

Children's Privacy Policy

Last Updated: May 28, 2015

Just Seconds Apart knows that safeguarding the privacy of children is very important. This Children's Privacy Policy supplements our general [Privacy Policy](#) and explains how we address personal information of children under 13 years of age (a "Child" or "Children"). All provisions of our general [Privacy Policy](#) apply here unless specifically stated otherwise in this Children's Privacy Policy. Capital Terms not defined in this Children's Privacy Policy will have the meanings set forth in our general [Privacy Policy](#).

Some of our web and mobile services, including any web sites operated by us and mobile applications, are for general audiences, and are not intended for use by Children. However, we have certain web sites and mobile applications targeted to teenagers ("Teen Online Services") and we recognize those Teen Online Services may have some users who are Children. We also may have certain web sites and mobile applications that are targeted to Children ("Children's Online Services"). For our Teen and Children's Online Services, we recognize the need to provide further privacy protections with respect to Personal Information we may collect from Children.

The Children's Online Privacy Protection Act ("COPPA") requires that we inform parents and legal guardians (collectively, a "Parent") of Children about how we collect, use, and disclose Personal Information from Children, and that we obtain the consent of Parents before we collect Personal Information from Children for certain uses.

1. What Kinds of Personal Information Do We Collect from Children?

We do not knowingly collect, store, use or disclose any Personal Information from Children without first notifying and obtaining the express consent of a Parent. Personal Information has the same meaning as defined in our general [Privacy Policy](#) and will also include, for the purposes of this Children's Privacy Policy, any information considered to be "personal information" under COPPA and its implementing regulations, as they may be amended from time to time - including geolocation information sufficient to identify a Child's street name and name of a city or town, and persistent identifiers that are used to recognize a user over time and across different Web sites or online services.

Our Teen and Children's Online Services may collect the kinds of information described in [Section 2](#) of our general [Privacy Policy](#). Among other things, this can include the following kinds of information a Child may be asked to submit to us (for example, in connection with creating an account on our online services):

- first and last name
- a user name created by the Child
- gender
- date of birth

- email address
- password

To the extent we request to Children submit anything that is considered Personal Information, we will first notify and obtain consent from a Parent.

In addition, our Teen and Children's Online Services may also passively collect information from Children using technological means, as described in [section 2](#) of our general [Privacy Policy](#).

Certain activities or services available through our Teen and Children's Online Services will require a user to register. This includes signing up for an account (and at such time, opting to be added to mailing lists, such as for an electronic newsletter). When users seek to register for such services or activities, they will be asked to enter their date of birth. If the user is a Child, the user will be asked to supply an email address for a parent or guardian, so that we can implement the Parental Notice and Consent Process described below.

If a sweepstakes, contest or promotion we offer is open to Children, we will collect an email address from any Child who wishes to enter but we will only use that email address to notify Child entrants if they have won a prize or not. If a Child wins a prize, the notification email will also ask the Child to provide a Parent's email address that we can contact the Parent to provide any further information or consent we need (such as information to fulfill the prize or consent to include the Child's name on a published list of winners.)

Children may not subscribe to any of our magazine publications through our Teen or Children's Online Services; instead, they must subscribe to magazines by telephone or mail, with credit card information from a Parent.

If you are a Parent of a Child, and believe your Child has disclosed Personal Information to us on any of our Teen or Children's Online Services without your knowledge and consent (or has disclosed Personal Information to us on any of our General Audience Online Services), please contact us at info@justsecondsapart.com If such collection is verified, we will delete such information.

2. How Do We Use Personal Information Collected from Children?

As described in [Section 3](#) of our general Privacy Policy, we may use: (a) Personal Information of a Child that we collect to support our internal operations and non-Personal Information of a Child for various other reasons set forth in our general [Privacy Policy](#); and; (b) Personal Information of a Child that we collect with a Parent's consent: (i) to process the Child's registration with the Teen and Children's Online Services, including verifying the Child's information is active and valid; (ii) to provide the Child with information or services or process transactions that the Child has requested or agreed to receive, including to send electronic newsletters; (iii) for marketing and promotional purposes, including to provide the Child with special offers or promotional materials on behalf of us and our business partners; (iv) to enable the Child to participate in a variety of features of our Teen and Children's Online Services; (v) to customize experience with the Teen or Children's Online Services or to serve the Child specific content that is most relevant to the Child; (vi) to contact the

Child with regard to the Child's use of the Teen or Children's Online Services; and (vii) for purposes disclosed at the time the Child provides his or her information or as otherwise set forth in the general [Privacy Policy](#) or this Children's Privacy Policy.

We do not, however, permit Children to make their Personal Information publicly available on our Teen or Children's Online Services. If/Whenever we become aware that a Child has made Personal Information publicly available through our Teen or Children's Online Services, we delete such information from any public area.

3. How Do We Disclose Personal Information Collected from Children?

(a) No Third-Party Marketing Purposes. We will not rent, sell or otherwise disclose a Child's Personal Information to advertisers, sponsors, business partners and other third parties for their use to directly market to the Child.

(b) Third Parties Providing Services on Our Behalf. As described in our general [Privacy Policy](#), we may use third party vendors to perform certain aspects of the Teen and Children's Online Services. This may include hosting the Teen and Children's Online Services, designing and/or operating the Teen and Children's Online Services' features, tracking the Teen and Children's Online Services analytics, processing online subscription requests, enabling us to send you special offers, administering or fulfilling our sweepstakes, contests or promotions, or performing other administrative services. We may provide these vendors with access to user information, including a Child's Personal Information, to carry out the services they are performing for the Child or for us. These third party vendors have access to the Personal Information needed to perform their functions and are obligated to maintain the confidentiality and security of that Personal Information.

(c) Administrative and Legal Reasons. We may access, use, preserve, transfer and disclose a Child's Personal Information, including disclosure to third parties, if in our good faith belief, it is required: (i) to comply with or satisfy any applicable law, regulation, subpoenas, governmental requests or legal process if in our good faith opinion such is required or permitted by law; (ii) to protect and/or defend the [Terms of Use](#) for the Teen and Children's Online Services or other policies applicable to the Teen and Children's Online Services, including investigation of potential violations thereof; (iii) to protect the safety, rights, property or security of Bauer Publishing, the Teen and Children's Online Services, any third party person or entity, or the public (including under emergency circumstances); and/or (iv) to detect, prevent or otherwise address fraud, security or technical issues. Further, we may use IP address or other Device Identifiers to identify users, and may do so in cooperation with third parties such as copyright owners, internet service providers, wireless service providers and/or law enforcement agencies, including disclosing such information to third parties, all in our discretion. Such disclosures may be carried out without notice to the Child or Parent.

(d) Business Transfer. We may share a Child's information, including the Child's Personal Information, Demographic Information and Usage Information with our parent, subsidiaries and affiliates for internal reasons. We also reserve the right to disclose and transfer all such information: (i) to a

subsequent owner, co-owner or operator of the Teen or Children's Online Services or applicable database; or (ii) in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our membership interests and/or assets or other corporate change, including, during the course of any due diligence process.

4. How Do We Notify and Get Consent from a Parent to Collect a Child's Personal Information?

When a Child seeks to engage in an activity or provide Personal Information on our Teen or Children's Online Services which requires parental notification and consent, we follow this "**Parental Notice and Consent Process**":

- We ask the Child to supply an email address for a Parent.
- We will send an email (at the supplied email address) to directly notify the Parent of the Child's requested activity and describe the Personal Information that we intend to collect from the Child in connection with the Child's requested service or activity and how we intend to use such Personal Information.
- The Parent will have the opportunity to consent (or not) to our collection and use of the Child's Personal Information, by clicking an approval link.
- At some later time, we will then send another message to the Parent's email address to confirm the consent. This message will give the Parent the opportunity to revoke the consent.

By giving consent, a Parent: (i) further confirms (although our [Terms of Use](#) are already applicable) that the Child's activities on our Teen or Children's Online Services are subject to the [Terms of Use](#) for our web sites and any applicable terms of use for any mobile applications or services; and (ii) consent to our storage, use, and disclosure of Personal Information collected from the Child as described in our general [Privacy Policy](#) and this [Children's Privacy Policy](#). We make special provisions to allow Parents to control the Personal Information submitted by or collected from Children as described below.

If a Parent does not give consent to collection of Personal Information, the Child can still browse and view content on the Teen or Children's Online Services, and we will only collect and use a persistent identifier to support our internal operations.

5. How Can a Parent Review, Change or Delete Personal Information Collected from Children?

Parents have the right to review Personal Information about Children collected by us, can ask us to delete the Personal Information, and can refuse to permit us to collect or use the Child's Personal Information in the future. If a Parent wishes to review a Child's Personal Information or ask us to delete that Personal Information, the Parent should contact us using the information provided in section 7 below. We will make good faith efforts using reasonable procedures to verify the identity of the Parent before allowing the person to review a Child's Personal Information; however, we will not

be liable for any disclosure of a Child's Personal Information we make in good faith and following reasonable procedures in responding to a request for disclosure of a Child's Personal Information.

6. How Will We Notify Parents if Our Children's Privacy Policy Changes?

We may amend our Children's Privacy Policy from time to time. We will provide Parents notice by e-mail of any material changes in the way we intend to collect, use and/or share Children's Personal Information. Please note that, at all times, Parents should update their contact information to provide us current email addresses; Parents may do so by emailing us at info@justsecondsapart.com We will apply material changes in our Children's Privacy Policy only in conformance with applicable law, including any applicable provisions of COPPA that require parental consent.

7. Who is the Operator and How Can You Contact Us?

Just Seconds Apart is the operator of the Teen and Children's Online Services.

If you have any questions about this Children's Privacy Policy or our data practices, you may contact us in the following ways:

By e-mail: info@justsecondsapart.com

By postal mail:

Just Seconds Apart
c/o Tiffany & Bosco, P.A.
7th Floor Camelback Esplanade II
2525 East Camelback Road
Phoenix, AZ 85016

In the subject line of your email or letter, please specify which of our web site(s) or Mobile Application(s) or other Just Seconds Apart properties are the subject of your inquiry.