

FLUMMOX LABS, LLC PRIVACY POLICY

OVERVIEW

1. Your Privacy

This privacy policy (this "Privacy Policy") tells you about the information that Flummox Labs, LLC ("Flummox Labs," "we," "us" or "our") collects in connection with the operation of our website located at <http://www.flummoxandfriends.com> (the "Website"), the Flummox Labs mobile application (the "App") and all related online newsletters, stores or other related services (the "Services") offered by Flummox (collectively, the Website, App and other Services shall collectively be referred to as the "Flummox Services"), how the information is used and how you can access and correct certain information that we may collect.

Please note that this Privacy Policy applies only to information collected from you by Flummox Labs via Flummox Services. It does not apply to information obtained or disclosed in offline correspondence or through other personal contacts with Flummox Labs representatives. Further, Flummox Services may contain links to other entities' websites that are not controlled or operated by Flummox Labs. This Privacy Policy does not apply to such third party websites, and Flummox Labs is not responsible for the content of such third party websites or the privacy practices of such third parties. Therefore, we encourage you to request and review the privacy policies of any third parties upon disclosing your information to such parties or visiting such third party websites.

This Privacy Policy is effective as of **December 1, 2013**

HERE'S HOW WE COLLECT YOUR INFORMATION

1. Collection of Your Information

You can access most areas of the Website and/or Services without submitting any personally identifiable information. Flummox Labs collects personally identifiable information only if you choose to complete any online forms to contact us, post content, provide design/product feedback, make an online purchase or to request information or assistance through the Flummox Services. The personally identifiable information that Flummox Labs collects through these portions of the Flummox Services may include your name, username, password, email address, address and telephone number and any other personally identifiable information that you choose to include in your submissions to us. You represent and warrant that you have the right and authority to provide any information provided by you. Flummox Labs may also collect certain non-personally identifiable information in connection with the operation of the Flummox Services, including IP addresses, browser or operating system information, data on advertisements or links on which you click, and the websites that you visit before or after you visit the Flummox Services. Such information is maintained by Flummox Labs or service providers acting on behalf of Flummox Labs. Please Note: in some instances other users of the Flummox Services may be able to view your information.

2. Electronic Newsletters

As part of the Flummox Services you may provide your email addresses to receive email newsletters and promotions from Flummox Labs. You may change your preferences regarding emails at any time through the unsubscribe link in the newsletters or emailing at info@flummoxandfriends.com

The newsletters are not directed or targeted to children under 13, but are intended only for parents or other adults.

3. Social Platform Registrations and Social Media Plugins

The Flummox Services may permit or require users who are at least 13 years old 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 services and other information available about you are collected from you on these 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 Flummox Services, and they may notify your connections on the social networking platform about your use of the Flummox 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. Please note that their privacy policies may be different from our own and we encourage you to read them.

4. Computer Information Collected By Others

Flummox Labs uses the services of third parties who may collect, use or disclose cookie information, IP addresses or other identifiers from devices and/or browsers of users who visit the Flummox Services. You should be aware that different rules might apply to the collection, use or disclosure of your information by third parties in connection with their advertisements, promotions and other websites you encounter on the Internet. The use of such technology by these third parties is within their control and not Flummox Labs. Even if we have a relationship with the third party, we do not control their services or their policies and practices regarding your information and their services may use the information they collect from you consistent with their own privacy policies, which we encourage you to review. We encourage you to research and direct any of your questions in this regard to these third parties.

5. Links to Third Parties

The Flummox Services website may contain links to other sites, including those of sponsors, advertisers, social networking platforms, and survey companies. These other websites are governed by their own privacy policies or information collection practices, which may be substantially different from ours. We encourage visitors to other websites to review the privacy policies and information collection practices of those websites.

HERE'S HOW WE USE YOUR INFORMATION

1. Use of Your Personally Identifiable Information

Upon our collection of your personally identifiable information, Flummox Labs may use such personally identifiable information internally, separately or in combination with pre-existing information, for the following purposes:

- To provide any requested information, products or Flummox Services;
- To troubleshoot problems with the Flummox Services;
- To customize your experience on the Flummox Services;
- To enforce our Terms of Service or License or compliance with this Privacy Policy; or
- To contact you with more information about Flummox Labs and its products.

Personally identifiable information collected on the Flummox Services may be stored and processed in the United States, Canada or abroad.

2. Protection of Your Information

To prevent unauthorized access or disclosure, maintain data accuracy and facilitate the appropriate use of information, Flummox Labs uses physical, technological and administrative procedures to attempt to protect the personally identifiable information we collect through the Website and/or Services. Nevertheless, Internet transmissions are never completely private or secure. You understand that any messages or information you send to the Flummox Services may be read or intercepted by others. If you

have any questions about the security of personally identifiable information collected by Flummox Labs, please contact us at: info@flummoxandfriends.com

HERE'S HOW WE MAY DISCLOSE YOUR INFORMATION

1. Disclosure of Your Information

We may disclose your personally identifiable information to our subsidiaries or affiliates and to third party partners whom we occasionally hire to provide services on our behalf, including support services, website services, delivering promotional materials, answering customer questions about our services and new services. Flummox Labs will only provide those third party partners with the personally identifiable information they need to deliver the services to us and/or on our behalf, and they will be contractually prohibited from using that information for any other purpose. In the event that Flummox Labs is involved in a transaction such as a merger, stock purchase or sale, or sale of substantially all of Flummox Labs assets, your personal information may be transferred to the other party in such transaction.

Flummox Labs reserves the right to disclose your personally identifiable information if required to do so by law or legal process or otherwise requested by any law enforcement officer or agency acting under color of law. In addition, Flummox Labs reserves the right to disclose your personally identifiable information based on the good faith belief that such action is necessary or appropriate to: (a) protect and defend the rights or property of Flummox Labs, or (b) act in urgent circumstances to protect the safety or security of the public or of users of the Flummox Labs' products and/or the Flummox Services.

2. Financial Information

We collect and use financial information, such as credit card numbers and security codes, for the limited purposes of consumer purchasing.

Flummox Services include offering those who are of legal age the opportunity to purchase consumer products (the "Shop"). To do so, you need to provide contact, shipping, billing and credit information. The Shop may be hosted and operated by a third party that is independent and separate from Flummox Labs. This third party may collect personal information about Shop visitors and may share this information with us. We use this information to process the order and to send order confirmation via email, as well as to send information about products and services of interest and as otherwise required by law.

3. Retention of Your Personally Identifiable Information

The personally identifiable information that you provide will be stored and maintained by Flummox Labs until you instruct us otherwise, or, in Flummox Labs' sole discretion, for the longer of: (a) for so long as is necessary or appropriate to carry out the purpose(s) for which such information was collected and (b) for so long as we are required to maintain such information by law or other applicable rules or regulations.

4. Disclosure to Third Parties

We may share your information with third parties for the limited purposes described below. In the U.S., parents of children under the age of 13 have the option of consenting to the collection and use of their child's personal information without consenting to the disclosure of that information to certain third parties.

a. You acknowledge, consent, and agree to the extent legally permissible in your jurisdiction to allow us to access, preserve, and/or disclose the information we collect and/or content you provide to us (including information you may have posted on bulletin boards or internal site communication systems) to a law enforcement agency or other third parties if required to do so by law or with a good faith belief that such access, preservation, or disclosure is reasonably necessary to: (a) comply with legal process; (b) enforce the Terms of Use and/or License of the respective Flummox Services; (c) respond to claims that the content violates the rights of third parties; (d) respond to your requests for customer service; or (e) protect the rights, property, or personal safety of the owners of Flummox Labs, any user of the

Flummox Services, a third party or the general public. We also may disclose user information whenever we believe disclosure is necessary to limit our legal liability; to protect or defend our rights or property; or protect the safety, rights, or property of others.

b. Information collected through Flummox Labs may be transferred, disclosed or shared with third parties engaged by us to handle and deliver certain activities, such as message boards, payment processing, newsletters, and to perform other technical and processing functions, such as sending postal mail and email, maintaining data integrity, programming operations, user services or technology services. We may provide these third parties information collected as needed to perform their functions, but they are prohibited from using it for other purposes and specifically agree to maintain the confidentiality of such information. Some of these agents, such as payment processors, may request additional information during the course of offering their services. Before you provide additional information to third party agents, we encourage visitors to review their privacy policies and information collection practices.

5. Business Transfer

In the event that assets relating to Flummox Labs are transferred or sold to another entity as a result of, for example, a corporate sale, merger, consolidation, asset sale, or in the unlikely event of bankruptcy, information collected on the Flummox Services may be transferred to the acquiring company.

OUR STANCE ON CHILDREN'S PRIVACY

Children's privacy is important to us, and we recognize the need to provide additional privacy protection for children on the Flummox Services. Our privacy practices are guided by the United States' Children's Online Privacy Protection Act of 1998, as well as data privacy laws in the United States and other applicable countries. Younger visitors should always check with their parents or guardians before entering information on any website or mobile application and we encourage families to discuss their household guidelines regarding the online sharing of personal information. Flummox Labs recognizes the privacy interests of children and we encourage parents and guardians to take an active role in their children's online activities and interests. In most instances, the Flummox Services are not targeted or geared toward children under the age of 13 and Flummox Labs does not knowingly collect any personally identifying information from children under the age of 13.

The App is designed for use by children. It was designed and created under strict guidelines established by the leading online app retailers. The App is clearly marked as a child's product, and in most cases, is found in the portion of the online store set aside for children. While the App does allow for in-app purchases, those purchases must be made with a credit card issued to an adult parent or guardian.

We take all reasonable precautions to identify all users of the Flummox Services for whom we collect personal identifying information. If you believe your child's personally identifying information has been collected by or disclosed to the Flummox Services, please contact us at info@flummoxandfriends.com. We will take all reasonable steps to assure that any personally identifiable information collected about your child is deleted and/or make sure that no further collection or use of your child's personally identifiable information is made.

OTHER IMPORTANT INFORMATION

1. Choice and Opt-Out Preferences

Flummox Labs does not collect your personally identifiable information unless you choose to provide it. If, at any time, you prefer not to receive further e-mail communications (newsletters, etc.) from Flummox Labs (except in connection with information, products or services that you specifically request), you will have the ability to unsubscribe from such communications by means of a link provided in every broadcast e-mail that is sent to you by Flummox Labs. If, at any time, you prefer not to receive any other form of communication from Flummox Labs, you will have the ability to unsubscribe from such communications by contacting us at: info@flummoxandfriends.com

2. Access and Accuracy

Flummox Labs will use commercially reasonable efforts to provide access to your personally identifiable information if you request such access in writing submitted to: info@flummoxandfriends.com. Flummox Labs reserves the right to deny access to your personally identifiable information: (a) when such denial of access is required by law; (b) when granting you access is reasonably likely to negatively impact other people's privacy; (c) when such access to your acceptance of This Privacy Policy and Revisions to This Privacy Policy is cost prohibitive; (d) when your acceptance of This Privacy Policy and Revisions to This Privacy Policy is necessary to protect Flummox Labs' rights and property, and (e) when such requests are frivolous or made in bad faith. If you believe that the personally identifiable information maintained by Flummox Labs about you is inaccurate or incomplete, you may notify Flummox Labs in writing describing in details any inaccuracies or omissions, submitted to: info@flummoxandfriends.com. Following receipt of such a properly submitted written notice, Flummox Labs will, within a reasonable time period, use commercially reasonable efforts to, in its sole discretion, either: (y) amend or correct your personally identifiable information to reflect corrected or additional information provided by you, or (z) in connection with your personally identifiable information, make note of any claimed inaccuracies or omissions reflected in the notice submitted by you.

3. Your Acceptance of This Privacy Policy and Revisions to This Privacy Policy

By using the Flummox Services, you agree to this Privacy Policy. If you do not agree to this Privacy Policy, you may not use the Flummox Services. Flummox Labs reserves the right, in our discretion, to change, modify, add or remove portions of this Privacy Policy at any time and from time to time, without prior notice to you. All revisions will be posted to the Flummox Services. We urge you to review this Privacy Policy frequently for changes. Your continued use of the Flummox Services means that you accept those changes.

4. International Transfer

The Flummox Services are designed for and targeted to U.S. audiences and are governed by and operated in accordance with the laws of the U.S. While users from countries other than the U.S. may access the Flummox Services, we make no representation that the Flummox Services are operated in accordance with the laws or regulations of, or governed by, other nations. By participating in activities on the Flummox Services, you certify that you meet the age and other eligibility requirements for the Flummox Services as set forth in the respective Terms of Use or applicable License. If you do not meet the age and other eligibility requirements of the Flummox Services you are using, please discontinue using those services immediately as your continued use of the Flummox Services indicates that you are agreeing to the collection, use, disclosure, management and storage of your Information as described in this Privacy Policy.

Please be aware that by providing us with personal information, you understand and agree that: (1) your personal information may be transferred to and stored on servers located outside your resident jurisdiction; (2) to the extent you are a resident of a country other than the United States, you consent to the transfer of such data to the United States for processing by our affiliates in accordance with this Privacy Policy and (3) the Privacy Policy and the collection of information pursuant to the Privacy Policy shall be governed by and construed in accordance with the laws of the United States, without giving effect to any principles of conflicts of law. Our affiliates comply with the U.S. and EU Safe Harbor.

5. Your California Privacy Rights

California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to or write us at the addresses below.

6. Questions or Comments

Flummox Labs welcomes questions and comments about this Privacy Policy. Questions or comments should be directed to Flummox Labs' privacy policy compliance department:

Via email:

info@flummoxandfriends.com

Via snail mail:

Flummox Privacy Policy
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Oakland, CA 94602

This document is the sole statement of the Flummox Labs' Privacy Policy and no summary, restatement or other version thereof, or other privacy statement or policy, in any form, including, without limitation, machine-generated, is valid. In interpreting this Agreement, the English version governs the interpretation and meaning of the obligation set forth herein. To the extent there is an ambiguity or conflict with the Privacy Policy in other languages, the Privacy Policy in English governs.