

ELLE TWELVE CHILDREN'S ONLINE PRIVACY POLICY

Elle Twelve is committed to protecting the privacy of children who use our sites and services. This Children's Online Privacy Policy explains our information collection, disclosure, and parental consent practices with respect to information provided by children under the age of 18 ("child" or "children"). This policy is in accordance with the U.S. Children's Online Privacy Protection Act ("COPPA"), and outlines our practices regarding children's personal information.

We recognize the need to provide further privacy protections with respect to personal information we may collect from children on our sites. When we intend to collect personal information from children, we take additional steps to protect children's privacy, including:

- Notifying parents about our information practices with regard to children, including the types of personal information we may collect from children, the uses to which we may put that information, and whether and with whom we may share that information
- In accordance with applicable law, obtaining consent from parents for the collection of personal information from their children, or for sending information about our products and services directly to their children
- Limiting our collection of personal information from children to no more than is reasonably necessary to participate in an online activity
- Giving parents access or the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed or deleted

Overall, we are committed to protecting your and your child's information. We have adopted reasonable technical, administrative, and physical procedures to help protect this information from loss, misuse, and alteration. Please note that no data transmission or storage can be guaranteed to be 100% secure. We want you to feel confident using Elle Twelve's sites and services but we cannot ensure or warrant the security of any information you or your child transmit to us.

1. THE INFORMATION WE COLLECT FROM CHILDREN, HOW WE USE IT, AND HOW AND WHEN WE COMMUNICATE WITH PARENTS

Elle Twelve offers to its users a range of sites and services, some of which are primarily targeted at children, and others that are intended for users of all ages and their families. Our sites and services offer a variety of activities, including activities that may collect information from children. Below we summarize potential instances of collection and outline how and when we will provide parental notice and/or seek parental consent. In any instance that we collect personal information from a child, we will retain that information only so long as reasonably necessary to fulfill the activity request or allow the child to continue to participate in the activity, and ensure the security of our users and our services, or as required by law. In the event we discover we have collected information from a child in a manner inconsistent with COPPA's requirements, we will either delete the information or immediately seek the parent's consent for that collection.

About the collection of parent email address: Consistent with the requirements of COPPA, on any child-targeted site or application, or in any instance where we ask for age and determine the user is age 12 or under, we will ask for a parent or guardian email address before we collect any personal information from the child. If you believe your child is participating in an activity that collects personal information and you or

another parent/guardian have NOT received an email providing notice or seeking your consent, please feel free to contact us at info@elletwelve.com.

Content Generated by a Child

Certain activities on our sites and services allow children to create content and save it with Elle Twelve. Some of these activities do not require children to provide any personal information and therefore may not result in notice to the parent or require parental consent.

About Verifiable Parental Consent:

Email Consent. In the event Elle Twelve wishes to collect personal information from a child, COPPA requires that we first seek a parent or guardian's consent by email. In the email we will explain what information we are collecting, how we plan to use it, how the parent can provide consent, and how the parent can revoke consent.

High-Level Consent. In the event Elle Twelve collects personal information from a child that will be posted publicly, we will seek a higher level of consent than email consent. Such "high-level" methods of consent include but are not limited to asking for a credit card or other payment method for verification (with a nominal charge involved), speaking to a trained customer service representative by telephone or video chat, or requiring a signed consent form by mail, email attachment, or fax.

Chat

Certain activities that are directed to children allow users to communicate directly with other users by means of a chat system. These chat systems may employ filters that are

intended to prevent the communication of both personal information and age-inappropriate words and phrases. In addition to filters, we may employ live moderation and/or encourage other users to flag inappropriate communications. We strongly encourage children who use these interactive features on our sites and services never to provide personal information about themselves or any third party, and certainly never to attempt to circumvent our filters or moderation. We also recommend that parents carefully supervise their children when the children participate in online activities.

Electronic Newsletters

Visitors to our sites can provide their email addresses to receive email newsletters and promotions from Elle Twelve. Visitors may change their preferences regarding emails at any time through the unsubscribe link in the newsletters.

When visitors to Elle Twelve sites that are directed to children under 13 ask to receive our email newsletter(s), they will be asked to provide their first name, email address and the email address of their parent/guardian. We will send the child's parent/guardian a notification email informing them of the child's request to receive by email the newsletter on an ongoing basis and give the parent/guardian the option to have his or her child's information removed from our newsletter database.

Social Platform Registrations and Social Media Plugins

Some Elle Twelve sites may permit or require users to register or log into their account via a social networking platform such as Login with Facebook, or permit you to use social media plugins such as the Facebook "Like" or Google "+1" buttons. When you use these social networking platforms and plugins, your username and password for

the sites and services and other information available about you or collected from you on these sites and services may be shared with us.

When you use social networking platforms and plugins, you share your information with them and their privacy policy applies to their collection, use, and disclosure of such information. In addition, they may be able to collect information about you, including your activity on the Elle Twelve sites and services, and they may notify your connections on the social networking platform about your use of the Elle Twelve sites and services. Such services may also employ unique identifiers which allow your activity to be monitored across multiple websites for purposes of delivering more targeted advertising to you. For more information about logging into Facebook, please go to [facebook.com](https://www.facebook.com). Please note that their privacy policies may be different from our own, and we encourage you to read them.

Cookies, Web Beacons, Local Shared Objects, and Other Similar Technologies

We may use cookies, web beacons, Local Shared Objects, and other similar technologies to collect information about your or your child's use of our sites and services. Cookies are small bits of information that are stored by a computer's web browser. Web beacons are very small images or small pieces of data embedded in images, also known as "pixel tags," "GIFs," or "clear GIFs," that can recognize cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from a computer or device. Local Shared Objects (sometimes referred to as "Flash Cookies") are similar to standard cookies except that they can be larger and are downloaded to a computer or mobile device by the Adobe Flash media player.

You may be able to refuse or disable cookies by adjusting your web browser settings. Because each web browser is different, please consult the instructions provided by

your web browser (typically in the "help" section). Please note that you may need to take additional steps to refuse or disable Local Shared Objects and similar technologies. For example, Local Shared Objects may be controlled through the instructions on Adobe's Setting Manager page. If you choose to refuse, disable, or delete these technologies, some of the functionality of our site may no longer be available to you or your child.

Contests and Sweepstakes

For contests and sweepstakes, we typically require the information necessary for a child to participate, such as first name (to distinguish among family members) and parent email address (to notify the parent where required by law). Some contests and sweepstakes ask the child to submit their own created content along with the child's entry. In those instances, we may require parental consent prior to submission. Please see *Content Generated by a Child* above for more information on our collection, notice, and consent policies.

Email Contact with a Child

In connection with certain activities or services, we may collect a child's online contact information, such as an email address, in order to communicate with the child more than once. In such instances we will retain the child's online contact information to honor the request. One example would be a newsletter that provides occasional updates about a site, game/activity, television show, or personality/character. On some occasions a child may be engaged in more than one ongoing communication, and a parent may be required to "opt-out" of each communication individually.

2. WHEN INFORMATION COLLECTED FROM CHILDREN IS AVAILABLE TO OTHERS

In addition to instances where a child's personal information is posted publicly (after receiving high-level parental consent), we also may share or disclose personal information collected from children in a limited number of instances, including the following:

Third-Party Services, Content, and External Links

If you access third-party services, such as Facebook, Google, or Twitter, through our services to share information about your experience with your friends and other connections, we may collect information about you from those services. In addition, those third-party services may be able to collect information about you, including information about your activity on our sites and services, and they may notify your connections about your use of our sites and services, in accordance with their own privacy policies.

We may share information with our service providers if necessary for them to perform a business, professional, or technology support function for us. We may use these technologies, for example, to help us recognize your or your child's browser as a previous user and save and remember any preferences that may have been set; to help us customize the content shown while you or your child use our website or services; to provide you or your child with content customized to your interests and to understand whether users read e-mail messages and click on links contained within those messages so that we can deliver relevant content and offers; and to help measure and research the effectiveness of our sites and services, interactive online content, features, and other communications.

We may allow third parties to place and read their own cookies, web beacons, and similar technologies to collect information through our sites and services. For example, our third-party service providers may use these technologies to collect information that helps us with traffic measurement, research, and analytics.

You may access third-party content through our sites or services and navigate to third-party sites and services from links on our website or services. Whether the third-party content appears within our sites or services (such as in an embedded video player), or you leave our sites or services to view the content on another website, the third party is in control of and independently produces, maintains, and monitors the content and third-party sites. When you watch third-party content that is made available through our sites or services or navigate to such third-party sites, you become subject to the third party's terms of use and privacy policies. You should review the privacy policies of these third-party sites for their policies and practices regarding the collection and use of your information as their policies may differ from ours. We do not accept any responsibility or liability for the privacy practices of third parties.

Disclosure of Personal Information for Legal Reasons

We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or services; (iii) to protect the security or integrity of our sites, services, applications, and other

technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.

3. CHANGES TO THIS PRIVACY POLICY AND NOTICE

We reserve the right to revise this Privacy Policy at any time for any reason in our sole discretion by posting an updated Privacy Policy without advance notice to you. Such revisions shall be effective immediately upon posting and if you use the Site after they become effective it will signify your agreement to be bound by the changes. We shall post or display notices of material changes on the Site's homepage or otherwise on the Site and/or e-mail you or notify you upon login about these changes; the form of such notice is at our discretion. However, we encourage you to check this Privacy Policy often for updates.

4. PARENTAL CHOICES AND CONTROLS

At any time, parents can refuse to permit us to collect further personal information from their children, and can request that we delete from our records the personal information we have collected. Please keep in mind that a request to delete records may lead to a termination membership or other service.

To allow parents to access, change, or delete the personally identifiable information that we have collected from their children, please contact us at the mailing address, email, or phone number below:

Elle Twelve
253-4 E 650 N
Valparaiso, IN 46383
United States of America

Phone: (312) 883-5711

Email: info@elletwelve.com