

CLEVELAND BROWNS PRIVACY POLICY

Updated: February 2, 2023

NFL Enterprises LLC, the National Football League, the League's thirty-two member clubs ("Member Clubs"), and the other members of the [NFL Family](#) (collectively, "NFL," "we," "our," "us") respect your privacy and value your trust and confidence. This privacy notice (the "Privacy Notice") applies to our websites, mobile applications, and other offline or online and mobile services that link to or post this Privacy Notice (collectively, the "Services"), and explains how we collect, use, and disclose information through the Services.

It is our policy to comply with applicable privacy laws, and so our privacy practices may vary depending on where you live. Please see the region-specific disclosures and applicable supplemental notices for more information relevant to data collected in certain regions and by individual member clubs. By using the Services, you acknowledge that you have read and understood the terms of this Privacy Notice. Please note that this Privacy Notice does not apply to information collected in employment or job applicant contexts. For information about data handling practices in these contexts, please refer to the applicable privacy notices or seek more information from the relevant NFL entity. Likewise, this Privacy Notice does not apply to products and services that link to a separate privacy notice instead of this Privacy Notice.

Please also note that in some instances, we may direct you to a site or page that is operated by one of our partners or use framing techniques to serve you content from partners while preserving the look and feel of our website. Even though the page where you provide information may have the look and feel of the Services, a different privacy policy may govern that information collection by such partners.

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1. Information Collection

Information Provided by You

We may collect some or all of the following types of information, some of which may be considered sensitive information, including when you register with us, use our Services, sign up for contests or sweepstakes, participate in surveys, create a profile, access various content or features, submit comments or content, use a send-to-a-friend feature, attend events, or directly contact us with questions or feedback:

- Identifiers, such as contact information, which may include name, e-mail address, postal address, telephone number, and date of birth;
- Other unique identifiers, such as a username or password, and, where appropriate, other identifiers such as Social Security Numbers and government-issued identifiers. For example, we may need to collect these identifiers to award you certain types of prizes under relevant laws;
- Demographic information, which may include gender, race, ethnicity, and sexual orientation, and other protected classifications under relevant state or federal law;
- Financial and commercial information, such as credit card or other payment information and records of products or services purchased;
- Real-time geolocation information, which may include precise geolocation information;
- Communications and marketing preferences;
- Favorite team and inferences about you and your personal preferences;
- Audio, electronic, or visual information, such as photographs that you provide to us;

- Biometric information, such as when you elect to use biometric authentication at stadiums that offer this functionality for entry or other relevant functionality. Where required by law, we collect this information pursuant to your consent and may provide additional notice about relevant data handling practices;
- Information about your contacts, such as name and email address, when you share that information with us. If you authorize us to access your contacts, calendar, or photos, we may also collect that information to provide you with relevant functionality;
- Search queries;
- Comments and other information posted in our interactive online forums;
- Professional and employment information;
- Education information;
- Information that could be considered health information, such as when you purchase accessible seating;
- Correspondence, waivers or acceptances and other information that you send to us; and
- Additional information as otherwise described to you in this Privacy Notice, at the point of collection, or pursuant to your consent.

If you decide not to provide this information, it may limit our ability to provide the Services or some of our content.

Information We Collect Automatically

We also may collect internet and electronic network activity information, device identifiers, and information about your use of the Services automatically when you visit or use the Services, including:

- Your Internet Protocol (“IP”) address, which is the number automatically assigned to your computer whenever you access the Internet and that can sometimes be used to derive your general geographic area;
- Your Media Access Control (“MAC”) address, which is a unique identifier assigned to a network interface controller;
- Your device type or mobile carrier;
- Other unique identifiers, including mobile device identification numbers and advertising identifiers (e.g., IDFA);

- Your browser type and operating system;
- Sites and apps you visited before and after visiting, or while using, the Services;
- Pages you view and links you click on within the Services;
- Information collected through cookies, web beacons, Local Shared Objects, and other technologies, as described further below;
- Information about your interactions with e-mail messages, such as the links clicked on and whether the messages were received, opened, or forwarded;
- If you link your social media account to your NFL account, information from those social media accounts in accordance with your settings on the social platform and their privacy policy;
- App usage information, including how often you use our application, the events that occur within the application, usage, and performance data, and where the application was downloaded from;
- Other Standard Server Log Information;
- Standard Network Traffic Information, when you are connected to an NFL stadium's Wi-Fi network; and
- We may also collect audio, electronic, or visual information from you automatically, such as information collected from CCTV cameras and when we film or photograph you in a public location at an NFL Event, as described further [here](#).

Information We Collect from Other Sources

In addition to information we receive from you and collect automatically, we may receive information about you from other members of the NFL Family and from other sources, such as your friends, social networks, publicly available sources, data brokers, advertising partners, and our business partners and sponsors, including to facilitate co-branded programs. We may combine this data with information we already have about you, including to create inferences about you and your personal preferences.

2. Use of Information

We may use information that we collect about you for a variety of purposes, including to:

- Provide you with products, promotions, services, newsletters, and information you request and respond to correspondence that we receive from you, including, where relevant, to facilitate your purchases (e.g., to process returns or streamline the checkout process);

- Contact you about your account or relationship with us;
- Conduct analysis on your behavior in order to customize and personalize your use of the Services and to better serve you with offers and content that we think may be of interest to you, such as by providing you with tailored advertising both on and off the Services. For more information on how we use cookies and similar technologies for advertising, please see [Cookies and Similar Technologies](#);
- Communicate with you about products, services, contests, and events that we think might be of interest to you, and otherwise send you promotional material or special offers on our behalf or on behalf of our marketing partners, their respective affiliates or subsidiaries, and other third parties. We will obtain your consent to send such communications to the extent required by law;
- Maintain or administer the Services (e.g., to maintain the security and integrity of the Services), perform business analyses, create aggregated or anonymized information that no longer identifies you and therefore is no longer subject to this Privacy Notice, or for other internal purposes to improve the quality of our business, the Services, and other products and services we offer, such as internal administrative purposes or to manage our relationships;
- Publish stories, comments, photos, and other information posted in our interactive online features;
- In the case of location information, for example, to determine your market location for purposes of administering broadcast restrictions for live games or other events, to validate your location to geogate certain features or information, to locate a place that you may be searching for in your area, for determining teams and offers in which you may have an interest and providing you with information or relevant advertising based on where you are located;
- In the case of Social Security Numbers, for example, for tax purposes when administering prizes to certain contest winners;
- Protect the health and safety of our guests, personnel, and the public;
- Protect or enforce the legal and contractual rights, safety, and security of the NFL and NFL stadiums, enforce applicable agreements with you or others, comply with applicable law, and prevent fraud; and
- As otherwise described to you in this Privacy Notice, at the point of collection, or pursuant to your consent.

3. Disclosure of Information

We may disclose each of the categories of personal information described above with others for the purposes described above, including as follows:

- Authorized Third Parties and Service Providers: We may disclose your information to third-party vendors and service providers that perform certain functions or services on our behalf (such as to host the Services, fulfill orders, provide products and services, manage databases, perform analyses, process credit card payments, provide customer service, or send communications for us).
- Within the NFL Family: We may disclose your information to all members of the NFL Family, including, without limitation, the subsidiaries and affiliates of the National Football League (e.g., NFL Properties LLC, NFL International LLC, NFL Enterprises LLC, NFL Ventures, L.P., and NFL Ventures, Inc.) and to the subsidiaries and affiliates of the Member Clubs. For example, we may disclose your information to Member Clubs with whom you have interacted, such as where you have indicated a preference for one or more Member Clubs or when you attend or purchase a ticket for an event sponsored by a particular Member Club. These Member Clubs may disclose your information to other companies under common control with a Member Club that may be subject to separate privacy policies, including so that they may directly offer you products, services, contest, and events that may be of interest to you and send you promotional material or offers that may be of interest to you.
- Select Business Partners: We may disclose your information to select business partners so that they can provide you with special offers, promotional materials, and other materials that may be of interest to you. For example, we may disclose your information to our co-brand partners when you choose to be involved in those programs, such as when you enter contests or sweepstakes that are conducted with those business partners. We are not responsible for the privacy practices of our business partners, and we urge you to review their privacy notices for more detail on how they might process your information and for information about how to exercise your marketing and other choices with such partners.
- Third-Party Advertising and Audience and Traffic Measurement Services: We use third party advertising, analytics, and measurement partners to serve you advertisements on the Services as well as across other sites and services. These third parties may set their own cookies or similar web technologies on the Services and elsewhere online to collect information about users' online activities over time and across different websites. In some cases, the use of these third-party solutions involves the sharing of your information for purposes of serving you targeted advertising (as defined below). We may also disclose non cookie-based information for advertising purposes, including for targeted advertising. For example, we may disclose information to social networking platforms, so that they may send tailored communications on our behalf via their platforms.

For more information about cookies and similar technologies on our Services, please see [Cookies and Similar Technologies](#). For information about the opt out methods and choices available to you related to targeted advertising, please see [Your Other Choices](#).

- Business Transfer: If we sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a merger or business transfer, or in the unlikely event of bankruptcy, a business reorganization, or similar event, we may transfer your information as part of such transaction.
- Administrative or Legal Process: We may disclose your information to third parties in order to protect the legal rights, safety, and security of the NFL, our corporate affiliates, subsidiaries,

business partners, and the users of our Services; enforce our terms of use and other agreements; respond to and resolve claims or complaints; prevent fraud or for risk management purposes; and comply with or respond to law enforcement or legal process or a request for cooperation by a government or other entity, whether or not legally required.

- Other Parties With Your Consent: We may disclose information to third parties or the public when you consent to such sharing. For example, if you win a contest or sweepstakes, we may ask your permission to publicly post certain information on the Services identifying you as the winner.
- Aggregate Information: We may disclose aggregate information, such as demographics and usage statistics, to advertisers, sponsors, or other organizations.
- Geolocation Information: We may disclose your geolocation information to service providers that perform certain functions or services on our behalf. We also may disclose your geolocation information to third parties so that they may provide you with geographically relevant advertising. If you wish to stop the further collection of your geolocation information, please opt-out using your device settings.

Please also note that if you choose to engage in public activities on the Services, such as through interactive features like a chat room, forum, blog, or other community tool, you should be aware that the information you share there will be publicly available and can be read, collected, or used by other users of these features. You may receive unsolicited messages from other parties. We cannot ensure that parties who have access to such information will respect your privacy. Please exercise caution when using these features.

4. Cookies and Similar Technologies

We and others use cookies and similar technologies such as beacons, tags, HTML5 local storage, and scripts, to collect information from your browser or device. By using the Services, you acknowledge the use of cookies and similar technologies on the Services, subject to the cookie-related choices we make available to you and, where required by law, your additional consent.

The following types of cookies are used on our Services:

- Strictly necessary cookies: These cookies are necessary for the Services to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for Services, such as setting your privacy preferences, logging in, or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the Services will not then work.
- Functional cookies: These cookies enable the Services to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you disable these cookies then some or all of these services may not function properly.
- Performance cookies: These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Services. They help us to know which pages are

the most and least popular and see how visitors move around the Services. If you disable these cookies we will not know when you have visited our Services, and will not be able to monitor its performance.

- **Targeting cookies:** We partner with third party advertisers to serve and display advertising on the Services and elsewhere online across different sites and services. These partners may use cookies and other tracking technologies to collect information about your activities across different websites and services to build a profile of your interests and provide you with relevant advertising (“targeted advertising”). This is typically done based on uniquely identifying your browser and internet device. If you disable these cookies, you will experience less targeted advertising.

To disable optional cookies, please utilize the Cookie Settings of the applicable website. Additional choices, including with respect to targeted advertising, are described below under [Your Other Choices](#).

You also may be able to reject cookies and similar technologies through your browser settings. If you reject cookies through your browser settings, you may still use our Services, but your ability to use certain features may be limited.

5. Social Networking

The NFL works with certain third-party social media providers to offer you their social networking services through our Services. For example, you can use third-party social networking services to share information about your experience on our Services with your friends and followers on those social networking services. These social networking services may be able to collect information about you, including your activity on our Services. These third-party social networking services also may notify your friends, both on our Services and on the social networking services themselves, that you are a user of our Services or about your use of our Services, in accordance with applicable law and their own privacy policies. If you choose to access or make use of third-party social networking services, we may receive information about you that you have made available to those social networking services, including information about your contacts on those social networking services. Your interactions with those social networking services are governed by the privacy policy of the company providing the relevant service.

You also may be able to link an account from a social networking service (e.g., Facebook, Twitter, or Snapchat) to an account through our Services. This may allow you to use your credentials from the other site or service to sign into certain features on our Services. If you link your account from a third-party site or service, we may collect information from those third-party accounts, and any information that we collect will be governed by this Privacy Notice.

6. Links to Other Websites

The Services may contain links to other websites or online services that are operated and maintained by third parties and that are not under our control or maintained by us. Such links do not constitute an endorsement by us of those other websites, the content displayed therein, or the persons or entities associated therewith. This Privacy Notice does not apply to this third-party content. We encourage you to review the privacy policies of these third-party websites or services.

7. Data Security and Data Integrity

The security and confidentiality of your personal information is very important to the NFL. We have implemented technical and organizational safeguards designed to appropriately protect your personal information against accidental, unauthorized, or unlawful access, use, loss, destruction, or damage. Still, no system can be guaranteed to be 100% secure.

As a result, while we strive to protect your information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to the Services and cannot be responsible for the theft, destruction, or inadvertent disclosure of your information.

8. Data Transfers

When we transfer your personal information to third parties as described in this Privacy Notice, some of these parties may be located in countries other than your own, such as the United States, whose privacy and data protection laws may not be equivalent to those in your country of residence. When we transfer your personal information to other countries, we apply appropriate safeguards, to protect your information in accordance with applicable laws. For example, some NFL entities implement measures such as standard data protection contractual clauses to ensure that any transferred personal information remains protected and secure. A copy of these clauses can be obtained by emailing enquiries@nfl.com. If you would like to know more about the processing of your personal information and whether your personal information is transferred to a third country, please contact us using any of the methods described in [Contact Us](#).

9. Data Retention

We will retain your information for as long as reasonably necessary for the purposes set out above, considering criteria such as applicable rules on statute of limitations, any legal requirements to retain your personal information in light of compliance obligations, any relevant litigation or regulatory investigations and to enable the NFL to defend or bring potential legal claims, the sensitivity of the relevant information, and the duration of your use of the Services.

10. Children's Privacy

We do not knowingly collect personal information from children as defined by local law. If we learn that a child has provided us with personal information, we will delete it or otherwise comply with applicable law.

11. Communications and Geolocation Preferences

You may choose to receive promotional emails, text messages, newsletters, push notifications, and similar communications from us. You may opt out of receiving commercial emails from the applicable Member Club or other members of the NFL Family by clicking on the opt-out or "unsubscribe" link included in the commercial emails you receive. You may opt out of receiving marketing text messages from the applicable Member Club or other member of the NFL Family by replying "STOP." You may also opt out of receiving push notifications by turning off push notifications through your device settings.

If you have multiple accounts or relationships with different Member Clubs or other NFL entities, you may need to opt out separately for each account and relationship in relation to these choices. In addition, if you would like to opt out of receiving push notifications on all of your devices, you must turn off the feature on each device.

Please note that opt-out requests may take some time to be effective where permitted by applicable law. Your opt-out requests will not apply to messages that you request or that are not commercial in nature. For example, we may contact you concerning any purchases you have made with us, even if you opt out of receiving unsolicited commercial email messages.

You may also have choices available to you to opt out of the collection of your geolocation information, whether collected through location services, Bluetooth, or microphone access technology. Where collected, this information may be used in accordance with local laws to serve and display advertising relevant to your location. To understand your choices and opt out if desired, please visit your device settings.

12. Your Other Choices

You may have additional choices depending on where you live.

In some jurisdictions, you may have the right to opt out of the sale of your personal information and the sharing or processing of personal information for targeted advertising purposes. You can exercise these opt-out choices by clicking the "Your Privacy Choices" link at the footer of our sites or by clicking [here](#).

If you wish to opt out of the sale or sharing for targeted advertising of online data through the use of cookies and similar technologies, please utilize the Cookie Settings of the applicable website. Our

websites also support the Global Privacy Control (“GPC”), which is a browser-based opt-out preference signal that can communicate your opt-out to the websites you visit. For more information on how the GPC works, visit their website [here](#). Because the GPC is browser-based, note that your choices will be tied to online data that is associated with your browser, and you should enable the signal separately for each browser and/or device from which you would like to be opted out.

Note that we do not knowingly sell or share the personal information of consumers under 16 years of age.

You may also have additional choices available to you, such as certain vendor-specific choices, including:

- You can opt out of receiving some types of ads by managing your preferences at <https://optout.aboutads.info/>.
- Certain of our Services may feature Nielsen proprietary measurement software, which will allow users to contribute to market research, such as Nielsen TV Ratings. Nielsen believes that you should have a choice about whether to contribute to our research and insights. To learn more about Nielsen measurement and your choices, including how to opt out, please visit <http://www.nielsen.com/digitalprivacy>.
- We may participate in the Adobe Marketing Cloud Device Co-op to better understand how you use our website and apps across the various devices you use, and to deliver tailored promotions. Learn more about how Adobe does this at <https://cross-device-privacy.adobe.com>.

Do-Not-Track Signals: Some web browsers may transmit "do-not-track" signals to the websites with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. Because there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, we currently do not take action in response to these signals. If and when a final standard is established and accepted, we will reassess how to respond to these signals.

13. Data Subject Rights

You may be afforded, in accordance with applicable law, the following rights:

1. To access the information that we have collected about you in a portable and (if technically feasible) readily usable form, including the categories and specific pieces of personal information that we have collected about you, the categories of sources for that information, the business or commercial purposes for collecting, selling, or sharing the information, and the categories of third parties with which the information was shared.
2. To delete the personal information the NFL has collected about you.
3. To correct inaccurate personal information we have collected about you.
4. To object to or request the restriction of processing of your personal information.
5. To withdraw your consent.

To exercise your access, deletion, and correction rights, please submit your request by visiting our [Data Subject Request Portal](#). California residents may also exercise their rights under applicable law by calling 1-855-265-6894. If you would like to object to, or request the restriction of, processing of your personal information, withdraw your consent, or if you are otherwise not able to submit a request via the portal above or toll-free number, you can contact the NFL by filling out an inquiry [here](#). Once we receive your request, we may verify it by requesting information sufficient to confirm your identity. If you would like to use an authorized agent to exercise your rights, we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf.

We reserve the right to deny requests as allowed by applicable law, such as where we have a reasonable belief that the request is fraudulent, where your identity cannot be confirmed, or where the NFL must retain your information consistent with applicable law. You can, however, appeal those requests that we deny by submitting a request [here](#).

You may also be afforded, in accordance with applicable law, the right to limit certain uses and disclosures of sensitive personal information. You can exercise this right, if applicable, by clicking the "Your Privacy Choices" link at the footer of our sites or by clicking [here](#). Please note that we may still maintain, use, and disclose your sensitive personal information for certain purposes, such as to provide you with services that you have requested, protect the safety and security of services, and comply with our legal obligations.

We will not discriminate against you for exercising your rights and choices, although some of the functionality and features available to you may change or no longer be available to you.

14. NFL Events

Information When You Attend An NFL Event: When you attend an NFL-event or NFL co-hosted event, including NFL games at an NFL stadium or at a third party stadium or other NFL fan events (including events at which a fan mobile pass is utilized) ("NFL Event"), we may capture your image, voice and/or likeness, including through the use of CCTV cameras and/or when we film or photograph you in a public location at an NFL Event. You should therefore expect to be filmed or photographed by CCTV and/or by cameras when you are in a public location at an NFL Event (e.g., as an audience-member in the stadium if you are attending a game). In addition to describing how we capture and use your image, voice and/or likeness in this Privacy Notice, we may also display signs at any NFL Event indicating that you may be filmed or photographed.

We may use your personal information collected at an NFL Event:

- To produce, exhibit, advertise or otherwise use your image, voice, or likeness in any and all media now or existing in future as part of NFL's commercial, advertising and marketing activities; and
- In the case of images or footage captured on CCTV cameras, to ensure the safety of the venues hosting NFL Events and of individuals attending NFL Events.

Sharing your personal information from an NFL Event: We may disclose your personal information captured at an NFL Event with any of the entities set out in this Privacy Notice, as described in [Disclosure of Information](#). Additionally, when you appear in a photograph or film footage at an NFL Event, we may disclose that photograph or film footage containing your image, voice, and/or likeness with our third-party partners. These partners include our sponsors, licensees, advertisers, and/or broadcasters. We will disclose the photographs or film footage containing your image, voice and/or likeness when it is in our legitimate business interests to do so. However, each of the third-party partners may use your personal information for their independent commercial purposes without reference to the NFL.

Please also note that broadcasters and other third parties that are unconnected to the NFL may be independently filming or photographing you when you attend an NFL Event. Although we only give permission to a small group of entities (such as certain broadcasters) to film or photograph NFL Events, these entities are separate data controllers in respect of your personal information, and the NFL is not responsible for how those parties use your personal information and for what purposes.

15. Changes To This Privacy Notice

We may update this Privacy Notice, including any supplemental privacy disclosures, to reflect changes to our information practices. If we make any material changes, we will notify you by email or by means of a notice on the Services prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

16. Contact Us

If you have any questions about this Privacy Notice or the privacy practices of the Services, please contact us by submitting an inquiry [here](#) or at the following address:

NFL Digital Media Group
345 Park Avenue
New York, NY 10154
Attn: Website Privacy Notice

For contact information for other members of the NFL Family, click [here](#).

17. California Users

This section provides additional information with respect to personal information that is subject to the California Consumer Privacy Act (“CCPA”). This section should be read together with the rest of our Privacy Notice, which includes other important information about our handling of your personal information.

Some of the practices described may not be relevant to you, since the ways we collect, use, and disclose personal information vary based on our relationship with an individual. For information about our retention practices, please click [here](#).

As described further in the [Information We Collect](#) section above, the categories of personal information we collect, and have collected in the prior 12 months, include:

- Identifiers;
- Other unique identifiers, such as where appropriate, Social Security Numbers and government-issued identifiers;
- Demographic information, which may include gender, race, ethnicity, and sexual orientation, and other protected classifications;
- Financial and commercial information;
- Real-time geolocation information, which may include precise geolocation information; communications and marketing preferences;
- Favorite team and inferences about you and your personal preferences; audio, electronic, or visual information;
- Biometric information;
- Information about your contacts and other information from your device;
- Search queries;
- Comments and other information posted in our interactive online forums;
- Professional and employment information;
- Education information;
- Information that could be considered health information;
- Correspondence, waivers or acceptances and other information that you send to us;
- Internet and electronic network activity information, device identifiers, and information about your use of the Services when you visit or use the Services; and
- Additional information as otherwise described to you in this Privacy Notice, at the point of collection, or pursuant to your consent.

As described further in the [Use of Information](#) section, we process, and have processed over the prior 12 months, personal information for the following business purposes:

- Provide you with products, promotions, services, newsletters, and information you request and respond to correspondence that we receive from you;
- Contact you about your account or relationship with us;
- Conduct analysis on your behavior in order to customize and personalize your use of the Services and to better serve you with offers and content that we think may be of interest to you;
- Communicate with you and otherwise send you promotional material or special offers on our behalf or on behalf of our marketing partners, their respective affiliates or subsidiaries, and other third parties;
- Maintain or administer the Services, perform business analyses, create aggregated or anonymized information that no longer identifies you and therefore is no longer subject to this Privacy Notice, or for other internal purposes;

- Publish stories, comments, photos, and other information posted in our interactive online features;
 - In the case of location information, for example, to determine your market location for purposes of administering broadcast restrictions for live games or other events, to validate your location to geo-gate certain features or information, to locate a place that you may be searching for in your area, and for determining teams and offers in which you may have an interest and providing you with information or relevant advertising based on where you are located;
 - In the case of Social Security Numbers, for example, for tax purposes when administering prizes to certain contest winners;
- Protect the health and safety of our guests, personnel, and the public; protect or enforce the legal and contractual rights, safety, and security of the NFL and NFL stadiums, enforce applicable agreements with you or others, and prevent fraud; and
- As otherwise described to you in this Privacy Notice, at the point of collection, or pursuant to your consent.

Depending on the nature of your relationship with us, and as described further in the [Disclosure of Information](#) section, we disclose, and have disclosed over the prior 12 months, each category of personal information to the following:

- Authorized third parties and service providers;
- Within the NFL family;
- Select business partners;
- Third-party advertising and audience and traffic measurement services; and
- Other partners, including as part of a business transfer; for administrative or legal process; or with your consent.

Please review the [Your Other Choices](#) section for more information about the circumstances in which we sell or share personal information, such as internet and electronic network activity information, device identifiers, and other information about your use of the Services we collect automatically when you visit or use the Services, and to exercise your rights to opt out.

If you are a California resident and your personal information is subject to CCPA, then you have certain rights under California law. For more information about the rights you have and how to exercise these rights, please review the [Data Subject Rights](#) section above.

The metrics below include the aggregate number of requests from consumers to know, access or delete personal information received by the League for the calendar year 2021. These numbers do not include requests that did not state a valid initial request under California law.

- **Requests to Know:** 12 total requests were received; we complied with 3 in whole or in part and denied 9 requests that did not properly verify their identity, with an average completion time of 45 days.
- **Requests to Access:** 18 total requests were received; we complied with 10 in whole or in part and denied 8 requests that did not properly verify their identity, with an average completion time of 45 days.

- Requests to Delete: 38 total requests were received; we complied with 25 in whole or in part and denied 13 requests that did not properly verify their identity, with an average completion time of 45 days.

Shine the Light: California Civil Code Section 1798.83 permits 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, or if you have questions as to how your information is handled in compliance with CCPA, please contact [NFL Support](#) or write us at CA Privacy Rights, NFL Digital Media Group, 345 Park Avenue, New York, NY 10154.

18. International Users

This section of the Privacy Notice is supplemental and provides disclosures in addition to those made elsewhere in this Privacy Notice. This supplemental section applies only if you attend an event outside of the United States or use our website or Services otherwise covered by this Privacy Notice from a country that is not the United States, and where the applicable member of the NFL Family is subject to jurisdiction-specific laws.

NFL Enterprises LLC is the data controller for League processing of personal information when you use our website and mobile applications. NFL International LLC is the data controller for League processing of personal information collected when you attend an NFL Event outside of the United States. Member Clubs may also be a data controller for certain club specific executions, and their entities are listed [here](#).

Legal Basis for Data Processing: We process personal information for the specific purposes set out in this Privacy Notice, as described above. Where such concept is recognized, our legal basis to process personal information includes:

- Necessary for the entry into or performance of a contract: When you enter into a transaction with us, we will need to collect, process, and share your personal information. Failure to provide the requisite personal information when entering into such an agreement, objecting to this type of processing, and/or exercising your deletion rights may mean that products and/or services cannot be provided to you.
- Legitimate interest: In certain circumstances we may use your personal information to pursue legitimate interests of our own, but this is provided your interests and fundamental rights do not override those interests. This is on the basis of our legitimate interest to:
 - provide you with information and services as requested by you on a non-contractual basis;
 - develop and improve our services to you and to our other customers;
 - communicate with you and manage our relationship with you;
 - administer our websites and applications;
 - carry out management analysis, audit, forecasts, business planning, and transactions;
 - ensure our compliance with applicable laws, regulatory requirements, and our policies; and
 - deal with legal claims and related administrative activities.

We consider that it is reasonable for us to process your personal information for achieving our legitimate interests, as outlined above, as:

- We process your personal information only so far as is necessary to achieve the purpose outlined in this Privacy Notice; and
 - The processing of your personal information does not unreasonably intrude on your privacy and ultimately benefits you in optimizing our provision of services to you.
- **Consent:** We may, on occasion and where permitted by law, process your personal information based on your consent. For example, we may process sensitive categories of information or send you marketing messages by email with your consent. You may opt out of receiving certain marketing messages by exercising the choices described in [Communications and Geolocation Preferences](#). To the extent our processing is based on consent, you can withdraw your consent at any time. However, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
 - **Compliance with legal obligations:** To meet our regulatory and legal obligations, we may need to process some of your personal information.

In some instances, you may be required to provide us with personal information for processing, as described above, in order for us to be able to provide you all of our Services and for you to use all the features of our website.

If you are aware of changes or inaccuracies in your information, you should inform us of such changes so that our records may be updated or corrected. You may lodge a complaint with your local supervisory authority if you consider that our processing of your personal information infringes applicable law.

Except as otherwise prescribed by applicable law, in the event of any inconsistency between the English language version and local language version of this Privacy Notice, the English language version will prevail.

19. Supplemental Notice for Cleveland Browns Football Company LLC and Cleveland Browns Stadium Company LLC.

This section provides additional information relevant to the Cleveland Browns and its affiliates (collectively, “the Cleveland Browns Group”).

This Privacy Notice applies only to personal information collected when you interact with the Cleveland Browns football team. For example, this Privacy Notice does not apply when you purchase tickets for or sign up for information about concerts and other events that do not involve the Cleveland Browns football team, book a private event at the Cleveland Browns Group’s facilities, or visit Cleveland Browns Stadium branded web pages or mobile sites.

Contact Information

If you have any questions about this Privacy Policy or the privacy practices of the Services, please contact us by email at privacy@clevelandbrowns.com or by regular mail at:

Legal Department
76 Lou Groza Blvd
Berea, Ohio 44017
Attn: Privacy Policy

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Photos and Biometric Information

In addition to the information described in Section 1, we may also capture photographs in connection with the Services. For instance, our mobile application may allow you to submit existing pictures from the photo gallery stored on your device or to take new pictures using the camera on your device, which may require access to certain features of your smartphone or mobile device, such as facial recognition data and other data collected by imaging technologies provided by your camera or mobile device. We do not consider photographs to be “biometric information” as we do not use this data to personally identify you. We do not require the submission of any photographs to use the Services, including our mobile application;

In addition to your rights under Section 12, you may opt-out of the collection and use of biometric information by us by emailing your opt-out request to privacy@clevelandbrowns.com.

Additional Information on Disclosures

In addition to the disclosure of information identified in Section 3 above, the Cleveland Browns Group may share your information with its subsidiaries and affiliates, including, for the avoidance of doubt, entities with direct or indirect common ownership with the Browns, such as Columbus Crew entities or other entities associated with Haslam Sports Group. If you share information with us under this Privacy Notice, we may share your data with affiliates that will collect, disclose, and use your data pursuant to such affiliates’ privacy policies. We encourage you to visit our affiliates’ privacy policies for more information.

Browns Programs

We may offer membership programs and benefits and loyalty programs from time-to-time, which may provide you with benefits for or from transactions and activities, which we will track. One such example is our Browns Benefit Card Program, which you can learn more about [here](#), and the Browns Barking Backers program, which you can learn more about [here](#). By participating in any such program, including without limitation using your member account information to obtain or receive any benefits, you consent to this Privacy Policy and the Terms of Use, any applicable program terms, and our collection and use of your Browns-Collected PI and non-Personal Information, such as:

- Those games and other events to which you purchase tickets and/or attend;
- Information related to purchases in-stadium or from a third party merchant that is a partner of the Browns, such as where and when such purchases are made and what was purchased;
- Survey responses and other survey information;
- Locations where Browns Benefit Card Program cards are used; and
- Similar information related to your preferences and choices with respect to the Browns, our partners, and our and their business activities.