

## **PRIVACY POLICY**

We take the privacy of your personal information seriously. This Privacy Policy outlines your privacy rights, as well as how we collect and use your personal information, and how and to whom we disclose it. All references to “Company,” “we,” “us,” and “our” shall mean the Boston Professional Hockey Association, Inc. (“Boston Bruins”). If the practices described in this Privacy Policy are not acceptable to you, you should not provide us with information about yourself. We may periodically update this Privacy Policy. The “Last Updated” date at the bottom of the page tells you when this Privacy Policy was last revised. We will notify you of material changes by posting notice on our website (“Website”) or through other means. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on our Website. Therefore, we encourage you to check the date of our Privacy Policy, whenever you visit our Website for any updates or changes.

### **Collection of Your Personal Information**

“Personal Information” refers to information that relates to an identified, or identifiable, person or household. This includes, for example, your first and last name, home address or email address. We may also collect and process sensitive Personal Information, such as payment card number, driver’s license identification, precise geolocation, or Social Security number, as further described in this Privacy Policy. In addition to Personal Information, we also collect information that does not identify you, such as de-identified or aggregated information. The Personal Information that we collect depends on what services you use or information that you request. Our collection and processing of your information is based on different contexts: our performance of a contract, our obligations under law, our legitimate interest in conducting our business, protection of a natural person’s vital interests, and/or upon your consent.

### **Usage Data**

When you use our Website, we may collect various kinds of Personal Information, including your first and last name, email address, home address, home phone number, and information associated with your Internet Protocol. This information is used to process your requests or to send you information about us, our products, services, or offerings.

### **Surveys**

From time to time, we may post surveys on our Website or otherwise send you surveys. The surveys may request demographic information (such as age range, gender, areas of interest, and familiarity with us or our products and services), and customer feedback. Participation in these requests is completely voluntary. With each request, you will have the choice of whether or not to disclose information. Such survey information will be used to improve our products and services and the overall experience on our Website.

### **Customer Service Correspondence**

We may collect information that identifies you individually, such as your first and last name, home address, email address, phone number, Internet Protocol address, and fax number when you submit comments, questions, or suggestions to our customer service

department. We use that information to verify your identity and to respond to your correspondence.

**Contests and Promotions**

From time to time, we may conduct sweepstakes and contests that are separately governed by their own terms of use. In relation to such sweepstakes and contests, we may collect information that identifies you individually, such as your first and last name, e-mail address, and home address. In addition, we may also collect sensitive Personal Information such as Social Security number. We collect these categories of Personal Information and sensitive Personal Information in order to conduct the contest/promotion, notify you if you have won, and/or process delivery of a prize.

**What Personal Information Has the Company Collected in the Last 12 Months?**

The chart below lists the categories of Personal Information that we have collected in the last twelve (12) months. The chart below also lists the categories of third parties, such as processors or other service providers, to which we have disclosed Personal Information in the last 12 months for a business purpose, such as contacting our customers or processing a payment transaction.

<b>Category of Information Collected</b>	<b>Source of Information</b>	<b>Purpose for Collection</b>	<b>Third Parties to Which Information Has Been Disclosed for a Business Purpose</b>
Identifiers, such as real name, postal address, date of birth, gender, telephone number, unique personal identifier, online identifier, Internet Protocol address, e-mail address, account name or other similar identifiers. This also includes demographic information obtained from third parties.	You, your company, and/or your use of our Website; demographic content providers; your responses to our surveys; communications with our Customer Service representatives	To contact you; provide you or your company, or other Boston Bruins guests or customers, with goods, services, or information you or your company request; or to make our products and services better	We disclose your information to service providers, such as mailing fulfillment vendors and companies that help us identify you and your preferences, to conduct our business. We may also share your Personal Information with other service providers, such as credit card processors or professionals, like attorneys or accountants, where necessary for our business. Our venues in the Boston Bruins family of brands may also share Personal

<b>Category of Information Collected</b>	<b>Source of Information</b>	<b>Purpose for Collection</b>	<b>Third Parties to Which Information Has Been Disclosed for a Business Purpose</b>
			Information with affiliates that provide back-office support.
Other identifiers such as signature, credit card number, or debit card number	You, your company, and/or your use of our Website	See above. Generally, we collect these categories of information in relation to purchases you make from us.	See above. Generally, we share purchase-related information only to third parties that help us process your purchases.
Sensitive personal information such as Social Security number, driver's license identification, or passport identification	You	To comply with laws and regulations, detect security incidents, protect against malicious or fraudulent activity, to protect physical safety of natural persons, or to otherwise perform services on behalf of our business	When performing a service, we may share this information with our service providers. We may also share this information with law enforcement to protect the Boston Bruins and natural persons. We may also share this information with governmental agencies as required by law.
Commercial information, including records of products or services purchased, obtained or considered	You, your company, and/or your use of our Website	See above.	See above.
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with our Website, an application, or advertisement	You, your company, and/or your use of our Website	To better serve you, provide you information best suited to you, and to maintain and secure our networks and systems; to operate the website and collect analytics; to understand our customer preferences; to create remarketing campaigns, and audience look-a-likes	We share with third parties to serve you relevant advertisements, to tailor our content to your preferences, and to maintain and secure our networks and system.

<b>Category of Information Collected</b>	<b>Source of Information</b>	<b>Purpose for Collection</b>	<b>Third Parties to Which Information Has Been Disclosed for a Business Purpose</b>
		for promotions and marketing	
Audio or video recordings, such as recordings of customer service calls or video recordings on our premises, as well as audio or visual recordings made at interactive experiences at our arena	Equipment on our network or at our premises	We use audio recordings for training and quality control purposes. We use video recordings to protect our customers, our employees, our premises and otherwise deter theft and fraud.	We share audio and video recordings only with third parties necessary to our use and processing of such recordings.
Your location	From you, your company, and/or use of our Website. Also, if you connect to a guest or other wireless network at one of our premises, we or our service provider may collect information about your location.	To better serve you depending upon your location and otherwise to identify your location in relation to our network	We share location information only with third parties necessary to our use and processing of such information.
Purchase history and other commercial information	You	We may maintain a record of goods and services you obtain from us for our commercial records and otherwise to better serve you, and to draw inferences about your preferences.	We share purchase and commercial information only with third parties necessary for the processing of such information.
Professional information	You and other third-party sources	We collect professional information such as job title and contact information, from our business contacts, so	We share professional information concerning our business contacts only with those third parties necessary for us

Category of Information Collected	Source of Information	Purpose for Collection	Third Parties to Which Information Has Been Disclosed for a Business Purpose
		we can connect and do business with them.	to process such information.
Inferences we draw from any of the information identified above to create a profile about you reflecting your preferences	We develop such inferences internally or with the help of third parties.	Generally, we may develop inferences, like product or service preferences, concerning our customers, which we use to better serve them and provide them with information concerning products or services that may interest them.	We share such inferences with third parties necessary for our processing of such inferences, such as marketing software platforms.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you with notice.

**Use of Your Personal Information**

In addition to the purposes and uses described elsewhere in this Privacy Policy, we use Personal Information in the following ways:

1. To identify you when you visit our Website or our locations.
2. To provide products and services or to process returns.
3. To process your requests, purchases, transactions, and payments and prevent transactional fraud.
4. To streamline the checkout process.
5. To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
6. To improve our services and product offerings.
7. To conduct analytics.
8. To provide, support, personalize, and develop our Website, products, and services.
9. For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.

10. To send marketing and promotional materials, including information relating to our products, services, sales, or promotions.
11. To develop look-a-like audiences for marketing of promotional materials.
12. To monitor the effectiveness of our marketing campaigns.
13. In relation to professional contact information, to conduct business with our business partners.
14. For internal administrative purposes, as well as to manage our relationships.
15. For other internal operations reasonably aligned with the expectations of our customers, including processing in furtherance of the provision of a product or service requested by a customer.
16. As otherwise required or permitted by law.

### **Disclosing Your Personal Information**

In addition to the specific situations discussed elsewhere in this Privacy Policy, we disclose Personal Information in the following circumstances:

#### **Affiliates**

We may disclose your information to companies that share common or similar ownership or control with Company, our subsidiaries and/or affiliated companies.

#### **Offers from The Boston Bruins**

We may use or disclose your Personal Information (excluding your credit card information), non-personal information, as well as aggregate information with Delaware North Companies, Inc. – Boston and its parent, affiliates, and subsidiaries; the Boston Bruins Charitable Foundation, Inc.; and The Sports Museum of New England, Inc. so that they may send you information about related products and services that may be of interest to you. If you do not want your personal information disclosed to the any of these entities, please make such a request pursuant to the “How to Contact Us” section below. These entities have their own independent privacy and data collection practices, which may differ from our privacy policy. Therefore, we encourage you to review and understand the privacy policy of these entities.

#### **Other Third Parties**

We may disclose your information to other third parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you.

#### **Business Transition**

We may share or sell your information as an asset of the Boston Bruins in conjunction with the sale to a third party of the Boston Bruins, our subsidiaries and/or affiliated companies, or a portion of our or their business or assets.

## **Legal Purposes**

We may disclose your information:

- (a) to conform with the law, research and fulfill our regulatory obligations, respond to regulatory inquiry, respond to claims, or comply with legal process served on Company (e.g., a lawful subpoena, warrant or court order, or discovery request).
- (b) to enforce or apply our policies or agreements (including to bill and collect for amounts owed to us).
- (c) to protect and defend our operations and ours and our employees', patrons', users', or the public's rights, privacy, safety or property (including through surveillance).
- (d) to protect our Websites, including fraudulent, abusive or unlawful use of our Websites.
- (e) if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.
- (f) to governmental authorities, in our sole discretion, in exceptional circumstances, such as a national emergency, security matter, or other situations in which we deem such disclosure prudent.

## **Vendors and Providers of Services**

We may disclose your information to vendors and others who help us operate our business or provide services on our behalf, including the production or transmission of marketing materials. Among other things, service providers may help us to administer our Website, conduct surveys, conduct contests and sweepstakes, provide technical support, process payments, and assist in the fulfillment of orders. We may also transmit information about you to vendors to better understand the people that have an interest in our products and services so that we can identify others that might have similar interests.

We may disclose de-identified or aggregate information that does not contain your Personal Information. Where we do so, we require that the recipient agree not to re-identify any such information. When we process de-identified data, we take reasonable steps to ensure that it remains de-identified and we will not re-identify it, other than as allowed by applicable law.

We do not use or disclose sensitive Personal Information for purposes other than to provide the goods or services you expect, to detect security incidents, protect against malicious or fraudulent activity, to protect physical safety of natural persons, or to otherwise perform services on behalf of our business (things like servicing accounts, fulfilling orders or transactions, verifying customer information).

## **First and Third-Party Cookies, Pixels and Related Data**

We use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a web site is viewed. Certain cookies are necessary to operate our website. This means that a third party uses technology (e.g., a Cookie) to collect information about your use of our Website, so that they can provide advertising about products and services tailored to your interests on our Website, or on other websites. We use this information to capture website analytics and engage in behavior-based advertising.

## **Sale and Sharing of Personal Information**

In the last twelve (12) months, we have not sold Personal Information.

In the last twelve (12) months, we have shared the following categories of information with third parties for the purposes of cross-contextual advertising, otherwise known as targeted advertising, such as when we purchase space to serve you an advertisement based on your preferences or activity on a website unaffiliated with ours, or serve you an advertisement on one of our Websites, based on Internet activity before you reached our Website.

- Cookie ID
- Browsing information
- Other identifiers, such as IP address

## **Your Choices**

You can make the following choices regarding your Personal Information:

1. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in emails that you receive or by contacting us with such request pursuant to the “How to Contact Us” section below. If you decide not to receive promotional emails, we may still send you transactional or service-related communications.
2. **Promotional Mailings.** If at any time you do not want to receive offers and/or mailings from us, you can remove yourself from our mailing list by contacting us with such request pursuant to the “How to Contact Us” section below and including “NO SNAIL MAIL” in the subject line along with your name, address, and zip code. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.
3. **Changes to Your Personal Information.** If the information we have concerning you is incorrect, you can correct it as noted in the “Your Privacy Rights” section below.
4. **Deletion of Your Personal Information.** You may request that we delete your Personal Information by contacting us with such request pursuant to the “Your Privacy Rights” section below and we will delete such Personal Information to the extent required by law.



5. **Revocation of Consent.** If we are processing your Personal Information based on your consent, you may revoke consent, or object, to specific processing of your Personal Information by contacting us with such request pursuant to the “Your Privacy Rights” section below. If you revoke your consent for the processing of Personal Information, then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. We note, however, that the majority of our processing is not based on consent.
6. **Access to Your Personal Information.** If required by law, upon request, we will grant you reasonable access to the Personal Information that we have about you. You may request access to your Personal Information by contacting us with such request pursuant to the “Your Privacy Rights” section below.
7. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include “Do Not Track” instructions.

### **Protecting Your Information**

Securing your data is important to us and we have adopted administrative, technical and physical safeguards to do so. No transmission of data over a network, nor any storage of data, is 100% secure, however. In the event that we are required by law to inform you of a security incident in relation to your Personal Information, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

### **Retention of Information**

We retain Personal Information for the period necessary to fulfill the purposes outlined in this policy, or until an individual makes a valid request that we delete information about them, unless a longer retention period is required or is permitted by law.

### **Your Privacy Rights**

Depending on where you reside, applicable law may provide you with additional privacy rights, such as the right to confirm that we are processing your Personal Information, the right of access, or the right to correct your Personal Information. You may also have the right to delete some or all of the Personal Information we have collected about you; valid requests to delete may be fulfilled by deleting or de-identifying this information, although we will retain any information we are required to keep by law. You may also have the right to opt-out of certain processes, such as targeted advertising and to obtain a portable and useable copy of the information you provided to us.

To exercise these rights, please contact us through one of the following means:

- Calling us at: **TBD**
- Emailing us [here](#)
- Sending a letter to 100 Legends Way, Boston, MA 02114; Attention: Data Privacy.

Please note that if you make a request, we will need to verify or authenticate your identity (that you are the person that is the subject of the request, the legal guardian of that person, or in some jurisdictions an authorized representative) to carry out the requests. In order to verify your identity, we may ask for certain additional information that we will only use for the purpose of this verification. If we can't authenticate your identity, we will let you know. Note, in order to maximize the potential that we can identify you when you make a request, please use the information you provided to us, for example when you registered with one of our Websites or otherwise communicated with us. If you use Personal Information not in our possession when you make a request, we may not be able to identify you.

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt or as otherwise required by law. If we require more time (up to 90 days in certain circumstances), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

If we cannot process your request, we will inform you of the reason why. For data portability requests, where applicable, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without undue 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, under applicable law, 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.

### **Non-Discrimination**

We do not discriminate against consumers who exercise any of their rights described in this section.

### **Appeal Rights**

If we deny a request you make concerning your Personal Information, you may have the right to appeal that denial. If so, we will provide you information concerning your appeal right when we deny your request.

## **Miscellaneous**

### **Aggregate Information**

We collect aggregate information about you and your use of our Website whenever you visit us online. For instance, we may collect various forms of "click stream" information such as entry and exit points for our Website (i.e., referring URLs or domains), site traffic statistics, page views, impressions, and operating system and browser type. In addition, when you request pages on our Website, our servers automatically log your Internet Protocol addresses. An Internet Protocol address, or IP Address, is a number that is

automatically assigned to your computer whenever you are surfing the Internet. We will not attempt to de-aggregate the aggregate information we collect.

We also use third-party software that tracks traffic directed to the Website from affiliate websites and the purchases that result from this traffic. This information is aggregated and is not tied to an individual purchase.

This aggregate information generally will not identify you or be correlated to you individually for external purposes. We may collect, compile, store, publish, promote, report, sell, or otherwise disclose or use any and all aggregate information, provided that such information does not reveal your identity. When we share such information with other companies, it is not traceable to any particular user, and will not be used to contact you. If we do correlate any aggregate information to you, such information will be treated like any other Personal Information under this policy.

### **Links to Other Sites**

Please be aware that we provide links to third-party websites as a service to our users, and that we are not responsible for the content or information collection practices of those pages. Please note that these websites' privacy policies may differ from our Privacy Policy. We encourage you to review and understand their privacy practices before providing them with information.

### **Transmission of Information to Other Countries**

By submitting your Personal Information to us, you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States of America. If you would like more information concerning where we process your information, you can contact us pursuant to the "How to Contact Us" section below.

### **Third Party Tracking**

You can opt out of receiving advertising based on your browsing behavior from some network advertising companies by going to the [Network Advertising Initiative](#) and the [Digital Advertising Alliance](#) websites, although to completely prevent advertising based upon your browsing behavior you should also disable the cookies on your browser.

### **Children Under the Age of 16**

Our Website is not directed at persons under the age of 16 and should not be used by them. In no event should children under the age of 16 provide any Personal Information through our website. More information about the Children's Online Privacy Protection Act (COPPA) and how it protects children who use the Internet may be found at [www.ftc.gov](http://www.ftc.gov).

We do offer certain interactive experiences that children may participate in with their parents' consent and that may collect some Personal Information like images. We use the contact information collected in relation to these experiences to share a free takeaway with

the user. We delete any images collected through these experiences after they are made available to the user for download for a short period.

### **How to Contact Us**

If you have any questions about our Privacy Policy or our use of your information, you can email or contact us as set forth below. When contacting us, please include your first and last name, the name of the location that collected your information and a contact number or email address where you agree to be reached.

Email us [here](#)

Or send a letter to:

**Boston Professional Hockey Association, Inc.**

100 Legends Way

Boston, MA 02114

Attention: Data Privacy

**Effective Date: April 2024**

**BPHA**