

Updated: 01/09/2017



Children's Privacy Policy

The PX Kids Interactive Family of Companies ("PXKIDS"), including for example Expulsar is committed to protecting the privacy of children who use our sites and applications. This Children's Online Privacy Policy explains our information collection, disclosure, and parental consent practices with respect to information provided by children under the age of 13 ("child" or "children"), and uses terms that are defined in our general [Privacy Policy](#). This policy is in accordance with the U.S. Children's Online Privacy Protection Act ("COPPA"), and outlines our practices in the United States regarding children's personal information. For more information about COPPA and general tips about protecting children's online privacy, please visit [OnGuard Online](#).

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe at <https://feedback-form.truste.com/watchdog/request>.

1. The Information We Collect From Children, How We Use It, and How and When We Communicate With Parents

PXKIDS offers to its users a range of sites and applications, some of which are primarily targeted at children, and others that are intended for users of all ages and their families. Our sites and applications offer a variety of activities, including activities that may collect information from children. Below we summarize potential instances of collection and outline how and when we will provide parental notice and/or seek parental consent. In any instance that we collect personal information from a child, we will retain that information only so long as reasonably necessary to fulfill the activity request or allow the child to continue to participate in the activity, and ensure the security of our users and our services, or as required by law. In the event we discover we have collected information from a child in a manner inconsistent with COPPA's requirements, we will either delete the information or immediately seek the parent's consent for that collection.

Registration

Children can, in many cases, register with our sites and applications to view content, play games, participate in contests, and engage in special features, among other things. During the registration process, we may ask the child to provide certain information for notification and security purposes, including a parent or guardian's email address, the child's first name and gender, the child's member or account username, and password. We also may ask for birth dates from children to validate their ages.

We strongly advise children never to provide any personal information in their usernames. Please note that children can choose whether to share their information with us, but certain features cannot function without it. As a result, children may not be able to access certain features if required information has not been provided. We will not require a child to provide more information than is reasonably necessary in order to participate in an online activity.

About the collection of parent email address: Consistent with the requirements of COPPA, on any child-targeted site or application, or in any instance where we ask for age and determine the user is age 12 or under, we will ask for a parent or guardian email address before we collect any personal information from the child. If you believe your child is participating in an activity that collects personal information and you or another parent/guardian have NOT received an email providing notice or seeking your consent, please feel free to contact us at contact@PXKidsInteractive.com. We will not use parent emails provided for parental consent purposes to market to the parent, unless the parent has expressly opted in to email marketing or has separately participated in an activity that allows for such email contact.

Content Generated by a Child

Certain activities on our sites and applications allow children to create or manipulate content and save it with P XKIDS. Some of these activities do not require children to provide any personal information and therefore may not result in notice to the parent or require parental consent. If an activity potentially allows a child to insert personal information in their created content, we will either pre-screen the submission to delete any personal information, or we will seek verifiable parental consent by email for the collection. Examples of created content that may include personal information are stories or other open-text fields, and drawings that allow text or free-hand entry of information. If, in addition to collecting content that includes personal information, P XKIDS also plans to post the content publicly or share it with a third party for the third party's own use, we will obtain a higher level of parental consent.

About Verifiable Parental Consent:

Email Consent. In the event P XKIDS wishes to collect personal information from a child, COPPA requires that we first seek a parent or guardian's consent by email. In the email we will explain what information we are collecting, how we plan to use it, how the parent can provide consent, and how the parent can revoke consent. If we do not receive parental consent within a reasonable time, we will delete the parent contact information and any other information collected from the child in connection with that activity.

High-Level Consent. In the event P XKIDS collects personal information from a child that will be posted publicly, we will seek a higher level of consent than email consent. Such "high-level" methods of consent include but are not limited to asking for a credit card or other payment method for verification (with a nominal charge involved), speaking to a trained customer service representative by telephone or video chat, or requiring a signed consent form by mail, email attachment, or fax. After providing high-level consent, a parent may have the opportunity to use a pin or password in future communications as a way to confirm the parent's identity.

Teacher consent in lieu of a parent. With regard to school-based activities, COPPA allows teachers and school administrators to act in the stead of parents to provide consent for the collection of personal information from children. Schools should always notify parents about these activities. For more

information on parental rights with respect to a child's educational record under the Family Educational Rights and Privacy Act (FERPA), please visit the [FERPA site](#).

Chat

Certain games and activities that are directed to children allow users to communicate directly with other users by means of a chat system. In most cases, these chat systems employ filters that are intended to prevent the communication of both personal information and age-inappropriate words and phrases. In addition to filters, we may employ live moderation and/or encourage other users to flag inappropriate communications. We strongly encourage children who use these interactive features on our sites and applications never to provide personal information about themselves or any third party, and certainly never to attempt to circumvent our filters or moderation. We also recommend that parents carefully supervise their children when the children participate in online activities.

Where P XKIDS employs a chat system that does not filter all or nearly all personal information, we will first seek high-level consent from the parent.

Contests and Sweepstakes

For contests and sweepstakes, we typically require only the information necessary for a child to participate, such as first name (to distinguish among family members) and parent email address (to notify the parent where required by law). We only contact the parent for more personalized information for prize-fulfillment purposes when the child wins the contest or sweepstakes.

Of course, some contests and sweepstakes ask the child to submit their own created content along with the child's entry. In those instances, we may require parental consent prior to submission. Please see [Content Generated by a Child](#) above for more information on our collection, notice, and consent policies.

Email Contact with a Child

On occasion, in order to respond to a question or request from a child, P XKIDS may need to ask for the child's online contact information, such as an email address. P XKIDS will delete this information immediately after responding to the question or request.

In connection with certain activities or services, we may collect a child's online contact information, such as an email address, in order to communicate with the child more than once. In such instances we will retain the child's online contact information to honor the request and for no other purpose such as marketing. One example would be a newsletter that provides occasional updates about a site, game/activity, personality/character, or book. Whenever we collect a child's online contact information for ongoing communications, we will simultaneously require a parent email address in order to notify the parent about the collection and use of the child's information, as well as to provide the parent an opportunity to prevent further contact with the child. On some occasions a child may be engaged in more than one ongoing communication, and a parent may be required to "opt-out" of each communication individually.

Push Notifications

Push notifications are notifications on mobile and other devices that are typically associated with downloaded applications, and which can communicate to the device holder even when the application is not in use. We will require a child to provide a parent email address before the child can receive push

notifications from our child-directed applications that collect a device identifier. We will then provide the parent with notice of our contact with the child and will provide the parent the opportunity to prevent further notifications. Finally, we will not associate the device identifier with other personal information without contacting the parent to get consent.

Geolocation Data

If a child-directed PXXKIDS site or application collects geolocation information that is specific enough to equate to the collection of a street address, we will first seek parental consent via email.

Persistent Identifiers

When children interact with us, certain information may automatically be collected, both to make our sites and applications more interesting and useful to children and for various purposes related to our business. Examples include the type of computer operating system, the child's IP address or mobile device identifier, the web browser, the frequency with which the child visits various parts of our sites or applications, and information regarding the online or mobile service provider. This information is collected using technologies such as cookies, flash cookies, web beacons, and other unique identifiers (which we define under the "[Online Tracking Technologies](#)" section of our general [Privacy Policy](#)). This information may be collected by PXXKIDS or by a third party. This data is principally used for internal purposes only, in order to:

- provide children with access to features and activities on our sites and applications
- customize content and improve our sites and applications
- conduct research and analysis to address the performance of our sites and applications
- generate anonymous reporting for use by PXXKIDS

In the event we collect (or allow others to collect) such information from children on our sites and applications for other purposes, we will notify parents and obtain consent prior to such collection. For a current list of third-party operators who collect persistent identifiers on our sites and applications, please contact us at the mailing address, email, or phone number below:

PX Kids Interactive, Inc.

14544 Glendale Avenue SE

Prior Lake, Minnesota 55372-1407

United States of America

Phone: (612) 518-7818

Email: contact@pxkidsinteractive.com

2. When Information Collected From Children Is Available To Others

In addition to those rare instances where a child's personal information is posted publicly (after receiving high-level parental consent), we also may share or disclose personal information collected from children in a limited number of instances, including the following:

- We may share information with our service providers if necessary for them to perform a business, professional, or technology support function for us.
- We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety

of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.

3. Parental Choices and Controls

At any time, parents can refuse to permit us to collect further personal information from their children in association with a particular account, and can request that we delete from our records the personal information we have collected in connection with that account. Please keep in mind that a request to delete records may lead to a termination of an account, membership, or other service.

Where a child has registered for a PXXkidsInteractive.com account, we use two methods to allow parents to access, change, or delete the personally identifiable information that we have collected from their children:

1. Parents can request access to and delete their child's personal information by logging on to the child's account. Parents will need their child's username and password. The Account home page explains how to recover a password if the child cannot recall it.
2. Parents can contact Guest Services to request access to, change, or delete their child's personal information by sending an email to us at contact@pxkidsinteractive.com. A valid request to delete personal information will be accommodated within a reasonable time.

Email: contact@pxkidsinteractive.com

In any correspondence such as e-mail or mail, please include the child's username and the parent's email address and telephone number. To protect children's privacy and security, we will take reasonable steps to help verify a parent's identity before granting access to any personal information.

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Online Tracking and Advertising

1. Online Tracking and Advertising

We and certain service providers operating on our behalf collect information about your activity on our sites and [applications](#) using tracking technologies such as cookies, Flash cookies and Web beacons. Definitions for the tracking technologies listed, as well as information regarding how to disable them, are available below. This tracking data is used for many purposes including, for example, to:

- Provide useful features to simplify your experience when you return to our sites and applications; for example, remembering your shipping information for future purchases
- Deliver relevant content based on your preferences, usage patterns and location
- Monitor and evaluate the use and operation of our sites and applications
- Analyze traffic on our sites and on the sites of third parties

We may associate this tracking data with your registration account, in which case we will treat it as personal information. Service providers that collect tracking data on our behalf may provide an opportunity for you to choose not to be tracked online.

Advertisers and third parties also may collect information about your activity on our sites and applications and on third-party sites and applications using tracking technologies. Tracking data collected by these advertisers and third parties is used to decide which ads you see both on our sites and applications and on third-party sites and applications, but does not identify you personally and is not associated with your registration account. You may [choose not to receive targeted advertising from many ad networks](#), data exchanges, marketing analytics and other service providers. You may also choose to control targeted advertising you receive within applications by using your mobile device settings (for example, by re-setting your device's advertising identifier and/or opting out of interest based ads). We adhere to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising.

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2. Online Tracking Technologies

Examples of online tracking technologies include:

- Cookies. Cookies are pieces of information that a website places on the hard drive of your computer when you visit the website. Cookies may involve the transmission of information from us to you and from you directly to us, to another party on our behalf, or to another party in accordance with its privacy policy. We may use cookies to bring together information we collect about you. You can choose to have your computer warn you each time a cookie is being sent, or

you can choose to turn off all cookies. You do this through your browser settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you won't have access to many features that make your guest experience more efficient and some of our services will not function properly.

- Flash cookies. We may use local shared objects, sometimes known as Flash cookies, to store your preferences or display content based upon what you view on our site to personalize your visit. Our advertisers and third-party service providers also may use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies. Learn how to [manage privacy and storage settings for Flash cookies](#). If you disable Flash cookies, you won't have access to many features that make your guest experience more efficient and some of our services will not function properly.
- Web beacons. Web beacons are small pieces of data that are embedded in images on the pages of sites. Web beacons may involve the transmission of information directly to us, to another party on our behalf, or to another party in accordance with its privacy policy. We may use web beacons to bring together information we collect about you.

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3. Do Not Track

Do Not Track is a standard that is currently under development. As it is not yet finalized, we adhere to the standards set out in this privacy policy. [Learn about Do Not Track](#).

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Definitions

Application. Application means a program or service operated by us (or on our behalf) that may be displayed on various online, mobile or other platforms and environments, including those operated by third parties, which permits us to interact directly with our guests.

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