

Privacy Policy

Effective Date: July 31, 2010

Cosmic Cubs Club is Committed to Protecting the Privacy of Our Users

Welcome to www.Cosmiccubsclub.com. This website (the "Site") is owned and operated by Cosmic Cubs Club LLC ("Cosmic Cubs Club" or "We"). As a website geared toward children under the age of 13, we understand that the privacy of our users is of utmost importance to you (their parents or legal guardians). As used in this Privacy Policy, the word you means the parent or guardian.

This Privacy Policy addresses our policies and procedures relating to the Personal Information (defined below) that we collect from you and the children you sign up for membership at www.Cosmiccubsclub.com. This Privacy Policy is intended to assist you in understanding Cosmic Cubs Club' policies and procedures relating to our management of your and your child's Personal Information.

What Is Personal Information?

As used in this Privacy Policy, the term Personal Information means any information that identifies a particular person, such as their first and last name, home or other physical address, e-mail address, telephone number, or any other identifier that permits the physical or online contacting of a specific individual. When certain other information is directly associated with Personal Information, that other information also becomes Personal Information for purposes of this Privacy Policy.

Cosmic Cubs Club Complies with Privacy Laws

COPPA Compliance. Cosmic Cubs Club is committed fully to protect the privacy and confidentiality of all Personal Information provided to us. In that regard, we strive fully to comply with all applicable laws concerning privacy rights, including the Children's Online Privacy Protection Act "COPPA"). For more information about COPPA and children's privacy, we encourage you to visit <http://www.ftc.gov/privacy/privacyinitiatives/childrens.html>.

California Privacy Rights Compliance. In addition to the information provided in this Privacy Policy, if you are a resident of the state of California, you have the right to request certain information from us regarding the manner in which we share your Personal Information with third parties for their direct marketing purposes. At this time, Cosmic Cubs Club does not sell any of your Personal Information to third parties for their marketing purposes. Upon receipt of a written request at our designated e-mail address (support@cosmiccubsclub.com) and we will provide you with the following information (if applicable):

1. The categories of information Cosmic Cubs Club disclosed to third parties for their direct marketing purposes during the preceding calendar year;
2. The names and addresses of third parties that received any such Personal Information; and
3. Examples of the products or services that were marketed if the nature of the third party's business cannot be reasonably determined from the third party's name.

This information will be provided to you in a standardized format. We will provide a general statement of our policy and activities, but we will not provide any specific information specific to you or your children.

Collection of Information

Cosmic Cubs Club does not require anyone to provide any Personal Information to us simply to browse the Site. However, if your child wishes to participate in the activities and games that we offer on the Site, we will ask you to provide certain Personal Information. The type and amount of Personal Information collected by Cosmic Cubs Club will vary depending on the level of service or activity involved. We will collect Personal Information regarding your child only as is reasonably necessary for the activity that your child will participate in. That being said, we do not currently collect any Personal Information from or about your child.

Collection of Information During Registration.

To enable your child to participate in the games and activities on the Site, you must sign them up for a trial membership or paid subscription. Once the trial membership expires, you will need to sign them up for a full membership to continue their participation in the Site.

When you sign-up your child for a trial membership, Cosmic Cubs Club will request and collect your first name, last name, e-mail address, user created password, the number of children to be registered, and the desired user names and passwords for each child that you are registering. Because we can use your e-mail address to contact you, this information is Personal Information. We will treat it as such pursuant to this Privacy Policy. You should not use any Personal Information as part of your child's user name or password. If you do, it will be at your own risk as there is no way for us to monitor such a use.

Once you successfully complete the trial registration process, we will send you an e-mail confirming the creation of your new account and each of your children's trial registration status on www.cosmiccubsclub.com. We will also provide you with information and access to our Parent's Area, where you can control and limit the types of activities that your children participate in, or make changes to your children's account.

Once the trial membership ends, you may register your child as a member of www.cosmiccubsclub.com by purchasing a paid subscription. To do so, you must provide your credit card information (card number, full credit card billing address, your home telephone number and any other relevant information) to PayPal.com, which is an unrelated business that processes payment transactions for us. We do not store or have access to any of the information that you provide to PayPal. This information is accessed solely by PayPal and any of its third party vendors. Thus, this information is not considered Personal Information and is not covered by this Privacy Policy. For details on the Privacy Policy of PayPal, you may go to www.PayPal.com to review Pay Pals' privacy policy.

Cosmic Cubs Club uses the username and password created by you for your child to create and maintain his or her user account. We do not knowingly collect any Personal Information from any user during either during the trial registration or membership registration processes. Further, we will not communicate or allow others to communicate with your child online or otherwise. Accordingly, no information we collect from you or your child about your child is Personal Information.

Passive Collection of Information

In addition to collecting information during the registration processes, we also collect information passively on this Site using various technologies. We do not passively collect any Personal Information from you or your child. We passively collect information only in the following manner and for the following purposes:

We may collect the IP address of the computer being used to browse or access the Site. An IP address is a unique number that identifies your computer every time you go on any website. By collecting your computer's IP address, we are able to perform troubleshooting, maintain security on the Site, this for system administration purposes, to make our Website more interesting and useful to you and your child, or to manage content delivery. Once your child has logged into the website, we will track your child's website activities by using logs of database transactions and server interactions. This data is used to maintain your child's avatar status on the Site. Our site also uses other passive methods to collect information.

Cookies are pieces of information that a website sends to your child's computer while he or she is viewing the website. Cookies provide information to the Site so that the Site will remember the user. These technical methods may involve the transmission of information either directly to us or to our third party service providers who are subject to the protections described in this Privacy Policy. None of the information collected through these methods is directly connected to your Personal Information.

Cosmic Cubs Club discloses Personal Information on a limited basis to Third Parties

Cosmic Cubs Club will not share your (nor your child's) Personal Information with any other person or entity, except as set forth below. If it does share such information, it will do so only to the extent required to fulfill the purposes for which it is disclosing the information. You may request that Cosmic Cubs Club not share your Personal Information by contacting support@cosmiccubsclub.com. Cosmic Cubs Club may disclose your (but not your child's) Personal Information as follows:

- 1. To Perform Processing and Other Specialized Services:** At times, Cosmic Cubs Club may use outside organizations to perform certain services to support our internal operations and administration. These vendors may come into contact with your (but not your child's) Personal Information and your child's username and password. These service providers are only given the information needed to perform those services and they are bound contractually to protect the confidentiality, privacy and security of your information and to limit the use of your information to the service being provided. These vendors may not contact your child.
- 2. For Legal Reasons:** We may disclose your (but not your child's) Personal Information and your child's user name and password to the government or other legal or regulatory authorities (i) if ordered to do so by a court of law or (ii) for other legal reasons, such as (a) to comply with legal process such as a search warrant, subpoena or court order; (b) to protect Cosmic Cubs' rights and property; (c) to investigate reports of fraud or of users sending material using a false e-mail address or users sending harassing, threatening, or abusive messages; (d) to protect against misuse or unauthorized use of our Website; or (e) in emergencies, such as when we believe someone's physical safety is at risk. In some cases, disclosure may be required by law to be without notice to you.
- 3. To accomplish an Extraordinary Business Transaction:** In the case of any extraordinary business transaction or event involving Cosmic Cubs Club, such as, a sale, merger, consolidation, financing, re-organization, liquidation, or insolvency, other parties to the transaction and their professional advisors may need to have access to Cosmic Cubs Club' customer lists and various databases as

part of their review of the business and its assets. In this event, Cosmic Cubs Club would only provide such access under terms of a strict confidentiality agreement. Also, upon completion of the transaction or event, your (but not your child's) Personal Information and your child's user name and password would be transferred to Cosmic Cubs Club's successor-in-interest to be used only for the purposes for which it was collected.

Cosmic Cubs Club will contact you if it needs to collect your Child's Personal Information

If at any time in the future we have a need to obtain Personal Information from your child, we will first contact you by e-mail to notify you that your child wishes to provide Personal Information to us, describe the purposes for which the Personal Information is collected, and provide you with an opportunity to opt-out of the collection of the Personal Information, at that time, we will also provide a revised version of this Privacy Policy to address any such disclosures.

If Cosmic Cubs Club collects Personal Information about your Child you can request that we update or delete it

You can review the Personal Information that Cosmic Cubs Club has for you by accessing our Parent Area. To gain access, you will need to enter your e-mail address and password. Once in that area, you can make any changes to your Personal Information or your children's accounts. You can also delete your children's account registration and other information.

If you have any questions or comments about this Privacy Policy, would like a copy of the information we have on file for your child, to change how your Personal Information is collected, used or disclosed, would like to access or update your Personal Information or want to stop us from collecting further Personal Information about you, you may also contact us at support@cosmiccubsclub.com from the e-mail address that we have on file for you. We will assist you with your request in accordance with applicable law.

Cosmic Cubs Club may make changes to this Privacy Policy

By registering for a trial or full membership, or accessing, browsing or using or allowing your child to access, browse or use this Website, you signify your agreement to the terms and conditions of this Privacy Policy. When submitting your or your child's Personal Information to Cosmic Cubs Club, you will be prompted to expressly indicate your agreement to the terms and conditions of this Privacy Policy. If you do not agree to this policy, please do not submit your Personal Information to us. **We reserve the right, at our discretion, to change, modify, add or remove portions of our Privacy Policy at any time.** If at some point in the future, there is a material change to this Privacy Policy, we will notify you of such change. By accessing, browsing or using

or allowing your child to access, browse or use this Website after any such change, you signify your agreement to the terms and conditions of this Privacy Policy.

For Questions or Comments Regarding the Privacy Policy:

If you have any questions or comments about Cosmic Cubs Club' Privacy Policy, please contact the Customer Service Department at the following address, Cosmic Cubs Club, 1771 Post Road East, Westport, CT 06880 ATTN: Customer Service or E-mail: support@cosmiccubsclub.com.

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