

## **BRIGHTCOVE PRIVACY POLICIES**

**Last modified: February 11, 2025**

### **INTRODUCTION**

The Brightcove Privacy Policies ("Privacy Policies") describe Brightcove Inc., and its affiliates' ("Brightcove" or "we") practices regarding information collected by our products and services (collectively, "Brightcove Services"). Any use of Brightcove Services, including the Studio and sign-up pages accessible through Brightcove domains (including [www.brightcove.com](http://www.brightcove.com)), and any other information you may provide to us or we may collect from you, is covered by these Privacy Policies.

Brightcove collects and processes information based on our relationship with you. We believe in transparency in our data practices. That is why our Privacy Policies are divided by user type - such as (a) website visitors and prospective customers, (b) customers and the viewers of our customers' content, (c) job applicants and employees, (d) and/or PLAYTV viewers. Select your category from the options below to learn more about the practices applicable to you. .

Brightcove Services are generally intended for business use by corporate entities - our "Customers" - and not for personal use. Our Customers use Brightcove technology to serve video through their own websites or apps to their "Viewers." We do not have an independent relationship with our Customers' Viewers.

Brightcove's PlayTV service has a direct relationship with its viewers (our Customers) and collects information from and about those Customers as set out in the PlayTV section below. Like most companies, we also collect information from visitors to our website. Finally, we collect and process information from our own employees and job applicants.

Information collected from Viewers on Customers' websites or apps is on behalf of our Customers and subject to the Customers' privacy policies. Customers' Viewers who have questions or concerns about information collected when they view content via Brightcove Services, or about the content they are viewing, should contact the Customer through the Customer's website or app on which such content is available.

Our Cookie Policy & Advertising Choices and Communication Options apply to everyone. Please review these Privacy Policies as part of your use of Brightcove's publicly-available websites ("Website"), so you can learn about the options available to you and how to change your preferences.

Download the Privacy Policies in a PDF Format.

### **CHANGES TO OUR PRIVACY POLICIES**

We may occasionally update our Privacy Policies to reflect changes to our information and privacy practices. If we make any material changes, we will notify you by posting a notice on our

Website prior to or simultaneously with the change becoming effective, or directly where required by law or our agreements with you. Your continued use of the Website and the Brightcove Services after any such modification constitutes, and is conditioned on, acceptance of such modified Privacy Policies. We encourage you to review this page periodically for the latest information on our privacy practices. The date the Privacy Policies were last revised can be found at the top of this page.

## **CONTACT US**

If you have any questions regarding these Privacy Policies, please contact us by email at [privacy@brightcove.com](mailto:privacy@brightcove.com), call us +1 617 500 4947, or write to us at:

Brightcove Inc.  
Attn: Privacy Team  
281 Summer Street  
Boston, MA 02210

Please be sure to include sufficient information so we can understand and respond to your specific question or request.

### **Prospective Customers & Website Visitors**

- All
- California Residents
- Nevada Residents
- Texas Residents
- Utah Residents
- Nebraska Residents
- EEA/UK Residents

### **Customers & their Viewers**

- All
- EEA/UK Residents
- California Residents
- Virginia Residents
- Connecticut Residents
- Colorado Residents
- Nevada Residents
- Utah Residents
- Texas Residents
- Oregon Residents
- Montana Residents
- Nebraska Residents
- New Hampshire Residents
- New Jersey Residents
- Delaware Residents
- Iowa Residents

- **Canadian Residents**
- **APAC Region Residents**

#### **Job Applicants & Current and Former Employees**

- **EEA/UK Residents**
- **California Residents**

#### **PlayTV Customers**

#### **Privacy Controls**

- **Cookie Policy & Advertising Choices**
- **Communication Choices**

### **PROSPECTIVE CUSTOMERS & WEBSITE VISITORS**

The practices in this section of the Privacy Policies apply to all Website visitors, including prospective customers, non-Customer event attendees and survey participants, wherever they reside. When we collect information that you provide to us directly, we are a “controller” under the General Data Protection Regulation (“GDPR”), and a “business” or “controller” under state privacy laws.

### **TYPE OF INFORMATION COLLECTED**

Depending on how you interact with us, we may collect:

- Your name and contact information - like email and business phone number;
- Employment-related information - like the industry you work in, the business or organization you are associated with and your role there;
- Commercial information - like the products or services you may be interested in, and Website interactions, such as pages visited, videos watched, duration of sessions and search terms;
- Device and browser information - like IP address, approximate geographic location, computer type, screen resolution, OS version, and browser type;
- Communications - like comments or opinions you provide to us through our Forums or other information you provide to us directly or through a third-party service, including messages you send us on social media; and
- Inferences based on that information - like information generated from your use of the Website or communications with us reflecting a company’s interest in our products and services.

### **HOW INFORMATION IS COLLECTED**

We collect personal information when you provide it directly to us through forms - on our Websites or on third party or unaffiliated vendor sites - or through Forums, Promotions or surveys. We may collect inferential information on our prospective corporate Customers’ from publicly-available sources or service providers.

We also collect personal information about the type of devices you use to access the Website and your interactions with the Website indirectly using web beacons placed by us or our service providers on our Website and in email communications. For more information about the use of

cookies or other tracking technology on the Website, please review our Cookie Policy & Advertising Choices.

Our Websites and applications may contain links to non-Brightcove sites and services. We are not responsible for the privacy practices of those sites. Privacy choices you make on those sites or services will not apply to our use of the information we collect directly through our Website - including applications and forms. This is also true for information you provide to us via third parties. The information you provide may be separately collected by the third party sites - those that refer or redirect you to us - and subject to their privacy practices.

The Brightcove Services enable you to utilize third party social media features, such as those offered by LinkedIn, X (f/k/a Twitter), Facebook and Instagram, Shopify and Google, including YouTube, and integrations with other marketing and CRM platforms you utilize. Your interactions with these features are governed by the privacy policy and terms of use of the company providing the social media feature. While this is a non-exhaustive list of available integrations, as an example, if you utilize these plug-ins, you agree to be bound by the terms of service and privacy policies of that Platform, as applicable:

- Your use of the YouTube API Services is governed by the YouTube Terms of Services policy, available at <https://www.youtube.com/t/terms> and its privacy policy available at <http://www.google.com/policies/privacy>. In addition to exercising data deletion rights you may have under the law, you can revoke Brightcove's access to data generated during your use of the YouTube API Services via the Google security settings page at <https://security.google.com/settings/security/permissions>.
- LinkedIn's terms are available at <https://legal.linkedin.com/api-terms-of-use>, and its privacy policy can be accessed at <https://www.linkedin.com/legal/privacy-policy>.
- Facebook's terms are available at <https://www.facebook.com/terms> and its privacy policy is available at <https://www.facebook.com/privacy/policy>
- Instagram's terms are available at [https://privacycenter.instagram.com/policy/?section\\_id=3-HowIsYourInformation](https://privacycenter.instagram.com/policy/?section_id=3-HowIsYourInformation).
- X (f/k/a Twitter) terms are available at <https://twitter.com/tos?lang=en> and its privacy policy is available at <https://twitter.com/privacy?lang=en>.
- Your use of the Shopify integration is subject to Shopify's terms available at <https://www.shopify.com/legal/privacy/merchants>, and the Privacy Policies applicable to your use of the Brightcove Services.

## Forums

We may enable you to post information to certain parts of the Website (collectively, the "Forums"). Please note that any information you disclose through any Forum will be publicly available. We urge you to exercise discretion and caution when deciding to disclose personal information, or any other information, via any Forum. We are not responsible for the use of any personal information you disclose through any Forum. To request removal of your personal information from a Forum, contact us at [privacy@brightcove.com](mailto:privacy@brightcove.com). Because we do not control these sites and services, we may not be able to remove your personal information.

## **Promotions**

If you participate in a Promotion, we may request additional personal information. We will disclose additional uses of personal information that you provide in connection with that particular Promotion in the Promotion rules. To the extent that the Promotion's rules conflict with these Privacy Policies regarding the treatment of personal information, the Promotion's rules will control.

## **WHY WE PROCESS INFORMATION**

We use collected information to provide you with requested materials, inform you of important information regarding the Brightcove Services, the Website, including changes to Website terms, conditions and policies, to make the Brightcove Services, products and Websites available, to allow you to participate in Promotions, for business purposes, like page use analytics (including through automated systems and machine learning), benchmarking, reporting, audits, developing new products, identifying usage trends, and to obtain inferences. We do so to identify and better understand our customer base and their interests in Brightcove, to improve our business, our services and products and to tailor our marketing and product development efforts, for employee training, for security, crime and fraud prevention, and to comply with legal obligations and as otherwise permitted by law.

We may also use your contact information, your company name and your title to craft communications to you using services that rely on machine learning and generative artificial intelligence models.

We also use cookie-level data to understand how our Websites are being reached and used and to aid in marketing efforts and advertisement placement. Alongside cookies, web beacons allow us to accurately count the number of unique users who have visited a specific page on the Website, or opened or acted upon an email. This information allows us to measure the performance of our Website and our email and marketing campaigns. You can learn more about the cookies on our Websites here in the Cookie Policy & Advertising Choices section.

When you use multiple browsers on a single device, or use various devices (such as desktops, smartphones and tablets), we and our service providers and third parties may use cross-device/cross-context technology to connect these various accounts or profiles and the corresponding data from the different contexts and devices to allow you to use the Brightcove Services seamlessly across such devices.

## **HOW WE SHARE INFORMATION**

We do not share your personal information outside of Brightcove's current and future corporate subsidiaries and affiliates except in limited circumstances, including:

- When you allow or direct us to share your personal information with another company as part of either their services and products or the Brightcove Services, including to allow you to voluntarily participate in contests, surveys, Forums or Promotions;

- In connection with a corporate transaction, proceeding or reorganization involving the business activities for which the information is maintained. You will be notified via a prominent notice on our Website, of any change in ownership.
- To enforce our policies, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, to comply with legal process to the extent we believe necessary or required under applicable law, and to permit us to pursue available remedies or limit the damages that we may sustain.
- With our trusted service providers to:
  - provide you with the features on our Website such as website hosting, data analysis, infrastructure provision, IT services, customer service, analytics and email delivery services.
  - to protect the security and integrity of our Websites and their features;
  - process forms you fill out;
  - create communications based on your needs;
  - understand our customer base (including through automated systems and machine learning), identify usage trends, and tailor our products and Brightcove Services based on those insights and adjust our marketing and communication strategies;
  - understand how visitors are using our Websites;
  - create marketing, advertisements, contests or for other similar purposes, and determine the effectiveness of our promotional campaigns. Where required by applicable law, we will share such data for advertising and marketing purposes only in an aggregate, and de-identified manner; and
  - develop new products, enhance our Website, improve Brightcove Services, and train employees.

Our service providers are contractually obligated to use your personal information only as necessary to provide these services to us and to comply with the law.

## **DATA SECURITY, INTEGRITY, AND RETENTION**

We understand that your trust is integral to our business. We have invested in and implemented technical, administrative and physical security measures that are designed to protect information in our control from unauthorized disclosure and use and protect its integrity and accessibility. We regularly review our security procedures to consider appropriate new technology and methods. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable. If you have any questions about the security of your personal information, you can contact us at [privacy@brightcove.com](mailto:privacy@brightcove.com).

We will retain your personal information for the length of time needed to fulfill the purposes outlined in these Privacy Policies and our agreements with you unless a longer retention period is required or permitted by law. We will honor any deletion requests we receive in accordance with the laws applicable to that information.

## **CHILDREN'S PRIVACY**

Brightcove Services, and our Websites, are not intended for use by children under 16 years of age. We do not intentionally collect information from children, and we request that children not provide any personal information to us. If you have any concerns about your child's privacy, please contact us at [privacy@brightcove.com](mailto:privacy@brightcove.com), and we will take steps to delete any information we learn that we have unintentionally collected from your child without your consent.

## **INTERNATIONAL TRANSFERS**

We operate globally and may transfer your personal information to a Brightcove affiliate in other countries, but solely for the purposes described in these Privacy Policies. Wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard its privacy. These steps may include implementing standard contractual clauses where recognized by law, obtaining your consent or relying on other lawful means of transferring personal information. By using the Website, or where you provide personal information to request documents from or contact us, you consent to this transfer. We will protect the privacy and security of personal information we collect in accordance with these Privacy Policies, regardless of where it is processed or stored.

## **CALIFORNIA RESIDENTS**

### **INFORMATION PRACTICES - BY CATEGORY**

Our collection, use and sharing practices for our business purposes are the same for all Prospective Customers, regardless of their residency. By category, that breaks down to:

- Identifiers;
- Contact information;
- Commercial information;
- Internet activity from our Websites;
- Professional information; and
- Approximate location.

## **YOUR RIGHTS TO YOUR PERSONAL INFORMATION**

For those individuals that would like more information on the specific information collected about them, you have the ability to request:

- That we provide details about the categories of personal information we collect about you, including how we collect and share it;
- The correction or deletion of personal information we collected from you;
- That we provide you access to the personal information we collected from you; and
- To contact us if there are any questions, comments or requests in connection with our Privacy Policies.

California residents also have the right to opt out of "sales" or "sharing" of their personal information. We do not "sell" personal information as most people would typically understand that term. However, we do allow certain unaffiliated partners and service providers to collect information about users directly through our Website for purposes of analyzing and optimizing our Website and ads, providing content more relevant to you, measuring statistics and the

success of ad campaigns, and detecting and reporting fraud. You can opt out of any potential sharing or sales at the link below:

[Do Not Sell or Share My Personal Information](#)

There you can exercise your rights to opt-out of cookies, analytics and personalized advertising. You can also opt out of non-essential cookies through the cookie consent portal that pops up when you reach our Websites. To learn more about cookies, please visit our Privacy Controls section.

### **SUBMITTING A REQUEST**

To exercise a data right, please complete the webform located [here](#). The minimum amount of information we will need to enable us to process your request is: your name, business or other email address, company name and country, and if applicable, state of residence, as well as your request type and your relationship to Brightcove. We will use your email and mobile phone number to verify your identity. We will not use your mobile number other than to assist in processing the request or in any other way you've previously permitted us to use it. We will process any requests within a reasonable period of time, and in any case in accordance with applicable law.

Where Brightcove receives a request from a Customer's Viewer, we will refer the request to the Customer and support the Customer in responding to the request.

You can designate an authorized agent to make a data-rights request on your behalf. Authorized agents can submit requests on behalf of another individual by completing the form found [here](#).

For the previous calendar year, Brightcove has received: .

- 0 Requests to Know or Access;
- 2 Requests to Delete;
- 0 Requests to Correct;
- 1 Request to Opt Out; and
- 5599 Requests to Opt-Out of Sale/Sharing for all users in the United States (we do not segregate by State).
- The mean number of days it took Brightcove to respond to these requests was 30 days. For opt out requests, the mean was 3 days. For web-based opt out requests, the turnaround was same day.

The California "Shine the Light" law gives residents of California the right under certain circumstances to opt out of the sharing of certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share personal information with third parties for their own direct marketing purposes.

### **NEVADA RESIDENTS**



The personal information we collect from Nevada consumers and how it is processed is the same as that collected for all Prospective Customers generally. Please review those sections in this Privacy Policy. We also require any service providers we use to process any personal information we share in connection with Brightcove Services and operations to restrict their use of the information to providing the Brightcove Services and acting on our behalf. Otherwise, we will only provide information to third parties if you direct us to or as required by law. We do not “sell” personal information as defined under Nevada privacy laws.

## **TEXAS RESIDENTS COLLECTION AND USE NOTICE**

Our collection, use and sharing practices for our business purposes are the same for all Prospective Customers, regardless of their residency. By category, that breaks down to:

- Identifiers;
- Contact information;
- Commercial information;
- Internet activity from our Websites;
- Professional information; and
- Approximate location.

The categories of third parties with whom the above information is shared includes:

- Cloud service providers;
- Content syndicators;
- Marketing automation platforms;
- Analytics providers;
- Consent management platforms;
- Security & monitoring tools;
- Email and mail delivery services;
- Computing services;
- Consulting firms; and
- Chatbots.

## **YOUR RIGHTS TO YOUR PERSONAL DATA**

For those non-corporate individuals that would like more information on the specific information collected about them, you have the ability to request:

- Confirmation that we’re processing your personal data, and to access it;
- That we delete the personal data about you;
- That we correct inaccuracies in data you’ve provided to us;
- A copy of the personal data you’ve provided in a portable format, if that is technically feasible;
- To opt out of the sale and processing of your personal data for targeted advertising; and
- An appeal to a denial of your request.

Brightcove does not process sensitive data or engage in profiling that has a legal or similarly significant impact on you, and therefore does not offer an opt out from such processing.

## **SUBMITTING A REQUEST**

To exercise a data right, please complete the webform located [here](#) or email your request to [privacy@brightcove.com](mailto:privacy@brightcove.com). The minimum amount of information we will need to enable us to process your request is: your name, business or other email address, company name and country, and if applicable, state of residence, as well as your request type and your relationship to Brightcove. We will use your email and mobile phone number to verify your identity. We will not use your mobile number other than to assist in processing the request or in any other way you've previously permitted us to use it. We will process any requests within a reasonable period of time, and in any case in accordance with the law.

Where Brightcove receives a request from a Customer's Viewer, we will refer the request to the Customer and support the Customer in responding to the request.

You can designate an authorized agent to make a data-rights request on your behalf. Authorized agents can submit requests on behalf of another individual by completing the form found [here](#).

To exercise your right to opt out of the sale and use of your personal data for targeted advertising, please use this link:

[Do Not Sell or Share My Personal Information](#)

You can also opt out of non-essential cookies through the cookie consent portal that pops up when you reach our Websites. To learn more about cookies, please visit our Privacy Controls section.

## **APPEALING A DENIAL OF YOUR REQUEST**

The law requires or permits Brightcove to deny your request to exercise your data rights in whole or in part for various reasons, including to prevent fraud or as necessary to provide you with requested services. Where you receive a denial, you may submit an appeal to [privacy@brightcove.com](mailto:privacy@brightcove.com) within 45 days of receipt. Please include your name, email used to submit the request, the date and type of the denied request, and your belief that the denial was incorrect. We will review and respond to your request within the 60-day period provided by the law. You may be required to re-submit your request as provided in this policy as a result. If your appeal is denied you can contact the [Attorney General](#).

## **UTAH RESIDENTS COLLECTION AND USE NOTICE**

Our collection, use and sharing practices for our business purposes are the same for all Prospective Customers, regardless of their residency. By category, that breaks down to:

- Identifiers;
- Contact information;
- Commercial information;

- Internet activity from our Websites;
- Professional information; and
- Approximate location.

The categories of third parties with whom the above information is shared includes:

- Cloud service providers;
- Content syndicators;
- Marketing automation platforms;
- Analytics providers;
- Consent management platforms;
- Security & monitoring tools;
- Email and mail delivery services;
- Computing services;
- Consulting firms; and
- Chatbots.

## **YOUR RIGHTS TO YOUR PERSONAL DATA**

For those non-corporate individuals that would like more information on the specific information collected about them, you have the ability to request:

- Confirmation that we're processing your personal data, and to access it;
- That we delete the personal data you've provided to us;
- A copy of the personal data you've provided in a portable format, if that is technically feasible; and
- To opt out of the sale and processing of your personal data for targeted advertising. Brightcove does not process sensitive data as defined under the law, and therefore does not offer an opt out from such processing.

## **SUBMITTING A REQUEST**

To exercise your data rights to access, deletion or portability, please complete the webform located [here](#). You will, at a minimum, need to provide the following: your name, business or other email address, company name and country, and if applicable, state of residence, as well as your request type and your relationship to Brightcove. We will use your email and mobile phone number to verify your identity. We will not use your mobile number other than to assist in processing the request or in any other way you've previously permitted us to use it. We will process any requests within a reasonable period of time, and in any case in accordance with applicable law.

Where Brightcove receives a request from a Customer's Viewer, we will refer the request to the Customer and support the Customer in responding to the request.

To exercise your right to opt out of the sale and use of your personal data for targeted advertising, please use this link:

[Do Not Sell or Share My Personal Information](#)

You can also opt out of non-essential cookies through the cookie consent portal that pops up when you reach our Websites. To learn more about cookies, please visit our Privacy Controls section.

## **NEBRASKA RESIDENTS COLLECTION AND USE NOTICE**

Our collection, use and sharing practices for our business purposes are the same for all Prospective Customers, regardless of their residency. By category, that breaks down to:

- Identifiers;
- Contact information;
- Commercial information;
- Internet activity from our Websites;
- Professional information; and
- Approximate location.

The categories of vendors and third parties with whom the above information is shared includes:

- Cloud service providers;
- Content syndicators;
- Marketing automation platforms;
- Analytics providers;
- Consent management platforms;
- Security & monitoring tools;
- Email and mail delivery services;
- Computing services;
- Consulting firms; and
- Chatbots.

## **YOUR RIGHTS TO YOUR PERSONAL DATA**

For those non-corporate individuals that would like more information on the specific information collected about them, you have the ability to request:

- Confirmation that we're processing your personal data, and to access it;
- That we delete the personal data about you;
- That we correct inaccuracies in data you've provided to us;
- A copy of the personal data you've provided in a portable format, if that is technically feasible;
- To opt out of the sale and processing of your personal data for targeted advertising; and
- An appeal to a denial of your request and to file a complaint of a denial of the appeal with the Attorney General.

Brightcove does not process sensitive data or engage in profiling that has a legal or similarly significant impact on you, and therefore does not offer an opt out from such processing.

## **SUBMITTING A REQUEST**

To exercise a data right or appeal a denial of your previous request, please complete the webform located [here](#) or email your request to [privacy@brightcove.com](mailto:privacy@brightcove.com). The minimum amount of information we will need to enable us to process your request is: your name, business or other email address, company name and country, and if applicable, state of residence, as well as your request type and your relationship to Brightcove. We will use your email and mobile phone number to verify your identity. We will not use your mobile number other than to assist in processing the request or in any other way you've previously permitted us to use it. We will process any requests within a reasonable period of time, and in any case in accordance with the law.

Where Brightcove receives a request from a Customer's Viewer, we will refer the request to the Customer and support the Customer in responding to the request.

You can designate an authorized agent to make a data-rights request on your behalf. Authorized agents can submit requests on behalf of another individual by completing the form found [here](#).

To exercise your right to opt out of the sale and use of your personal data for targeted advertising, please use this link:

[Do Not Sell or Share My Personal Information](#)

You can also opt out of non-essential cookies through the cookie consent portal that pops up when you reach our Websites. To learn more about cookies, please visit our Privacy Controls section.

## **APPEALING A DENIAL OF YOUR REQUEST**

The law requires or permits Brightcove to deny your request to exercise your data rights in whole or in part for various reasons, including to prevent fraud or as necessary to provide you with requested services. Where you receive a denial, you may submit an appeal to [privacy@brightcove.com](mailto:privacy@brightcove.com) within 45 days of receipt. Please include your name, email used to submit the request, the date and type of the denied request, and your belief that the denial was incorrect. We will review and respond to your request within the 60-day period provided by the law. You may be required to re-submit your request as provided in this policy as a result. If your appeal is denied you can contact the [Attorney General](#).

## **EEA/UK RESIDENTS**

### **INTERNATIONAL TRANSFERS**

When you use our Website or voluntarily submit requests for information or otherwise engage with us online, that personal information may be transferred to the United States, where our primary processing facilities are located. The United States has been deemed to provide an adequate level of protection for personal data transferred from the European Economic Area (EEA) and the United Kingdom (UK). As such, we rely on the Data Privacy Framework, consent you give when you directly submit your information to us, and otherwise rely on the legitimate

interest derogation available under the GDPR for interactions that are not continuous and are necessary to provide the requested information and services on our Websites. We do not transfer sensitive personal information.

Brightcove complies with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework and the Swiss-U.S. Data Privacy Framework as set forth by the U.S. Department of Commerce. Brightcove has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles and processes personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. Data Privacy Framework and the UK Extension to the EU-U.S. Data Privacy Framework. Brightcove has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. Data Privacy Framework. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. Data Privacy Framework Principles and/or the Swiss-U.S. Data Privacy Framework Principles, the Principles shall govern. To learn more about the Data Privacy Framework program and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

If you object to this transfer, please do not use our Website and do not submit your personal information to us. If you would like to withdraw your consent for further processing of information already provided to us, you can do so by following the instructions here in the Data Rights Requests.

## **COOKIES AND OTHER TECHNOLOGIES**

This Website sets cookies and other similar technologies. Users coming in from an IP address associated with the EEA/UK region will receive a consent based pop-up that will enable users to accept, reject or manage their cookies preferences. You can learn more about our cookie policy and positions, as well as opt out of targeted advertising within the Cookie Policy and Advertising Choices.

## **CUSTOMERS & THEIR VIEWERS**

### **TYPE OF INFORMATION COLLECTED**

We collect and process information related to Customers (Customer Account Data) and to Customers' Viewers, such as a Viewer's interactions with a Customer's content (Customer Usage Data), at the Customer's direction. That information falls into two basic types of categories: personal information and anonymous information. We may use personal and anonymous information to create a third type of information - aggregate information. Personal information is anything alone or in combination with other readily available information that identifies a particular person, and under certain laws, also includes devices attributed to that individual. Anonymous information means any information from which anyone's identity cannot be reasonably ascertained. Aggregate information means information that is combined in such a way that any one person cannot be identified from another in the grouping.

### **Customer Account Data**

As part of providing Brightcove Services, we may collect the following personal information from individuals authorized by Customers (such as a Customer's employees) to use Brightcove Services on their behalf:

- Name, business email address, business telephone number, company, title and business billing address, internal account name and number, payment information and tax exemption status.
- Content of communications with Brightcove, including when you consent to recordings of video conferences or calls, Customer feedback and satisfaction surveys, support tickets and chats with our chatbot.
- Login credentials and authentication tokens.
- Information collected indirectly through our Websites in accordance with the Cookie Policy.
- Activity information from your use of the Brightcove Services, which will be further outlined within the relevant Schedule of the data processing addendum to your agreement with Brightcove.

### **Customer Usage Data**

The Brightcove Services give our Customers the flexibility to choose the type of personal information Brightcove will collect on its behalf. Such information may include personal information such as:

- Viewer name, address, email address, title and industry, but only if a Customer elects to use certain features of Brightcove Services that can be used to collect such information.
- Unique IDs such as IP addresses and user IDs created by the Customer.
- System information, such as device, browser and operating system type and version, screen resolution and preferred language.
- Referring domain, destination domain and destination path.
- Video-viewing activity, such as player loads, number of views, viewed minutes, percent of content viewed, new or unique Viewers, top domains, geography, traffic sources, search terms and other similar information. This information is aggregated unless a Customer elects to use certain Brightcove Services that are intended to connect such information.
- Approximate location data (based on IP address).
- Interactivity with content (like poll responses & reactions).
- Other personal information of a natural person that may be included in videos or other data that our Customers upload to Brightcove Services.

### **HOW WE COLLECT INFORMATION**

Brightcove collects the above information when you request information on, or purchase, products or services from us (including when you link a third party service with your Brightcove Services account), participate in public forums, respond to surveys or feedback forms, visit our offices, interact with our support or customer success teams, participate in video conferences or calls, or otherwise interact with us when using our Websites, apps, products and services. We collect information using analytics tools when you use the features on our domains. We also

acquire information from other trusted sources to update or supplement the information provided, such as information about the industry in which our Customers operate, or to validate contact information (like corporate addresses).

We also collect information through a variety of technologies such as cookies, pixels, http headers, tags, site development kits, application program interfaces and web beacons. For instance, we may use third party analytics services, such as Google Analytics, using anonymous identifiers, to understand the use of Brightcove Services by our Customers.

The Brightcove Player does not set cookies by default nor does it store information locally on a Viewer's device. If you utilize cookies on your sites where you implement a Brightcove Player, the Player will recognize any cookie settings of Viewers based on consent management tools on your sites. Where a Customer chooses to install a third party integration - including those made available through Brightcove - that third party may set cookies, the use and control of which is subject to that third party's policies.

When Brightcove Services are used by Viewers, as is true of most online services, we gather certain, mainly non-personal information automatically and store it in log files. This information may include Viewer IP address (which are automatically hashed and logged), browser type, device type, internet service provider (ISP), referring/exit pages, origination source, operating system, date/time stamp and/or clickstream data. We may combine this automatically-collected log information with other information we collect.

When this information is collected about our Customers, Brightcove is a Controller as that term is defined under privacy laws. Otherwise, Brightcove is a Processor or a Service Provider, as those terms are defined under the law.

## **HOW WE PROCESS INFORMATION**

We use Customer Account Data and Customer Usage Data to perform under our Customer and related vendor agreements and in furtherance of our legitimate business interests, such as managing our Customer relationships, carrying out our core business operations like accounting, regulatory filings, security and fraud prevention and product design and development. To the extent Brightcove receives deidentified Customer data, Brightcove will maintain the data only in deidentified form and not attempt to re-identify the subject unless instructed to do so by a Customer in connection with Brightcove Services. Consistent with applicable law, we may use information collected from you for the below reasons. You can learn more about the choices and controls that may be available to you in the Communication Controls section.

If personal data covered by this Privacy Policy is going to be used for a new purpose that is materially different from which the personal data was originally collected or subsequently authorized, or is to be disclosed to a third party in a manner not specified in this Privacy Policy, we will provide you with an opportunity to choose whether to your personal data used or disclosed in that manner as described in the notice. You can also opt out of that use or sharing



by contacting Support or [privacy@brightcove.com](mailto:privacy@brightcove.com) with the Subject Line: Opt Out and the use case.

### **Support our Customers:**

- Provide you with the experiences, products and services you request, view, engage with or purchase;
- When Customers or Viewers use devices to display and/or view a Customer's video content, cross-device/cross-context technology may be used to connect the various accounts or profiles and the corresponding data from the different contexts and devices to a singular account;
- Provide technical and administrative support;
- Communicate with Customers about their account or transactions with us and send Customers information, provide Customers with guidance or analysis or request feedback about features or changes to our products or policies;
- To enable Customer's Viewers to register with the Customer in order to utilize Brightcove Services through their websites or apps;
- Send Customers notifications about features that fit or enhance use of the Brightcove Services or align with Customer-stated goals or metrics;
- Alert Customers of outages, issues or suspected fraudulent account activity;
- Personalize content and experiences; and
- To provide our Customers with analytical data and reports about Customer Viewer video viewing activity and service utilization.

To the extent permitted by applicable law, we may collect data, in an automated manner or through machine learning algorithms, about Viewers and Customers in order to provide and/or optimize Brightcove Services, for security or analytics purposes or to transcribe video content. We may also use machine learning algorithms to recommend content to a Customer's Viewer based on such Viewer's interactions with the Customer's products and content, if the Customer chooses to use this feature. Customers can also choose to turn this feature off. While Brightcove collects and analyzes data from video views to show trends and events, unless directed by the Customer, we do not use models to make predictions or decisions using the data. You can learn more below.

### **Support our Business Needs and Operations:**

- Operate, understand, optimize, analyze, develop or improve our products, Brightcove Services, Websites, applications and APIs, and to better understand the industry or our customer base, including through surveys and analytics tools. To the extent permitted by applicable law, this may include processing non-personal, aggregated data about Customers and Viewers;
- Comply with applicable legal or regulatory requirements, participate in audits and protect against criminal activity, claims and other liabilities;
- Detect, investigate and prevent activities that may violate our policies, cause service disruptions or quality control issues, and notify you of those impacting your account;
- Train our employees; and

- Otherwise with your consent or at Customer direction/instruction.

### **In Connection With the Use of Machine Learning Models and Generative AI**

Brightcove is committed to deploying and integrating products, features, functionality and services that allow Customers to use artificial intelligence, machine learning, and similar technologies within the Brightcove Service (the “AI Features”) responsibly and with privacy and security at the forefront. Brightcove evaluates and tests proposed AI Features prior to their deployment. A list of Brightcove's current AI Features is available in [Brightcove's Artificial Intelligence Supplemental Terms](#), as may be updated by Brightcove from time to time.

In line with transparency principles and to enable Customers to exercise their data subject rights, if any Customer or Viewer personal data may need to be used to train an AI Feature or for the Customer to interact with an AI Feature, Brightcove will provide prior notice with an opportunity to opt out. You can exercise your data subject rights with respect to AI Features in the same manner as directed in the Resident section that applies to you. Retention periods for personal data used with AI Features remain the same as those disclosed in this Privacy Policy for that type of information in connection with the use of Brightcove Services and our business operations.

### **HOW WE SHARE INFORMATION**

We do not sell or allow Customer personal information to be used by third parties for their own business interests, unless you ask us to do this or direct us to share. Further, we do not sell Customer Viewers' personal information. You can read more in the state-specific sections.

Below are the different scenarios under which we may share personal information as part of our provision of the Brightcove Services. Where we use service providers, they are authorized to use your personal information only as necessary to provide services to us.

- With the Customer, as part of the Brightcove Services;
- With service providers and subprocessors we use to support Brightcove Services and our business operations. These services include website hosting, data analysis, infrastructure provisioning, IT services, customer service, analytics and email delivery services, marketing, advertising, promotions, contests or other similar purposes;
- With third parties and other partners that Brightcove does not control where the Viewer or Customer has requested to use a third party service (including applications made available by Brightcove) in connection with evaluating or using Brightcove Services;
- With third parties if the data has been aggregated or de-identified in a way so it cannot be used to identify you or your Viewers;
- With our current affiliates and any future corporate subsidiaries or affiliates;
- With a buyer, investor, new affiliate or other third party in the event that Brightcove, or any portion, group or business unit thereof, undergoes a business transition, such as a merger or acquisition, or during steps in contemplation of such activities (e.g., negotiations and due diligence). You will be notified via email and/or a prominent notice

on our Website of any change in ownership, change in use of your personal information and choices you may have regarding any change in use of your personal information;

- To enforce our policies, terms and conditions;
- To protect our operations or those of any of our affiliates, customers, partners or agents , and to protect our rights, privacy, safety or property and/or that of our affiliates, Customers, partners, agents and any other person or organization;
- To permit us to pursue available remedies or limit the damages that we may sustain; and
- As we believe necessary: under applicable law, including laws outside the Viewer's or Customer's country of residence; to comply with any law or directive, judicial or administrative order, legal process or investigation, warrant, subpoena, law enforcement or national security investigation, or as otherwise required or authorized by law; to respond to requests from public and government authorities, including public and government authorities outside the country of residence. EEA/UK customers can learn more about our government request policy under the EEA/UK Residents section.

We may also share information with unaffiliated payment service(s) ("Payment Service") to process credit card payments for certain Brightcove Services. Customers acknowledge and agree within their Brightcove Services agreement that when prompted to provide credit card information, that information gets transmitted directly to the Payment Service. Brightcove does not have access to full credit card numbers and does not store such information in its own systems. Information transmitted to the Payment Service is encrypted using SSL technology. The Payment Service is required to comply with all applicable privacy and security laws and the rules and regulations issued by the payment card industry and the credit card companies.

Some services may allow you to utilize third party social media features, such as those offered by LinkedIn, X (f/k/a Twitter), HootSuite, Facebook and Instagram, Shopify and Google, including YouTube, and integrations with other marketing and CRM platforms you utilize. Your interactions with these features are governed by the privacy policy and terms of use of the company providing the social media feature. While this is a non-exhaustive list of available integrations, as an example, if you utilize these plug-ins, you agree to be bound by the terms of service and privacy policies of that Platform, as applicable:

- Your use of the YouTube API Services is governed by the YouTube Terms of Services policy, available at <https://www.youtube.com/t/terms> and its privacy policy is available at <http://www.google.com/policies/privacy>. In addition to exercising data deletion rights you may have under the law, you can revoke Brightcove's access to data generated during your use of the YouTube API Services via the Google security settings page at <https://security.google.com/settings/security/permissions>.
- LinkedIn's terms are available at <https://legal.linkedin.com/api-terms-of-use>, and its privacy policy can be accessed at <https://www.linkedin.com/legal/privacy-policy>.
- Facebook's terms are available at <https://www.facebook.com/terms> and its privacy policy is available at <https://www.facebook.com/privacy/policy>
- Instagram's terms are available at [https://privacycenter.instagram.com/policy/?section\\_id=3-HowIsYourInformation](https://privacycenter.instagram.com/policy/?section_id=3-HowIsYourInformation).

- X (f/k/a Twitter) terms are available at <https://twitter.com/tos?lang=en> and its privacy policy is available at <https://twitter.com/privacy?lang=en>.
- Your use of the Shopify integration is subject to Shopify's terms available at <https://www.shopify.com/legal/privacy/merchants>, and the Privacy Policies applicable to your use of the Brightcove Services.
- HootSuite terms are available at <https://www.hootsuite.com/legal/api-terms-of-service>, and its privacy policy is available at <https://www.hootsuite.com/legal/privacy>

## **DATA SECURITY, INTEGRITY, AND RETENTION**

We understand that your trust is integral to our business. We have invested in and implemented technical, administrative and physical security measures that are designed to protect information in our control from unauthorized disclosure and use and protect its integrity and accessibility. We regularly review our security procedures to consider appropriate new technology and methods. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable. If you have any questions about the security of your personal information, you can contact us at [privacy@brightcove.com](mailto:privacy@brightcove.com).

We will retain your personal information for the length of time needed to fulfill the purposes outlined in these Privacy Policies and our agreements with you unless a longer retention period is required or permitted by law. We will honor any deletion requests we receive in accordance with the laws applicable to that information.

## **CHILDREN'S PRIVACY**

Brightcove Services are not intended for use by children under 16 years of age. However, Brightcove recognizes that certain of our Customers' target audiences may be children. Our Customers are ultimately responsible for disclosing any collection and use and obtaining the appropriate consents, and Viewers should visit the privacy policy of that Customer to understand how they address child-directed video content and personal information required for use.

## **EEA/UK RESIDENTS DROPDOWN**

Brightcove has developed a comprehensive compliance program for its EEA, Swiss and UK Customers and their Viewers. In addition to the disclosures in these Privacy Policies, we have provided links to key documentation that outlines our processing activities, data transfer practices and Brightcove's stance on government requests, to make it easy for our Customers to comply with their own obligations as Controllers when using Brightcove Services in those regions.

## **COLLECTION BASIS**

We collect and process personal data where it is necessary to satisfy a contract with our Customers or Service Providers, to comply with our legal obligations, for our legitimate business purposes or with your consent. Where the term "personal information" is used in these Privacy Policies it covers the same type of information as "personal data," as that term is defined in the General Data Protection Regulation ("GDPR").

## **DATA PROCESSING AGREEMENTS**

We only process Customer and Viewer personal data in accordance with the terms of a data protection agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. You can review our standard [data processing addendum](#) here to learn more about how we treat and transfer personal data we receive from Customers.

We are also transparent about our use of subprocessors, which are also contractually obligated to protect your personal data under these standards. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as dictated in our agreements.

## **INTERNATIONAL TRANSFERS**

Brightcove complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Brightcove has [certified](#) to the U.S. Department of Commerce that it adheres to the EU-U.S. DPF Principles with regard to processing personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Brightcove has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. DPF Principles with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. DPF Principles and/or the Swiss EU-U.S. DPF Principles, the Principles will govern. For further information, please see our Data Privacy Framework Notice below. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

For those transfers of personal data that are not covered by the Data Privacy Framework, Brightcove relies on the most recent versions of the European Commission Standard Contractual Clauses as a transfer compliance mechanism to transfer personal information collected in the EEA, Switzerland and UK.

We have also conducted a transfer impact assessment (“TIA”) for transfers to the United States, where our primary processing takes place for transfers out of the EEA/UK/Swiss region. This TIA takes into account the personal information involved and the laws of the importing country around government access to that information. We will continue to compile TIAs for any countries which do not have adequacy or qualified state status. We monitor any changes in the law that may impact this assessment and will update the TIAs accordingly. Our TIAs are available for Customers or Prospective Customers upon request.

## **GOVERNMENT REQUESTS**

Brightcove may be required to disclose personal data in response to lawful requests by public authorities, including disclosures necessary to meet national security or law enforcement requirements, or pursuant to judicial orders.

### **FISA Warrant Statement**

Only “electronic communication service providers,” within the meaning of 50 U.S.C § 1881(b)(4) are subject to an order for “Upstream” surveillance under Section 702 of the U.S. Foreign Intelligence Surveillance Act (“FISA”) – the type of order that was of principal concern to the Court of Justice of the European Union in the Schrems II decision. In practice, the U.S. government uses “Upstream” orders only to target traffic flowing through internet backbone providers that carry traffic for third parties (i.e., telecommunications carriers). For more information see Privacy and Civil Liberties Oversight Board, Report on the Surveillance Program Operated Pursuant to Section 702 of the Foreign Intelligence Surveillance Act (July 2, 2014) pp. 35-40, *available at* <https://fas.org/irp/offdocs/pcllob-702.pdf>. Brightcove does not provide such backbone services, as we only handle traffic involving our own Customers, so “Upstream” orders are inapplicable to Brightcove.

Brightcove also does not process personal data that is within scope of a FISA 702 order. The Department of Commerce was clear that companies that transfer personal data involving commercial information like employee, customer or sales records, could have no basis to believe intelligence agencies interpret the law to ever seek to collect that data. For more information see Information on U.S. Privacy Safeguards Relevant to SCCs and Other EU Legal Bases for EU-U.S. Data Transfers after Schrems II(Sept. 2020) pp.2-3, 6, *available at* <https://www.commerce.gov/sites/default/files/2020-09/SCCsWhitePaperFORMATTEDFINAL508COM>

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### **DATA RIGHTS REQUESTS**

Customers may have certain rights to their personal data, namely:

- Access;
- Correction;
- Erasure/deletion;
- To object to processing for direct marketing purposes;
- To withdraw consent for data collected based on your consent and not for any other lawful basis;
- To restrict processing; and
- To portability in a commonly used and machine-readable form.

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request.

Please keep in mind that when you ask us for your personal data or ask us to delete it, we may need to retain or withhold some of the information for security or legal reasons. For instance, we

need Customer and Customer Usage data to maintain your account and requested services. That means if you ask us to delete that information, we may not be able to continue providing those services or products.

To exercise a data right, on your own behalf (as a Customer) or on behalf of a Viewer, please contact Support or [privacy@brightcove.com](mailto:privacy@brightcove.com) with the Subject Line: GDPR Data Rights Request. Within the request, please provide the following: your name, corporate email, company name and country and, if applicable, state of residence. We will process any requests within a reasonable period of time, and in any case in accordance with applicable law.

There is also the right to lodge a complaint with your local supervisory data protection authority (“DPA”) if you believe our processing is inconsistent with the applicable data protection laws. You need to lodge any such complaint directly with the relevant DPA.

If you utilize a Payment Service for payments related to Brightcove Services, please contact us at [privacy@brightcove.com](mailto:privacy@brightcove.com), and note in your email that you would like Brightcove to facilitate the correction or deletion of your personal data with the Payment Service.

Accuracy of data is very important to us. Customers should ensure that any information provided to us is up-to-date and Customers may correct information by either logging into their Customer account or by contacting Brightcove’s customer support team. In certain situations, Customers may need assistance from customer support in making a change. We will respond to requests to make changes to Customer records as soon as reasonably practicable. We may require Customer representatives to verify their identity before granting access to, or agreeing to update, correct or delete personal data belonging to Customers.

## **DATA PRIVACY FRAMEWORK NOTICE**

**Brightcove has** certified our compliance with the EU-U.S. Data Privacy Framework, the Swiss-U.S. Data Privacy Framework, and the UK Extension to the Data Privacy Framework (collectively, the “Data Privacy Framework”) with respect to the Personal Data of users of the Website who are residents of the European Union (“EU”), European Economic Area (“EEA”), the United Kingdom and Switzerland that we receive and process through the Website. We certify that we adhere to the Data Privacy Framework principles of notice, choice, onward transfer, security, data integrity, access and enforcement (the “Data Privacy Framework Principles”) for Personal Data of users of the Website in the countries participating in the Data Privacy Framework. We are responsible for the processing of personal data we receive under the Data Privacy Framework and subsequently transfer to a third party agent, and may be liable for onward transfers in violation of the Data Privacy Framework Principles. Our certification is available [here](#). To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>. Brightcove’s commitments under the Data Privacy Framework are subject to the investigatory and enforcement powers of the United States Federal Trade Commission.



If you are a resident of a country participating in the Data Privacy Framework, you may direct any questions or complaints concerning our Data Privacy Framework compliance to our Data Privacy Framework and Data Protection Contact listed below. We will work with you to resolve your issue.

Your Data Privacy Framework and Data Protection Contact for the personal data that we process in connection with the Website is:

Brightcove Inc.  
Attn: Chief Privacy Officer  
281 Summer Street  
Boston, MA 02210  
Phone: +1 617 500 4947  
privacy@brightcove.com

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Brightcove commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to our U.S.-based dispute resolution provider, TrustArc, at no cost to you, at <https://feedback-form.truste.com/watchdog/request>. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, you may have the right to invoke binding arbitration through the Data Privacy Framework panel. However, prior to initiating such arbitration, a resident of a country participating in the Data Privacy Framework must first: (1) contact us and afford us the opportunity to resolve the issue; and (2) seek assistance from our designated independent dispute resolution provider, TrustArc. If a resident invokes binding arbitration, each party shall be responsible for its own attorney's fees. Pursuant to the Data Privacy Framework, the arbitrator(s) may impose only individual-specific, non-monetary, equitable relief necessary to remedy any violation of the Data Privacy Framework Principles with respect to the resident.

## **DIGITAL SERVICES ACT DISCLOSURES**

Your use of Brightcove Services to disseminate content and videos is subject to the General Terms and Conditions found [here](#) (the "Terms"). The Terms outline restrictions on use, what content is prohibited and how you can report illegal content.

We will review each properly submitted report in a timely manner, and typically within 24-48 hours. Brightcove will review your report for procedural propriety, such as DMCA notice requirements (as outlined in the Terms), and if those legal requirements are met, the video will be deactivated and the title deleted, with a copy created until review is complete. Brightcove will then provide the report to the offender with instructions on applying for restored access. The reporter will also be notified that the video is being reviewed. Any appeals of the decision are referred to the Brightcove legal team.



If, after following the proper reporting procedures, you have not received a timely or satisfactory response to your concern relating to content removal or suspension or termination of your account due to your violation of the Terms, you may (but do not have to) contact our U.S.-based dispute resolution provider, as provided in the EU-US Data Privacy Framework Notice above, at no cost to you, at <https://feedback-form.truste.com/watchdog/request>. If neither Brightcove nor our independent dispute resolution provider resolves your complaint, you may have the right to file in a court of competent jurisdiction. Any disputes relating to this section shall be referred to and conducted in accordance with the procedures provided in the EU-U.S. Data Privacy Framework Notice Section.

In the past calendar year, for all regions, not just the EEA, of the fifty one(51) reports Brightcove received alleging illegal content, Brightcove:

- Denied 48 reports;
- Removed 3 reported videos;
- Responded to properly submitted reports within 24 hours;
- Reported video content all related to copyright infringement claims;
- Received 2 appeals of any content removal decisions;
- Restored 2 videos based on appeals on the basis of documentation showing licensing rights to content.

We only remove content when we have actual knowledge of a violation of our Terms. In the past calendar year, for all regions, not just the EEA, we voluntarily removed 12 spam posts promoting products and services, which is a violation of our Bright Spot™ Terms of Use.

Single Point of Contact:

Brightcove Inc.

Attn: Chief Privacy Officer

281 Summer Street

Boston, MA 02210

Phone: +1 617 500 4947

[general\\_counsel@brightcove.com](mailto:general_counsel@brightcove.com)

If you would prefer, you can contact the below EEA-based representative for DSA-specific inquiries and disputes, with the Subject Line: DSA Inquiry, and it will be routed to the appropriate department.

Anna Gene

Phone: +44 207 148 6450

[agene@brightcove.com](mailto:agene@brightcove.com)

**CALIFORNIA RESIDENTS DROPDOWN  
INFORMATION PRACTICES**

The personal information we collect from California consumers is the same for all Customers and their Viewers, irrespective of residency. We do not use sensitive personal information beyond providing the Brightcove Services in a secure manner. If this ever changes, we will notify you.

We also require any service providers we use to process any personal information we share in connection with Brightcove Services and operations to restrict their use of the information to providing those contracted-for services and complying with the law, and allowing us to audit and ensure their compliance with our agreements with them.

## **YOUR RIGHTS TO YOUR PERSONAL INFORMATION**

For those individuals that would like more information on the specific information collected about them, you have the ability to request:

- That we provide details about the categories of personal information we collect about you, including how we collect and share it;
- The correction or deletion of personal information we collected from you;
- That we provide you access to the personal information we collected from you;
- To contact us if there are any questions, comments or requests in connection with our Privacy Policy; and
- The right to opt out of sale and sharing for targeted advertising of their personal information. You can opt out of sale and sharing [here](#) or via the cookie consent pop up. Please review our Cookies Policy & Advertising Choices section for more information including how to exercise your rights to opt-out of cookies, analytics and personalized advertising.

The California “Shine the Light” law gives residents of California the right under certain circumstances to opt out of the sharing of certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

## **SUBMITTING A REQUEST**

To exercise a data right on your own behalf (as a Customer), please complete the webform located [here](#). The minimum amount of information we will need to enable us to process your request is: your name, business or other email address, company name and country, and if applicable, state of residence, as well as your request type and your relationship to Brightcove. We will use your email and mobile phone number to verify your identity. We will not use your mobile number other than to assist in processing the request or in any other way you’ve previously permitted us to use it. We will process any requests within a reasonable period of time, and in any case in accordance with applicable law.

Please keep in mind that when you ask us for your personal information or ask us to delete it, we may need to retain or withhold some of the information for security or legal reasons. Also, we need Customer and Customer Usage data to maintain your account and requested services.

That means if you ask us to delete that information, we may not be able to continue providing those services or products.

You can designate an authorized agent to make a data-rights request on your behalf. Authorized agents can submit requests on behalf of another individual by completing the form found [here](#). If you are making a request through an agent, they will need to submit proof of their authority to act on your behalf.

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request.

## **VIRGINIA RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer personal data in accordance with the terms of a data protection agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with compliance with your obligations - as controllers - under the law - like assisting with data subject rights requests you receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are also transparent about our use of subprocessors, which are also contractually obligated to protect your personal data under no less restrictive standards than those implemented by Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as dictated in our agreements.

## **YOUR RIGHTS TO YOUR PERSONAL DATA**

Certain non-corporate Virginia residents have the following rights:

- To know what personal data is being processed;
- To ask to access, copy, correct and to delete it; and
- To opt out of profiling that results in legal impacts, targeted ads, and “sales” of their personal data.

We do not “sell” personal data of our Customers’ Viewers under Virginia privacy laws, do not use it for targeted advertising and do not engage in “profiling” that has legal or similar significant effects. If you are on our Website, you can opt out of any non-essential cookies [here](#) or via our

cookie consent pop up. Please review our Cookies Policy & Advertising Choices for more information.

### **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer or Contact ID or other unique identifier you assign to your Viewers.

### **CONNECTICUT RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer personal data in accordance with the terms of a data protection agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with data subject rights requests you receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are also transparent about our use of subprocessors, which are also contractually obligated to protect your personal data under no less restrictive standards than those implemented by Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as dictated in our agreements.

### **YOUR RIGHTS TO YOUR PERSONAL DATA**

Certain non-corporate Connecticut residents have the following rights:

- To know what personal data is being processed;
- To ask to access, copy, correct and to delete it; and
- To opt out of targeted ads, profiling solely by automated means and “sales” of their personal data.

We do not “sell” personal data of our Customers’ Viewers, do not use it for targeted advertising or engage in “profiling.” If you are on our websites, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Please review our Cookies Policy & Advertising Choices for more information.

## **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer or Contact ID or other unique identifier you assign to your Viewers.

## **COLORADO RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer personal data in accordance with the terms of a data protection agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with data subject rights requests Customers receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are also transparent about our use of subprocessors, which are also contractually obligated to protect your personal data under no less restrictive standards than those imposed contractually on Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as dictated in our agreements.

## **YOUR RIGHTS TO YOUR PERSONAL DATA**

Additionally, certain non-corporate Colorado residents have the following rights:

- To know what personal data is being processed;
- To ask to access, correct and to delete it; and
- To opt out of targeted ads, profiling that impacts your legal rights or access to basic necessities, and “sales” of their personal data.

We do not “sell” the personal data of Customers’ Viewers, do not use it for targeted advertising nor do we engage in “profiling.” If you are on our Website, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Our Website also recognizes global opt out signals. Please review our Cookies Policy & Advertising Choices for more information.

## **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to

the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer or Contact ID or other unique identifier you assign to your Viewers.

### **NEVADA RESIDENTS DROPDOWN**

The personal information we collect from Nevada consumers and how it is processed is the same as that collected for Customers generally. Please review those sections in this Privacy Policy. We also require any service providers we use to process any personal information we share in connection with Brightcove Services and operations to restrict their use of the information to providing the Brightcove Services and acting on our behalf. Otherwise, we will only provide information to third parties if you direct us to or as required by law. We do not “sell” personal information as defined under Nevada privacy laws.

### **UTAH RESIDENTS COLLECTION AND USE NOTICE**

Your respective data processing agreement with Brightcove outlines the categories of personal data collected, processed and for what purpose and under what conditions and instructions, including our obligations to you with respect to securing that information and engaging subprocessors. Other than any third parties that you direct us to disclose personal data to as part of Brightcove Services, the categories of third parties we share Customer, non-Viewer personal information with, as disclosed above in How We Share Information, applies to all Customers. Customer Viewer personal information is shared with the subprocessors listed [here](#), by name and category, that Brightcove uses to provide Brightcove Services.

We only process Customer and Viewer personal data in accordance with the terms of a data processing agreement outlining our respective obligations, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, and provides for assistance with compliance with your obligations - as controllers - under the law - like assisting with data subject rights requests you receive. That data processing agreement also outlines the administrative, technical, and physical security practices appropriate to the volume and nature of the personal data we process. You can review our standard data processing agreement [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are also transparent about our use of subprocessors, which are also contractually obligated to protect your personal data under no less restrictive standards than those implemented by Brightcove. Those subprocessors are listed [here](#). You can [sign up](#) to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as dictated in our agreements.

### **YOUR RIGHTS TO YOUR PERSONAL DATA**

Utah law does not give residents data subject rights when operating in their business or employment capacity. Where we obtain covered personal data from a Customer's Viewers, we process that information solely as provided for in our data processing agreement.

We do not "sell" personal data of our Customers' Viewers under Utah privacy laws, do not use it for targeted advertising and do not use personal data received from Customers for targeted advertising. If you are on our websites, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Please review our Cookies Policy & Advertising Choices for more information.

### **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer or Contact ID or other unique identifier you assign to your Viewers.

### **TEXAS RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer personal data in accordance with the terms of a data processing agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with compliance with your obligations - as controllers - under the law - like assisting with data subject rights requests you receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are transparent about our use of subprocessors, which are contractually obligated to protect your personal data under no less restrictive standards than those implemented by Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as set forth in our agreements.

### **YOUR RIGHTS TO YOUR PERSONAL DATA**

Certain non-corporate Texas residents have the following rights:

- To know what personal data is being processed;
- To ask to access, copy (if feasible and portable), correct and to delete it;



- To opt out of profiling that results in legal impacts, targeted ads, and “sales” of their personal data; and
- To appeal a denial of a request of the above rights.

We do not “sell” personal data of our Customers’ Viewers under Texas privacy laws, do not use it for targeted advertising and do not engage in “profiling” that has legal or similar significant effects. If you are on our websites, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Please review our Cookies Policy & Advertising Choices for more information.

### **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer ID or other unique identifier you assign to your Viewers.

### **OREGON RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer personal data in accordance with the terms of a data processing agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with compliance with your obligations - as controllers - under the law - like assisting with data subject rights requests you receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are transparent about our use of subprocessors, which are contractually obligated to protect your personal data under no less restrictive standards than those implemented by Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as set forth in our agreements.

### **YOUR RIGHTS TO YOUR PERSONAL DATA**

Certain non-corporate Oregon residents have the following rights:

- To confirm if personal data is or was processed;
- To know what categories of personal data are or were processed;
- To copy (if feasible and portable), correct inaccuracies in and to delete it;



- To opt out of profiling that results in legal impacts, targeted ads, and “sales” of their personal data; and
- To appeal a denial of a request of the above rights, including to the Oregon Attorney General.

We do not “sell” personal data of our Customers’ Viewers under Oregon privacy laws, do not use it for targeted advertising and do not engage in “profiling” that has legal or similar significant effects. If you are on our websites, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Please review our Cookies Policy & Advertising Choices for more information.

### **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer ID or other unique identifier you assign to your Viewers.

### **NEBRASKA RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer personal data in accordance with the terms of a data processing agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with compliance with your obligations - as controllers - under the law - like assisting with data subject rights requests you receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are transparent about our use of subprocessors, which are contractually obligated to protect your personal data under no less restrictive standards than those implemented by Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as set forth in our agreements.

### **YOUR RIGHTS TO YOUR PERSONAL DATA**

Certain non-corporate Nebraska residents have the following rights:

- To know if personal data is being processed;
- To ask to access, copy (if feasible and portable), correct and to delete it;

- To opt out of profiling that results in legal impacts, targeted ads, and “sales” of their personal data; and
- To appeal a denial of a request of the above rights and to file a complaint of a denial of the appeal with the Attorney General.

We do not “sell” personal data of our Customers’ Viewers under Nebraska privacy laws, do not use it for targeted advertising and do not engage in “profiling” that has legal or similar significant effects. If you are on our websites, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Our Website also recognizes global opt out signals. Please review our Cookies Policy & Advertising Choices for more information.

### **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer ID or other unique identifier you assign to your Viewers.

### **NEW HAMPSHIRE RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer personal data in accordance with the terms of a data protection agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with data subject rights requests you receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are also transparent about our use of subprocessors, which are also contractually obligated to protect your personal data under no less restrictive standards than those implemented by Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as dictated in our agreements.

### **YOUR RIGHTS TO YOUR PERSONAL DATA**

Certain non-corporate New Hampshire residents have the following rights:

- To know if personal data is being processed;
- To ask to access, copy, correct personal data provided and to delete it;

- To opt out of targeted ads, profiling solely by automated means that impacts your legal rights or has similarly significant effects, and “sales” of their personal data; and
- To appeal a refusal to take action on your request.

We do not “sell” personal data of our Customers’ Viewers, use it for targeted advertising, nor do we engage in “profiling. If you are on our websites, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Our Website also recognizes global opt out signals. Please review our Cookies Policy & Advertising Choices for more information.

### **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer or Contact ID or other unique identifier you assign to your Viewers.

### **NEW JERSEY RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer persona data in accordance with the terms of a data protection agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with data subject rights requests Customers receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are also transparent about our use of subprocessors, which are also contractually obligated to protect your personal data under no less restrictive standards than those imposed contractually on Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as dictated in our agreements.

### **YOUR RIGHTS TO YOUR PERSONAL DATA**

Additionally, certain non-corporate New Jersey residents have the following rights:

- To know if and what personal data is being processed;
- To ask to access, correct and to delete it;
- To opt out of targeted ads, profiling that impacts your legal rights or has similarly significant effects, and “sales” of their personal data; and

- To appeal a refusal to take action on your request.

We do not “sell” the personal data of Customers’ Viewers, use it for targeted advertising, nor do we engage in “profiling.” If you are on our Website, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Our Website also recognizes global opt out signals. Please review our Cookies Policy & Advertising Choices for more information.

### **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer or Contact ID or other unique identifier you assign to your Viewers.

### **DELAWARE RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer persona data in accordance with the terms of a data protection agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with data subject rights requests Customers receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are also transparent about our use of subprocessors, which are also contractually obligated to protect your personal data under no less restrictive standards than those imposed contractually on Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as dictated in our agreements.

### **YOUR RIGHTS TO YOUR PERSONAL DATA**

Additionally, certain non-corporate Delaware residents have the following rights:

- To know if and what personal data is being processed;
- To ask to access, correct and to delete it;
- To obtain a list the categories of personal data a controller shares with third parties;
- To opt out of targeted ads, profiling that impacts your legal rights or has similarly significant effects, and “sales” of their personal data; and
- To appeal a refusal to take action on the request.

We do not “sell” the personal data of Customers’ Viewers, use it for targeted advertising, nor do we engage in “profiling.” If you are on our Website, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Our Website also recognizes global opt out signals. Please review our Cookies Policy & Advertising Choices for more information.

### **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer or Contact ID or other unique identifier you assign to your Viewers.

### **IOWA RESIDENTS INFORMATION PRACTICES**

Our collection, use and sharing practices are the same for all Customers & their Viewers, regardless of their residency, and are dependent on the Brightcove Services purchased. Please refer to those sections above for more details.

We only process Customer and Viewer persona data in accordance with the terms of a data protection agreement, entered into in each instance by Brightcove and the Customer, that limits the processing in accordance with your instructions, securely, and as necessary to provide the services, for our legitimate business interests and in the other ways permitted by law. It also provides for assistance with data subject rights requests Customers receive and data protection assessments. You can review our standard data processing addendum [here](#) to learn more about how we treat and transfer personal data we receive from Customers.

We are also transparent about our use of subprocessors, which are also contractually obligated to protect your personal data under no less restrictive standards than those imposed contractually on Brightcove. Those subprocessors are listed [here](#), where you can also sign up to receive alerts whenever we add any additional service providers to the list. Customers will be provided with advance notice and an opportunity to object to the use of the subprocessor as dictated in our agreements.

### **YOUR RIGHTS TO YOUR PERSONAL DATA**

Additionally, certain non-corporate Iowa residents have the following rights:

- To know if and what personal data is being processed;
- To ask to access, copy and to delete the personal data provided by you;
- To opt out of “sales” of your personal data; and
- To appeal a denial of your request.

We do not “sell” the personal data of Customers’ Viewers or use it for targeted advertising. If you are on our Website, you can opt out of any non-essential cookies [here](#) or via our cookie consent pop up. Please review our Cookies Policy & Advertising Choices for more information.

### **SUBMITTING A REQUEST**

Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request. If you need assistance in responding to the request for a Viewer, please reach out to your customer success representative with your request. You may also send the request to [privacy@brightcove.com](mailto:privacy@brightcove.com), including the full name and email address of the viewer, or the Viewer or Contact ID or other unique identifier you assign to your Viewers.

### **CANADIAN RESIDENTS DROPDOWN**

Canadian residents may have additional rights under Canadian law. Please see the information provided by the Office of the Privacy Commissioner of Canada [here](#) for additional details.

You, and we, confirm that it is our wish that these Privacy Policies and all other related policies be drawn up in English. Vous reconnaissez avoir exigé la rédaction en anglais du présent document ainsi que tous les documents qui s'y rattachent.

### **APAC REGION RESIDENTS INFORMATION PRACTICES**

The personal information we collect from individuals in APAC countries is the same for all Customers and their Viewers. Please refer to those sections above for more details. Customers can use our Privacy Policies, including our Cookie Policy, to assist them with their notice obligations if they are subject to data privacy laws that require notice and consent for personal data collection and use, including but not limited to Japan’s Telecommunications Business Act, as amended, and the Digital Personal Data Protection Act.

When you enter into a contractual agreement with us for Brightcove Services, including the Data Processing Agreement, which incorporates this Privacy Policy, you provide us your consent for the data collection for the stated use purpose as provided in those agreements and policies. Customers are responsible for collecting consent from their Viewers to provide their personal data to Brightcove or for processing through Brightcove Services.

Where required by regional law, you have the right to request access to personally identifying information Brightcove has in its possession about you, and to correct information you believe is incorrect. Where Brightcove receives a request from a Viewer, we will refer the request to the Customer and support the Customer in responding to the request.

To the extent voluntarily provided, we may collect certain information concerning our Customers and Prospective Customers (such as name, business email, voice ID, details contact and business details, of our communications with participating such customers and prospects (correspondences, call and video recordings, and transcriptions and analyses thereof), as well

as any needs, preferences, attributes and insights relevant to our potential engagement) that you provide during call and video recordings. You will be provided with notice about the use and deletion of the recording and the option to refuse the recording prior to the call and when accepting the invite to a call that may be recorded.

## **DATA SUBJECT RIGHTS**

Please keep in mind that when you ask us for your personal information or ask us to delete it, we may need to retain or withhold some of the information for security, legal or anti-fraud reasons. Also, we need Corporate Customer and Customer Usage data to maintain your account and requested services. That means if you ask us to delete that information, we may not be able to continue providing those services or products.

To exercise a data right, on your own behalf (as a Customer) or on behalf of a Viewer, please contact Support or email [privacy@brightcove.com](mailto:privacy@brightcove.com), with the Subject Line: Data Rights Request - COUNTRY NAME. Within the request, please provide the following: your name, corporate email, company name and country of residence. For a Viewer request, please provide the Viewer or Contact ID or other unique ID you use to identify said Viewer. We will process any requests in accordance with applicable law and within a reasonable period of time.

You may also have opt out rights and the right to withdraw your consent. Our Cookie Policy will provide instructions on how to withdraw consent from further personal data collection by cookies and other web beacons when you are on our Website. Given the nature of the Brightcove Services, you can only withdraw your consent for further processing when you stop using those Brightcove Services and terminate your agreements with us, in accordance with the terms of those agreements.

## **INTERNATIONAL TRANSFERS**

We operate globally and may transfer your personal information to our locations in other countries for the purposes described in these Privacy Policies. We will protect the privacy and security of personal information we collect in accordance with our policies, regardless of where it is processed or stored.

In some of the countries to which we transfer personal data, like the United States, the privacy and data protection laws and rules regarding when government authorities may access data may vary from those of your country. The United States data protection framework is comprised of state laws and sector-specific regulations based on entity type - like banks or credit bureaus - or the information type - like financial information or electronic medical records. As such, not all information at the state level is treated similarly.

No matter where your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. These steps may include implementing encryption when the information is outside of our networks and during transfer, standard contractual clauses where recognized by law, obtaining your consent for that

purpose or relying on other lawful means of transferring personal information and restricting or limiting access to that information. By using the Website and the Brightcove Services, you consent to this transfer.

## **CONTACT US**

If you have any questions regarding these Privacy Policies, please contact us by email at [privacy@brightcove.com](mailto:privacy@brightcove.com), call us +1 617 500 4947, or write to us at:

Brightcove Inc.  
Attn: Privacy Team  
281 Summer Street  
Boston, MA 02210

Please be sure to include sufficient information so we can understand and respond to your specific question or request.

## **JOB APPLICANTS & CURRENT AND FORMER EMPLOYEES**

### **Job Applicants**

You may voluntarily provide data about yourself in connection with a job application. Such provision of data is subject to the privacy policy of the vendor platform you use to submit your application. You will have the opportunity to review that [privacy policy](#) before providing the data.

### **Former Employees**

The collection, use, retention and disclosure of the personal information you provide throughout your employment and/or termination is governed by the Employee Brightcove Privacy Policy you received at the start of your employment. You can request a copy of the policy by contacting [privacy@brightcove.com](mailto:privacy@brightcove.com).

### **EEA/UK RESIDENTS**

Additionally, EEA/UK residents will also receive a notice relating to personal information we receive from non-affiliated parties - like job boards and networking sites - as part of their application. As a resident in the EEA/UK region, you have certain rights to access, correction, erasure, to restrict processing, to transfer that personal data to another party, and where applicable, to withdraw consent you previously provided in connection with your application. To exercise those rights, please complete the webform located at this [page](#).

If you indicate you want to continue to be considered for other roles or receive updates from Brightcove, your personal data shall be retained for 18 months from an unsuccessful candidacy. Otherwise, the job portal will automatically purge your application a year after its submission.

### **CALIFORNIA RESIDENTS**

Job applicants, your application is covered by our hiring vendor's [privacy policy](#). Please review their practices prior to submitting your personal information.



As a California resident, current and former employees have certain rights to access, correct and delete personal information you provide to us in connection with their employment. Job applicants have those same rights to that information related to their application. We do not sell your personal information. To exercise those rights, please complete the webform located at this [page](#). You can also contact us at +1 617 500 4947, and we will assist you in submitting a request through the webform. We will use the information submitted to verify your identity and to evaluate and process your request.

We retain the personal information of applicants as long as it is necessary to evaluate their candidacy for employment, and to comply with the law. We retain personal information of former employees for a legally mandated period post-termination, and then as otherwise legally permitted.

### **PLAY TV CUSTOMERS**

The use of the PlayTV Website and any version of its mobile app is governed by its privacy policy, located at <https://playtv.brightcove.com/privacypolicy/>. Please review this policy prior to your use of that service.

## **PRIVACY CONTROLS**

### **COOKIE POLICY & ADVERTISING CHOICES**

Brightcove Inc., and its affiliates (“Brightcove” or “we”), and certain service providers and partners operating on our behalf may set cookies and other similar technologies to identify your device as you navigate our publicly-accessible Website, certain Brightcove Services, support pages, and documentation. A cookie is a piece of data contained in a very small text file stored in your browser or elsewhere on your hard drive. By themselves, cookies do not identify you specifically; they recognize the browser or device (whether you are using it or someone else). Unless you log into your Brightcove account, we do not know who you are just because you visited our Websites. Definitions for some of the technologies listed, as well as information about your choices with respect to them, are available below.

### **HOW WE USE COOKIES**

The Website uses both session cookies and persistent cookies. We use session cookies to make it easier for you to navigate the Website. A session cookie disappears when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. We use persistent cookies to help remember user preferences and improve the user experience. Data collected by these technologies may be used for several purposes, including, for example, to:

- Provide useful features to simplify your experience when you return to our Websites and applications (for example remembering where you left off on a video, or your conversation with the Brightcove third-party provided chatbot);
- Provide you with relevant content based on your activity on our Websites, your industry, and approximate geographic location;

- With the help of service provider technology, help us to better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) in aggregated form;
- Evaluate and optimize the use and operation of our Websites and various Brightcove Services; and
- Analyze traffic on our Websites and where that activity is generated from.

More specifically, the below cookies are found on the Websites.

<b>Providers</b>	<b>Categories</b>
Brightcove	required, functional, advertising
Salesforce	functional
SalesWings	functional
DoubleClick	functional
IntentPro	advertising
6Sense	advertising
Google/Google Analytics/Google Ads	required, functional, advertising
LinkedIn	advertising
Microsoft/Bing	advertising
3Play	functional
YouTube	advertising
StackAdapt	advertising
X (f/k/a/) Twitter	advertising
Drift	functional, advertising
Evergage	functional
Hotjar	functional, advertising

## **OTHER TECHNOLOGIES**

**Web Beacons.** We use web beacons along with cookies to gather data about use of the Website and interactions with our Players and emails. They recognize certain types of data on your device, like when it viewed a particular article and a description of the Website tied to the beacon. For example, we may put beacons in our marketing emails that notify us when you click on a link in the email that links to our Websites or materials, and then use that information to operate, improve and measure the performance of the Website and our marketing communications and strategies.

**Log Files.** As is true of most websites, we gather certain information automatically and store it in log files. This information may include IP addresses, browser type, internet service provider (ISP), referring/exit pages, the files viewed on the Website (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data. For example, your IP address is identified and logged automatically in our server log files whenever you use the Website, along with the time(s) of your visit(s) and the page(s) you visited. We may combine this automatically-collected log information with other information we collect from you. We do this to improve and enable the functionality of the Website and the Brightcove Services.

**IP Addresses.** An IP address is a number that is automatically assigned to the device you are using by your ISP and, in many cases, IP addresses are shared by multiple people or computers and may be dynamically generated (meaning they change over time). Brightcove uses hashed IP addresses to provide our contracted-for services, namely aggregate analytics, viewership statistics and for billing purposes. We use IP addresses in raw logs temporarily stored in internal-access only systems for technical support, debugging and billing inquiries. We also use IP addresses to serve up customized cookie consent options in certain regions, and as part of fraud prevention.

## **BROWSER OPT OUT OPTIONS**

Our Website is set up to recognize browser do not track and global opt out signals. If you are not in a region where cookie consent pop ups are deployed, you can still adjust your web browser preferences to alert you when a cookie is set on your computer, to block cookies altogether or to activate or later deactivate cookies once set to your computer.

To learn more about how to control cookie settings through your browser:

Learn more about “Private Browsing” and managing cookie settings in Firefox;  
Learn more about “Incognito” and managing cookie settings in Chrome;  
Learn more about “InPrivate” and managing cookie settings in Internet Explorer; or  
Learn more about “Private Browsing” and managing cookie settings in Safari.

You may remove persistent cookies by following directions provided by your Internet browser at the links above. You can submit a rights request for personal data collected via cookies on our Websites by StackAdapt [here](#). While we do not require you to use cookies, certain parts of the Website may not function properly if you set your browser to refuse cookies.

## **EEA/UK RESIDENTS OPT OUT RIGHTS**

If you are located in the European Union, click [here](#) for ways to opt out of receiving targeted advertising from participating third party advertisers, or following this [link](#) to opt out. You can submit a rights request for personal data collected via cookies on our Websites by StackAdapt [here](#). You can also opt out of any non-essential cookies via the consent management pop up that comes up when your browser opens our Websites.

Please note that when you opt out of receiving interest-based advertisements, this does not mean you will no longer see advertisements from or through us. We are not responsible for the effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs. In addition, third parties may still use cookies to collect information about your use of our Website, including for analytics and fraud prevention. Please visit the COMMUNICATION CHOICES tab to see your options relating to Brightcove email marketing.

### **TELECOMMUNICATIONS AND TELEMEDIA DATA PROTECTION ACT STATEMENT**

The Brightcove Player does not set any cookies on a Viewer's device or browser, nor does it store information locally on the Viewer's device. Our traditional analytics use IP addresses and are based on stop, play and pause time and to enable playing of the requested video across devices, which would all fall under the strictly necessary categories. You, as a Customer, may be subject to local laws, such as the ePrivacy Directive or the Telecommunications Telemedia Data Protection Act, depending on the types of plugins you utilize within the Brightcove Player (if any) and/or on your website where the Player is located, particularly those technologies used for marketing or analytics.

### **ADVERTISING**

We partner with service providers to manage our advertising on the Website and third party websites, which may include serving or tracking advertisements on or relating to the Website. Our service providers may use technologies such as cookies to gather information about your activities on the Website and third party sites in order to provide you advertising based upon your browsing activities and interests. The privacy policies of those third parties will govern your interactions with such third party websites or ad networks.

We support the self-regulatory principles for online behavioral advertising (Principles) published by the Digital Advertising Alliance (DAA). This means that we allow you to exercise choice regarding the collection of information about your online activities over time and across third party websites for online interest-based advertising purposes. More information about these Principles can be found at [www.aboutads.info](http://www.aboutads.info). If you want to opt out of receiving online interest-based advertisements on your internet browser from advertisers and third parties that participate in the DAA program and perform advertising-related services for us and our partners, please follow the instructions at <http://www.aboutads.info/choices>, or <http://www.networkadvertising.org/choices/> to place an opt-out cookie on your device indicating that you do not want to receive interest-based advertisements. Opt-out cookies only work on the internet browser and device they are downloaded onto. If you want to opt out of interest-based advertisements across all your browsers and devices, you will need to opt out on each browser on each device you actively use. If you delete cookies on your device generally, you will need to opt out again.

Please note, while there is no generally accepted method to do so, our Website does recognize a "do not track" setting (or similar mechanism) from your browser to indicate that you do not

wish to be tracked or to receive interest-based ads. We also interpret the Global Privacy Control (GPC) signal to opt out of non-essential cookies.

## **CHANGES TO THIS POLICY**

We may update this Cookies Policy to reflect changes to our information and cookies practices by posting an updated version of this Cookies Policy on this page, or with any notice to you if required by applicable law. Your continued use of the Website after any such update constitutes acceptance of any such modified Cookies Policy. We encourage you to review this page periodically for the latest information on our cookies practices. The date of last revision is shown at the top of the Brightcove Privacy Policies page.

## **CONTACT US**

If you have any questions about this Cookies Policy, or our privacy practices generally, please contact us at [privacy@brightcove.com](mailto:privacy@brightcove.com). If you have any questions regarding this Privacy Policy, please contact us by email at [privacy@brightcove.com](mailto:privacy@brightcove.com), call +1 617 500 4947, or write to:

Brightcove Inc.  
Attn: Privacy Team  
281 Summer Street  
Boston, MA 02210

Please be sure to include sufficient information so we can understand and respond to your specific question or request.

## **COMMUNICATION CHOICES**

You can make various choices about what communications you receive from Brightcove, our service providers or our partners. You can unsubscribe from marketing emails anytime by following the “unsubscribe” instructions in the latest such message you have received. If you’d like to limit our sharing for marketing purposes or remove your emails from our marketing databases, please email [privacy@brightcove.com](mailto:privacy@brightcove.com), with your name, email address and your request for removal.

We no longer use personal information for marketing purposes when you request to be removed from our marketing database, or we’re informed that it is outdated or inaccurate. If you would like to remove your personal information from the databases of third parties with whom your personal information has already been shared, please contact them directly.

Please see our Cookie Policy and Advertising Choices sections to opt out of any targeted advertising from ad partners and marketing, certain analytics and digital advertising.