

PRIVACY POLICY

This policy was last modified on June 11, 2018.

The website you have entered (one37pm.com, its sub-domains, affiliated websites, and any services available therefrom, including any mobile versions of the website or mobile applications) (the “Site”) is operated by VaynerStudios, LLC d/b/a Gallery Media Group and its affiliates (“Gallery Media Group,” “we” or “us”). We respect your privacy rights and recognize the importance of protecting data collected from you and about you. This privacy policy (the “Privacy Policy”) describes how we collect, use, share, and protect that data.

If you do not accept and agree with this Privacy Policy, you must stop using the Site immediately. Your continued use of the Site constitutes your acceptance of this Privacy Policy.

1. Collection of Data

a. We collect personal data when you voluntarily provide it to us.

We collect personal data from you in several different ways on the Site. Personal data means information that can reasonably be used to identify you personally (such as your name, phone number, address, and email address). We collect this personal data when you voluntarily provide it to us (such as when you submit an inquiry or apply for a job online). You can choose not to provide the requested data, but you might not be able to take advantage of certain Site features.

b. We automatically collect data about your browser or device and your use of the Site.

Upon the launch of the fully functional Site, when you access and use the Site, our technology and tools may automatically collect and record certain data (which does not identify you as an individual) about your use of the Site (your IP address, browser type, the make and model of device used to view the Site, unique device identifiers, the referring web page, pages visited, search terms and other information relating to your use of the Site, browser or device).

c. Third-parties may also automatically collect data about you.

Upon the launch of the fully functional Site, some embedded content on the Site may be served by third-party content providers. Please note that these companies may also use cookies or other similar technologies to collect data about you, both on the Site and throughout the Internet. Data collection and use by those third-parties is subject to the privacy policies of those third-parties.

d. Our “Do Not Track” (DNT) Policy

Some websites have “do not track” features that allow you to tell a website not to track you. We do not currently respond to those signals or similar mechanism transmitted by web browsers. To learn more about browser tracking signals and DNT, please visit <http://allaboutdnt.org>.

2. Use of Collected Data

We collect and use the types of data described above to assist in the administration and operation of the Site and to provide you an efficient, meaningful, and customized experience. We may use the data to:

- Fulfill our obligations with respect to the reason you volunteered the data (e.g., to respond to an inquiry, evaluate your job application, etc.);
- Allow you to participate in certain features of the Site;
- Improve the Site or our products, events and services;
- Optimize your experience on the Site (e.g., troubleshooting technical programs, storing your preferences, etc.);
- Notify you about changes to the Site (including this Privacy Policy);
- Carry out our obligations and enforce our rights arising from arrangements between you and us; and
- For any other purpose with your consent or as permitted by law.

Additionally, we may use the data for marketing purposes to:

- Provide you with additional information regarding products, events and services from Gallery Media Group, and its subsidiaries and affiliated companies via email or through advertising on various social media platforms or websites (both desktop and mobile) that you may visit; and
- Develop, improve, and target our promotional messaging to you and others via retargeting, online behavioral advertising, and use of social media platform tools for advertising (such as creation of Facebook Lookalike Audiences).

You can learn more about Facebook ads [HERE](#) and other types of online advertising [HERE](#).

3. Legal Basis for Processing Personal Data

To the extent you provide us with personal data, we are processing your personal data under the following lawful basis:

- a. Consent: by clicking the opt-in button on the Site you consent to permit us to process your personal data for the purposes set forth in this Privacy Policy.
- b. Processing necessary for compliance with legal obligations.

4. Third-Party Websites and Third-Party Embedded Content

We do not control the privacy policies of third-party websites, our affiliates, service providers, and business partners which may be accessed, directly or indirectly, through your use of the Site once launched and fully functional. Any data you provide to, or that is collected by, third-party sites may be subject to the privacy policies of those sites (including third-party content embedded on the Site), if any. It is up to you to review the terms of use and privacy policy of third-party websites or third-party content originators once the Site is launched and fully functional.

5. How We Share Data

a. Affiliates and Subsidiaries. We may share your data collected on this Site with our subsidiaries or affiliated companies.

b. Service Providers. We may provide collected data to our service providers. They may use your data to perform services for us and may have access to, store and process your personal data to provide services on our behalf.

c. Sponsors or Event Partners. In the instance of ticketed events, we may share your personal data with sponsors or event partners.

d. Law Enforcement and Safety. We may also share or disclose your data to comply with a court order or other legal obligation, to enforce the Site terms of use, and to protect the rights, property or safety of our users and other third-parties. We may disclose data to government or law enforcement officials or private parties as we determine, in our sole and absolute discretion, is necessary or appropriate to respond to claims or to comply with legal processes, to comply with laws, regulations or ordinances or to prevent or stop illegal, unethical or actionable activity.

e. Business Transfer. In the event that the Gallery Media Group undergoes a merger, acquisition by another company or sale of its assets, your data will, in most instances, be part of the assets transferred.

6. Your Rights under the GDPR

If you are accessing the Site from the European Economic Area, which includes the European Union, Iceland, Liechtenstein, and Norway, you have the following rights under the General Data Protection Regulation (GDPR).

- a.** Right to be informed about the collection and use of your personal data
- b.** Right to access your personal data
- c.** Right to have any inaccurate personal data corrected
- d.** Right to have your personal data erased
- e.** Right to restrict use of your personal data
- f.** Right to personal data portability

- g.** Right to object to the processing of your personal data

If you wish to exercise any of these rights under the GDPR, please email us at privacy@one37pm.com or write to us at the address below with such request. We will respond to any requests without undue delay and no later than one-month after receipt of your request.

7. Opting-Out of Data Use or Withdrawing Consent

As described above, we collect personal data about you when you voluntarily provide it to us, collect other data about you and your use of the Site automatically when you interact with us. If you do not want us to use your collected data as described above or if you wish to withdraw your consent to permit us to process your personal data, please email us at privacy@one37pm.com or write us at the address below with such request.

If you no longer wish to receive communications from Gallery Media Group, you can opt-out from receiving such messages in the future by following the instructions in the emails or contacting us at privacy@one37pm.com.

With respect to the Site's use of cookies and other similar technologies, by adjusting settings on your browser, you may elect not to allow cookies to be placed, and thus opt-out of certain features of the Site and the Site's automatic collection of certain data about you.

You may remove certain tracking technologies and opt-out of online behavioral advertising messaging by using the opt-out tools available from the Digital Advertising Alliance ([DAA Opt-Out Tool](#)) and the Network Advertising Initiative ([NAI Opt-Out Tools](#)). Please note that these opt-out tools are device and browser specific, so you must repeat the opt-out from each of your browsers and devices.

You may also adjust your advertising preferences on various social media websites by adjusting your Settings on the platform (for example, you may adjust the types of Facebook ads you receive [HERE](#)).

8. Protection and Retention of Data

We use appropriate technical and organizational measures to ensure a level of security appropriate to the risk and to safeguard your data in our possession. However, no data transmission over the Internet is completely secure and no security mechanism is impenetrable. Therefore, although we take steps to protect your data, we cannot guarantee the security of the data that we collect from you or the security of our servers or the Site. By accessing the Site, any transmission of data is at your own risk and you agree to assume all risk in connection with data sent to us or collected by us.

We retain data only as long as necessary in light of the reasons it was collected as set forth in this

Privacy Policy, or until you inform us you wish to have your data deleted, whichever comes first. Please note that we may retain your data for longer periods of time as necessary to comply with our legal obligations or respond to governmental authorities.

9. Foreign Jurisdictions; Personal Data Transfers

The data that you provide to us or we obtain as a result of your use of this Site will be collected, stored, and processed in a destination outside the European Economic Area (“EEA”) that may not be subject to equivalent data protection laws, including the United States. We may transfer your personal data outside the EEA in order to store it and enable us to provide advertising, products or services to you. Where your personal data is transferred outside the EEA, including the US, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards and ensure that your data is treated securely and in accordance with this Privacy Policy. By using this Site and/or providing us with your personal data, you (a) consent to the transfer and/or processing of any personal data outside the EEA, including to the U.S., (b) acknowledge that U.S. law may not be equivalent to the data protection laws of your location and (c) understand that we will collect, transfer, store, process and/or deal with your personal data in accordance with this Privacy Policy.

10. Children and Parents

We respect children’s privacy. We do not target or knowingly or intentionally collect personally identifiable information from children under the age of 13. By using the Site, you have represented and warranted that you are either 18 years of age or using the Site with the supervision of a parent or guardian. If you are under the age of 13, you may not use the Site. If you become aware that your child has provided us with personal information without your consent, please email us at privacy@one37pm.com.

11. Your California Privacy Rights

If you are a resident of California, California law permits you to request certain information regarding the disclosure of your personal data by Gallery Media Group, or its affiliates and subsidiaries, to a third-party for direct marketing purposes. To make such a request, please email us at privacy@one37pm.com or write to us at:

VaynerStudios, LLC d/b/a Gallery Media Group
Attention: California Privacy Rights
10 Hudson Yards, 25th Floor
New York, NY 10001

12. Data Controllers

The data controller for the personal data that you provide or that is collected by Gallery Media

Group or its affiliates is VaynerStudios, LLC d/b/a Gallery Media Group, 10 Hudson Yards, 25th Floor, New York, New York 10001.

13. Miscellaneous

From time to time, we may update this Privacy Policy to reflect, among other things, changes in the law or our data collection and use practices and such modifications shall be effective upon posting by the Gallery Media Group. Your continued use of the Site after an updated Privacy Policy signifies your acceptance of the updated Privacy Policy. **It is important that you review this Privacy Policy regularly to ensure you are updated as to any changes.** If we make a material change to this Privacy Policy, as determined in our sole discretion, we will notify you via email.

14. Contact Us

If you have any general questions about this Privacy Policy or other aspects of the Site or would like to correct, update or erase data provided to us, please email us at privacy@one37pm.com or write to us at:

VaynerStudios, LLC d/b/a Gallery Media Group
Attention: ONE37pm.com Privacy Policy
10 Hudson Yards, 25th Floor
New York, NY 10001