent data collection procedures.
- Train employees in online privacy and security measures.
- Build secure networks to protect online data from cyberattacks.
- Establish clear procedures for reporting privacy breaches or data misuse.
- Include contract clauses or communicate statements on how we handle data.
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)
- Publish our data protection provisions our website.

## **Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.