

## **Catch&Release Privacy Policy** **(Effective Date: June 16, 2020)**

Thank you for visiting the Catch&Release, Inc. website (“**Site**”) located at <http://www.catchandrelease.com>. The Site is owned and operated by Catch&Release, Inc. (“**Catch&Release**”, “**us**”, or “**we**”).

Your privacy is important to us. This Privacy Policy (the “**Policy**”) details certain policies implemented throughout Catch&Release governing Catch&Release’s collection, use and disclosure of information about users of our Site, the Catch&Release Platform (the “**Platform**”, available at <https://app.catchandrelease.com/>) and our services to curate, clear, promote and license curated content for commercial applications (“**Services**”).

### **Privacy Policy Updates**

We may make changes to the Site in the future and as a consequence will need to revise this Policy to reflect those changes. We will post all such changes on the Site, so you should review this page periodically. If we make a material change to the Policy, you will be provided with appropriate notice.

### **Information Collection**

*Personal information.* You can generally visit Catch&Release’s Site without revealing any personally information about yourself. However, in certain sections of this Site, and in order to use the Platform, Catch&Release requires you to submit your personal information.

- When you register to use the Platform as a customer, you will be required to provide Catch&Release with personal information such as your email address, company name and other contact information.
- When you register to use the Platform as a Catch&Release Contributor (“**Contributor**”), you will be required to provide Catch&Release with personal information such as your name, username, email address, company name, address, phone number, personal website URL and/or personal social media usernames, handles or the like, and information regarding your content.
- When you register to receive Catch&Release’s newsletter or other communications, you will be required to provide Catch&Release with personal information such as your name, email address, company name and other contact information.
- When you seek a career opportunity through the job postings on the Site, you will be required to provide Catch&Release with personal information such as your name, email address and resume or LinkedIn URL.

- If you are a customer or Contributor, we use your PayPal or bank account information to process payments that customers provide to us in order to access our Services or that we provide Contributors for licensing their content.

If you sign up for Catch&Release's Contributor Network via a social media provider including YouTube, Vimeo, Instagram, etc., or any other means, Catch&Release may access, index, and store your profile information as well as your content metadata ("**Your Contributor Information**") associated with content you post on social media sites including, without limitation, YouTube, Vimeo, and Instagram ("**Your Contributor Content**").

Catch&Release also may invite you to submit questions, comments and request information from Catch&Release. Catch&Release will collect any personally information that you include in such communications to Catch&Release, such as your name, email address and whether you are a Contributor, agency representing a company, representing a company or other affiliation you may provide.

Web log data. When you use the Site, we automatically receive and record certain information from your computer (or other device) and your browser. This may include such data as your IP address and domain name, the pages you visit on the Site, the date and time of your visit, the files that you download, the URLs from the websites you visit before and after navigating to the Site, your software and hardware attributes (including device IDs), your general geographic location (e.g., your city, state, or metropolitan region), and certain cookie information (see below). To obtain such information, we may use web logs or applications that recognize your computer and gather information about its online activity.

Cookies. We also use cookies on the Site. Cookies are small files that are stored on your computer by your web browser. A cookie allows the Site to recognize whether you have visited before and may store user preferences and other information. For example, cookies can be used to collect or store information about your use of the Site during your current session and over time (including the pages you view and the files you download), your computer's operating system and browser type, your Internet service provider, your domain name and IP address, your general geographic location, the website that you visited before the Site, and the link you used to leave the Site.

We collect cookies, except those that are strictly necessary, with your consent. If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer. However, if you choose to block or delete cookies, certain features of the Site may not operate correctly. To learn more, please visit Catch&Release's [Cookie Policy](#).

Web beacons. The Site or the emails that you receive from us use an application known as a "web beacon" (also known as a "clear gif" or "web bug"). A web beacon is an electronic file that usually consists of a single-pixel image. It can be embedded in a web page or in an email to

transmit information, which could include personal information. For example, it can allow an email sender to determine whether a user has opened a particular email.

*Third-party online tracking and behavioral advertising.* We also may partner with certain third parties to collect, analyze, and use some of the personal and other information described in this section. For example, we may allow third parties to set cookies or use web beacons on the Site or in email communications from us. This information may be used for a variety of purposes, including online interest-based advertising, as discussed below.

## **How We Process Your Information**

Catch&Release will acquire, hold, use, disclose, and process your information based on the legal grounds outlined in this Policy or as otherwise clearly identified at the point of collection.

Our legal basis for processing the information we collect for the purposes described below are: 1) our legitimate interest in running and maintaining our business; 2) performance and fulfillment of our contracts; 3) your consent; and 4) compliance with our legal obligations. We specify our legal basis for each use case identified below.

We process, use, and disclose your information for the following purposes:

### *To provide our Services:*

- If you are a user of the Platform, Catch&Release will use your personal information to provide access to projects you are authorized to access on the Platform. In addition, if you are a Contributor, we may provide your information to potential customers (licensees) of your content through our Platform or offline in connection with the Services.
- Catch&Release may use your information to deliver certain information you have requested, verify your authority to enter certain password protected areas of the Platform and/or Services, send you notices about Catch&Release's Services that you have used or that may be of interest to you, and improve the content and general administration of the Site, Platform and the Services.
- Your Contributor Information and Your Contributor Content will be searchable by Catch&Release, and other users of Catch&Release via our Services, to evaluate potential licensing opportunities for Your Contributor Content. Any license of Your Contributor Content from you will be subject to written license and/or release agreement(s) on terms acceptable to You and Catch&Release and in accordance with our [Terms of Use](#).

Our legal basis for processing personal information about our customers and Contributors is that it is necessary for us to fulfill our contracts with them. It is also in our legitimate interest to use the information we collect in this context to provide our Services by, for example, providing customers and Contributors access to authorized projects on the Platform.

*For administrative purposes:* Catch&Release may also use your information for our administrative purposes, such as to measure interest in and/or develop the Services, ensure internal quality control, comply with regulatory requirements, process payments, prevent potentially prohibited or illegal activities, and enforce our [Terms of Use](#).

Our legal basis for processing information we collect for administrative purposes is our legitimate interest in running and maintaining our business.

*To market our products and Services:* Catch&Release's use of personal information may also include providing you with materials about offers, products, and Services that may be of interest, including new content or Services.

We market our products and Services to you pursuant to our legitimate interest in promoting our Services to our customers and Contributors.

*Analytics and Interest-Based Advertising.* We partner with certain third parties to obtain the automatically collected information discussed above and to engage in analysis, auditing, research, and reporting. These third parties may use web logs and/or web beacons, and they may set and access cookies on your computer or other device.

The Site also enables third-party tracking mechanisms to collect information about you and your computing devices for use in online interest-based advertising. For example, third parties may use the fact that you visited our Site to target online ads to you. In addition, our third-party advertising networks might use information about your use of our Site to help target advertisements based on your online activity in general. For information about interest-based advertising practices, including privacy and confidentiality, visit the [Network Advertising Initiative](#) website or the [Digital Advertising Alliance](#) website.

The use of online tracking mechanisms by third parties is subject to those third parties' own privacy policies, and not this Policy. If you prefer to prevent third parties from setting and accessing cookies on your computer or other device, you may set your browser to block cookies. Additionally, you may remove yourself from the targeted advertising of companies within the Network Advertising Initiative by opting out [here](#), or of companies participating in the Digital Advertising Alliance by opting out [here](#). Although our Site currently does not respond to "do not track" browser headers, you can limit tracking through these third-party programs and by taking the other steps discussed above.

Our legal basis for processing your information for analytics and interest-based advertising is your consent, which you may revoke at any time by contacting us through the means identified below.

*Disclosures to Protect Us or Others (e.g., as Required by Law and Similar Disclosures):* Catch&Release may access, preserve, and disclose your personal information, other account information, and content if we believe doing so is required or appropriate to: (i) comply with law

enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect yours', ours' or others' rights, property, or safety; (iv) to enforce Catch&Release policies or contracts; (v) to collect amounts owed to us; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if Catch&Release, in good faith, believes that disclosure is otherwise necessary or advisable.

Catch&Release will disclose your personal information if Catch&Release reasonably believes it is required to do so by law, regulation or other government authority or to assist in any investigation, to protect Catch&Release's rights or our users' rights or to enforce our Terms of Use.

Catch&Release may transfer your personal information to a successor entity upon a merger, consolidation or other corporate reorganization in which Catch&Release participates, or to a purchaser of all or substantially all of Catch&Release's assets to which the Site and the Platform relate.

Our legal basis for processing the information described in this section is compliance with our legal obligations.

*Other purposes:* Catch&Release may use your personal information for other purposes for which we have a legitimate interest, such as direct marketing, individual or market research, and anti-fraud protection.

We may also use your information for any other purposes disclosed to you at the time you provide it with your consent.

*To create anonymous and/or aggregated information:* Catch&Release may use personal information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services, or other analyses we create. Catch&Release may analyze the aggregate data for trends and statistics in the aggregate but such information will be maintained, used and disclosed in aggregate form only and it will not contain any identifiable information. Catch&Release may use such aggregate information to analyze trends, administer the Site, track users' movement, and gather broad demographic information for aggregate use. We may use aggregated information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within Catch&Release and with third parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

## **EU Residents**

If you are an EU resident, you have certain rights available to you under the General Data Protection Regulation. These rights are:

- The right to be informed about our data collection practices;
- The right to access and rectify your data;
- The right to erase your data;
- The right to data portability;
- The right to restrict and object to the processing of your data (including for direct marketing purposes); and
- The right to withdraw your consent (to the extent applicable).

To exercise any of the rights listed above, please contact us via email at [privacy@catchandrelease.com](mailto:privacy@catchandrelease.com). We will respond and comply with your request or provide you with reasons as to why compliance is delayed within thirty (30) days of receiving the request.

### **Privacy Shield Certification**

Catch&Release is certified with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, United Kingdom (“UK”), and/or Switzerland to the United States. We have certified to the Department of Commerce that we adhere to the [Privacy Shield Principles](#). If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov>.

In compliance with the Privacy Shield Principles, Catch&Release commits to resolve complaints about our collection or use of your personal information. EU, UK, or Swiss residents with inquiries or complaints regarding our Privacy Shield policy should first contact us via email at [privacy@catchandrelease.com](mailto:privacy@catchandrelease.com).

Catch&Release has further committed to refer unresolved Privacy Shield complaints to Judicial Arbitration and Mediation Services, Inc. (“JAMS”), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgement of your complaint from us, or if we have not resolved your complaint, please contact or visit JAMS, at <https://www.jamsadr.com/eu-us-privacy-shield> for more information to file a complaint. These services are provided at no cost to you.

EU, UK and Swiss residents have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. EU, UK, and Swiss residents also have the right to access their personal information at any time, as well as to correct, amend, or delete their personal information. Additionally, to the extent that we use the information we collect for purposes other than for which it was collected, you will have the opportunity to opt-out of such use. We will only process and transfer sensitive personal information (such as information about your race or medical

conditions) with your affirmative consent. For more information or to exercise your rights, you may contact us at [privacy@catchandrelease.com](mailto:privacy@catchandrelease.com).

Catch&Release has responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. Catch&Release shall remain liable under the Privacy Shield Principles if its agent processes such personal information in a manner inconsistent with the Privacy Shield Principles.

Catch&Release is subject to the investigatory and enforcement powers of the Federal Trade Commission, the Department of Transportation, and any other U.S. authorized statutory body with regards to its compliance with the Privacy Shield Principles. As such, Catch&Release is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

### **Data Transfers From Outside the EU, UK and Switzerland**

The information that we collect through or in connection with the Site is transferred to and processed in the United States for the purposes described above. We also may subcontract the processing of your data to, or otherwise share your data with, affiliates or third parties in the United States or countries other than your country of residence. The data-protection laws in these countries may be different from, and less stringent than, those in your country of residence. By using the Site or by providing any personal or other information to us, you expressly consent to such transfer and processing.

### **Updating Your Information**

Users of the Platform have the ability to review and update their information on their user account page. You may also update your information by contacting us via email at [privacy@catchandrelease.com](mailto:privacy@catchandrelease.com).

### **Links to Third-Party Sites**

The Site may provide links to other websites or resources over which Catch&Release does not have control ("External Web Sites"). Such links do not constitute an endorsement by Catch&Release of those External Web Sites. You acknowledge that Catch&Release is providing these links to you only as a convenience, and further agree that Catch&Release is not responsible for the content of such External Web Sites. Your use of External Web Sites is subject to the terms of use and privacy policies located on the linked External Web Sites.

### **Security**

Catch&Release employs administrative, physical and technical safeguards that are reasonably designed to help protect your personal information from loss, unauthorized access, disclosure, alteration or destruction. Catch&Release may use, without limitation, firewalls, password

protection, secure socket layer, and other security measures to help prevent unauthorized access to your personal information.

### **Children's Privacy**

Catch&Release recognizes the privacy interests of children and we encourage parents and guardians to take an active role in their children's online activities and interests. Neither our Site, Platform, nor our Services are intended for children under the age of thirteen. Catch&Release does not target its Platform, Services or its Site to children under the age of thirteen. Catch&Release does not knowingly collect personal information from children under the age of thirteen.

### **Questions.**

If you have any questions regarding this Policy please contact us via email at [privacy@catchandrelease.com](mailto:privacy@catchandrelease.com).

This Privacy Policy was last updated: June 16, 2020

This Privacy Policy is effective as of: June 16, 2020



**Effective as of June 16, 2020**

## **Catch&Release, Inc**

### **STATEMENT OF COMPLIANCE**

Catch&Release, Inc. is in compliance with applicable data protection regulations and is committed to GDPR compliance across its relevant products and services.

### **INTRODUCTION**

The **EU General Data Protection Regulation (“GDPR”)** went into effect across the European Union on May 25, 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardize data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

### **OUR COMMITMENT**

Catch&Release, Inc. (*‘Catch&Release’ or ‘we’ or ‘us’ or ‘our’*) is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have had an effective data protection program in place but we recognise our obligations in updating and expanding this program to meet the demands of the GDPR.

Our preparation and objectives for GDPR compliance have been summarized in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

### **HOW WE PREPARED FOR THE GDPR**

Catch&Release had a consistent level of data protection and security across our organization prior to the implementation of GDPR. However, in response to evolving regulations, we did implement our own plans and procedures in order to be fully compliant with the GDPR by June 16, 2020. *Our GDPR compliance implementation included:*

- **Information Audit** - carried out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.

- **Policies & Procedures** – revised existing and implemented new data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including:

- o **Data Protection** – our privacy policy and incident response procedures for data protection have been revised to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on the rights of individuals.

- o **Data Breaches** – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures have been disseminated to all key employees, making them aware of the reporting lines and steps to follow.

- o **International Data Transfers & Third-Party Disclosures** – where Catch&Release stores or transfers personal information outside the EU, we have procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include standard data protection clauses for data transferred between the EU and the United States.

- o **Subject Access Request (SAR)** – we have revised our privacy policy to include SAR procedures to accommodate the revised 30-day timeframe for providing the requested information. Our new procedures detail how to verify the data subject, what steps to take for processing an access request and what exemptions apply.

- **Legal Basis for Processing** - we have reviewed and are continuing to review our processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the related activity. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.

- **Privacy Notice/Policy** – we have revised our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.

- **Processor Agreements** – where we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Service Providers, etc), we have drafted compliant Data Processing Agreements and due diligence procedures for ensuring that they (as well as we), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the product & services provided, the necessity of the processing activity, the technical and organizational measures in place and compliance with the GDPR.

## DATA SUBJECT RIGHTS

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide the ability for any individual to access any personal information that Catch&Release processes about them and to request information about: their personal data we hold.

- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

## **INFORMATION SECURITY & TECHNICAL AND ORGANIZATIONAL MEASURES**

Catch&Release takes the privacy and security of individuals and their personal information very seriously and implements every reasonable measure and precaution to protect and secure the personal data that we process. We have information security policies and procedures in place to protect personal information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures, including:

- TLS (Transport Layer Security) for all data in transit, including Catch&Release email;
- Data at rest on the Catch&Release servers is encrypted with AES (Advanced Encryption Standard);
- Restricted access to employee files on Catch&Release servers;
- Ongoing revisions to Catch&Release password complexity requirements (WIP); and
- Monitoring of all incoming and outgoing Catch&Release email for suspicious content

## **GDPR ROLES AND EMPLOYEES**

Catch&Release has designated a data privacy officer (DPO) to develop and implement our roadmap for complying with the new data protection Regulation. The DPO is responsible for promoting awareness of the GDPR across the organisation, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures. Catch&Release understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR.

If you have any questions about our preparation for the GDPR, please contact our DPO at [privacy@catchandrelease.com](mailto:privacy@catchandrelease.com)