

PRIVACY POLICY

Thank you for visiting GirlSpring.com. GirlSpring.com is strongly committed to protecting your privacy. The purpose of this privacy policy is to inform users of GirlSpring.com as to what information we collect and how and why we use such information.

DISCLOSURE REGARDING COLLECTION AND USE OF PERSONAL INFORMATION.

Through GirlSpring.com, including any mobile version thereof, users may enter personal information about themselves. This policy explains our online information collection and use practices and the choices you can make about the way we use and share such information. Please take the time to read and understand this policy so that you can understand how we use your personal information. Please note that our online information collection and use practices may differ from our practices regarding information obtained offline.

REMEMBER: IF YOU MAKE USE OF GIRLSPRING.COM, REGISTER WITH GIRLSPRING.COM, REQUEST INFORMATION THAT WE MAY OFFER, OR SUBMIT INFORMATION IN ANY WAY TO OR THROUGH GIRLSPRING.COM YOU AGREE TO THESE TERMS. AS WE UPDATE AND EXPAND OUR SERVICES, THIS POLICY MIGHT CHANGE, SO PLEASE REVIEW IT FROM TIME TO TIME.

THE INFORMATION WE COLLECT.

We may collect information about you through a variety of methods, such as your participation in games, quizzes, contests, chat rooms, forums or the like or other documents that you submit to us, transactions in which you may engage with us or our affiliated companies ("Affiliates"), or through visits that you may make to GirlSpring.com, including via our mobile applications. This policy applies to all personally identifiable information that we collect and maintain about our users in connection with providing services, such as:

- Your contact information (such as name, Twitter handle, postal and email address, or phone number);
- Username and password for the account you may establish on our sites;
- Demographic information (such as age, date of birth and gender);
- Location information, such as the real-time geographic location of the device on which you install our mobile applications; and
- Other details that you may submit to us or that may be included in the information provided to us by third parties.

You may view or change your information at any time by contacting us. You also can engage with our content, such as video, games, applications, and other offerings, on or through third-party social networking sites, such as

Facebook or third-party social media plug-ins and applications. When you engage with our content on or through third party social networking sites, plug-ins and applications, you may allow us to have access to certain information from your social media profile (e.g., your name, e-mail address, photo, gender, birthday, location, list of friends, people you follow and/or who follow you, the posts or the 'likes' you make) to deliver the content or as part of the operation of the application. We may also obtain non-personally identifiable information (e.g., content viewed, games played and performance, high scores, and information about advertisements within the content you have been shown or may have clicked on,) from your interaction with our content.

When you provide information from your social media account, it can help enable us to do things like: (i) give you exclusive content; (ii) personalize your online experience with us within and outside our applications or websites; and (iii) contact you through the social networking sites or directly by sending you the latest news, special offerings, and rewards. By doing so, you consent to the use of this information in accordance with our privacy policy. When you provide personal information to us through an application, on our sites, or on social networking sites, it may be publicly viewed by other members of these sites and we cannot prevent further use of the information by third parties.

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Through some social networking sites' privacy settings, you can control what data you share. For more information about how social networking sites handle your personal information, please refer to their respective privacy policies and terms of use.

OTHER COLLECTED INFORMATION

We also may use third-party website analytics tools (such as Omniture or Google), that collect information about visitor traffic on our sites and mobile applications. The information we may collect by automated means includes: Information about the devices our visitors use to access the Internet (such as the

IP address and the device, browser and operating system type);
URLs that refer visitors to GirlSpring.com;
Dates and times of visits to GirlSpring.com;
Information on actions taken on GirlSpring.com (such as page views and site navigation patterns)
A general geographic location (such as country and city) from which a visitor accesses our Site; and
Search terms that visitors use to reach GirlSpring.com.

When you use our mobile applications on your mobile device, you may choose not to share your geo-location details with us by adjusting the device's location services settings. For instructions on changing the relevant settings, please contact your service provider or device manufacturer.

HOW WE USE YOUR PERSONAL INFORMATION.

We use your personal information to provide you with products or services that you have requested, to respond to questions or communications and to get in touch with you when necessary. For example, we may use your personal information to communicate with you or to send you information that you have requested. Additionally, by registering for GirlSpring.com you will be automatically entered into sweepstakes and contests held on GirlSpring.com.

Except as otherwise set forth on GirlSpring.com, in addition, we may send to you an e-mail offering products or services which we think you may be interested in or to ask you to participate in a survey. If you want to opt-out using the personal information you provided in these ways, please contact us.

UPDATING OR REMOVING YOUR PERSONAL INFORMATION.

Please contact us at any time to update or change your personal information.

HOW WE SHARE YOUR PERSONAL INFORMATION.

We will not share with third parties the personal information you provide except (a) if it is for the purpose(s) you provided it; (b) with your consent; (c) as may be required by law or as we think necessary to protect our company or others from injury (e.g. in response to a court order or subpoena, in response to a law enforcement agency request or when we believe that someone is causing (or about to cause) injury to or interference with the rights or property of another); (d) with other persons, service providers or companies with whom we contract to carry out internal site operations or our business activities (for example, sending out a product or a promotional item that you have requested on GirlSpring.com); and/or (e) notifying you when we make material changes to one of our subscriber agreements or this policy.

PERSONAL INFORMATION GATHERED UNDER PREVIOUS VERSIONS OF THIS PRIVACY POLICY.

Personal information collected via GirlSpring.com will generally be governed by the version of the Privacy Policy in effect at the time the information was gathered. We will not retroactively make material changes to the way we use personally identifiable information collected under previous versions of this. Privacy Policy without obtaining your consent.

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USE AND DISCLOSURE OF ANONYMOUS INFORMATION.

We sometimes use the non-personal information that we collect to improve the design and content of GirlSpring.com and to enable us to personalize your Internet experience. We also may use this information in the aggregate to analyze how GirlSpring.com is used, as well as to offer you products, programs or services. Sometimes we share aggregate information with others, including Affiliates and non-affiliated companies.

RECEIPT OF COMMUNICATIONS; OPT-OUT.

If you would prefer not to receive marketing or promotional e-mails from us that may relate, for example, to new services or offerings, you may opt-out of receiving these communications by contacting us at the address below.

COLLECTION OF INFORMATION BY OTHERS.

GirlSpring.com may contain links to other websites, including links that are placed there by us, such as third-party advertisements or text hyperlinks. Please be aware that we are not responsible for the privacy practices of any other website. We encourage all users of GirlSpring.com to be aware of when they leave GirlSpring.com, and to read the privacy policies of each and every website that collects personal information. This privacy policy applies solely to information collected by GirlSpring.com, through GirlSpring.com. We may offer additional e-mail services or promotions that are sponsored by or co-sponsored with non-affiliated companies. Based on our agreement with them, these third parties may obtain personal information that site visitors voluntarily submit to participate in the contest, sweepstakes, or promotion. We have no control over the use of this information by these companies.

ONLINE TRACKING AND ADVERTISING.

We collect information regarding GirlSpring.com visitors through various technologies, such as cookies, Flash cookies and Web beacons, including when you visit our sites and applications or use our applications on third-party sites or platforms. Please visit Online Tracking and Advertising for further information regarding this collection and usage, including how to disable cookies.

CLICKSTREAM DATA.

As you use the Internet, a trail of electronic information is left at each web site you visit. This information, which is sometimes referred to as "Clickstream Data," can be collected and stored by a web site's server. Clickstream Data can tell us the type of computer and browsing software you use and the address of the web site from which you linked to GirlSpring.com. We may use Clickstream Data as a form of non-personal information to anonymously determine how much time visitors spend on each page of GirlSpring.com, how visitors navigate throughout GirlSpring.com and how we may tailor our web pages to better meet the needs of visitors. This information will only be used to improve GirlSpring.com. Any collection or use of Clickstream Data will be anonymous and aggregate.

SUPPLEMENTING INFORMATION.

From time to time we may supplement information you give us with information from other sources, such as information validating your address. Thus, information we obtain through GirlSpring.com may be intermingled with and used in conjunction with information obtained through sources other than GirlSpring.com, including both offline and online sources.

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DISCUSSIONS AND COMMUNITY TOOLS.

We may, from time to time, make review lists, chat rooms, forums, message boards, blogs, newsgroups and other community tools available to you. Please remember that any information that is disclosed in these areas becomes public information for other users to view and for us to use. For example, from time to time, we may use the content you write (including your name or screen name if you post it) for promotional purposes, in e-mail newsletters or elsewhere, and by using GirlSpring.com and/or these chat rooms, forums, message boards, news groups, and other community tools, you agree that we may do so. You should exercise caution when deciding to disclose your personal information in these areas, since anyone – not just us – may access your publicly posted information.

OUR COMMITMENT TO SECURITY.

We believe we have in place the appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access, maintain data security and correctly use the information we collect online. Whenever personal information is passed on to non-affiliated companies, to the extent practical, we require that they also have in place the appropriate safeguards. We cannot, however, guarantee that they do so.

HOW YOU CAN ACCESS OR CORRECT YOUR PERSONAL INFORMATION.

For instructions on how you can access the personal information that we have collected about you online, or how to correct any errors in such information, please contact us. To protect your privacy and security, we will take reasonable steps to help verify your identity before granting access or making corrections.

SPECIAL NOTE FOR PARENTS.

We will not knowingly accept personal information from anyone under 13 years old in violation of applicable law. If you believe that your child under 13 has gained access to GirlSpring.com without your permission, please contact us. We have taken commercially reasonable steps to restrict use of GirlSpring.com to those who are at least 13 years old. We do not market products or services for purchase by children and all children's products or services we market are for purchase by adults only, or with adult permission.

TRANSFER OF BUSINESS ASSETS.

The personal information you provide is considered a company asset and may be included among transferred assets if GirlSpring.com, we, or parent(s) or any or all of Affiliates or any of our assets are ever acquired by a third party.

CHANGES TO THIS POLICY.

Because our business needs may change over time, we reserve the right, at our discretion, to change, modify, add, or remove portions from this policy at any time. If at any time in the future we plan to use your personal information in a way that differs from this policy, we will revise this policy as appropriate. Your continued use of GirlSpring.com following the posting of any changes to this policy means you accept such changes. This policy is effective as of March 31, 2016.

HOW TO CONTACT US.

If you have any questions or concerns about this privacy policy you may contact us or write to the following address:

GirlSpring, Inc.

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