



SCAPENATION.COM
the adventure begins

CHILDREN'S PRIVACY POLICY

UPDATED: FEBRUARY 2, 2009

Tween Brands is committed to protecting the privacy and confidentiality of all personal information provided to us, and we have special concerns about the privacy of information of our users who are under the age of 13. It is to these users under the age of 13 that this Children's Privacy Policy applies. We comply with the Children's Online Privacy Protection Act ("COPPA"). Consistent with this law, we provide special notifications to parents and legal guardians (both of which we refer to herein as "parents") regarding the personal information being collected from their children and how we use and disclose that information.

Parental guidance and involvement are essential to help ensure that children have a safe and rewarding online experience. We strongly encourage parents to participate in and monitor their children's online experiences. General information about COPPA and online privacy for children is available at www.ftc.gov/kidzprivacy.

1. WHAT IS PERSONAL INFORMATION?

When this Children's Privacy Policy uses the term "personal information," we mean information that identifies a particular individual, such as the individual's full name (first name and surname together), postal address and email address. When certain other information such as your hobbies, interests or other non-identifiable information is directly associated with personal information, this other information also becomes personal information for purposes of this Children's Privacy Policy.

2. THE INFORMATION WE COLLECT

We collect no more personally identifying information from your child than is reasonably necessary for your child to participate in an online activity.

Submission by Your Child. When your child registers for a ScapeNation account, we collect only his or her first name, birthday, gender, state of residence, and a parent's email address. None of this is personally identifiable information, because it cannot be used to contact or identify the child offline. The parent's email address is used to notify the parent about ScapeNation's privacy practices, seek parental consent to various activities their child may wish to participate in, to send the parent communications either about the child's account with us or about features of our Site, and for the other purposes described in this Privacy Policy. This email address is correlated with the account username. During the registration process, the child is also asked to create a username and password. Your child should not use any personally identifiable information as his or her username, as this username may be visible to others on the site.

In the event that you consent to your child's participation in our chat services, your child may also submit information about him- or herself through chat. We employ a word filter and moderation techniques to help prevent personal information from being transmitted via chat, but children are creative and we cannot promise that they will not find a way. If your child contacts us by email, we use the email address (which is personally identifiable information) only to respond to your child's specific request or question, after which the address is deleted. If we ask for your (the parent's) email address, we keep that information and use it only for the purpose of providing notices to you and requesting parental consent as required under applicable law.



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We also collect and aggregate non-personal information, which is information that cannot be associated with or traced back to a specific user. For example, we collect information about the number of users who view each page so that we may enhance our Site to better suit our customers' desires. We may disclose anonymous, aggregated information about our Site to third parties.

We may collect aggregate information in connection with surveys or other online activities that allow your child to give us feedback. Unless we first obtain parental consent, we do not collect any personal information in connection with surveys or feedback requests, nor is the information provided connected to any personal information we may have about the child.

Cookies. ScapeNation uses software technologies such as unique identifiers or "cookies." Cookies are small text files that we place in visitors' computer browsers to store their preferences. Cookies themselves do not contain any personal information. Where we link these unique identifiers with your other personal information, we will treat the cookies as personal information as long as they are linked. We use cookies to learn about usage of our Site, such as geographic location, how many visitors we have and how often they visit various sections of our Site.

Other Technology. We may passively collect certain non-personally identifying computer information, such as your child's IP address and the operating system and web browser used, through technology for the purposes of routine system administration, enhancement of our Site or management of content delivery such as avatar status and wallet status. We may link this information to personal information that we have collected. If we do so, we will treat such linked information as personal information.

3. HOW WE USE AND DISCLOSE THE INFORMATION WE COLLECT

Internal Uses and Disclosures. As indicated in Section 2, we use the personal information we collect to communicate with you regarding your account, fulfill your orders, contact participants in sweepstakes and contests, assess results of polls and surveys, provide services to you, respond to your communications, and administer and enhance our Site.

In addition, we may actively collect and use email addresses and usernames to track usage and to ensure users are following the Site's User Agreement and to ban a user temporarily or permanently from the Site if that user engages in inappropriate conduct on the Site. We may also use email addresses and usernames to enable parents to review personal information that the children have submitted to the Site and to provide notification regarding the Site, such as future amendments to this Privacy Policy.

Finally, we may use your personal information to offer you other products, programs or services that we offer and that we believe may be of interest to you.

Note that we do not use your credit card information for any purpose other than processing payments to us. This information that you enter to make a purchase is not stored by us, but, instead, by our payments processing vendor for the purpose of processing credit card payments made to us.

Third Party Uses and Disclosures. We do not allow third-party companies to solicit or advertise to our users. Under COPPA, parents have the option to consent to the collection of their children's personal information without consenting to the disclosure of that information to third parties. However, this option does not apply and we may disclose such information for the legal and corporate transaction reasons discussed below.



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7. CONTACT US

If you have questions or wish to send us comments about this Privacy Policy, please send an email with your questions or comments to privacy@scapenation.com or write us:

ScapeNation: Attention Legal Department
8323 Walton Parkway
New Albany, Ohio 43054

Please be assured that any personal information that you provide in communications to the above email and postal mail addresses will not be used to send you promotional materials, unless you so request.

8. EFFECTIVE DATE

The privacy policy set out above is effective as of the date set forth at the top, and applies to all information obtained via the Site. We reserve the right to change this Children's Privacy Policy. ScapeNation users will be informed of any such change by our posting of a new privacy policy on the Site, and the effective date of any change of privacy policy will be clearly marked. As required by law, we will not use personal information in ways that are materially different from the ones described in this Children's Privacy Policy without also providing notification of such practices and obtaining consent to any such different uses.

