

# Social Judo Privacy Policy

## ***Our Privacy Commitment***

Social Judo, Inc. ("Social Judo," "we," "us" or "our") is committed to respecting the privacy rights and concerns of all users of the Social Judo website (the "Site"), software and service (we refer to the Site, the service and the software made available through the Site, collectively, as the "Social Judo Service"). As such, we have established and implemented this Privacy Policy to inform visitors to the Site and users of the Social Judo Service how we use and protect the information we collect through the Site and the Social Judo Service. By visiting the Site or using any of the Social Judo Service, you consent to Social Judo's collection, use, storage, deletion and disclosure of information relating to you as set forth in this Privacy Policy. This Privacy Policy is effective as of the date set forth above and is only applicable to the Site and not to any other website that you may be able to access from the Site which may have its own data collection and use practices and policies.

This policy answers the following questions:

- What information do we collect about you and how do we use it?
- Will we share your Personal Information with third parties?
- What choices do you have about the collection and use of your Personal Information?
- What security measures do we take to safeguard your Personal Information?

Subscribers to the Social Judo Service should be aware of the privacy policies set forth below before making a purchase and/or utilizing the Social Judo Service.

## ***What information do we collect about you and how do we use it?***

### **Types of Information We Collect**

Personal information means information that can be used to identify and contact an individual such as name, email address, screen name, mailing address and phone number (the "Personal Information"). We consider such Personal Information sensitive in nature. You, as a parent or legal guardian, need to submit Personal Information to access the Site and the Social Judo Service. By submitting information, you are consenting to our collection of such information.

We collect Personal Information when you create an account through the Social Judo Service; subscribe to our newsletter; participate in feedback forms and questionnaires; or receive customer or technical support. Personal Information is collected only for lawful purposes.

To create an account for the Social Judo Service, we require you to provide certain information to create your profile, including your name, a login name and password, your email address, your mailing address, phone number and information about your child(ren), such as the child(ren)'s date of birth and state of residence. Providing additional information beyond what is required to create an account is entirely optional, but enables you to gain more from the Social Judo Service. If you sign up for one of our services which involves tracking mobile and Internet activities, we may also collect information from other internet sources and database services. No information of this type will be collected unless you have registered for services that require it.

Additionally, though not necessarily Personal Information, the Social Judo Service collects and provides you access to certain cell phone and computer activities (including, but not limited to, email, text messages and the activities on social networking sites and applications, such as Instagram) of your children, including through the use of computers and/or other devices on which the Social Judo software is installed and/or the Service is used (the "Accessed Activities"). For clarity, we do not knowingly collect Personal Information from children or sell any products to children.

### **How We Use Your Personal Information**

The Personal Information you provide to us will allow us to provide the services available through the Site and the Social Judo Service; alert you of new products or services, features, or enhancements; handle/route your customer service questions or issues; and/or notify you of upgrade opportunities, or special offers. We also use your email address as part of the Social Judo Service in sending you messages about the Social Judo Service and other general announcements.

We keep track of your interactions with us, including but not limited to your activity within the Social Judo Service. We may use Personal Information you provide to us to send messages to you in response to your request to perform an activity in connection with your use of the Social Judo Service. We may also use your Personal Information to contact you when necessary.

We may combine Personal Information (provided to us by you the parent or legal guardian) with non-personal information that we have collected (including from your use of the Social Judo Service or from your child's Accessed Activities) in a manner such that the end-product does not personally identify you or your child. We may also make your Personal Information non-personally identifiable by either combining it with information about other users (e.g., aggregating your Personal Information with information about other users), or by removing characteristics (such as your name or email address) that make the information personally identifiable. This process is known as de-personalizing your information. We refer to this de-personalized information as "Aggregated Data". For Clarity, unless otherwise described in this Privacy Policy, we do not access your child(ren)'s Accessed Activities.

You acknowledge and agree that we can use Aggregated Data to create and develop analytical and statistical data about the Social Judo Service, to operate and enhance the Social Judo Service, and to promote and market the Social Judo Service.

### **Cookies and other Tracking Technologies**

"Cookies" are small bits of electronic information that a website sends to a visitor's browser and are stored on the visitor's hard drive. Like many websites, we employ cookies in certain areas of the Site to allow us to provide information to make your online experience more convenient. For example, when you return to our Site after logging in, cookies provide information to the Site so that the Site will remember who you are on subsequent visits, speeding up or enhancing your experience of the services offered by, for instance, tailoring content to you.

"Web beacons" (also known as internet tags, single-pixel GIFs, clear GIFs, and invisible GIFs) are tiny graphics on a web page or in an e-mail message that are used to track pages viewed or messages opened. Web beacons tell the web site server information such as the Internet Protocol address and browser type related to the visitor's computer. Like many websites, we employ Web beacons in online advertisements that bring people to our Site and on different pages of our Site and in online advertisements that take people from our Site to a third party's website. Web beacons provide us with information on how many times a page is opened and which information is consulted.

In addition, like most advertisers, we place advertisements where we think they will be most relevant to customers. One way we do so is by allowing network advertising companies with whom we work to place their own cookies when an individual visits our Site. This enables the network advertising company to recognize individuals who have previously visited the Site. When the individual visits a third-party web site on which that network advertising company has purchased ad space, the advertising company can then recognize the individual's interest in Social Judo and deliver one of our advertisements. We do not control third parties' use of cookies or web beacons and cannot guarantee that such third parties will uphold our same privacy standards. Please see "Additional Information You Should Know About Third Parties", below, for more information.

### **Log Information**

Our servers automatically record information that your browser sends whenever you visit the Site or the Social Judo Service. This information includes your Internet Protocol address, your browser type and version, the search engine you used to find the Social Judo Service, if any, which Social Judo Service features you use and when and how long you use them. We use this information to monitor and analyze how users use the Social Judo Service, to provide customer service and to maintain and improve the Social Judo Service.

### **Children's Privacy**

You must be at least 18 years old to obtain an account for the Social Judo Service.

We do not knowingly collect personal information from children or sell any products to children. We take children's privacy seriously, and encourage the parents and legal guardians of children to play an active role in their children's online experience at all times. Social Judo provides you, as a parent or legal guardian of a child or children under the age of 18, with the ability to collect and access the Accessed Activities. For the avoidance of doubt, Social Judo will not provide for your ability to collect and access the Accessed Activities of any child (i) who is a resident of the states of Iowa or Vermont (United States), (ii) for whom you are not the legal guardian or (iii) who is 18 years of age or older,

as more thoroughly explained in the Terms of Use governing the use of the Site and the Social Judo Service.

You are solely responsible for the Accessed Activities information accessed by you or any third party you have permitted to use the Social Judo Service and you agree to the Representations and Warranties of the Terms of Use governing the use of the Site and the Social Judo Service.

If a subscription is canceled for any reason, a subscription is suspended by Social Judo if a payment is late, there is an investigation into the authenticity of information or a device is linked to a child who has reached the age of 18 or is believed to be a resident of Iowa or Vermont (United States) (each occurrence, a "Cancellation Event"), Social Judo may (i) immediately cease the monitoring of all computers and/or other devices related to such subscription or the applicable minor child and (ii) delete all monitored data (e.g., the Accessed Activities) for such subscription within 90 days from the date of the Cancellation Event (and such deletion may occur immediately upon such Cancellation Event). Upon such deletion, no monitored data (as a whole or with respect to the applicable minor child, as applicable) will be available on the Site and/or the Service. However, Social Judo will keep your general account information (such as your name and email address) indefinitely.

### ***Will we share your Personal Information with third parties?***

#### **Sharing of Information**

Unless required by applicable law or legal process or as described in this Privacy Policy, we do not access, use, or share any of the Accessed Activities, any of your Personal Information or any other information obtained by our servers through your use of the Social Judo Service.

To the extent we share Personal Information that has not been de-personalized with third parties, we require those third parties to comply with this Privacy Policy and take appropriate confidentiality and security measures. We may share Aggregated Data with third parties, including strategic partners, for marketing and promotional purposes. Additionally, we will share the Personal Information and Accessed Activities we collect under the following circumstances:

- **Protection of rights.** We will access and share your Personal Information or any of the information within the Accessed Activities if we have a good faith belief that (i) access, use, preservation or disclosure of such information is reasonably necessary to satisfy any applicable law, regulation, legal process, such as a court order or subpoena, or a request by law enforcement or governmental authorities, (ii) such action is appropriate to enforce the [Terms of Use](#) for the Social Judo Service, including any investigation of potential violations thereof, (iii) such action is necessary to detect, prevent, or otherwise address fraud, security or technical issues associated with the Social Judo Service, or (iv) such action is appropriate to protect the rights, property or safety of Social Judo, its employees, users of the Social Judo Service or others.
- **Asset transfers.** If we become involved in a merger, acquisition or other transaction involving the sale of some or all of Social Judo's assets, user information, including Personal Information and Accessed Activities collected through your use of the Social Judo Service, could be included in the transferred assets. You expressly consent to such transfer. Should

such an event occur, we will use reasonable means to notify you, either through email and/or a prominent notice on the Site.

- **Service Providers.** We may access and share your Personal Information or information within the Accessed Activities with service providers that we engage for the sole purpose of processing information on our and your behalf. For example, we may partner with other companies to process, analyze, and/or store data, including, but not limited to, Aggregated Data. While providing services for us, these companies may access your Personal Information or any of the Aggregated Data.

### **Additional Information You Should Know About Third Parties**

We may grant third parties with whom we have a business relationship access to non-personal information gathered through our cookies and web beacons. This Privacy Policy does not cover and expressly excludes the information practices of third party websites linked to the Site. Although we encourage such third parties to adopt and follow their own privacy policies, we are not responsible for their collection and use of your Personal Information and non-personal information through their websites. You should refer to the privacy policies and statements of other websites or contact the respective webmasters of those websites to obtain information regarding their information collection, use and disclosure policies.

When you have clicked on a third party logo or URL displayed on our Site which links you to a different website, our Privacy Policy no longer applies and you must read the privacy policy of the third party to see how your Personal Information will be handled on their website. Social Judo expressly disclaims any and all liability related to the collection, use or disclosure of information by third parties.

### ***What choices do you have about the collection and use of your Personal Information?***

#### **Control of Your Information**

You may access, update or delete your Personal Information or modify your account preferences for the Social Judo Service by accessing the "Settings" area of the Social Judo platform. Please note that when you delete your account, we may retain your account information for a reasonable period of time afterward for the purpose of internal account management and fraud prevention activities.

#### **Opting Out of Receiving Communications from Us**

If you no longer want to receive our newsletter, emails or other announcements, you may unsubscribe by writing to us at [privacy@SocialJudo.com](mailto:privacy@SocialJudo.com) or replying to the unsubscribe link at the bottom of our emails. Please note that you cannot unsubscribe from certain correspondence from us, including messages relating to your account transactions.

#### **Mediation**

For residents of all countries other than India, you agree that, in the event any dispute or claim arises out of or relating to this Privacy Policy that you and Social Judo will attempt in good faith to negotiate a written resolution of the matter directly between the parties. If you reside in any country in which the Service is available, other than India, you agree that if the matter remains unresolved for forty-five (45) days after notification (via certified mail or personal delivery) that a dispute exists, all parties shall join in mediation services in (TBD) with a mutually agreed mediator in an attempt to resolve the dispute.

For residents of India, you agree that, in the event any dispute or claim arises out of or relating to this Privacy Policy that you and Social Judo will attempt in good faith to negotiate a written resolution of the matter directly between the parties. If you reside in India, you agree that if the matter remains unresolved for forty-five (45) days after notification (via certified mail or personal delivery) that a dispute exists, all parties shall join in mediation services in Mumbai, India, with a mutually agreed mediator in an attempt to resolve the dispute.

If the parties are unable to resolve the dispute following referral of the matter to mediation in accordance with the above, then they shall be free to pursue such other remedies as may be available under applicable law or this Privacy Policy, subject to the provisions of our Terms of Use. Should you file any arbitration claims, or any administrative or legal actions without first having attempted to resolve the matter by mediation, then you agree that you will not be entitled to recover attorney's fees, even if you would otherwise be entitled to them.

### **Dispute Resolution for Residents of India**

If you are a resident of India, in the event that you have any dispute or claim arising out of or relating to this Privacy Policy, you may report your claim to the Cyber Appellate Tribunal located in your jurisdiction.

### ***What security measures do we take to safeguard your Personal Information?***

The Personal Information provided to us is stored on servers, which are located in secured facilities with restricted access, and protected by protocols and procedures designed to ensure the security of such information. In addition, we restrict access to Personal Information to Social Judo employees who need to know this information in order to develop, operate and maintain the Social Judo Service. All Social Judo personnel who have access to this information are trained in the maintenance and security of such information. However, no server, computer or communications network or system, or data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect user information, we cannot ensure or warrant the security of any information you transmit to us or through the use of the Social Judo Service and you acknowledge and agree that you provide such information and engage in such transmissions at your own risk. Once we receive such transmissions, we will endeavor to maintain the security of such information on our systems.

In addition to the above, you are requested not to disclose your log-in information to anyone. In the event you disclose your log-in information (e.g., your password) to any other person, Social Judo shall not be liable for any misuse of your Personal Information arising out of such disclosure.

### ***Notification of Changes***

This Privacy Policy may change from time to time and we will post all changes on this page.

### ***Questions? Contact Us***

If you have any questions or complaints about our privacy practices or this Privacy Policy, please contact us by email at [privacy@SocialJudo.com](mailto:privacy@SocialJudo.com).

### ***Terms of Use***

Please read the [Terms of Use](#) governing the use of the Site and the Social Judo Service.