

SOCIAL JUDO PRIVACY POLICY

K&M Bristol Holdings, LLC (hereafter “the Company”), the owner of Social Judo, takes your privacy seriously. Please read the following to learn more about our privacy policy, which policy you acknowledged and agreed that you accepted when you established your subscription.

NOTICE: The Federal Trade Commission has important information concerning the use of the Internet and Internet “surfing.” Their website is available by cutting and pasting the following link into the address bar of your browser: <http://www.ftc.gov/bcp/online/pubs/online/sitesee.htm>

1. WHAT THIS PRIVACY POLICY COVERS

A. *General.* This policy covers how the Company treats personal information that it collects and receives, including information related to your past use of its products and services. Personal information is information about you that is personally identifiable like your name, address, e-mail address, or phone number, and that is not otherwise publicly available.

B. *Companies Not Controlled.* This policy does not apply to the practices of companies that the Company does not own or control, nor to people that the Company does not employ or manage.

2. INFORMATION COLLECTION AND USE

A. *General*

1. *Collection.* The Company collects personal information when you register with the Company, when you use the Company products or services, and, when you visit the Company website and use the Company application. The Company may combine information about you that we have with information we obtain from business partners or other companies.

2. *Information Sought.* When you register we ask for information such as your name, e-mail address, zip code, cellular telephone number, and the names, dates of birth and

cellular telephone numbers of your Child or Children, as defined in the Terms of Use. Once you visit our website, or, subscribe to the application, you are not anonymous to the Company. The Company also collects data from your Child or Children, as set forth in the Terms of Use; however, this data is not accessible by the Company and can only be accessed by you, the subscriber, and, if you add him or her to the account, your Child or Children's other parent.

3. **Financial Services/Use.** The Company collects information about your transactions with us, including information about your use of your subscription, and, the number of items in the categories that the application monitors.

4. **IP Address and Cookies.** The Company automatically receives and records information on our server logs from your browser, including your IP address, the Company cookie information, and the page you request.

5. **Use.** The Company uses information for the following general purposes: to customize the advertising and content you see, fulfill your requests for products and services, improve our services, contact you, conduct research, and such other uses as the Company may determine.

B. Children

1. **Children.** As noted in the Terms of Use, a subscriber must be 18 years of age or older. The Company does not allow children to subscribe to our services, although parents will have the ability to access all facets of their children's cellular telephones, other mobile devices and computers, which will result in certain of the children's information being accessed by the Company, as noted above and in the Terms of Use.

2. **Marketing to Children Under 18.** The Company does not and will not contact children under the age of 18 for marketing purposes, with or without a parent's permission.

3. **Minimal Information Requested.** The Company does not ask any child under the age of 18 for any information; information needed to operate the application through an adult parent's subscription is provided directly by the parent.

C. Information Sharing and Disclosure

1. **Sharing of Personal Information.** The Company does not rent, sell, or share personal information about you with other people or with companies that are not affiliated with us, except to provide the products or services you have subscribed to/purchased, and we only do so when we have your permission, or, under the following circumstances:

(a) The Company will provide the information to trusted partners who work on behalf of or with the Company under confidentiality agreements. These companies may use your personal information to help the Company communicate with you about offers from the Company and our marketing partners. However, these companies do not have any independent right to share this information.

(b) The Company has a parent or guardian's permission to share the information if the user is a child under age 18, which would be limited to the child's first name, date of birth and cellular telephone number, as well as other device/computer identification. This information will be used only to allow the Application to operate, and, any information shared with third parties will be only for these purposes such that the third party may not use this information for their own purposes;

(c) The Company will respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;

(d) The Company believes it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of the Company's terms of use, or as otherwise required by law; and

(e) The Company will transfer information about you if the Company is acquired by or merged with another company. In this event, the Company will notify you before your information is transferred and becomes subject to a different privacy policy.

2. Ad Targeting. The Company displays targeted advertisements based on personal information. Advertisers (including ad serving companies) may assume that people who interact with, view, or click on targeted ads meet the targeting criteria—for example, women ages 18-24 from a particular geographic area.

(a) The Company does not provide any personal information to the advertiser when you interact with or view a targeted ad. However, by interacting with or viewing an ad you are consenting to the possibility that the advertiser will make the assumption that you meet the targeting criteria used to display the ad.

(b) The Company advertisers may include financial service providers (such as banks, insurance agents, stock brokers and mortgage lenders) and non-financial companies (such as stores, airlines, and software companies).

3. COOKIES

A. *Rights Reserved.* The Company may set and access the Company cookies on your computer.

B. *This Policy Not Applicable to Other Companies.* The Company lets other companies that show advertisements on some of our pages set and access their cookies on your computer. Other companies' use of their cookies is subject to their own privacy policies, not this one. Advertisers or other companies do not have access to the Company's cookies.

C. *Web Beacons.* The Company uses Web beacons to access the Company cookies inside and outside our network of websites, and, in connection with the Company products and services.

4. YOUR ABILITY TO EDIT AND DELETE YOUR ACCOUNT INFORMATION AND PREFERENCES

A. *General*

1. **Editing.** You can edit your Social Judo Information, including your marketing preferences, at any time.

2. **New Categories.** New categories of marketing communications may be added to the Marketing Preferences page from time to time. Users who visit this page can opt out of receiving future marketing communications from these new categories or they can unsubscribe by following instructions contained in the messages they receive.

3. **Marketing and Newsletters.** We reserve the right to send you certain communications relating to Social Judo, such as service announcements, administrative messages and the Company Newsletter, all of which are considered part of your subscription, and to do so without offering you the opportunity to opt-out of receiving them.

4. **Account Removal.** You can delete your Social Judo account by visiting our support. Once you terminate your subscription, or, if it is terminated by the Company for reasons set forth herein, or, under the Company Terms of Use or the Company Privacy Policy, all information will be deleted and the Company will no longer have access to it, however, if the same was terminated in an effort to avoid investigation, or for similar reasons, the Company will continue to keep your information for a reasonable period of time.

B. *Children*

Account Deletion. If a parent chooses not to allow us to further collect or use a child's information, you must terminate your subscription, as this is the primary purpose of subscribing to the Application.

5. CONFIDENTIALITY AND SECURITY

A. *Limited Access to Information.* The Company limits access to personal information about you to the extent possible by employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs.

B. *Federal Compliance.* The Company maintains physical, electronic, and procedural safeguards that comply with federal regulations to protect personal information about you.

C. *Protection.* Your Social Judo Account Information is password-protected.

D. *Encryption.* The Company uses the highest level of encryption to protect data transmissions and all facets of its website and the application.

6. CHANGES TO THIS PRIVACY POLICY

Updates to the Policy. The Company may update this policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary e-mail address specified in your the Company account, or, by placing a prominent notice on our site.

7. QUESTIONS AND SUGGESTIONS

Feedback. If you have questions or suggestions, please complete a feedback form or you can contact us at:

K&M Bristol Holdings, LLC
Customer Care—Privacy Policy Issues
335 Elm Street
Dartmouth, MA 02748

8. YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code §1798.83 permits our visitors who are California residents to request certain information regarding their disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to port@customerservice.com or write us at:

K&M Bristol Holdings, LLC
Customer Care—Privacy Policy Issues
335 Elm Street
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