

PRIVACY POLICY

Welcome *This Week from Indian Country Today* eNewsletter subscribers/readers. *This Week from Indian Country Today* (“eNewsletter”) is owned and operated by Indian Country Today Media Network, LLC (“we”, “us” or “our”). This document describes how we will treat the information that we gather via our eNewsletter. By subscribing to receive the eNewsletter, or otherwise viewing our eNewsletter (e.g. you did not subscribe, but received and viewed our eNewsletter), you agree to the terms of this privacy policy and you signify that you have read and understand the terms of this policy. If at any time you do not agree to these or any future terms, please see “Changing or Updating Your Account; Limitations” below for information on how to cancel your subscription if you are a subscriber. Otherwise, please do not view our eNewsletter. Please note that this policy does not apply to entities that we do not own or control.

Information Collected

Information That You Provide

Registration — When you subscribe to receive the eNewsletter, you provide us with certain personally identifiable information, such as your name, email address, postal address and, as applicable, billing information.

Transactional Information — We may retain your billing information and the details of any payments you make with respect to your subscription. For more information on payments and security, see the section of this Privacy Policy titled “Security.”

Other — On occasion we, or our service providers, may request certain information about you in order to improve the eNewsletter. We may make these requests through surveys or other methods. Your response to these requests is optional. While we require these service-related companies to take steps to maintain the confidentiality of any personally identifiable information they may receive from you to perform these functions, consistent with our privacy policy, you should also review the privacy policies of these service providers to understand how they handle this information. You also have the option of contacting us directly with any feedback you may have on the eNewsletter. We welcome your feedback and will use any personally identifiable information you provide to us consistent with this privacy policy.

Information Collected Automatically or From Other Sources

When you view the eNewsletter or click on any advertisements, certain information about you is automatically logged, such as server name, browser type and IP address, the date and time you accessed our eNewsletter, and click throughs, which we sometimes aggregate with similar information from other customers to help improve or promote our eNewsletter.

“Cookies” — A cookie is a small piece of data stored on the user’s computer tied to information about the user. We may use session ID cookies and persistent cookies. A session ID cookie terminates when you close your browser. A persistent cookie is stored for an extended period of time. Cookies allow us to recognize your computer and help customize your experience and make it more convenient for you. The information collected from cookies may also be used to improve the eNewsletter.

Most web browser applications (such as Google Chrome and Firefox) have features that can notify you when you receive a cookie or prevent cookies from being sent. If you disable cookies, you may not be able to use certain personalized functions of this website.

Clear GIFs (Web Beacons/Web Bugs) — We may employ a software technology called clear GIFs (sometimes called web beacons or web bugs), to learn what content subscribers/readers find effective. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of subscribers/readers. We may tie information collected through the use of Clear GIFs to subscribers/readers’ personally identifiable information.

Clear GIFs can “work with” existing cookies on a computer if they are both from the same web site. For example, clear GIFs enable us to match the Clear GIF identifier with a cookie ID number to show the past online behavior for a particular computer.

In addition, we use clear GIFs in our HTML-based emails to let us know which emails have been opened by the recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns.

Information from Other Sources — We may receive information about you from other sources, such as data compiled from our advertising partners (e.g. how you responded to an ad) and companies who provide audience measurement or analytical services. We may also cross reference information you provide to us with information contained in our service providers’ databases, which helps us tailor content to our subscribers/readers.

Location Data — We receive data from the computer, mobile device, or any other device you use to access the eNewsletter. If you access the eNewsletter via a mobile device, we may receive information about your actual location through the GPS signals sent from your mobile device.

Our Use of Your Information:

Your information is important to us. We use the information we collect only for such purposes described below:

- maintaining the security and integrity of our systems and your account (e.g., helping to establish and verify the identity of subscribers/readers);
- providing services and support to subscribers/readers (e.g., responding to your questions, inquiries, comments and instructions, and opening, maintaining, administering and servicing subscribers/readers’ accounts);

-
- compiling and analyzing statistics to better understand our subscribers/readers, improve and promote the eNewsletter and tailor the content to our subscribers/readers; and
 - sending general and tailored communications to subscribers/readers, such as special topical issues and targeted advertising on behalf of our advertisers.

Disclosure of Information to Third Parties

We will only share information we have received about you with others as set forth below. If we need to share information about you for any other reason, we will obtain your consent before doing so.

- We may share aggregated information with third parties to help improve or promote the eNewsletter or report statistical information to our advertisers. But we only do so in such a way that no individual user can be identified or linked to any specific information.
 - We may disclose personally identifiable information to unaffiliated service companies to help us maintain and operate the eNewsletter or for other reasons related to the operation of our own business or marketing. We require these service-related companies to take steps to maintain the confidentiality of any personally identifiable information they may receive from us to perform their functions, consistent with our policy, and they may not use this information for any other purpose.
 - When you make payments with respect to your subscription, we will share transaction information with those third parties necessary to complete the transaction.
 - You may choose to share information with marketers or electronic commerce providers that are not associated with the eNewsletter by taking advantage of offers that are advertised via our eNewsletter or other communications you may receive from us on an advertiser's behalf. This is entirely at your discretion and we will not provide your information to these marketers without your consent, unless otherwise provided for in this policy.
 - We may conduct joint promotions with other companies or use a sweepstakes administrator. We may share with such companies (and their service providers) certain personally identifiable information as necessary to conduct the promotion. We will not share this information with our promotional partners for any other purpose without your prior consent, unless otherwise provided for in this policy. We require these companies to take steps to maintain the confidentiality of any personally identifiable information they may receive from us, and require them to use such information only for legitimate business purposes associated with us.
 - We may ask third party advertisers to display ads promoting our services. We may ask them to deliver those ads based on the presence of a cookie, but in doing so will not share any other information with the advertiser.
 - We may disclose personally identifiable information about you in connection with legal requirements, such as in response to an authorized subpoena, governmental request or investigation, or as otherwise required by law.
-

-
- As our business develops, we may sell, buy, or transfer corporate assets, and in such transactions, customer information may be one of the transferred business assets. Also, in the event that the eNewsletter, ourselves, or substantially all of our assets are acquired, personally identifiable information may be one of the assets transferred in such acquisition.
 - Sometimes we receive information about you from third parties (e.g. from a list rental service). If we receive information about you from a third party, will not share your information if disclosure would violate any policy of the third party that is provided to us.

Changing or Updating Your Account; Limitations

Changing or Updating Your Account – If you want to cancel your subscription, or change/update your account, please contact us at customercare@ictmn.com. If you cancel your subscription, you will receive a refund on any unserved issues as of the date we receive your cancellation request.

Limitations – Even after you cancel your subscription or discontinue viewing our eNewsletter, your information may continue to be used to the extent it was previously distributed or aggregated with other information under the terms of this policy. Additionally, we may retain certain information to prevent identity theft and other misconduct. If you have given third party widgets, applications, or websites access to your information, they may retain your information to the extent permitted under their terms of service or privacy policies.

Backup copies – Removed and deleted information may persist in backup copies, but will not be available to others.

External Links

The eNewsletter may contain links to other websites, including those of advertisers. In addition, if you are a new subscriber, a magazine subscriber registering to have the eNewsletter delivered to your email, or opting out of receiving our eNewsletter, you will be directed to a site operated by Palm Coast Data LLC. Please be aware that we are not responsible for the privacy practices or the content of other websites including those that may be linked to through the eNewsletter and associated emails. Websites that are accessible by hyperlinks from the eNewsletter or associated emails may use [cookies](#). We encourage you to read the privacy policies provided by other websites before you provide personally identifiable information to them.

Children's Privacy

Children under the age of 13 are prohibited from subscribing to or viewing the eNewsletter. We do not solicit or knowingly collect personally identifiable information from children under the age of 13. If we nevertheless receive personally identifiable information from an individual who indicates that he or she is, or whom we otherwise have reason to believe is, under the age of 13, we will delete such information from our systems. We reserve the right to add restrictions on any subscribers/readers under the age of eighteen, in order to provide an age-appropriate eNewsletter.

Security

We maintain physical, electronic, and procedural safeguards to help guard your personal information. We restrict access to personally identifiable information internally on a need-to-know basis and externally to any persons you have authorized to have access to such information (in accordance with the terms of this policy and otherwise). While we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us. We may keep this information and archive such information at our discretion.

We have taken measures to help ensure that transacting business with us is safe. We use Secure Sockets Layer (SSL) technology, the industry standard for secure online transactions, to encrypt your personal credit information, including your credit card number, before it travels over the internet. As a result of our use of SSL technology, making a payment is just as safe as providing your credit card number over the telephone. In the unlikely event of credit card fraud, we will work with your credit card company to resolve the issue. Typically, credit card holders are not responsible for any fraudulent charges.

Additionally, and in accordance with industry custom, we enforce commercially reasonable security measures which are commensurate with the sensitivity of the personal information (including encryption using SSL technology) in our physical facilities to protect against the loss, misuse, or alteration of personal information that we have collected from you via the eNewsletter.

Choice/Opt-Out

In order to provide service to you, we will send you communications related to security or the administration of the eNewsletter. From time to time, we or our service providers on our behalf, and our affiliates and/or promotional partners may also wish to send you other messages or updates about our services, promotions, and other activities. If you do not wish to receive such communications, please opt-out as using the mechanism provided in eNewsletter e-mail messages. Even if you opt-out in this manner, however, you may still receive account-related and non-commercial messages from us.

Transmission of Information

The internet is a global environment. By using subscribing to or viewing our eNewsletter and sending information to us electronically, you consent to trans-border and international transmission of any data that you may supply to us, consistent with this privacy policy. Information transmissions may not be secure. Given the inherent nature of the internet, all internet transmissions are done at the user's own risk.

California Privacy Rights

California Civil Code § 1798.83 permits customers who are California residents to request certain information regarding disclosure of personal information to third parties for their direct marketing purposes. We do not provide your personal information to any third party for their direct marketing purposes without your consent. If you would like to revoke consent already provided, please send a request to customercare@ictmn.com with "California Opt-Out" in the subject line. This opt-out will not prevent the use of information that has already

been disclosed to third parties with your consent. Please contact such third parties directly to opt-out from such communications. If you would like more information with respect to your privacy rights under California law, please send an email to customercare@ictmn.com with “California Disclosure Information” in the subject line.

Changes to this Privacy Policy

We reserve the right in our sole discretion to change, modify, add or delete portions of this privacy policy at any time. Unless stated otherwise, this privacy policy applies to all information that we have about you and your account. If we decide to change the privacy policy materially or in any way that restricts your rights, we will notify you of those changes and require that you accept such changes. Any information you provide to us after we post such a revised privacy policy will be governed by the privacy policy posted at that time. Prior privacy policies will be archived.

Contacting Us

In the event that you have any questions about this privacy policy or if you have reason to believe that we may have failed to adhere to this privacy policy, you may contact us at customercare@ictmn.com. You may also contact us at customercare@ictmn.com to request access to or correction or update of your personal information if you are a subscriber.

Revision Date: July 10, 2013