

# Privacy Policy

*Last Updated: August 4<sup>th</sup>, 2022*

Please read this Privacy Policy and our [Terms of Service](#) carefully before using the Platform.

This Privacy Policy describes how we collect, use, and disclose information, governs how we treat this information, and lets you know your associated rights. This Privacy Policy applies to the Website <http://tim.blog> (the “Website”) operated by Seneca and Marcus, LLC, on behalf of Tim Ferriss (“Tim” and collectively “we,” “our” or “us”), the services and information available via the Website, including Tim’s email newsletter and podcasts (the “Services”) (the Services, together with our Website, are referred to as the “Platform”).

## Navigating this Privacy Policy

To help you navigate our Privacy Policy, we have divided the Policy into numbered sections and provided a set of definitions in Section 21 (Definitions) to allow easy reference to key concepts. The sections are as follows:

1. [Your Consent To This Privacy Policy](#)
2. [The Information We Collect](#)
3. [How We Collect This Information](#)
4. [How We Use This Information](#)
5. [How We Share This Information](#)
6. [How We Safeguard the Information We Collect](#)
7. [Our Retention Of Data](#)
8. [Accuracy And Minimization Of Data](#)
9. [Accessing And Updating Your Information](#)
10. [Your Right To Opt-Out, Object To Processing, And Delete Information](#)
11. [Do Not Track](#)
12. [Advisory Regarding Participation By Children And Teens](#)
13. [Relationship To Terms Of Service; Incorporation Of Terms Of Service](#)
14. [Notice Of Privacy Rights To California Residents](#)
15. [Notice Of International Data Transfers](#)
16. [Third Party Sites](#)
17. [Complaints](#)
18. [Changes To This Privacy Policy](#)
19. [Contact Us](#)
20. [Definitions](#)

You may also print a copy of this Privacy Policy using the “Print” feature available from most web browsers.

## **1. Your Consent To This Privacy Policy**

By using the Platform, or otherwise providing information to us, you agree to this Privacy Policy. If you do not agree with this Privacy Policy, please do not use the Platform. You may withdraw your consent by requesting deletion of your information or otherwise exercising your rights in accordance with Section 10 (Your Right To Opt-Out, Object to Processing, and Delete Information).

## **2. The Information We Collect**

Our Platform gives us the opportunity to communicate with people interested in Tim’s blog, podcasts, books, TV shows, and his other activities and interests. The Platform also provides you with opportunities to participate in exchanges on these topics, and to receive additional information on all of the above. To provide these Services, and to otherwise conduct our business via the Platform, we rely on information provided by and collected from our users. This information consists of the following:

**2.1 Personal Information.** We collect certain information that identifies you as an individual (collectively, “Personal Information”). The Personal Information we collect may include the following:

- Your name;
- Your email address;
- Social media handle (e.g., if you engage with us on social media);
- Your billing and/or shipping address; and
- Your payment information.

**2.2 Automatically Collected Technical and Device-Related Information.** We also collect technical and device-related information that identifies or may reasonably be used to identify a particular user device (collectively, “Automatically Collected Information”). Automatically Collected Information is typically collected automatically by technical means, and for purposes of our Platform consists of the following:

- Device identifiers, such as cookies;
- Device information, such as hardware and software settings;

- IP addresses and log information, such as your device’s name, the type and version of your web browser, and referrer addresses that can function to identify a user device; and
- Tracking information that we collect, or that third parties collect.

**2.3 Anonymous Information.** Our Platform also collects, processes, and/or uses information that does not identify you or your devices, including Personal Information that has been made anonymous by: (i) removing identifying fields and aggregating the information with other information so that individual subjects of the information cannot be re-identified, or (ii) anonymizing the information with techniques that remove or perturb the identifying data so as to prevent re-identification of the anonymized information (collectively, “Anonymous Information”). Information that meets these criteria might include, for example, demographic information, statistical information (e.g., page views and hit counts), and general tracking information about how the Website is used.

If we combine or associate Automatically Collected Information or Anonymous Information with Personal Information, we treat the resulting combination as Personal Information.

### **3. How We Collect This Information**

We collect the above information through the following means and technologies:

**3.1 Registration.** In order to provide you with the Services, we need to collect Personal Information consisting of your name and email address. Accordingly, when you register to receive the Services, you provide this Personal Information.

**3.2 Payments.** When you order certain Services through our Website, we will require you to submit your payments using the payment method we have implemented on our Website. The payment information we will collect during this process will include your credit or debit card number or your bank account number, the expiration date of your credit or debit card, purchase amount, date of purchase, and payment method. We may also collect certain Personal Information from you, such as your name, billing address, and, if applicable, shipping address. Please note that different payment methods may require us to collect different categories of information. Depending on the payment method we have chosen to implement on our Website, we may collect your transaction information (i) directly from you for transfer to our payment processor, or (ii) through the third party payment processor(s) that we have authorized to collect such information from you on our behalf. For more information on our

privacy practices with respect to our service providers, please refer to Section 5.2 (Our Service Providers).

**3.3 User-Generated Content.** We give you the ability through the Platform to engage with David and others in public exchanges, and these include opportunities for you to provide comments, reviews, recommendations, and other input via the Platform (collectively, “User-Generated Content” or “UGC”). Please understand that, if you include Personal Information in User-Generated Content, others will be able to read, collect, re-publish, and otherwise freely use the information. We are not responsible for Personal Information you decide to include in UGC. For example, we do not assume any obligation or responsibility to take down, remove, or edit User-Generated Content, except as required by Applicable Law, although we reserve the right to do so in our discretion. If you include in your User-Generated Content any Personal Information relating to others, you represent that you have full permission and authority to do so.

**3.4 Contests, Special Offers, and Surveys.** On occasion, we will provide you with the opportunity to participate in contests, receive a special offer, or provide us with feedback via a survey. To make these Services available to you, we will use the email address and name you provided us when you registered.

**3.5 Beacons and Tags.** The Platform may use certain data collection technologies that rely on (i) beacons; (ii) pixel tags and object hyperlinking tags, and (iii) other means to link an object to an Internet address, a remote software application, a remote database, or other remote means of receiving or processing information. We may use these technologies to tell us what parts of our Platform have been visited or to measure the effectiveness of searches that users perform on our Platform. These technologies also enable us to send email messages in a format users can efficiently read, to learn whether these email messages have been opened, and to help ensure, for example, that our messages are of interest to our users. These technologies provide us with Anonymous Information, Automatically Collected Information and, in certain instances, Personal Information.

**3.6 Device Identifiers; Logs; IP Addresses.** To determine whether your device is supported by our Platform, we may collect certain information about your device and network, including your IP address, your operating system and browser, your device model, information about your use of the Platform, as well as the presence of any software that our Platform may require to operate with your device, or other third party software or mobile apps on your device. We automatically receive and record this information in log files, and this is generally Automatically Collected Information.

**3.7 Cookies.** A cookie is a small amount of data which is sent to your browser from a website's computers and stored on your computer's hard drive. Cookies can be used to provide you with a tailored user experience and to make it easier for you to use a website upon a future visit. We may include cookies on our Platform and use them to recognize you when you return to our Platform. You may set your browser so that it does not accept cookies; however, you may need to enable cookies on your web browser if you wish to access certain personalized features of our Services. Cookies are a form of Automatically Collected Information. Please visit <http://www.allaboutcookies.org/> and <https://cookies.insites.com/disable-cookies/> for more information on how you can disable some or all cookies.

**3.8 Click-Throughs.** We may send email messages or display links that use a "click-through URL" linked to our Platform or to another resource. When you click one of these URLs, you pass through our web server before arriving at the destination website page or other resource. Click-throughs may use and collect Anonymous Information and Automatically Collected Information. We may track this click-through data to help determine interest in particular topics and measure the effectiveness of our user communications.

**3.9 Advertising Technology.** The Services may include use of banner ads and other vehicles for presenting advertising content, and for serving and/or targeting ads, promotions, and other marketing messages, including through use of user profiles, online behavioral advertising methods, and related technologies. These ads may be provided, in some cases, by a third party service, as discussed in Section 5 (How We Share This Information). An advertiser, as described in Section 5.3 (Third Party Advertising), may place or utilize its own cookie or other identifier on your device, and may use Anonymous Information about your visit to our Platform, such as the number of times you have viewed the ad, as well as applicable Automatically Collected Information.

**3.10 Other Technologies and Data Sources.** We currently do not augment Personal Information you provide us with data from other third-party sources, such as privately-held marketing databases. We do not, for example, link your Personal Information with third-party demographic information (such as age, sex, household income, job industry, or job title). If we later choose to use these data sources, or technologies other than those listed above in this Section 3 (How We Collect Your Information), we will treat any information we collect or generate in that manner in full accordance with this Privacy Policy.

## **4. How We Use This Information**

We use the information we collect or process, including Anonymous Information, Automatically Collected Information, and Personal Information, as permitted under Applicable Law, including where the use is based on (a) the consent you provide to us; (b) performance of our agreement to provide you with the Services; (c) compliance with our legal obligations; and/or (d) our Legitimate Interests, as well as a third party's Legitimate Interests.

## 5. How We Share This Information

We value your privacy, and we share the information we collect only in the manner set out below.

**5.1 Our Affiliates.** We may choose to rely on and share any of the information we collect with our affiliates. By “affiliate” we mean an entity that is closely related to us, such as an entity that controls, is controlled by, or is under common control with Seneca and Marcus, LLC. Our affiliates will be bound by the terms of this Privacy Policy. By accessing the Platform, signing up for Services, or otherwise providing us with Personal Information, you consent to this transfer of your information.

**5.2 Our Service Providers.** We engage third parties to perform functions on our behalf, and these may include maintaining the Platform, collecting information, responding to and sending email or other messages, and other functions useful to our business. In this capacity, we may provide service providers with Personal Information, Automatically Collected Information, and Anonymous Information as applicable. The following are examples:

- We use service providers (a) to fulfill your orders (where applicable), (b) to provide customer service (where applicable), (c) to process and distribute email, including Tim's email newsletter, (d) to process and display User-Generated Content ; and (e) to manage promotions, special offers, and similar activities. These service providers generally require access to your Personal Information in order to perform these services.
- We use analytics service providers to assist us in understanding and using Automatically Collected Information. A service we use in this regard is Google Analytics, and information concerning how Google uses the information is available at <https://policies.google.com/privacy/partners>, and opt-out options specific to Google Analytics are available at <https://tools.google.com/dlpage/gaoptout>.
- We may use service providers to anonymize and aggregate Personal Information in order to generate Anonymous Information.

- We may engage service providers to analyze the interests and attributes of our users and, using techniques based on Anonymous Information and Automatically Collected Information, identify others who might share those interests and attributes. We then use this information to reach out to relevant market segments to provide them information concerning the Platform.

We require our service providers to contractually commit to protect the privacy and security of the Personal Information they process on our behalf.

**5.3 Third Party Advertising.** We may share Automatically Collected Information and Anonymous Information with third parties for their marketing purposes and activities. These marketing activities may take place on our Platform or via online services, mobile apps, traditional channels, and other methods independent of our Platform. These activities may involve a third party placing its cookies, beacons, and/or tags on our Platform, in the manner specified in Section 3.5 (Beacons and Tags) and 3.7 (Cookies). We do not monetize your Personal Information for third parties' advertising or marketing purposes.

**5.4 Questions of Harm; Legal Process.** We may disclose your Personal Information and Automatically Collected Information to third parties, including law enforcement agencies, attorneys, and private investigator organizations, where it is necessary, or where we have a good faith belief that it is necessary:

- To comply with legal process;
- To protect and defend our rights and property, including the Platform and associated content;
- To protect against fraud, misuse or unauthorized use of our Services;
- To protect the personal safety or property of Platform users or the public, including your personal safety or property (it being understood that we assume no duty to provide, or monitor the need for, such protections);
- To cooperate with public and government authorities including, where required, authorities outside your jurisdiction.

While you are not able to opt out of this use of information, we will take reasonable steps to limit such use, and disclose only the information we reasonably believe is necessary for the above purposes. If we receive legal process calling for the disclosure of your Personal Information, where required under Applicable Law, we will attempt to notify you within a reasonable amount of time, unless such notification is not permitted.

**5.5 Transfer of the Platform.** We shall be entitled to transfer information that we collect (including Personal Information, Automatically Collected Information, and User-Generated Content) to a third party in connection with a reorganization, merger, sale, joint venture, assignment, transfer or other disposition (including a disposition in connection with a bankruptcy or similar proceedings) of all or substantially all assets or stock of the business unit or division responsible for the information under this privacy policy, provided the acquiring third party has agreed to safeguard your information with protections that are compatible with those set out in this privacy policy.

## **6. How We Safeguard the Information We Collect**

We recognize the sensitivity of our users' Personal Information and we have put in place security systems designed to prevent unauthorized access to or disclosure of this information. Our security systems include physical, technical, and administrative information security controls, and we take commercially reasonable steps to secure and safeguard such Personal Information in accordance with Applicable Law.

## **7. Our Retention Of Data**

We retain Personal Information for the period of time necessary to fulfill the purposes for which we obtained the Personal Information and consistent with Applicable Law. We use the following criteria to set our retention periods: (a) the duration of our relationship with you; (b) the existence of a legal obligation as to the retention period; and (c) the advisability of retaining the information in light of our legal position (for example, in light of applicable statutes of limitations, litigation, or regulatory investigations).

## **8. Accuracy And Minimization of Data**

We take reasonable steps (a) to maintain the accuracy of the Personal Information we process and (b) to limit the Personal Information that we process to that which is reasonably necessary for the purposes for which we obtained the information.

## **9. Accessing And Updating Your Information**

If you would like to review, correct, or update the Personal Information that you have provided to us, or if you would like to request an electronic copy of your Personal Information, you may make such requests by completing the form located at [tim.blog/corrections/](http://tim.blog/corrections/) or emailing us at legal [at] tim.blog. If you email us, please provide your full name, email address you have used to access the Services, and



specify the type of request you are making. We will verify your identity using the email address we have in our records.

## **10. Your Right To Opt-Out, Object To Processing, And Delete Information**

**10.1 Unsubscribing to Email.** If you no longer wish to receive email messages from us, you can opt out of this Service by either (1) following the “unsubscribe” instructions located near the bottom of each email message, or (2) emailing us at legal [at] tim.blog.

**10.2 Deleting Your Information.** You may request that we delete your Personal Information, and we will do so within the time frames (if any) set out in Applicable Law. Please note that deletion requests are subject to certain limitations, for example, we may retain information as permitted by Applicable Law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate user requests.

**10.4 Anonymous Information.** We will not delete Anonymous Information from our database, and nothing in this Privacy Policy restricts our use of Anonymous Information.

**10.5 Objections.** If you object to our processing of your information, and a request for us to delete this information is not, in your view, sufficient, please [contact us](#) as provided below.

## **11. Do Not Track**

We do not monitor or follow “Do Not Track” signals because there is no standard interpretation or practice for DNT signals. Therefore, we handle all user information consistent with this Privacy Policy.

## **12. Advisory Regarding Participation By Children And Teens**

Under U.S. Federal Law (as reflected in the Children’s Online Privacy Protection Act), WE DO NOT COLLECT OR STORE ANY PERSONALLY IDENTIFIABLE INFORMATION FROM INDIVIDUALS THAT WE KNOW ARE UNDER THE AGE OF 13. If you wish further information concerning privacy policies in general, and concerning online social networking and safety, you should visit the following website: <http://www.ftc.gov/privacy/index.html>.

### **13. Relationship To Terms Of Service; Incorporation Of Terms Of Service**

This Privacy Policy must be read in conjunction with our [Terms of Service](#), and the provisions of our Terms of Service are incorporated herein. To the extent the Terms of Service conflict with the terms of this Privacy Policy, the terms of this Privacy Policy will control.

### **14. Notice Of Privacy Rights To California Residents**

California residents have the right under the CCPA to know (1) The categories of Personal Information we collected; (2) The categories of sources from which Personal Information is collected; (3) The business or commercial purpose for collecting or selling (if applicable) Personal Information; and (4) The categories of third parties with whom we share Personal Information. This information is set out in Sections 2–5 of this Privacy Policy.

California residents also have the right under the CCPA to request access to their specific information that a business collects, uses, discloses or sells (as applicable), and the right to request deletion of their information. California residents may exercise their rights as provided above in Section 9 (Accessing and Updating Your Information) and Section 10.2 (Deleting Your Information). California residents may authorize another person (your “agent”) to submit an access or deletion request on your behalf. In that event, we will verify your agent is properly authorized to act on your behalf by contacting you directly. We will not discriminate against you in price or service for exercising your CCPA rights.

We do not monetize users’ Personal Information, and under California law, we do not “sell” Personal Information to third parties. Nor do we disclose the categories of information listed in California’s “Shine the Light” law to third parties for their direct advertising purposes.

### **15. Notice Of International Data Transfers**

We are based in the United States. If you live or reside outside the United States, be aware that your Personal Information will be transferred and processed in the United States. By using the Services or Platform, or providing us with your information, you fully understand and consent to this transfer and processing of your Personal Information in the United States—a jurisdiction may have data protection rules that are different from those in your country.

### **16. Third Party Sites**

The Platform may link to third party websites, social media platforms or other online services, and such links are provided for your convenience only. We have no control over such third parties, and if you decide to access any of the third party links from the Website, you do so subject to the terms and conditions of use and privacy policies for such third parties.

## **17. Complaints**

We want your feedback. If you have suggestions on how we can improve our Services or complaints you would like us to address, please contact us at the address set out in Section 19 (Contact Us).

If you are protected by the GDPR with respect to our use of your information, you may lodge a complaint with a data protection authority for your country or region.

## **18. Changes To This Privacy Policy**

From time to time, we may change this Privacy Policy for our business purposes and to comply with changes in Applicable Law. In the event of any substantive or material changes, we will communicate these changes to you by posting the updated Privacy Policy on the Platform and/or notifying you of the change via the Platform, email, or other methods. To the extent permitted by Applicable Law, your continued use of the Platform following such notice constitutes your agreement to follow and be bound by the updated Privacy Policy.

## **19. Contact Us**

If you have any questions about this privacy policy, the Platform, or your dealings with this Platform, please contact us. You may contact us, for any reason, using the contact information below:

legal [at] tim.blog

## **20. Definitions**

Below are definitions applicable throughout this privacy policy.

**20.1 “Anonymous Information”** has the meaning set out in Section 2.3 (Anonymous Information). If you are protected by the GDPR with respect to our use of your information, the term “Anonymous Information” has the same meaning as information generated by “pseudonymisation” processes, as that term is defined under the GDPR.

**20.2 “Applicable Law”** means statutes, regulations, and any other laws that apply to your use of the Website, the Services, or the Platform. For example, if you are protected by the GDPR with respect to our use of your information, the term “Applicable Law” includes the GDPR.

**20.3 “CCPA”** means the California Consumer Privacy Act, as amended or revised from time to time.

**20.4 “GDPR”** means the European Union General Data Protection Regulation.

**20.5 “Legitimate Interest”** means, for purposes of the GDPR, that there is a good reason for the processing of your Personal Information, and that the processing is carried out in a way that minimizes impacts (if any) on your privacy rights and interests. The term “Legitimate Interest” also refers to our use of information in ways that you would reasonably expect, based on your relationship to us. For example, there is a Legitimate Interest in collecting and processing your Personal Information: (a) to safeguard our Platform, networks, content, and related information and resources; (b) to administer and generally conduct our business; and (c) to prevent fraud.