

ZURU'S CHILDREN'S PRIVACY POLICY

Last updated: February 2017

We welcome children who are under 13 years of age (“**Children**”) to visit all Zuru websites (however accessed and/or used), whether via personal computers, mobile devices, or other technology (“**Device**”) and other interactive features, applications or downloads that are operated by us that are available through these websites and contain this Children’s Privacy Policy (collectively “**Website**”) produced and maintained by ZURU. By using the Website, you acknowledge that you've read and understood this children’s privacy policy. ZURU includes any and all of their subsidiaries and affiliated companies and are referred to in this policy as “we”, “our” or “us”.

ZURU complies with the Children’s Online Privacy Protection Act of 1998 (“**COPPA**”). Please read our Children’s Privacy Policy carefully as it explains our information collection practices for Children at our Website, such as the type of information we collect regarding Children and how we may use that information. It also describes a parent’s or guardian’s (each, a “**Parent**”) ability to limit the collection and use of data collected from their Children. Please review our [Privacy Policy](#) that applies to our information collection practices for visitors to our Website who are 13 years or older.

What kind of information does ZURU collect?

A. Information provided by Children

Children may view much of the Website’s content without providing personal information (for example, first and last name, e-mail or postal address or telephone number (collectively, “**Personal Information**”). ZURU may collect a Child’s e-mail address under the following limited one-time use circumstances:

1. if your Child sends a request to us, we will keep their e-mail address to respond to them. We will then delete their e-mail address from our system once we have responded to them; or
2. if your Child enters a competition, sweepstake or contest, we will ask the Child to give us the Parent’s e-mail address, too, so that we can tell the Parent that the Child has registered for the competition, sweepstake or contest. If we need more than the Child’s e-mail address and first name (or screen name) to enter your Child in the competition, sweepstake or contest, we will notify you, explain what information we need and ask that the Parent provide it. For example, we will ask the Parent for his or her mailing address so that we can send, for your Child, any prizes the Child wins, or for his or her telephone number so that we can tell the Parent when the Child has won. Any information a Parent or the Child gives us in

these circumstances will be deleted from our database once the competition, sweepstake or contest is concluded, and after any legally required period for keeping such information has ended.

Other than the one-time use exceptions set out above, if a Child registers to provide more than just the Child's e-mail address in order for the Child to participate in a particular activity, such as receiving e-mail newsletters or samples or tracking collectibles, we will ask the Child for the Parent's e-mail address so that we can notify the Parent of the Child's request and obtain the Parent's permission. When we ask for the Parent's permission, we will tell the Parent what we will do with the information the Parent or Child provides us. We will not keep the Child's e-mail address unless the Parent gives us permission to do so.

B. Information collected through the use of our Website

ZURU collects information on our Website's visitors collectively including which sections of the Website are most frequently visited, how often and for how long (collectively, "**Usage Information**"). This is done through cookies and other technologies. This data is used as aggregated, non-Personal Information. Cookies **do not** contain any Personal Information about a specific user. ZURU uses Usage Information to improve and enhance our online service. You may disable cookies using your browser's preferences, but some features of the Website may not function if you do so. We do not share this information externally. For more information about our technology practices, please review our general [Privacy Policy](#).

How May Parents Access Children's Personal Information?

If a Parent no longer wishes the Child to participate in an activity offered through our Website, such as an e-mail newsletter, simply click on the opt out link that is provided or contact us at info@zuru.com. Upon proper identification, a Parent may review the Personal Information we have collected about the Child, request deletion, or refuse to allow further collection or use of that information. When we delete Personal Information, it will be deleted from our active databases and deleted after any legally required period for keeping such information has ended.

What Does ZURU Do With The Information We Collect?

We may use a Child's Personal Information or Usage Information: (1) to enable a Child to participate in a variety of the Website's features or enter competitions, sweepstakes or contests; (2) to contact the Child and Parent with regard to the Child's use of the Website and, in our discretion, changes to the Website and/or Website's policies; or (3) for purposes disclosed at the time the Child provides their information or as otherwise set out in this Privacy Policy.

Does ZURU Share Any Information?

We do not disclose Children's Personal Information to third parties, except to service providers who provide support for the operations of the Website whom agree to protect the confidentiality, security, and integrity of Personal Information they process for us. We may share some or all of the Child's Personal Information within ZURU or any subsidiary or affiliated companies for our internal business purposes. We require our subsidiary or affiliated companies to comply with this Privacy Policy.

We may transfer and disclose your Child's Personal Information, to third parties: (1) in the event we are required to respond to subpoenas or other legal process or if in our good faith opinion such disclosure is required by law; (2) at the request of governmental authorities conducting an investigation; or (3) to protect the personal safety or rights of any individual. We may also use IP address or other device identifiers to identify users, and may do so in cooperation with copyright owners, internet service providers, wireless service providers or law enforcement agencies in our discretion. Such disclosures may be carried out without notice to you.

Security

No data transmission over the Internet, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use our Website and provide us with your information at your risk.

Changes to the Children's Privacy Policy

ZURU reserves the right to change this Children's Privacy Policy at any time without notice to you. Any changes will be effective immediately upon the posting of the revised Children's Privacy Policy. However, ZURU will not use your Child's Personal Information in a manner materially different than what was stated at the time it was collected without a Parent's consent.

Contact Us

Our customer service e-mail address for questions about this Children's Privacy Policy is info@zuru.com.