FINAL JOEL'S PLACE FOR CHILDREN PRIVACY POLICY: 3-13-2016 Privileged and Confidential

JOEL'S PLACE FOR CHILDREN PRIVACY POLICY

Effective Date: August 15, 2016

To download/print our Privacy Policy ("Privacy Policy"), click <u>here</u>. To download/print our Terms of Service, click <u>here</u>. To review the full Privacy Policy, keep reading.

Overview

You should read this entire Privacy Policy, but here is a partial list of some of the key topics. Any capitalized terms have the meanings given to them where defined in the Privacy Policy.

- Click <u>here</u> for a summary of each section of the Privacy Policy. Click on the topic for full details.
- We ask you for, and use Tracking Technologies (defined below) to detect information about you, and third parties may also do so in connection with our Service (defined below). Click here for details. As examples:
 - Third parties, including advertisers and advertising services providers, may collect information about you. They may use Tracking Technologies in connection with our Service, which may include the collection of information about your online activities over time and across third-party sites or services. Their privacy policies, not ours, govern their practices.
 - We do not monitor or take any action with respect to so-called browser do not track signals, but you may have certain other options regarding tracking and/or targeting.
- Your CA Privacy Rights¹: California residents have certain rights regarding our sharing of certain personal information with third parties for direct marketing. Click here for more information.
- You consent to our practices detailed in our Privacy Policy. Each time you use the Service, the version of our Privacy Policy then posted will apply to that use, subject to Section 10, so check for updates each time you access the Service. To prospectively change your consent, terminate your account, stop using the Service and uninstall any downloads and apps.

Introduction

Welcome! You have arrived at www.joelsplaceforchildren.org and/or are otherwise interacting with our Service (defined below), which is owned and operated by Joel's Place for children ("Joel's Place" or "we," "our" or "us"). This Privacy Policy governs your use of any online service location that posts a link to this Privacy Policy (each a "Site"), and also applies to your use of interactive features, widgets, plug-ins, applications, content, downloads and/or other services and/or that posts a link to this Privacy Policy (collectively, the "Service"), regardless of how you access or use them, whether via personal computers, mobile devices or otherwise, but does not apply to data we receive from third parties, except

1

to the extent we combine such data with Personal Information (defined below) that we have ourselves collected under this Privacy Policy. This Privacy Policy does not apply to our data collection activities offline or otherwise outside of our Service (unless otherwise stated below), and does not govern the data practices of third parties that may interact with our Service. Also, it is limited to our practices and our Service includes access to third party content and services we do not control. Consult their privacy policies regarding their practices.

To the extent we provide you notice on our Service of different or additional privacy policies or practices (e.g., at the point of our collection), those additional terms shall govern such data collection and use.

In addition, please review the Service's <u>Terms of Service</u>, which governs your use of the Service, and includes, among other things, grants of rights from you, limits on our liability and your remedies, mandatory arbitration, and waiver of jury trial and class actions. By using our Service, you agree to our Terms of Service and consent to our collection, use and sharing of your information and data, and other activities, as described below.

LINKABLE TABLE OF CONTENTS²

This Privacy Policy is posted in interactive format to ease your review, especially using smart phones and other devices with small screens. It is important that you read and understand the entire Privacy Policy before using the Service. Each section below contains a brief introductory summary and a link to the full explanation. Click on the headings and the "More" buttons to be taken to the full explanation. Any capitalized terms that appear in but are not otherwise defined in the introduction have the meanings given to them elsewhere in the Privacy Policy.

1. What Information Does the Service Collect?

We collect and receive certain information about you as you interact with our Service, explained further in this section. **More**

(a) Information About You That You Provide to Us

We may collect certain Personal Information and other information that you provide to us when you interact with the Service. We may collect this information through the "Contact Us" form on our website. <u>More</u>

(b) Information Collected and Stored As You Access and Use the Service

Certain information may be collected from you automatically when you access and use the Service. For example, we and third parties may use Tracking Technologies to collect Usage Information for a variety of purposes, including serving you advertising. We do not look for or respond to do not track signals, but you may have certain other options regarding tracking and/or targeting. This Section provides details on:

- Usage Information Tracking Technologies
- Tracking Technologies Usage
- Tracking Technologies Choices and Consent
- Third Party Tracking and Do Not Track

2

More

(c) Third-Party Content and Services

If you interact with third-party services, such as visiting our Facebook page or Twitter feed, those services may send us information about you and you or we may send them information about you. **More**

2. How Do We Use The Information Collected?

We use your Personal Information and Usage Information for a variety of purposes detailed in this section including:

- Generally
- Contact Us

More

3. How and When Do We Share Information With Third Parties?

We may provide your information to third parties under various circumstances detailed in this section. These may include:

(a) When You Request Information From or Provide Information to Third Parties

If you request information from third parties, request that we send information to third parties or interact with third-party services, content, ads or tools (including Facebook, Twitter, and other third party services) we may share your information with such parties and/or they may collect your information directly. **More**

(b) Third Parties Providing Services on Our Behalf

Our vendors may collect your information on our behalf or we may share it with them so that they may provide services to us and you. Some may offer you choices regarding the collection and use of your information. **More**

(c) To Protect the Rights of Joel's Place and Others

There are a variety of administrative and legal reasons for which we may share some or all of your information. **More**

(d) Affiliates and Business Transfer

We may share your information in the event our organization is acquired by or merges with another organization. **More**

(e) <u>Sweepstakes, Contests And Promotions</u>

Promotions entrants may be required to consent to certain information sharing. More

(f) EEOC/Affirmative Action Reporting

Certain employment application self-identifying information (e.g., race and gender) may be shared with the government and other third parties. **More**

(g) Your California Privacy Rights

We do not share personal information as defined by California Civil Code Section 1798.83 collected by us on the Service with third parties for their direct marketing purposes absent your consent.

4. Do Third-Party Content and Links to Third-Party Services Appear on the Service?

We may allow you to access third-party content on the Service but we are not responsible for third-party content, apps, and locations. **More**

5. Are Ads Served On the Service Or Retargeted to Me Later?

Third parties may send you ads, including targeted ads based on your location, information and/or behavior. If you object, do not use our Service and/or exercise choices some third parties may offer. **More**

6. How Do I Exercise Choice and Change Preferences?

You may change certain account information, and exercise certain choices regarding information collection and communications preferences, as more fully detailed in this section. **More**

7. What About Transfer of Information to the United States?

You consent to your data being transferred to the United States, which has different data protection laws than other countries. <u>More</u>

8. What Should Parents Know About Children?

Our service is for parents and other adults and we do not intend to collect personal information from children. If you think we have, let us know. More

9. What About Security?

No data security is absolute, but we endeavor to take reasonable steps to secure data appropriately. More

10. What About Changes to the Privacy Policy?

We may change this Privacy Policy upon posting of a revised Privacy Policy. However, we will continue to treat your Personal Information under the terms of the privacy policy in effect when it was collected unless you otherwise consent. More

The Full Detailed Privacy Policy

1. WHAT INFORMATION DOES THE SERVICE COLLECT?

(a) Information About You That You Provide to Us

Personal Information. On the Service, we may ask you to provide us with personally identifiable information, which is information that identifies you personally, such as your first and last name, e-mail address, and phone number ("**Personal Information**"). We may collect this information through the "Contact Us" form on our website.

(b) Information Collected or Stored As You Access and Use the Service Generally.

In addition to any Personal Information or other information that you choose to submit to us via our Service, we and our third-party service providers may use a variety of technologies that automatically (or passively) store or collect certain information whenever you visit or interact with the Service ("Usage Information"). To the extent we associate Usage Information with your Personal Information we collect directly from you on the Service, we will treat such combined data as Personal Information, but we do not otherwise treat it (including UIDs (defined below) as Personal Information (i.e., we treat it as Non-Personal Information), except to the extent required by applicable law.

This Usage Information may include:

- your IP address, UDID, advertising identifier, device identifier or other unique identifier ("UID"). A device identifier is a number that is automatically assigned to your Device used to access the Service, and our computers identify your Device by its device identifier;
- clickstream data reflecting the information you enter and the selections you make while using the Service;
- your Device functionality (including browser, operating system, hardware, mobile network information);
- the URL that referred you to our Service;
- the areas within our Service that you visit and your activities there, including remembering you and your preferences;
- your Device location;
- your Device characteristics; and
- certain other Device data, including the time of day, among other information.

Tracking Technologies. We may use now and hereafter known methods and technologies to store or collect Usage Information ("**Tracking Technologies**"). Tracking Technologies may set, change, alter or modify settings or configurations on your Device. A few of the Tracking Technologies include, without limitation, the following (and subsequent technology and methods later developed):

Cookies. A cookie is a data file placed on a Device when it is used to visit the Service. A Flash cookie (or locally shared object) is a data file placed on a Device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your Device. HTML5 cookies can be programmed through HTML5 local storage. To identify local shared objects on your computer and adjust your settings, please visit: www.macromedia.com/support/documentation/en/flashplayer/help/settings-manager.html

Web Beacons. Small graphic images or other web programming code called web beacons (also known as "1x1 GIFs" or "clear GIFs," "Pixel Tags," or "Web Bugs") may be included in our Service's pages and messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a page or e-mail can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Service, to monitor how users navigate the Service, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.

Embedded Scripts. An embedded script is programming code that is designed to collect information about your interactions with the Service, such as the links you click on. The code is temporarily downloaded onto your Device from our web server or a third party service provider, is active only while you are connected to the Service, and is deactivated or deleted thereafter.

Browser Fingerprinting. Collection and analysis of information from your Device, such as, without limitation, your operating system, plug-ins, system fonts and other data, for purposes of identification.

ETag, or Entity Tag. A feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner ETags are a form of UID. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash, and/or HTML5 cookies.

Recognition Technologies. Technologies, including application of statistical probability to data sets, which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user or household).

There may be other Tracking Technologies now and later devised and used by us in connection with the Service.

Tracking Technologies Choices and Consent.

We are giving you detailed notice of the Tracking Technologies and your limited choices regarding them so that your consent is meaningfully informed. For more information on your choices regarding Tracking Technologies, see **Section 6 below.**

Third Party Tracking and Do Not Track.

Third parties may use Tracking Technologies in connection with our Service, which may include the collection of information about your online activities over time and across third-party web sites or online services. We may not control those Tracking Technologies and we are not responsible for them. However, you consent to potentially encountering third party Tracking Technologies in connection with use of our Service. Statements regarding our practices do not apply to the methods for collecting information used by these third-parties and others or the use of the information that such third parties collect. The relevant third party's terms of service, privacy policy, permissions, notices and choices should be reviewed regarding their collection, storage and sharing practices. We make no representations

regarding the policies or practices of third-party advertisers or advertising networks or exchanges or related third parties. For more information on our vendors, and their Tracking Technologies, click here. For more information on advertising and advertisers, and related Tracking Technologies, click here. For more information on your choices regarding Tracking Technologies click here.

Also, various third parties are developing or have developed signals or other mechanisms known as "do not track signals". For instance, some browsers may have such signal options, though they differ as to if the signal is set as default or must be turned on by the user. Further, there is not yet an industry consensus as to what site and app operators should do with regard to these signals. Accordingly, we do not monitor or take any action with respect to these signals or other mechanisms, though we may consider doing so if an understandable and practical standard is developed and widely adopted. For more information on "do not track" visit http://www.allaboutdnt.com.

(c) Information Third Parties Provide About You

We may receive information about you from your friends and others that use the Service, such as when they submit content to us or post on our Facebook page, Twitter feed, or our website. Additionally, we may, from time to time, supplement the information we collect directly from you on our Service with outside records from third parties for various purposes, including to enhance our ability to serve you, to tailor our content to you and to offer you opportunities that may be of interest to you. To the extent we combine information we receive from those sources with your Personal Information we collect on the Service, it will be treated as Personal Information and we will apply this Privacy Policy to such combined information, unless we have disclosed otherwise. In no other circumstances do our statements under this Privacy Policy apply to information we receive about you from third parties.

(d) Third-Party Content and Services

The Service may include functionality that allows certain kinds of interactions between the Service and a third-party web site, platform, tool, application or other service, and accessing or display of third-party content via the Service ("**Third Party Services**"). The use of Third Party Services may involve the third-party operator thereof ("**Third Party Operator**") providing certain information, including Personal Information, to us.

If we offer and you choose to use Third Party Services to access or use our Service, the Third Party Services may send Personal Information about you to us. To the extent we combine such third-party sourced information with Personal Information we collect directly from you on the Service, we will treat the combined information as Personal Information under this Privacy Policy. If we discontinue use of any Third Party Service, you consent that we may nevertheless retain any Personal Information, and other information and data, we may have already received in connection therewith in accordance with this Privacy Policy.

In addition, we may provide Third Party Services' interfaces or links on the Service to facilitate your sending a communication from the Service. For example, we may use third parties to facilitate e-mails, tweets, "likes," content submissions or postings of comments on Facebook or other social media platforms. We also link to PayPal and may in the future link to other third party website for purposes of transactions (such as processing donations to Joel's Place for Children). We may also enable access to or display of third party content via the Service, that is actually being served or published by the third party, and such third party may be collecting data from you in connection with that content. These third parties may collect and retain any information used or provided in any such communications or other activities and these third parties' practices are not subject to our Privacy Policy.

When you use Third Party Services, you are using their services and not our Service and they, not we, are responsible for their practices. You should review the applicable third party privacy policies before using such Third Party Services in connection with our Service. For more information on Third Party Services and the policies and activities of Third Party Operators see Section 4.

2. HOW DO WE USE THE INFORMATION COLLECTED?

Generally. We may use your Personal Information and/or Usage Information that we collect about you: (1) to provide you with information or services or process donation payments that you have agreed to make, send you electronic newsletters, or to provide you with promotional materials; (2) to enable you to participate in a variety of the Service's features including online entry sweepstakes, contests or other promotions; (3) to process your queries through the "Contact Us" section of our website, including verifying your information is active and valid; (4) to manage and administer the Service; (5) to improve the Service or create new service offerings, to customize your experience on any of the Service, or to serve you, or suggest to you, specific content that may be most relevant to you; (6) to contact you with regard to your use of any of the Service and, in our discretion, changes to the any of the Service and/or any of the Service's' policies; (7) to prevent unauthorized, improper or illegal activities on the Service; (8) for internal business purposes; and (9) for purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy or for any other legal purpose not inconsistent with this Privacy Policy or our Terms of Service

Contact Us. Please note that information submitted to any of the Service via our "Contact Us" form or other similar visitor inquiry function may not receive a response. We will not use Personal Information provided by you in a visitor inquiry communication to contact you for purposes unrelated to your request unless you agree otherwise.

Return to policy summary and navigation

3. HOW AND WHEN DO WE SHARE INFORMATION WITH THIRD PARTIES?

We may share "Non-Personal Information" (i.e., information that is not or is modified not to be Personal Information), such as aggregated user statistics, with third parties. For instance, if we deidentify data about you, it is not treated as Personal Information by us, and we may share it with others freely. Except where prohibited by applicable law, we may share your UIDs with third parties along with data (other than Personal Information) related to you and your activities as non-Personal Information under this Privacy Policy. However, we do not share your Personal Information with third parties for those third parties' direct marketing purposes except as set forth in Section 3(d) (e.g., as part of the acquisition or merger of our organization) unless we have given you the choice to consent or withhold consent to such sharing at the time you provide such Personal Information, unless you otherwise consent.

In addition, we may share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information and as described below, as set forth in our <u>Terms</u> or any applicable Additional Terms, or otherwise set forth in this Privacy Policy for any other reason not prohibited by applicable law or inconsistent with this Privacy Policy. Without limitation of the forgoing, we may disclose your information, including Personal Information, as follows:

(a) When You Request Information From or Provide Information to Third Parties. You may be presented with an option on our Service to receive certain information and/or marketing offers directly from third parties. If you choose to do so, your Personal Information and other information may be disclosed to such third parties and all information you disclose will be subject to the third-party privacy policies and practices of such third parties. In addition, third parties may store, collect or

otherwise have access to your information when you interact with their Tracking Technologies, Third Party Services (e.g., Third Party Operator's content, tools, apps or ads on our Service) or link to them from our Service. This may include using third-party tools such as Facebook, Twitter or other third-party posting or content sharing tools and by so interacting you consent to such Third Party Operator's practices. We are not responsible for the privacy policies and practices of such third parties and, therefore, you should review such third-party privacy policies and practices of such third parties prior to requesting information from or otherwise interacting with them.

- partners to perform certain services on behalf of us or the Service, such as hosting or distributing the Service, designing and/or operating the Service's features, tracking the Service's activities and analytics, facilitating donation payments, and enabling us to send you promotional materials, or perform other administrative services. The third parties that currently interact with our website are Facebook, Twitter, PayPal, and Wix.com, our website development platform. We may provide these third parties with access to your information, including UIDs, Usage Information and Personal Information, to carry out the services they are performing for you or for us. Third-party analytics and other service providers may set and access their own Tracking Technologies on your Device and they may otherwise collect or have access to information about you, potentially including Personal Information, about you. We are not responsible for those third party technologies or activities arising out of them. However, some may offer you certain choices regarding their practices. For more information, see Section 6(b). For more on how to recognize and potentially limit our vendors' Tracking Technologies, see Section 1(b) (above).
- by applicable law, we may also disclose your information if we believe in good faith that doing so is necessary or appropriate to: (i) protect or defend the rights, safety or property of Joel's Place or third parties (including through the enforcement of this Policy, our Terms of Service, and other applicable agreements and policies); (ii) comply with legal and regulatory obligations and government requests (e.g., pursuant to law enforcement inquiries, subpoenas or court orders); (iii) comply with our obligations and commitments to safeguard the privacy and security of your information; or (iv) prevent unauthorized, improper or illegal activities on the Service. Further, we may disclose information about you as otherwise permitted under our Terms of Service or as specifically disclosed when we collect information from you. Additionally, if you notify us that you believe your rights have been violated in connection with the Service or another user of the Service, we may disclose information about you to the extent necessary to evaluate and respond to your concern. To the fullest extent not prohibited by applicable law, we have complete discretion in electing to make or not make such disclosures, and to contest or not contest requests for such disclosures, all without notice to you.
- (d) Affiliates and Business Transfer. We may share your information, including your UIDs and Personal Information and Usage Information with our parent, subsidiaries and affiliates ("Affiliates") subject to applicable law. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Service or applicable database; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change; including, in either case, during the course of any related due diligence process.
- **(e) Sweepstakes, Contests and Promotions.** We may offer sweepstakes, contests, and other promotions (any, a "**Promotion**") through the Service that may require registration. By participating in a Promotion, you are agreeing to official rules that govern that Promotion, which may contain specific requirements of you, including, allowing the sponsor of the Promotion to use your name, voice and/or likeness in advertising or marketing associated with the Promotion. If you choose to enter a Promotion, Personal Information may be disclosed to third parties or the public in connection with the

administration of such Promotion, including, in connection with winner selection, prize fulfillment, and as required by law or permitted by the Promotion's official rules, such as on a winners list.

Return to policy summary and navigation

- (f) **EEOC** / **Affirmative Action Reporting.** In conjunction with laws and regulations enforced by the Equal Employment Opportunity Commission ("**EEOC**"), the Office of Federal Contract Compliance Programs ("**OFCCP**") and similar state and local regulatory agencies, we may ask you to provide us with self-identifying information (such as veteran status, gender and ethnicity). Providing such self-identifying information is voluntary, but if you do provide us with such information, we may submit that information, to the EEOC, the OFCCP and similar state and local regulatory agencies or otherwise use or disclose it for business-related purposes, including, without limitation, responding to information requests, fulfilling regulatory reporting requirements and defending against employment related complaints.
- California Civil Code Section 1798.83 collected by us on the Service with third parties for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the California Shine the Light law by contacting us here or by sending a letter to P.O. Box 180 Avon, OH 44011, (Attention: Legal). Any such request must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

4. DO THIRD-PARTY CONTENT, LINKS TO THIRD-PARTY SERVICES, AND/OR THIRD-PARTY APPS APPEAR ON THE SERVICE?

The Service may contain content that is supplied by a Third Party Operator, and those third parties may collect Usage Data and your UID when such content is served to you. Third Party Services may also be available via the Service. We are not responsible for the data collection and privacy practices employed by such third parties or their services and they may be collecting data about you and may be sharing it with us and/or others. These third parties and their services may also associate their Tracking Technologies with you, track you across sites and time, serve you their own ads (including Interest-based Ads (defined below)) and may or may not have their own published privacy policies.

In addition, when you are on the Service you may be directed to other services that are operated and controlled by third parties that we do not control. For example, if you "click" on a link, the "click" may take you off the Service onto a different site. We encourage you to note when you leave our Service and to review the third-party privacy policies of all third-party locations and exercise caution in connection with them.

Be sure to review any available privacy policies and notices before submitting any Personal Information to a third party or its services, or otherwise interacting with Third Party Services or other locations you link to from our Service, and exercise caution in connection with them. We are not responsible for the availability, completeness or accuracy of such third parties' policies or notices.

Return to policy summary and navigation

5. ARE ADS SERVED ON THE SERVICE OR RETARGETED TO ME LATER?

Joel's Place may participate in online advertising networks and exchanges that display relevant advertisements to Joel's Place visitors, on the Service and on Third Party Services, based on user interests as reflected in their browsing of the Service and certain Third Party Services. These entities may use cookies and other Tracking Technologies to automatically collect information about you and your activities, such as registering a unique identifier for your device and tying that to your online activities on and off of the Service. Joel's Place may use this information to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online activity.

Some information about your use of the Service and certain Third Party Services may be collected using Tracking Technologies across time and services and used by Joel's Place and third parties for purposes such as to associate different devices you use, and deliver relevant and retargeted ads ("Interest-based Ads") and/or other content to you on the Service and certain Third Party Services. You may have certain choices regarding these activities as explained in the next section.

Joel's Place is not responsible for third parties or Third Party Services associated with advertising and analytics services, and related tracking activities. Consult their privacy policies and notices for information on their practices and see <u>Section 5</u> regarding certain choices some of them may offer you. Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. Note, however, Joel's Place currently does not alter Joel's Place's practices when Joel's Place receives a "Do Not Track" signal from a visitor's browser. For more information on tracking and "do not track," see <u>Section1(b)</u>.

Return to policy summary and navigation

6. HOW DO I EXERCISE CHOICE AND CHANGE PREFERENCES?

(a) Accessing And Changing Information.

The Service may provide web pages or other mechanisms allowing you to delete, correct or update some of the Personal Information you have provided Joel's Place. Joel's Place will make good faith efforts to make requested changes in Joel's Place's then-active databases as soon as practicable, but it is not always possible to completely change, remove or delete all of your information from Joel's Place's databases and residual and/or cached data may remain archived thereafter. Further, we reserve the right to retain data (i) as required by applicable law; and (ii) for so long as reasonably necessary to fulfill the purposes for which the data is retained as permitted by applicable law (e.g., business records).

(b) Tracking Technologies Generally.

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them separately. Also, tools from commercial browsers may not be effective with regard to Flash cookies (also known as locally shared objects), HTML5 cookies or other Tracking Technologies. For information on disabling Flash cookies, go to Adobe's website http://helpx.adobe.com/flash-player/kb/disable-third-party-local-shared.html. Please be aware that if you disable or remove these technologies some parts of the Service may not work and that when you revisit the Service your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

Some third parties may also offer you choices regarding their Tracking Technologies. One way to potentially identify cookies on our Site is to add the free Ghostery plug-in to your browser (www.ghostery.com), which according to Ghostery will display for you traditional, browser-based cookies associated with the web sites (but not mobile apps) you visit and privacy and opt-out policies and options of the parties operating those cookies. For specific information on some of the choice options offered by third party analytics and advertising providers, see the next section.

(c) Analytics and Interest-Based Advertising.

Joel's Place may use Google Analytics or other Service Providers for analytics services. These analytics services may use cookies and other Tracking Technologies to help Joel's Place analyze how users use the Service. Information generated by these services (*e.g.*, your IP address and other Usage Information) may be transmitted to and stored by Google Analytics and other Service Providers on servers in the U.S. (or elsewhere) and these Service Providers may use this information for purposes such as evaluating your use of the Service, compiling statistic reports on the Service's activity, and providing other services relating to Service activity and other Internet usage. You may exercise choices regarding the use of cookies from Google Analytics by going to https://tools.google.com/dlpage/gaoptout or downloading the Google Analytics Opt-out Browser Add-on.

Some third parties engaged in Interest-Based Ads offer you choices. For instance, Joel's Place may use Google DoubleClick in connection with the Service. Google DoubleClick may associate its own Tracking Technologies, such as cookies, with the Service. You may exercise certain choices regarding Google DoubleClick's Tracking Technologies by going to http://www.google.com/settings/u/0/ads/authenticated?hl=en.

Certain companies may participate in the Digital Advertising Alliance ("DAA") AdChoices Program and may display an Advertising Option Icon for Interest-based Ads that links to an opt-out tool which allows you to exercise certain choices regarding targeting. You can learn more about the DAA AdChoices Program at http://www.youradchoices.com/ and its opt-out program for mobile apps at http://www.aboutads.info/appchoices. In addition, certain advertising networks and exchanges may participate in the Network Advertising Initiative ("NAI"). NAI has developed a tool that allows consumers to opt out of certain Interest-based Ads delivered by NAI members' ad networks. To learn more about opting out of such targeted advertising or to use the NAI tool, see http://www.networkadvertising.org/choices/. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Ads, you will continue to receive non-targeted ads. Further, opting out of one or more NAI or DAA members only means that those selected members should no longer under the DAA / NAI rules deliver certain targeted ads to you. This will affect this and other services, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit this opt-out page, or you subsequently erase your cookies, use a different Device or web browser(s), or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA browser-based opt-out may not, or may no longer, be effective. Mobile device opt-outs will not affect browser-based Interest-based Ads even on the same device, and you must opt-out separately for each device. Joel's Place is 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. However, Joel's Place supports the ad industry's 2009 Self-regulatory Principles for Online Behavioral Advertising (http://www.iab.net/media/file/ven-principles-07-01-**09.pdf**) and expect that ad networks Joel's Place directly engages to serve you Interest-based Ads will do so as well, though Joel's Place cannot guaranty their compliance.

(d) Communications and Marketing.

You can opt out of receiving certain promotional emails from Joel's Place at any time by following the instructions as provided in any promotional emails to click on the unsubscribe link. Please note that your opt-out is limited to the e-mail address used and will not affect subsequent subscriptions. If you opt-out of only certain communications, other subscriptions may continue. Even if you opt out of receiving promotional communications, Joel's Place may, subject to applicable law, continue to send you non-promotional communications, such as those about any donations or other transactions that may occur through the website, servicing, or Joel's Place's ongoing business relations. California residents have certain rights regarding our sharing of certain of their personal information with third parties for third party direct marketing purposes, as explained in Section 3(g).

7. WHAT ABOUT TRANSFER OF INFORMATION TO THE UNITED STATES?

Our Service is operated in the United States and intended for users located in the United States. If you are located outside of the United States, please be aware that information we collect, including Personal Information, will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your Personal Information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the Service or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information, including Personal Information, in the United States as set forth in this Privacy Policy.

Return to policy summary and navigation

8. WHAT PARENTS SHOULD KNOW ABOUT CHILDREN?

We understand the importance of protecting children's privacy in the interactive world. We are a general audience service and do not use the Service to knowingly collect personal information from children under the age of thirteen (13) that requires parental notice and consent under the Children's Online Privacy Protection Act ("COPPA") without such parental consent. If you are a child under thirteen (13) years of age, you are not permitted to use the Service and should not send any information about yourself to us through the Service.

In the event that we become aware that we have collected personal information from any child, we will dispose of that information, or otherwise treat it, in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of thirteen (13) has provided us with personal information without COPPA-required consent, please contact us here.

Parents may want to consider commercially available parental control protections to limit what minors can access online and/or monitor their minor children's online activities. Examples include: www.webwatcher.com and www.webwatcher.com and www.webwatcher.com and www.webwatcher.com and www.sentrypc.com. We do not endorse these or other services and are not responsible for them.

For more information on COPPA, click http://www.onguardonline.gov/articles/0031-protecting-vour-childs-privacy-online] or visit www.FTC.gov and look for parental guidance on child online safety and privacy.

9. WHAT ABOUT SECURITY?

We endeavor to incorporate commercially reasonable safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure the security of any information you transmit to us, and you use our Service, and provide us with your information, at your own risk.

Return to policy summary and navigation

10. WHAT ABOUT CHANGES TO THE PRIVACY POLICY?

We reserve the right to change this Privacy Policy at any time. Any changes will be effective immediately upon the posting of the revised Privacy Policy and your use of our Service indicates your consent to the privacy policy posted at the time of use. However, we will not use your previously collected Personal Information, to the extent it is not collected under the new privacy policy, in a manner materially different than represented at the time it was collected without your consent. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

Return to policy summary and navigation

//End Privacy Policy//