

## **REACHTV PRIVACY POLICY**

### **READ BEFORE DISCLOSING INFORMATION**

Last Updated on: June [ ], 2012

#### **Personal Information.**

ReachTV, LLC with an office at 1976 NW Fork Road, Stuart, FL 34994 and its successors and assigns (collectively "ReachTV") is committed to protecting the privacy and confidentiality of personal information entrusted to us. When you provide us with your personal information, you acknowledge that the information will be stored and processed on our servers or the servers of our hosting providers.

#### **Privacy Policy.**

This privacy policy (the "Privacy Policy") is applicable to personally identifiable information ("Personal Information") of all users collected, stored or distributed through the one or more of our websites (collectively and individually, "Website"). When certain other non-identifiable information is directly associated with Personal Information, this other information also becomes Personal Information for purposes of this Privacy Policy.

ReachTV collects personal information that is voluntarily provided by you such as when you order a product, enter promotions, answer our polls or surveys, register as a member on the Website, sign up for additional services on the Website, or communicate with us by mail, telephone or electronically. The type of information we collect and maintain may include your name, mailing address, email address, telephone number, gender, date of birth, purchase history, credit card number, chat room communications, complaints you may have about our services and/or a record of promotions offered to you, if any.

#### **Consent.**

Your continued use of the Website signifies your consent to the collection and processing of both your personal information, and any resulting correlation of such information, as set forth in this Privacy Policy.

#### **Collection and Use of Personal Information.**

We reserve the right to collect, use and disclose your personal information without consent where required or permitted by law. Otherwise, personal information will be collected, used and disclosed in accordance with the form of consent required by applicable law and its use will be limited to the objectives for which it was collected. Your consent may be implied consent, (i.e. by giving us your name and contact information so that we may contact you), or express consent, (i.e., by not opting-out). Where we can reasonably conclude that you have given your consent by your action or inaction, you are giving us your implied consent. This Privacy Policy identifies the purposes for which your personal information is collected, used and disclosed.

Additional consent will be obtained from you if we wish to use or disclose your personal information for any additional purpose.

**Idea Submission and Comments.**

From time to time you or your child may submit an idea, concept or improvement (collectively an “Idea”) for the Website or our services. Once you submit that Idea, we will own all right title and interest to the Idea and you will not retain any right, title or interest in or to the Idea. We will not pay you for the Idea and you will not be entitled to any royalty or any other payment or consideration for the Idea, or credit for submitting the Idea. If you want to retain ownership to the Idea or received any type of payment for the Idea, please do not submit it to us.

**Non-Personal Information.**

To help us better understand our markets, we may gather non-personal information for analytical purposes on an anonymous, aggregate basis. This information is not kept, used or disclosed at the individual level, but may be disclosed to third parties on an anonymous, aggregate basis. We may collect such information through unique identifiers such as cookies (which may be HTML files, Flash files, or other technology), web beacons, or similar technologies for routine system administration purposes, to make our Websites more interesting and useful or to manage content delivery. We may use cookies, small text files stored on your hard drive, not our Website, which allow you to store your password without having to constantly re-enter it. Cookies also help us to tailor messages that better match your needs and interests, and they allow us to better understand how users in general use our sites, which in turn helps us to focus our resources on features that are most popular with our users.

**Third Party Data Collection.**

From time to time, we may use third-party advertising service provider to serve ads on the Website. These companies may use cookie-based ad serving technology for the purpose of (a) ad delivery and reporting; and (b) re-targeting and/or online advanced targeting. Furthermore, to monitor usage or transfer of content to another site or location and to collect advertising metrics, such third parties may include in the content web beacons or clear GIFs. Clear GIFs (a.k.a. web bugs, beacons or tags) are small graphic images placed on a web page, web-based document, or in an e-mail message. Clear GIFs are invisible to the user because they are typically very small and the same color as the background of the web page, document or e-mail message. Because your web browser must request such content from the third parties’ servers, such third parties can track your usage, or set their own cookies, just as if you had requested a web page from their site. Although the third-party advertising service providers may not have access to tracking technologies set by ReachTV, or any of your personal information collected on the Website, they may themselves set and access their own tracking technologies and/or they may otherwise have access to information about you. The use of such technology by these third parties is within their control and not ours. Even if ReachTV has a relationship with the third party, it does not control its sites or policies and practices regarding your information.

This Privacy Policy does not cover any use of information that third-party advertising service providers or advertisers may collect from you. We encourage you to investigate and ask questions directly of them in this regard.

### **Children under 13.**

Use of this Website is generally done on an anonymous basis. Your child will obtain a user name and/or password from his or her school. This user name and/or password will not be unique to each child; all children from a particular school will use the same user name and/or password.

We do not knowingly collect personal information from children under 13. If we offer products or services that require your child's personal information, we will collect your email address first and notify you that your child wishes to provide personally identifiable information to us, describe the purposes for which the personal information is collected, and provide you with an opportunity to consent to such disclosure of personal information. We will not collect more personal information from your child than is reasonably necessary to allow your child to participate in the services that is offered.

If your child is asked to register on this Website to use a service, your child may be asked to set up a user name and password. Your child should not use any personally identifiable information - such as his or her actual name - as his or her use name, because the user name may be visible to others on the Website.

We may collect aggregate information in connection with surveys or other online activities that allow your child to give us feedback, such as what they like and dislike about the Website and our products or services. We will not collect any personally identifiable information in connection with surveys or feedback requests, nor is the information provided connected to any personally identifiable information we may have about the child.

If your child contacts us by email or enters an email address to use or participate in a service on the Website, we use the email address only to respond to your child's specific request or question after which the address is deleted.

If your child wants to contact us by mail, and our site provides a submission form for such communication, you may do so using such submission form. The submission form may ask for your child's username and your (the parent's) name and signature.

We may collect your child's first name and email address and your email address where necessary for your child's safety. We may also collect your child's name and email address for the limited purposes of protecting the security and integrity of the site, taking precautions against liability, responding to the judicial process, or for law enforcement on a matter related to public safety.

### **Use of personal information is limited.**

ReachTV may collect personal information for the following reasons:

- 1) To provide you with the products or services you have requested;
- 2) To better understand you, to allow us to serve you better through enhanced products and customer service; and
- 3) To properly investigate and respond to any complaints, questions or concerns you may have about our services or this Website.

If you opt in to receive offers, promotions or other information from ReachTV, your information will be used to provide you with the information you requested and other information that we believe may interest you. If you have opted in to receive these offers, we may also use your personal information to ensure that your contact information is accurate and up to date.

ReachTV may share your and/or your child's personal information with ReachTV's affiliates and subsidiaries, and their respective successors and assigns, but only to the extent required to fulfill the purposes identified in this Privacy Policy. In addition, ReachTV may disclose personal information to third parties as follows:

- 1) ReachTV may use outside organizations to perform specialized services. These service providers are only given the information needed to perform those service.
- 2) We may disclose personal information to the government or other legal or regulatory authorities (a) if so ordered by a court of law or (b) for other legal reasons, such as (i) to comply with legal process such as a search warrant, subpoena or court order; (ii) to protect the company's rights and property; (iii) to investigate reports of fraud or of users sending material using a false email address or users sending harassing, threatening, or abusive messages; (iv) to protect against misuse or unauthorized use of our Website; or (v) in emergencies, such as when we believe someone's physical safety is at risk. In some cases, disclosure may be required by law to be without notice to you.
- 3) If any significant transaction or event involving ReachTV or any of its affiliates or subsidiaries such as a sale, merger, amalgamation, financing, re-organization, liquidation, or insolvency, other parties to the transaction and their professional advisors may need to have access to ReachTV's user lists and various databases as part of the due diligence process. In this event, ReachTV would only provide such access under terms of a confidentiality agreement. Also, upon completion of the transaction or event, your personal information would be transferred to ReachTV's successor-in-interest.

#### **Personal Information Protection.**

ReachTV has implemented physical, electronic and administrative measures to protect your information from error, loss or unauthorized access. For example, we use industry-standard efforts, such as passwords, firewalls and Secure Socket Layers, to safeguard the confidentiality of your personal information contained on our computer systems. In addition, our employees and any third parties we use are contractually bound to protect the confidentiality of your information and access is restricted to those with a need to know the information to carry out the identified purpose.

### **Parental Supervision.**

ReachTV urges all parents and legal guardians to supervise their children's exploration of the Internet and any online services, and to teach their children about protecting their personal information online.

### **Social Networks.**

You and your child should not have any expectation of privacy or confidentiality in online chat rooms and public user profiles, on message boards or in similar forums. Any personal information that you submit there can be read, collected, or used by other users. ReachTV is not responsible for personal information you choose to submit in these forums.

### **Links to Third Party Websites**

Users may, through links or otherwise, gain access to other websites that are not operated by ReachTV. If ReachTV provides these links, it is done so only as a convenience, and the inclusion of any link does not imply endorsement by ReachTV any linked website. REACHTV ASSUMES NO RESPONSIBILITY FOR ANY MATERIAL OUTSIDE OF THE WEBSITES OPERATED BY REACHTV AND ITS AFFILIATES OR SUBSIDIARIES, INCLUDING ANY WEBSITES WHICH MAY BE ACCESSED THROUGH A LINK ON THE WEBSITE. Unless otherwise indicated on the Website, ReachTV is not sponsored by or affiliated with any linked websites, and trademarks used in connection with the linked websites are not trademarks of ReachTV. ReachTV specifically disclaims responsibility for any inadvertent viewing by anyone under the applicable age of majority of any material intended for adults on a website accessed through a linked website. While ReachTV may provide links from this Website to other websites owned and/or operated by ReachTV or unaffiliated third parties, such sites are not part of this Website, and each is governed by a different set of terms. In addition, to the extent such linked websites are not owned or operated by ReachTV or its affiliates or subsidiaries, these sites also have different policies with respect to the collection, use and disclosure of your personal information. Make sure to review their privacy policies.

### **Your personal information.**

You have control over how we collect, use and disclose your Personal Information. Any comments, questions or changes regarding the collection, use and disclosure of your personal information shall be directed to ReachTV. You may choose not to receive email from us, even after granting permission, by unsubscribing. Instructions on how to unsubscribe from emails that are not related to processing of your transactions with us are included in each such email.

Personal Information provided by email may not be secure. You assume the risks associated with the email communication.

**Privacy Questions.**

If you have any questions or comments about ReachTV’s Privacy Policy, want to advise us how you would like your personal information not to be used or disclosed, or would like to access or update your personal information, please contact us at [support@reachtvonline.com](mailto:support@reachtvonline.com).

**Privacy Policy Changes**

This Privacy Policy outlines the information usage practices of ReachTV. By accessing, browsing or using this Website or by submitting your personal information to ReachTV, you signify your agreement to the terms and conditions of this Privacy Policy. If you do not agree to this Privacy Policy, please do not submit personal information to us. If at some point in the future, there is a material change to our information usage practices that affects your personal information, you will be notified of such change by a conspicuous posting on the Website. Depending on the changes made, you may be unable to utilize a ReachTV service or Website if you choose not to agree to a modification to this Privacy Policy. If any future change affects our payment processing and order fulfillment functions, if you withhold your consent, we may not be able to continue to process payments or fulfill orders from you. Your acceptance of a revised policy, which may be communicated by clicking to indicate your consent for the continued provision of your personal information to ReachTV following the effective date of any changes to this Privacy Policy shall mean that you have accepted those changes, subject to your continuing right to notify us at any time as to how you would like us to treat your personal information.