

# Interactive Communications International, Inc. Privacy Policy – Your Privacy Rights

Effective Date June 9<sup>th</sup> 2014 (last updated June 9<sup>th</sup> 2014)

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## **This Privacy Policy applies to the sites and apps where it appears.**

This Policy describes how we treat personal information we collect online where this policy appears. This includes on our websites or in our apps.

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## **We collect information from and about you.**

**Contact information.** For example, we might collect your name and street address. We might also collect your phone number or email.

**Payment and billing information.** For example, we collect your credit card number and zip code if you buy a gift card or other products or services. We might also collect your gift card or loyalty card number and pin number.

**Information about your transactions.** For example, we might collect the amount you have left on your stored value card, your spending and payment history, and dispute or claim requests. We also might collect your card's confirmation number and serial numbers including for card activation or redemption purposes.

**Information you submit or post.** If you post content, we will collect the information you provide to us.

**Other information.** If you use our website, we may collect information about the browser you're using. We might look at what site you came from, or what site you visit when you leave us.

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## **We collect information in different ways.**

**We collect information directly from you.** For example, if you register for an account or make a purchase. We also collect information if you post a comment or make a request.

**We collect information from you passively.** We use tracking tools like browser cookies and web beacons.

**We get information about you from third parties.**

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## **We use information as disclosed and described here.**

**We use information to respond to your requests or questions.** For example, we might use your information to fulfill your order or complete your transaction.

**We use information to improve our products and services.** We might use your information to customize your experience with us.

**We use information to look at site trends and customer interests.** We may use your information to make our website and products better. We may combine information we get from you with information about you we get from third parties.

**We use information for security purposes.** We may use information to protect our company, our customers, or our websites.

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**We use information for marketing purposes.** For example, we might send you information about special promotions or offers. We might also tell you about new features or products. These might be our own offers or products, or third-party offers or products we think you might find interesting. To learn about your choices for these communications, read the choices section below.

**We use information to send you transactional communications.** For example, we might send you emails about your account or purchase. We might also contact you about this policy or our website terms.

**We use information as otherwise permitted by law.**



### **We may share information with third parties.**

**We will share information within the Interactive Communications family of companies.**

**We will share information with third parties who perform services on our behalf.** For example, we share information with vendors who help us manage our online account registration process or who fulfill your purchases. Some vendors may be located outside of the United States. We also share information with third parties that assist us in marketing our products or services.

**We will share information with our business partners.**

**We may share information if we think we have to in order to comply with the law or to protect ourselves.** For example, we will share information to respond to a court order or subpoena. We may also share it if a government agency or investigatory body requests. Or, we might also share information when we are investigating potential fraud.

**We may share information with any successor to all or part of our business.** For example, if part of our business was sold we may give our customer list as part of that transaction.

**We may share information for other reasons we may describe to you.**



### **You have certain choices about how we use your information.**

**You can opt out of receiving our marketing emails.** To stop receiving our promotional emails, follow the instructions in any promotional message you get from us. Don't worry! Even if you opt out of getting marketing messages, we will still be sure to send you transactional messages. For example, we may still contact you about your orders.

**You can control if we share information with third parties for their marketing purposes.** To opt out of having us share your information with third parties for their promotional purposes, please email us [link]. If you accept an offer from one of them after you opt out, we will share your information with that specific party.

**You can control cookies and tracking tools.**

**You have other controls you can exercise.** You can choose whether or not to share personal information. If you choose not to share, some parts of our sites and some services may be more difficult or impossible to use. If you turn off cookies or tracking tools, parts of our site and services may also not work properly.



**These sites and apps are not intended for children.**

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Our sites and apps are meant for adults. We do not knowingly collect personally identifiable information from children under 13 without permission from a parent or guardian. If you are a parent or legal guardian and think your child under 13 has given us information, you can email us. You can also write to us at the address listed at the end of this policy. Please mark your inquiries "COPPA Information Request."

Parents, you can also learn more about how to protect children's privacy online [here](#).

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 **We use standard security measures.**

The Internet is not 100% secure. We cannot promise that your use of our sites will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

We keep personal information as long as it is necessary or relevant for our business. We also keep information as otherwise required by law.

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 **We store information both in and outside of the United States.**

If you live outside of the United States, you understand and agree that we may transfer your information to the United States. This site is subject to U.S. laws, which may not afford the same level of protection of those in your country.

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 **We may link to third party sites or services we don't control.**

If you click on one of those links, you will be taken to websites we do not control. This policy does not apply to the privacy practices of those websites. Read the privacy policy of other websites carefully. We are not responsible for these third party sites.

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 **Feel free to contact us if you have more questions.**

If you have any questions about this Policy or other privacy concerns, you can email us at [incentivessupport@incomm.com](mailto:incentivessupport@incomm.com). Please do not include your credit card number or other sensitive information in your email.

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 **What we will do if there is an update to this policy.**

From time to time we may change our privacy practices. We will notify you of any material changes to this policy as required by law. We will also post an updated copy on our website. Please check our site periodically for updates.

## About Our Ads and Tracking

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### **We use common tracking technologies.**

We – or third parties we work with – use several common passive data collection technologies. These may include browser cookies. We may also use web beacons, flash cookies, and similar technologies.

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### **We use tracking technologies for many reasons.**

We – or third parties acting on our behalf or on our website – use tracking technologies for many reasons. These include the following:

- To understand the activities and behaviors of our consumers and website visitors.
  - To recognize new visitors to our websites.
  - To recognize past customers.
  - To present more personalized content and offers, to improve your experience with us, optimize your shopping experience, and provide site and service enhancements.
  - To serve you with customized or interest-based advertising. These ads may appear on our website or others you visit (see below for more on interest-based advertising).
  - So we can better understand our audience, our customers, our website visitors, and their respective interests.
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### **We engage in interest-based advertising.**

We serve interest-based advertising using personal and other information gathered about you over time across multiple websites or other platforms. This might include apps. These ads are served on websites or apps. They might also be served in emails.

Interest-based or “online behavioral advertising” includes ads that are served to you after you leave our website, encouraging you to return. They also include ads we think are relevant to you based on your shopping habits or online activities.

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### **How do we gather relevant information for interest-based advertising?**

To decide what is relevant to you, we might look at your purchases or browsing behaviors. We might look at these activities on our platforms or the platforms of others. This information is gathered using the tracking tools described above. We work with third parties who help gather this information. These third parties might link your name or email address to other information they collect. That might include past purchases made offline or online. Or, it might include online usage information.

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### **You can control tracking technologies.**

You can control certain tracking tools. Many browsers give you the ability to delete or reject cookies. How you do so depends on the type of cookie. You can configure your browser to reject browser cookies. To control flash cookies go to

[http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html). Why? Because flash cookies do not reside in your browser, and thus your browser settings will not affect them. Not all of the tracking described here will stop if cookies are deleted or blocked.

NOTE: If you configure your computer to block cookies, you may not be able to access certain functionality on our site or the toolbar. If you block or delete cookies, not all of the tracking activities we have described here will stop. Choices you make are both browser and device-specific.

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## **You can opt-out of online behavioral advertising**

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The Self-Regulatory Program for Online Behavioral Advertising program provides consumers with the ability to opt-out of having their online behavior recorded and used for advertising purposes. If you want to opt out, visit <http://www.aboutads.info/choices/>. Choices you make are both browser and device-specific.

Some web browsers have a “Do Not Track” feature. This feature lets you tell websites you visit that you do not want to have your online activity tracked. These features are not yet uniform across browsers. Our sites are not currently set up to respond to those signals.