

## **CHILDREN'S PRIVACY POLICY**

### **What types of personal information do we collect about kids?**

Kids can surf *Clubhousenews.com* and other Clubhouse Children's News Network sites, view content, and play many games without any personal information being collected. We do not collect personal information from kids unless they register on Clubhouse Children's News Network sites. Typically, kids will register in order to participate in sweepstakes, contests or a special activity. The only information we collect from kids during our registration process is a kid's first name, parent's e-mail address, kid's birth date, member name, and password. We collect birth dates to validate the ages of our guests, including kids. We do not collect any other personally identifiable information from kids during our registration process. We also will collect a kid's e-mail address from a parent for the purpose of sending the kid e-mail related to a subscription. Note that all sites that are directed to children under 13 are prohibited by law from conditioning a kid's participation in an online activity on the kid's providing more personal information than is reasonably necessary.

We may collect personal information from parents in order to allow kids to participate in certain features located on our Web sites and within our kids' subscription products. These features may include one to one instant message chatting, sending e-mail, posting on message boards, and other similar activities. In the course of a kid's participation in these features, a kid may also provide us additional information about himself or herself, such as the contents of his or her chat or message board postings. If a parent allows us to collect personal information about their kid, we may link certain information collected through technology to that personal information.

### **How do we use and share the personally identifiable information that we have collected about kids?**

If a kid registers for a sweepstakes or contest, we use the parent's e-mail address to notify the parent of the kid's registration request. To personalize communications to a kid regarding a specific product we may use the kid's first name combined with the parent's last name and a mailing address provided by the parent when signing up for that specific product. We may collect a kid's e-mail address from the parent in order to send the kid a newsletter. In addition, personal information regarding a kid may be collected and used to enable a kid's participation in certain interactive features such as instant message chatting, sending e-mail, posting on message boards and other similar activities. These activities may involve disclosure of a kid's personal information to third parties. In addition, we may share a kid's personal information with third parties to the extent reasonably necessary to: protect the security of integrity of our sites; to take precautions against liability; to respond to judicial process; or to the extent permitted under provisions of law, to provide information to law enforcement agencies or for an investigation related to public safety.

### **How do we notify and obtain consent from parents for the collection of information from their kids?**

We send parents an e-mail when their kid registers and enters a sweepstakes or contest and we provide parents 48 hours to refuse their kid's registration and entry in the sweepstakes or contest. If the parent refuses to allow the kid's registration and entry, we delete the kid's information from our database. If

we don't hear back from the parent, we assume it is acceptable for the kid to be registered and entered in the sweepstakes or contest. Once a parent permits a kid to register, the kid will be able to enter future registration-based sweepstakes or contests without any further notification to the parent. If a kid wins a sweepstakes or contest, we notify the parent at the parent's e-mail address provided to us during the registration process and request that the parent provide their postal address for purposes of delivering the prize. We may publish a winner's first name, first initial of last name, city, and state of residence on our Web sites.

We collect personal information from kids when they participate in activities. Before allowing a kid to use these features, we send an e-mail to the kid's parent requesting the parent's affirmative consent to the kid's participation. If the parent responds by e-mail and gives such consent, we then follow that communication with an e-mail confirmation to the parent and allow the kid to participate in the activity.

Before allowing a kid to use a feature of our Web sites that might result in the public disclosure of the kid's information to third parties on the Internet, such as posting on open message boards, we require a high level of verification to confirm that the parent has given permission for the kid's participation in such features. For example, we may require a parent to provide us credit card information, speak to a trained telephone operator or return by postal mail or fax a signed consent form.

#### **How can parents access, change or delete personally identifiable information about their kids?**

At any time parents can refuse to permit us to collect further personal information from their kid and can request that any personal information we have collected be deleted from our records. We use two methods to allow parents to access, change, or delete the personally identifiable information that we have collected from their kids.

A parent can access, change, or delete his or her kid's personal information by logging on to the kid's account at the Member Services Home Page located at [www.clubhousenews.com/home](http://www.clubhousenews.com/home). The parent will need to have their kid's member name and password. There are instructions on the Your Account home page explaining how to recover a password if the kid has forgotten it.

A parent can contact Clubhousenews.com to access, change, or delete the personal information that we have collected from his or her kid by sending an e-mail to [info@clubhousenews.com](mailto:info@clubhousenews.com). Please include the kid's member name and the parent's e-mail address in the e-mail so that we can better assist you with your inquiry or request.

#### **How will we notify parents if our Kids' Privacy Policy changes?**

We may amend our Kids' Privacy Policy at any time. We will provide parents notice by e-mail of any material changes in the way we intend to collect, use, and/or share kids' personal information. Please note that, at all times, parents should update their personal information to provide us current e-mail addresses. We will apply material changes in our Kids' Privacy Policy only in conformance with applicable law, including any applicable provisions of COPPA that require parental consent.

**Who do guests contact with questions or concerns about our Kids' Privacy Policy?**

If you need further assistance, please write us at:

Clubhouse Children's News Network, LLC  
6245 W. Post Road  
Las Vegas, Nevada 89118

(If you are not 18 years of age or older, you must have your parent or guardian's permission to write us.)

**What operators collect or maintain information from children through our Web sites and online services?**

Operators collect and maintain information from children through our Web sites and online services, and we comply with the U.S. Children's Online Privacy Protection Act. The list of operators may be found here. Questions about the operators' privacy policies and use of children's information may be directed to:

Clubhouse Children's News Network, LLC  
6245 W. Post Road  
Las Vegas, Nevada 89118