

**PIXEL PRESS TECHNOLOGY, LLC  
PRIVACY POLICY AND CHILDREN'S PRIVACY POLICY**

**Last Updated December 12, 2016**

This Privacy Policy and Children's Privacy Policy (the "**Privacy Policy**") explains how Pixel Press Technology, LLC, a Missouri limited liability company ("**Pixel Press**"), handles personal information you provide in connection with the use of any website, mobile app, or other services ("**Services**") controlled by Pixel Press (including its subsidiaries and affiliates). This Privacy Policy applies only to Services which link to this Privacy Policy or whose Terms of Use incorporate this Privacy Policy. This Privacy Policy does not apply to personal information collected from you offline, unless it is combined with online data, to Services that do not link to this Privacy Policy or to third-party Services to which the Services may link. Your use of the Services is subject to this Privacy Policy and the applicable Terms of Use.

BY USING THE SERVICES, YOU AGREE TO BE BOUND BY THIS ONLINE PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS ONLINE PRIVACY POLICY, DO NOT USE THE SERVICES IN ANY MANNER.

This Privacy Policy is a legal document. Please read this Privacy Policy in its entirety before using the Services or submitting personal information to us.

**Definition of "personal information"**

"Personal information" means information that identifies any individual or could reasonably be used to identify such individual and which is submitted to and/or collected by the Services and maintained by Pixel Press in an accessible form. Examples of personal information include an individual's name, postal address, e-mail address, and telephone number.

**A SPECIAL NOTE FOR PARENTS AND LEGAL GUARDIANS:**

Wherever we refer to "children" or a "child" in this Privacy Policy, we mean children under 13, consistent with the U.S. Children's Online Privacy Protection Act of 1998 ("**COPPA**"). Please help us protect your children's privacy by instructing them never to provide personal contact information (like their full name, e-mail address, home address, telephone number, etc.) without your permission. We encourage you to spend time with your children when they are online or using any mobile device so you understand the sites, activities and apps they are engaged in, and to adopt available device and browser controls that reflect your preferences about your children's ability to access the Internet or make purchases online.

**A SPECIAL NOTE TO KIDS:**

If you are under 13, you should get your parent's or legal guardian's permission before giving out your contact information, like e-mail address or phone number, or any other personal information, to Pixel Press or to anyone else.

**A SPECIAL NOTE TO NON-U.S. RESIDENTS:**

Our Services operate under U.S. law and all information submitted to us may be transferred to the U.S. or to another country that is not your country of residence and may not apply the same privacy laws. By using the Services, you consent to this transfer. We will handle information in accordance with this Privacy Policy.

## **Personal Information Related to Children**

Pixel Press is committed to protecting children's privacy on the Internet. We do not intend to, or knowingly, collect, use, or disclose personal information (including online contact information) of children under the age of 13 in conjunction with our Services that are not directed toward children, and we encourage parents or guardians to monitor children's on-line activities. If we are aware of a child under the age of 13 attempting to register to use any of the Services that are not directed toward children, we will not accept the registration. Once we become aware of a child under the age of 13 providing personal information in conjunction with our Services that are not directed toward children, we will delete that information. If your child has provided personal information in this context, please contact us at the contact information below so we can delete it.

Pixel Press has special policies for the online collection, use, and disclosure of information from children under 13 years of age at Pixel Press' Services directed toward children, including its Bloxels Builder app (collectively, "Child-Directed Services"). Pixel Press does not collect personal information through Child-Directed Services without the consent of a parent or legal guardian, except in special, limited circumstances described below. We take steps to prevent children from posting or publicly disclosing personal contact information, like full name, phone number or e-mail address, online, without parental consent. Pixel Press does not condition a child's participation in an activity on the child's disclosure of more personal information than is reasonably necessary to participate in that activity.

Certain activities require your child to register. They may be able do so anonymously by providing a first name or user name. We encourage children to use a "screen name" (not their real name) that only they know. We use technology, like cookies, to facilitate the ability to play games, recognize returning visitors by their user name, and to screen for age in accordance with COPPA.

To permit your child to provide personal information through the Child-Directed Services, Pixel Press generally requires a parent or guardian to consent. Personal information collected from the Child-Directed Services initially is limited to the email address of the parent. If the parent does not grant consent to the collection of data from the child on the Child-Directed Services through the consent mechanism provided on the email request, after a reasonable amount of time, the parent's email address will be deleted. If the parent grants consent to the collection of data from the child on the Child-Directed Services through the consent mechanism provided on the email request, Pixel Press may also collect the child's email address for the purpose of password recovery, the child's username (that will be disclosed to the parent prior to becoming visible to other Pixel Press users) so that, in the Bloxels Builders app context, the child's Avatar may be identifiable to other members of the Bloxels Community, the IP address and/or mac address associated with the child's use, to facilitate the operation of the game, and cookies in the form of impression information, to facilitate and streamline the child's use of the game. In addition, with your verifiable consent, we may collect other personal information from your child, when such information is necessary for a particular activity. The parent will be given the opportunity to revoke his or her consent after it is initially given in a follow-up email from Pixel Press after a reasonable delay, pursuant to COPPA.

Parents can review or have deleted their child's personal information, and refuse to permit further collection or use of their child's information. To do this, parents should use the procedure outlined below.

We don't keep your (or your child's) e-mail address unless you tell us it is okay. If social networking opportunities are available through the Child-Directed Services, they are structured so that no personal information is shared between visitors unless verifiable parental consent is obtained.

Pixel Press might collect an e-mail address and first name (or screen name) from your child under 13 without your consent if a child sends a request to us. In such circumstances, we keep their e-mail address for long enough to respond to them. Pixel Press deletes this information from our system after we answer their question.

We may ask for certain information that is not personally identifiable, like city and state, birthdate, gender, hobbies, etc. to help us understand our visitors and improve our products and services.

## **Privacy Shield Compliance**

Generally: Pixel Press is a participant in the EU-U.S. Privacy Shield. This means Pixel Press adheres to the Privacy Shield Principles with respect to all personal data received from the EU in reliance on the Privacy Shield, and its committed to subject to the Privacy Shield Principles all personal information received from the EU in reliance on the Privacy Shield. Information about the EU-U.S. Privacy Shield can be found at: <https://www.privacyshield.gov/>. The list of companies that are currently certified under the Privacy Shield is available at: <https://www.privacyshield.gov/list>. Pixel Press is subject to the investigatory and enforcement powers of the Federal Trade Commission, and is committed to responding promptly to inquiries and requests by the United States Department of Commerce for information relating to the Privacy Shield Framework.

Pixel Press's privacy policy is at all times publicly available at: <http://www.projectpixelpress.com/privacy-policy>. Pixel Press does not collect Human Resources data from EU citizens. This Privacy Policy herein, and located at the above hyperlink, therefore only covers non-HR data.

Privacy Shield Contact: If you are an EU resident, please contact us with any questions or concerns you may have about Pixel Press's adherence to the Privacy Shield Principles. Pixel Press is committed and required to respond to any of your inquiries on this issue within forty-five (45) days of receiving the complaint. Pixel Press's contact for the handling of questions, complaints, access requests, and any other issues arising under the Privacy Shield is:

Chief Technology Officer  
Pixel Press Technology, LLC  
Attn: Privacy Shield  
1017 Olive Street, Suite 800  
St. Louis, MO 63101  
[privacypolicy@projectpixelpress.com](mailto:privacypolicy@projectpixelpress.com)

Independent Recourse Mechanism: Pixel Press utilizes the International Centre for Dispute Resolution ("ICDR"), the international division of the American Arbitration Association (ICDR/AAA) located in the United States, as its Independent Recourse Mechanism to investigate unresolved complaints regarding Pixel Press's compliance with the Privacy Shield. This independent dispute resolution mechanism will be provided to you free of charge for complaints that implicate the Privacy Shield Principles. The International Centre for Dispute Resolution's complaint submission form can be found at: [https://ss-usa.s3.amazonaws.com/c/2345/media/579fa20e067f3/ICDR\\_SafeHarbor\\_Notice\\_of\\_Arbitration.pdf](https://ss-usa.s3.amazonaws.com/c/2345/media/579fa20e067f3/ICDR_SafeHarbor_Notice_of_Arbitration.pdf) and general information about the ICDR Privacy Shield Program can be found at: <http://info.adr.org/safeharbor/>. The International Centre for Dispute Resolution may be contacted at:

International Centre for Dispute Resolution Case Filing Services  
1101 Laurel Oak Road, Suite 100  
Voorhees, NJ 08043

United States  
Phone: +1.212.484.4181  
Email box: [casefiling@adr.org](mailto:casefiling@adr.org)

The administrative procedures of the ICDR/AAA as they relate to the Privacy Shield, including the timing for the submission of defenses or counterclaims to complaints, may be found at: [https://ss-usa.s3.amazonaws.com/c/2345/media/57a211b24ab18/SafeHarbor\\_Procedures.pdf](https://ss-usa.s3.amazonaws.com/c/2345/media/57a211b24ab18/SafeHarbor_Procedures.pdf) . The Privacy Shield Principles' requirements for independent recourse mechanisms may be found at <https://www.privacyshield.gov/article?id=11-Dispute-Resolution-and-Enforcement-d-e>. Remedies that may be awarded by Pixel Press's Independent Recourse Mechanism include publicity for findings of non-compliance, data deletion, suspension and removal of a seal, compensation losses incurred as a result of non-compliance, and injunctive relief. Under certain conditions, where your complaint has not been resolved by other recourse and enforcement mechanisms, you may also invoke binding arbitration.

**FTC Action:** The FTC has committed to reviewing on a priority basis referrals alleging non-compliance of the Principles received from independent dispute resolution bodies, among others. If the FTC concludes that it has reason to believe Section 5 of the Principles has been violated, it may resolve the matter by seeking an administrative cease and desist order prohibiting the challenged practices or by filing a complaint in a federal district court, which if successful could result in a federal court order to same effect.

### **Access to, Correction, Insertion and Deletion of Personal Information in Current Customer Records**

You may request to access, amend, add, or remove your personal information from our current customer records, or request your personal information not be used for marketing purposes, by contacting Pixel Press at the contact information under the "Contacting Pixel Press" section, below. You will also be given the opportunity to opt out of any marketing communications sent to you in any marketing communications you receive. Upon proper identification, parents and guardians may also request to review and/or remove the personal information collected from their child or to amend this personal information. Please note, however, if you ask us to delete your child's information, your child may not be able to participate in certain online activities. Please notify us of your wishes with respect to your child's information by contacting us in one of the ways specified herein.

For our record keeping purposes, we may retain certain personal information you submit in conjunction with commercial transactions.

### **California Privacy Rights**

California residents who provide personal information are entitled to request and obtain from us, once per calendar year, information about the information we shared, if any, with unaffiliated third parties for their direct marketing purposes, including the categories of information and names and addresses of third parties with whom we shared the information for their marketing purposes. To obtain information about this sharing or to opt out of future sharing, please contact us in one of the ways specified herein. You must provide a current California address for our response. The e-mail subject line or mailing envelope and the content of your request must include the phrase "Your California Privacy Rights," and include your name, e-mail address (if you wish to receive a response via e-mail) or street address, city, state, zip code (if you wish to receive a response via postal mail). Requests via telephone or facsimile will not be accepted. Your request will be processed within thirty (30) days of the date on which we receive it. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

Please note that not all information sharing is covered by the California law. Our response will include only information relating to our sharing practices for information covered by the law.

### **Collection of Information Online**

Pixel Press may collect information in two ways:

Personal Information You Submit: Pixel Press collects personal information that you enter into data fields or otherwise provide via the Services, but limits its collection of personal information that is relevant for the purposes of providing the Services. For example, you may submit your name, postal address, e-mail address, credit card information, and/or other information in order to receive information about various subjects, register for programs, purchase products and services, contact customer service, or respond to surveys. To protect your privacy, you should not provide Pixel Press with contact information that is not specifically requested.

Email addresses, financial information such as credit card information, and postal addresses are actively collected by Pixel Press in conjunction with its Services. Email addresses are used to obtain parental consent when appropriate and allow users to reset their passwords and to log in to their accounts on other devices. The email addresses are also used to send emails to users to notify them of information related to the Services for which they have registered and for marketing communications. Financial information such as credit card information is collected in conjunction with customers' purchases of Pixel Press products, and postal addresses are also collected in conjunction with customers' purchases of Pixel Press products and Pixel Press's shipping of ordered products.

Passive Collection of Certain Information: Pixel Press may collect information about your use of the Services without you actively submitting such information. This information may be collected using various technologies, such as, but not limited to, cookies, Internet tags or pixels, and web beacons. Your internet browser automatically transmits to the Services certain information, such as your IP address and device identifier, the URL of the Services you just visited and the browser version your computer is operating. Passive information collection technologies can make your use of the Services easier by allowing Pixel Press or our service providers to provide better service, customize sites based on consumer preferences, compile statistics, analyze trends, serve advertising, and otherwise administer and improve the Services. Certain features of the Services may not work without use of these technologies.

### **Collection and Use of Personal Information**

After you have entered personal information into a form or data field, Pixel Press may use certain technologies to allow a web site or app to "remember" your personal preferences, such as sections of the web site or app that you use frequently and, if you choose, your user ID. We may also use this personal information for other business purposes, such as to offer you the opportunity to receive updates or information regarding Pixel Press' products or services, to invite you to participate in surveys about our products, or to notify you about special promotions. As part of providing the Services, Pixel Press may need to provide you with certain communications, such as announcements and administrative messages. These communications are considered part of the Services and you may not always be able to opt-out from receiving them.

### **Limitations on Collection of Personal Information**

You may limit the amount and type of personal information that you share with Pixel Press by choosing not to enter any personal information into forms or data fields. Some of our online Services require that you provide us with appropriate personal information for you to access them. Other parts of the Services

may ask whether you wish to opt out or opt into our contact lists for offers, promotions and additional services that may be of interest to you.

You may also be provided with preference questions or preference boxes allowing you to indicate that you do not want the Services to use tracking technologies, such as cookies, to “remember” your personal information, such as user IDs or mailing addresses, on return visits. However, if the Services use tracking technologies to collect unidentifiable information, it will not generally provide you with the ability to opt out of the tracking technologies. Some internet browsers allow you to limit or disable the use of tracking technologies that collect unidentifiable information. Please note that if you do not accept tracking technologies, some features or activities may not be available to you.

### **Targeted Advertising**

Pixel Press may work with third party online or mobile network advertisers that use cookies, pixels, or other non-cookie technology to help us manage advertising through the Services and measure its effectiveness. This is limited to our parent-directed Services. These technologies enable third party ad networks to recognize a unique cookie on your computer, tablet or mobile device and may be placed by us, our network advertising firm(s), or by another advertiser that works with our third party network advertiser(s). The information that is collected and shared in this fashion does not contain your name, address, telephone number, or e-mail address. However, it is linked to the device identifier of the device you are using to keep track of all the sites you have visited that are associated with the ad network. This information may be used for the purpose of targeting advertisements on the Services and other sites based on those interests, and to learn which ads bring users to our Services. **Please keep in mind that your web browser may not permit you to block the use of non-cookie technologies, and browser settings that block cookies may have no effect on non-cookie technologies.**

For more information about our network advertisers, including information about how to opt out of technologies that they control, you can visit websites operated by the [Network Advertising Initiative](#) and [Digital Advertising Alliance](#) to access opt-out tools available from those participating in the program. Participating network advertisers will be listed at those sites. Opting out means that you will still see ads, but they may not be tailored to your specific interests. **Please note:** your opt-out choices are browser-specific and device-specific.

Some web browsers may transmit “do not track” signals. Web browsers may incorporate or activate these features differently, making it unclear if users have consciously activated them. As a result, at this time we do not take steps to respond to such signals.

### **Social Media Platforms and Plugins**

If you are a member of a social media network, like Facebook, a cookie may be sent to that network when you access a page of our Services that links to their website through a plugin, register or log into your account at their platform, or use your social media user name and password to log into our Services where you have the option to do so. That may enable them and us to link your activities with your personal registration information at their site, and may include notifying your friends or connections about your activities in our Services, and using tracking technologies to monitor your online activities in order to serve targeted ads. The social media networks' privacy policy and terms apply to your use of their platforms. Your browser or device may allow you to block these technologies but you should visit the third party website and review their privacy policy and your registration profile or account to find out your options.

### **Access to Personal Information**

Personal information may be accessed by a restricted number of Pixel Press employees, by certain companies with which Pixel Press may conduct joint programs, provided Pixel Press complies with the requirements for onward transfers under the Privacy Shield, and by individuals and entities with whom Pixel Press contracts to carry out business activities for Pixel Press, again provided Pixel Press complies with the applicable requirements for onward transfers under the Privacy Shield. Companies that may have access to personal information collected in conjunction with Pixel Press's Services include Shopify, Inc., Squarespace, Inc., Stripe, Inc., Mailchimp.com, and Intuit Inc. We train our employees about the importance of privacy and how to handle and manage customer data appropriately and securely.

### **Transmission of Personal Information to Third Parties**

Pixel Press may share personal information with third parties that provide services to us under contract. For example, we may contract with third parties to provide database or server maintenance or security, manage transactions, help us process and fulfill orders or requests, assist us in analyzing our offerings, or provide other similar services. In such instance, Pixel Press will comply with the applicable requirements for onward transfers under the Privacy Shield. If Pixel Press fails to comply with the onward transfer requirements of the Privacy Shield, Pixel Press may be held liable for such a failure. Pixel Press may disclose or transfer personal information in connection with, or during negotiations of, any merger, sale of company assets, product lines or divisions, or any financing or acquisition. Pixel Press may also disclose personal information to prevent damage or harm to us, our Services, or any person or property, if we believe that disclosure is required by law, or in response to a legal request. Pixel Press will not otherwise disclose personal information to third parties, including for those third parties' own marketing purposes, unless you have been provided with an opportunity to opt in to such disclosure and, in the case of personal information collected from children, the appropriate verifiable consent is obtained.

Pixel Press currently discloses personal information to several entities, which process the personal information on behalf of and under the instruction of Pixel Press. Pixel Press has engaged an email service provider for the purpose of sending emails to parents of children who utilize the Services to notify them of Pixel Press's information collection practices and obtain consent from them to collect personal information from their children. Pixel Press also transfers this personal information to this email service provider for the purpose of sending emails to users to notify them of information related to the Services for which they have registered. Pixel Press also shares personal information with an ecommerce portal provider, for the purpose of shipping products, and a mapping platform provider for the purpose of storing shipping information for product ordered by customers and other information provided by customers, for example the location of educational institutions using Pixel Press products that seek to be included on the map at <http://www.bloxelsbuilder.com/edumap/>. Pixel Press also shares information with multiple ecommerce service providers for the purpose of processing credit card transactions. Pixel Press also stores some forms containing personal information submitted by customers on cloud-based storage, so the storage provider may also have access to such personal information.

Pixel Press shall remain liable under the Principles if its agents process personal information in a manner inconsistent with the Principles, unless it proves that it is not responsible for the event giving rise to the damage.

Pixel Press may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

### **Security of Personal Information**

Pixel Press takes reasonable steps to ensure that personal information is protected while you submit personal information to the Services. However, the confidentiality of personal information transmitted over the internet cannot be guaranteed. We urge you to exercise caution when transmitting personal information over the internet. Pixel Press cannot guarantee that unauthorized third parties will not gain access to personal information; therefore, when submitting personal information to the Services, you must weigh both the benefits and the risks.

### **Links to Other Apps, Sites and/or Service Providers**

The Services may contain links to web sites and/or services operated by others (“*Third Party Services*”). Each of those maintains its own policies about the collection, use and security of personal information. Pixel Press is not responsible for the manner in which others use your personal information. Before providing personal information in connection with any Third Party Services, you should read its Privacy Policy and Terms of Use, and be sure they are acceptable to you. Notwithstanding any content on Third Party Services indicative of the contrary, Pixel Press makes no endorsement of or representation about any such Third Party Services, or any information, software, products or materials found there, or any results that may be obtained from using them.

If you decide to access any Third Party Services linked to in these Services, you do so entirely at your own risk. Pixel Press does not guarantee that you will receive an alert when you leave its website or Services, and it is your responsibility to determine when you have done so. Pixel Press recommends that you review any privacy policies associated with Third Party Services before submitting any information thereto. Pixel Press assumes no responsibility for and shall not be liable for the privacy, terms of use, or other policies of any Third Party Services, any damage to, or viruses that may infect your computer equipment or other property, or for any loss or corruption of data resulting from any Third Party Services navigated to or accessed from links hosted on or contained in the Services.

### **Contacting Pixel Press**

If you have questions about the use, amendment, insertion or deletion of personal information that you or your child provided to us or if you would like to opt out of future communications from a Pixel Press business or a particular Pixel Press program, please contact us by clicking on the “Contact Us” link on the Services or by e-mailing us at [privacypolicy@projectpixelpress.com](mailto:privacypolicy@projectpixelpress.com). Alternatively, you may send a letter to the following address:

Pixel Press Technology, LLC  
Attn: Privacy Concerns  
1017 Olive St. Suite 800  
St. Louis, MO 63101  
[privacypolicy@projectpixelpress.com](mailto:privacypolicy@projectpixelpress.com)

As indicated above, please specifically direct the correspondence to the Chief Technology Officer, Pixel Press’s designated Privacy Shield contact, for questions, complaints, access requests, and any other issues arising under the Privacy Shield.

In all communications to Pixel Press, please include the e-mail address used for registration (if applicable), the web site address or the specific program to which you or your child provided personal information and a detailed explanation of your request. If you would like to delete, add or amend your personal information or that of your child and are contacting us by e-mail, please put “Deletion Request”,

“Insertion Request” or “Amendment Request”, as applicable, in the subject line of the e-mail. We will do our best to respond to all reasonable requests in a timely manner.

### **Policy Updates**

Pixel Press reserves the right to amend this Privacy Policy without prior notice to reflect technological advancements, legal and regulatory changes and good business practices, provided, however, that we will not make material, retroactive changes without your consent. If Pixel Press changes its privacy practices, a new Privacy Policy will reflect those changes and the effective date of the revised Privacy Policy will be set forth in this title of this Privacy Policy.