

# Privacy Policy

*Last modified: April 7, 2023*

Ingram Content Group and its related and affiliated companies ("**Ingram**" or "**We**") respect your privacy and are committed to protecting it through our compliance with the practices described herein. This Privacy Notice (the "**Notice**") describes the types of information we may collect from you or that you may provide when you visit our website (the "**Website**") and Ingram's practices when collecting, disclosing, maintaining, and using that information. It also describes options you may have regarding collecting, disclosing, and using your personal information when accessing the Website.

By using our Website and/or registering for any of our offerings, you accept the privacy practices described in this Notice and consent to our collection, disclosure, and use of your personal information. If you do not agree with this Notice, do not use our Website. We may modify the terms of this Notice at any time and will post any changes on the Website. Your continued use of the Website following the posting of changes is your acknowledgment of acceptance.

This Notice applies to information we collect:

- On the Website.
- In chat forms, email, text (SMS) messaging, and other electronic messages between you and us.
- Through mobile and desktop applications downloaded from the Website, which provide dedicated non-browser-based interaction between you and the Website.
- When you interact with our advertising and other applications on third-party websites and services, where those applications or advertising include links to this Notice.

It does not apply to information collected by:

- Us offline and not through this Website or any other electronic means; or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

**On occasion, We may offer special activities, events, programs, or promotions ("**Programs**") that have unique or additional terms, notices, or consent**

**requirements to explain how the information you provide will be processed in connection with the Programs. You should review those applicable terms, where applicable, before interacting or participating in the Programs.**

## Children Under the Age of 18

Our Website is not for anyone under 18 years of age. No one under 18 years of age may provide information to or on the Website or through any of its features, register on the Website, make any purchases, or use any comment features of the Website. If you believe we have information from or about a child under 18, please contact us at [privacy@ingramcontent.com](mailto:privacy@ingramcontent.com).

## Information We Collect

***What you provide us:*** When you use our Website, your information may be collected, used, and shared in a variety of manners. As detailed below, the type of information we collect may vary based on how it is gathered, which may include, without limiting, the information you voluntarily submit, including without limiting, when establishing an account or submitting a registration or application, submitting your contact information, social media handles, and/or professional information, or information that our third parties may share with us if such third party previously received your consent.

We may collect your information (including personally identifiable information) voluntarily provided by you or with your permission. For example, we may ask you for information, such as your email address, when you register with the Website or register for one of our Products. You may also provide information to Ingram in other contexts, including, for example, on your member profile page, and to enter into a contest, promotion, or sweepstakes. If you make a purchase from the Website or one of our other websites, we may request additional information from you, such as your name, address, telephone number, and credit card information, to complete the purchase. You always have the option not to provide this information. If you choose not to provide the information we request, you may still visit the Website, but you may be unable to access certain options, products, and services. If you provide personal information to us about a third party, such as your friend or colleague, do so only if you received permission from that friend or colleague. When you register with the Website or provide information to Ingram in any other manner, you agree to provide only true, accurate, current, and complete information.

***Automatically collected information from our Website and your Device:*** We collect information about your visit to and use of the Website, such as your IP address, IP server, device IDs, device type, connection information, geo-location data, search

history, browser type and operating system, date and time, websites and visited, and whether you came to the Website from another website, the address of that website.

We may collect information about you that we receive from other sources such as forms, profiles, surveys, quizzes, or other interactions to help us verify or update your information and to better customize services for you. We may also combine the information we receive from third parties with information we receive on our Website and your other interactions with us.

***Cookies and Other Tracking Technologies:*** Ingram and our third-parties, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers, and pixels) to provide functionality and to recognize you across different, Products, services and devices.

We use cookies, web beacons, and other similar security technologies to monitor traffic and improve the Website. Our third parties and we may also use these or similar technologies to monitor your use of the Website and interactions with emails from us, as well as other communications to personalize your experience and to deliver relevant advertisements for research and marketing purposes, and to better understand your use of online advertisements (see [Personalized Advertising](#)).

### ***How do we use cookies?***

**Where strictly necessary.** These cookies and other technologies are necessary to enable the Website and services to provide the features you have requested, such as remembering you have logged in.

**For functionality.** These cookies and similar technologies remember the choices you make, such as language or search parameters. We use these cookies to provide you with an experience more appropriate to your selections and make your use of the Website more tailored.

**For performance and analytics.** These cookies and similar technologies collect information on how users interact with the Website and to improve how the Website operates. For example, we use Google Analytics cookies to help us understand how visitors arrive at and browse the Website to identify areas for improvement, such as navigation, user experience, and marketing campaigns.

**Targeting Cookies or Advertising Cookies.** These cookies collect information about your browsing habits to make advertising relevant to you and your interests. These cookies remember websites you have visited, and that information is shared with other parties such as advertising technology service providers and advertisers.

**Social media cookies.** These cookies are used when you share information using a social media sharing button or “like” button on our websites, or you link your account or

engage with our content on or through a social media site. The social network will record that you have done this. This information may be linked to targeting/advertising activities.

### ***How can you opt-out?***

To opt-out of our use of cookies, you can use the Cookies Preferences link at the bottom of our website. You can instruct your browser by changing its options, stopping accepting cookies, or prompting you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Website. Ingram and our third-party partners also collect information using web beacons (also known as "tracking pixels"). You will not be able to opt-out of any cookies or other technologies that are "strictly necessary" for the Website and services. To learn how to manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). Please note that some parts of this site may be inaccessible or not function correctly if you disable or refuse cookies.

***Information You Share with Us:*** Our Website, where applicable, may allow you to connect and share your actions, content, comments, and other information publicly ("User Contributions"). You may also have the option to connect and share your personal information on third-party applications, services, social media platforms, and websites through "plug-ins," buttons, widgets, and other third-party features on or connected with our Website. You may also share with us contact information of friends and people in your address book, so we can help you let your friends know about special offers and help with product shipments. Please be mindful of your privacy needs and those of others as you choose who to connect with, what you share with us and others, and what you make public. We are not responsible for the personal information you make public or share with others using our Website. We also are not responsible for any third-party sharing services or their further actions. You should review their privacy policies to understand their privacy practices.

## **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To prepare the Website for you.
- To verify via electronic mail or text (SMS) messaging the information you provide to us, for example, your name, address or phone number.
- To authenticate your login to applicable accounts via electronic mail or text (SMS) messaging.

- To provide you with information, products, and services.
- To provide you with information about your account or subscription, including any expiration and renewal notices.
- To notify you of changes to the Website, products, services we offer or provide through it.
- To allow you to participate in interactive features on the Website.
- To send offers or promotions for our products or third-party products, services, or special events.
- To provide advertising, including advertising based on your activity on the Website or activity on third-party websites.
- To administer contests, promotions, sweepstakes, or surveys.
- To optimize or improve our products, services, and operations.
- To detect, investigate, and help prevent activities that may violate our policies or be illegal.
- To notify you of changes to your account information.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including billing and collection.
- To perform statistical, demographic, and marketing analyses of users of the Website and purchasing patterns.
- In any other way we may describe when you provide personal information.
- For any other purpose with your consent.

We may use or combine information that we collect offline or collect or receive from third-party sources to enhance, expand, and check our customer records' accuracy. We may also use the information gathered from multiple portions of the Website into a single record.

**Social Media:** We may include applications from third parties on the Website or through the Website, which allows interaction or content sharing by users. Some of these applications provide specific services or content from a third party, such as a Facebook "Share" or "Like" button and are visible to you when you visit our Website. Your interaction with these programs typically allows the third party to collect information about you through cookies they place on your device and other tracking mechanisms. In some cases, the third-party may recognize you through its cookies even when you do not interact with their application. If you choose to log in to your account with or through a social networking service, we, and that service, may share certain information about you and your activities. We also may share information about your activities,

including what you view and purchase on the Website with a social network, in accordance with your account settings with us or your social networking service, or with your permission. You should review the third parties' respective privacy policies to better understand their data collection practices and controls available to you.

### ***Personalized Advertising***

We use the information you make available to us when you interact with our Website or services to provide you with advertising and offers that are more relevant to you. We also use third-party advertising companies to provide advertisements on our Website(s) and other websites about goods and services that may be of interest to you, including advertisements for unaffiliated products and services on our Website. For information about how third parties may access your information, please see [How We Disclose Your Information](#) below.

You can learn more about ad serving companies and the options available to limit their collection and use of your information by visiting the websites for the [Network Advertising Initiative](#) and the [Digital Advertising Alliance](#), and the webpages for [Facebook's ad preferences tool](#) and [Facebook's privacy policy](#).

## **How We Disclose Your Information**

We may disclose aggregated information about our users and information that does not identify any individual without restriction.

We may disclose personal information that we collect, or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties, we use to support our business. Our service providers will not use your personally identifiable information for their marketing or other business purposes without your consent.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Ingram's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Ingram about the Website users is among the assets transferred.
- As permitted by this Notice. For more information, see [Choices About How We Use and Disclose Your Information](#).
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the "email a friend" feature of our Website, we will transmit the contents of that email and your email address to the recipients. We will also use your



information to help verify your account details and changes to your account via electronic mail or text (SMS) messaging.

- For any other purpose disclosed by us when you provide the information.
- With your consent.

If you participate in a contest, survey, sweepstakes, or other promotion sponsored by Ingram or a third party, such participation serves as your consent to share your information collected in conjunction with the contest, survey, sweepstakes, or promotion, with that co-sponsoring third party. After the information is provided to such third parties, the subsequent use or disclosure of such information is subject to those third parties' privacy policies and practices.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our website terms, terms of sale, and other agreements, including billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Ingram, our customers, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

We may share information about your visit to and use of the Website, including browser or device information, with third parties, including our affiliates, advertising networks, analytics providers, and others who may use the data for any legally permissible purpose without notice to you.

## **The United Kingdom and EEA Users and International Transfers**

Ingram is an international business, and our use of your information involves data transmission on an international basis. If you are located outside of the United States, please know that information we collect is transferred to and processed by servers located in the United States. By using our Website or providing us with any information, you consent to the collection, maintenance, processing, and transfer of such information in and to the United States.

If you are an individual in the United Kingdom or European Economic Area (EEA), we collect and process information about you only where we have a legal basis for doing so under applicable UK and EU laws. The legal basis depends on the Website and the services you use, and how you use them. This means we collect and use your information only where:

- We need it to provide you services, including to operate the Website, provide customer support and personalized features, and to protect the safety and security of the Website;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because a third party (e.g., your employer) or we have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Website.

## Choices About How We Use and Disclose Your Information

1. By establishing an account with Ingram or signing up for our email list, you agree to receive communications from us, including promotional emails, and current specials and deals. You may update your communication preferences with us at any time if you would like to alter the frequency, if available, and type of communications you receive from us, or you wish to no longer receive promotional emails from us by updating the communication preferences at the bottom of every email. If you want to receive emails from us but do not wish for us to track the emails we send you, some email services allow you to adjust your display to turn off HTML or disable download of images that should effectively disable our email tracking.
2. You may manage cookies on our Website by modifying your cookie preferences, which is available when you initially access the Website and is also located at the bottom of the Website. You may also turn off all cookies (except necessary cookies) using this method.
3. You may opt-out of your information's collection and use by some advertising networks, as described in the Personalized Advertising section of this Notice above.
4. You may opt-out of tracking analytics data by Google Analytics, one of our customer usage analytics providers, by clicking [here](#).
5. Visitors to our Website can choose not to provide personally identifiable information. In cases where personally identifiable information is needed to register for an account, you may not be able to use our services if you chose not to provide the necessary personally identifiable information.



We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt-out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's website or by clicking [here](#).

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) for more information.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: [privacy@ingramcontent.com](mailto:privacy@ingramcontent.com). However, please know we do not currently sell data triggering those statutes opt-out requirements.

## Accessing and Correcting Your Information

**To help us maintain accurate, current, and complete information about you, we require you to only provide true, accurate, and complete information whenever you provide personally identifiable information to us and promptly update your account whenever it changes.**

You may also send us an email at [privacy@ingramcontent.com](mailto:privacy@ingramcontent.com) to request access to, correction of, or to delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you provide User Contributions on or through the Website, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Website users.

California residents may have additional personal information rights and choices. Please see Your California Privacy Rights below for more information.

## Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit [Privacy Policy for California Residents](#) below.

## Data Security

We have implemented measures designed to help secure your personal information from accidental loss and unauthorized access, use, alteration, and disclosure. All

information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

The safety and security of your information also depends on you. Where we have given you, or where you have chosen a password for access to certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. Any user of the Website may view the information you share in public areas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings, security measures contained on the Website, or any unauthorized access to your data.

## Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we process our users' personal information, we will notify you by email to the primary email address specified in your account. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you and to periodically visit our Website and this privacy policy to check for any changes.

## Contact Information

Questions regarding this Privacy Policy or our privacy practices should be directed to [privacy@ingramcontent.com](mailto:privacy@ingramcontent.com) or [legal@ingramcontent.com](mailto:legal@ingramcontent.com), by calling our toll-free number at 1-800-253-1560, or by mail:

Ingram Content Group  
Attn: Legal Department/ Privacy  
1 Ingram Blvd.  
LaVergne, TN. 37086

# Privacy Policy for California Residents

**Effective Date:** December 29, 2020

**Last Reviewed on:** April 7, 2023

This **Privacy Policy for California Residents** supplements the information contained in Ingram's [Privacy Practices Notice](#) . It applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (CCPA), and any terms defined in the CCPA have the same meaning when used in this Notice.

This policy does not apply to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

Where noted in this policy, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("**B2B personal information**") from some of its requirements.

## Information We Collect

Our Website collects information that identifies, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - – health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - – personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), the California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, our Website has collected the following categories of personal information from Consumers within the last twelve (12) months:

Category	Examples of PI Collected	Sources of PI	Purposes for PI Collection	Categories of Recipients

Identifiers	Name, postal address, email address, identification numbers	From the consumer, customers, service providers, and third parties	<p>Processing interactions and transactions;</p> <p>Managing interactions and transactions;</p> <p>Performing services;</p> <p>Research and development;</p> <p>Quality assurance; and</p> <p>Security. For example, these purposes include to contact you, to verify your identity, to provide services, and to comply with our legal obligations.</p>	Visitors, Customers, and Service Providers
Personal Records	Name, postal address, telephone number, email address	From the consumer, customers, service providers, and third parties	<p>Processing interactions and transactions;</p> <p>Managing interactions and transactions;</p> <p>Performing services;</p> <p>Research and development;</p> <p>Quality assurance; and</p> <p>Security. For example, these purposes include to contact you, to verify your identity, to provide services, and to comply with our legal obligations.</p>	Visitors, Customers, and Service Providers
Commercial Information / Account Details	Purchase history or tendencies	From the consumer, customers, service providers, and third parties	<p>Processing interactions and transactions;</p> <p>Managing interactions and transactions;</p> <p>Performing services;</p> <p>Research and development;</p>	Visitors, Customers, and Service Providers

			<p>Quality assurance; and</p> <p>Security. For example, these purposes include to contact you, to verify your identity, to provide services, and to comply with our legal obligations.</p>	
Internet Usage Information	Information regarding interactions with our website, computer systems, and/or devices	From the consumer, customers, service providers, and third parties	<p>Processing interactions and transactions;</p> <p>Managing interactions and transactions;</p> <p>Performing services</p> <p>Research and development;</p> <p>Quality assurance;</p> <p>Security; and</p> <p>Debugging. For example, these purposes include improving our services, providing users more relevant content, securing our network, and protecting our personnel.</p>	Visitors, Customers, and Service Providers
Professional or Employment Information	Job title, employer, practice area, or industry focus	From the consumer, customers, service providers, and third parties	<p>Processing interactions and transactions;</p> <p>Managing interactions and transactions;</p> <p>Performing services</p> <p>Research and development; and</p> <p>Quality assurance</p> <p>For example, these purposes include marketing to consumers and customers.</p>	Visitors, Customers, and Service Providers

Inferences from PI Collected	Customer profiles reflecting preferences	From the consumer, customers, service providers, and third parties	Processing Interactions and Transactions; Managing Interactions and Transactions; Performing Services Research and Development; and Quality Assurance  For example, for business management and planning and to provide services.	Visitors, Customers, and Service Providers
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We may also collect, use, and disclose your personal information as required or permitted by applicable law. We do not treat de-identified data or aggregate consumer information as personal information. We reserve the right to convert or permit others to convert your personal information into de-identified data or aggregate consumer information.

Our Website obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Website.

### **Sources of personal information.**

We collect some personal information that you provide directly to us, including without limiting, contact information, communication information, your feedback, order information, payment information, pictures, preferences, and videos that you send us, and other information you provide to us.

We may also collect some personal information automatically from cookies, pixels, and similar technologies when you use our services. This can include your browsing activities, information about your devices, and other information collected through web beacons, cookies, pixels, and similar technologies.

We create some personal information when you use our services. This can include analytics and inferences about your interests, demographics, and shopping preferences.

We collect personal information from other companies, including without limiting, advertisers, Facebook, Twitter, and other similar platforms, that supplement the



personal information we already have.

## Use of Personal Information

We may use and disclose the personal information we collect for one or more of the purposes specified in the How We use your information above.

## Sharing Personal Information

We may share your personal information by disclosing it to a third party as necessary to serve a business purpose.

We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential and prohibit using the disclosed information for any purpose except performing the contract.

Ingram does not believe it has sold (as the term "sale" is defined by the CCPA) Consumer personal information in the past twelve (12) months. As the law evolves, we may revisit this conclusion and, if applicable, revise this Notice. See the Do Not Sell Rights section below regarding our current conclusion that data collection by third-party cookies associated with our web sites is not a sale under the CCPA.

## Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### ***Right to Know and Data Portability***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- – sales, identifying the personal information categories that each category of recipient purchased; and
- – disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

### ***Right to Delete***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information compatible with the context in which you provided it.

We will delete or de-identify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

We do not provide these deletion rights for B2B personal information.

### ***Exercising Your Rights to Know or Delete***

To exercise your rights to know or delete described above, please submit a request by either:

- Calling us at: 1-800-253-1560
- Emailing us at: [privacy@ingramcontent.com](mailto:privacy@ingramcontent.com)
- Emailing us at: [legal@ingramcontent.com](mailto:legal@ingramcontent.com)
- Write to us at: Ingram Content Group Attn: Legal Dept/ Privacy One Ingram Blvd. LaVergne, TN. 37086

Only you, or someone legally authorized to act on your behalf, may request to know or delete related to your personal information.

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
- Provide your account number and the Website address.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete it.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

### ***Response Timing and Format***

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact [legal@ingramcontent.com](mailto:legal@ingramcontent.com).

We strive to substantively respond to a verifiable consumer request within forty-five (45) days of the verified receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we may deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12 months preceding our receipt of your request. The response we provide will also explain why we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and allow you to transmit the information from one entity to another without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Do Not Sell Rights***

We may disclose your personal information for the following purposes, which are not a sale: (i) if you direct us to share personal information; (ii) to comply with your requests under the CCPA; (iii) as part of a merger or asset sale; and (iv) as otherwise required or permitted by applicable law and this Notice.

We do not believe that we sell California Consumer personal information as defined under the CCPA. Until we change our practices and update this Notice, we will treat personal information collected under this Notice is subject to a "do not sell" request.

However, although there is not yet an industry consensus, we do not believe that data collection by third-party cookies and other technologies on our Website is a sale of your personal information.

We do not knowingly sell the personal information of Consumers under 16.

To exercise the right to opt-out of sales for some of your personal data, you (or your authorized representative) may submit a request to us by visiting the following page link:

### **[Do Not Sell My Personal Information](#)**

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

## **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights.

## Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@ingramcontent.com](mailto:privacy@ingramcontent.com) or write us at: Ingram Content Group Attn: Legal Dept./ Privacy One Ingram Blvd. LaVergne, TN. 37086.

## Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated Notice on the Website and update the Notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

## Contact Information

If you have any questions or comments about this Notice, how Ingram collects and uses your information described in this Notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** 1-800-253-1560

**Website:** [www.ingramcontent.com](http://www.ingramcontent.com)

**Email:** [privacy@ingramcontent.com](mailto:privacy@ingramcontent.com) or [legal@ingramcontent.com](mailto:legal@ingramcontent.com), or by mail:

**Mail:**

Ingram Content Group  
Attn: Legal Department/ Privacy  
1 Ingram Blvd.  
LaVergne, TN. 37086

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