

## **HOTSPOT PRIVACY POLICY**

Power Graphics 360 LLC (“Power Graphics 360 LLC” or “we” or “us” or “our”) respects the privacy of its users (“user” or “you”) that use our HotSpot mobile app, including other media forms, media channels, mobile App or mobile application related or connected thereto (collectively, the “App”). The following Power Graphics 360 LLC privacy policy (“Privacy Policy”) is designed to inform you, as a user of the App, about the types of information that Power Graphics 360 LLC may gather about or collect from you in connection with your use of the App. It also is intended to explain the conditions under which Power Graphics 360 LLC uses and discloses that information, and your rights in relation to that information. Changes to this Privacy Policy are discussed at the end of this document. Each time you use the App, however, the current version of this Privacy Policy will apply. Accordingly, each time you use the App you should check the date of this Privacy Policy (which appears at the beginning of this document) and review any changes since the last time you used the App.

The App is hosted in the United States of America and is subject to U.S. state and federal law. If you are accessing our App from other jurisdictions, please be advised that you are transferring your personal information to us in the United States, and by using our App, you consent to that transfer and use of your personal information in accordance with this Privacy Policy. You also agree to abide by the applicable laws of applicable states and U.S. federal law concerning your use of the App and your agreements with us. Any persons accessing our App from any jurisdiction with laws or regulations governing the use of the Internet, including personal data collection, use and disclosure, different from those of the jurisdictions mentioned above may only use the App in a manner lawful in their jurisdiction. If your use of the App would be unlawful in your jurisdiction, please do not use the App.

BY USING OR ACCESSING THE APP, YOU ARE ACCEPTING THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY.

## **GATHERING, USE AND DISCLOSURE OF NON-PERSONALLY-IDENTIFYING INFORMATION**

### **Users of the App Generally**

“Non-Personally-Identifying Information” is information that, without the aid of additional information, cannot be directly associated with a specific person. “Personally-Identifying Information,” by contrast, is information such as a name or email address that, without more, can be directly associated with a specific person. Like most App operators, Power Graphics 360 LLC gathers from users of the App Non-Personally-Identifying Information of the sort that Web browsers, depending on their settings, may make available. That information includes the user’s Internet Protocol (IP) address, operating system, browser type and the locations of the Apps the user views right before arriving at, while navigating and immediately after leaving the App. Although such information is not Personally-Identifying Information, it may be possible for Power Graphics 360 LLC to determine from an IP address a user’s Internet service provider and the geographic location of the visitor’s point of connectivity as well as other statistical usage data. Power Graphics 360 LLC analyzes Non-Personally-Identifying Information gathered from users of the App to help Power Graphics 360 LLC better understand how the App is being used. By identifying patterns and trends in usage, Power Graphics 360 LLC is able to better design the App to improve users’ experiences, both in terms of content and ease of use. From time to time, Power Graphics 360 LLC may also release the Non-Personally-Identifying Information gathered from App users in the aggregate, such as by publishing a report on trends in the usage of the App.

## **Web Cookies**

A “Web Cookie” is a string of information which assigns you a unique identification that a App stores on a user’s computer, and that the user’s browser provides to the App each time the user submits a query to the App. We use cookies on the App to keep track of services you have used, to record registration information regarding your login name and password, to record your user preferences, to keep you logged into the App and to facilitate purchase procedures. Power Graphics 360 LLC also uses Web Cookies to track the pages that users visit during each App session, both to help Power Graphics 360 LLC improve users’ experiences and to help Power Graphics 360 LLC understand how the App is being used. As with other Non-Personally-Identifying Information gathered from users of the App, Power Graphics 360 LLC analyzes and discloses in aggregated form information gathered using Web Cookies, so as to help Power Graphics 360 LLC, its partners and others better understand how the App is being used. POWER GRAPHICS 360 LLC USERS WHO DO NOT WISH TO HAVE WEB COOKIES PLACED ON THEIR COMPUTERS SHOULD SET THEIR BROWSERS TO REFUSE WEB COOKIES BEFORE ACCESSING THE APP, WITH THE UNDERSTANDING THAT CERTAIN FEATURES OF THE APP MAY NOT FUNCTION PROPERLY WITHOUT THE AID OF WEB COOKIES. APP USERS WHO REFUSE WEB COOKIES ASSUME ALL RESPONSIBILITY FOR ANY RESULTING LOSS OF FUNCTIONALITY.

## **Third-Party Advertisers**

We may use third-party advertising companies to serve ads when you visit the App. These companies may use information (not including any Personally-Identifying Information) about your visits to the App and other Apps that are contained in Web Cookies in order to provide advertisements about goods and services of interest to you. Using a tool created by the Network Advertising Initiative, you can opt out of several third-party ad servers’ and networks’ Web Cookies simultaneously. If you would like more information about this practice and to know your choices about not having this information used by these companies, please follow the following links: [http://networkadvertising.org/managing/opt\\_out.asp](http://networkadvertising.org/managing/opt_out.asp), <http://preferences-mgr.truste.com/>, or <http://www.aboutads.info/choices/>. Please contact us if you would like to know the identity of the third-party advertising companies we are currently using to serve ads.

We may allow advertisers to choose the characteristics of users who will see their advertisements, and we may use any of the Non-Personally Identifying Information we have collected (including information you may have decided not to show to other users, such as your birth year or other sensitive personal information or preferences) to select the appropriate audience for those advertisements. We do not identify you to the advertiser.

## **Web Beacons**

A “Web Beacon” is an object that is embedded in a web page or email that is usually invisible to the user and allows App operators to check whether a user has viewed a particular web page or an email. Power Graphics 360 LLC may use Web Beacons on the App and in emails to count users who have visited particular pages, viewed emails and to deliver co-branded services. Web Beacons are not used to access users’ Personally-Identifying Information. They are a technique Power Graphics 360 LLC may use to compile aggregated statistics about App usage. Web Beacons collect only a limited set of information, including a Web Cookie number, time and date of a page or email view and a description of the page or email on which the Web Beacon resides. You may not decline Web Beacons. However, they can be rendered ineffective by declining all Web Cookies or modifying your browser setting to notify you each time a Web Cookie is tendered, permitting you to accept or decline Web Cookies on an individual basis.

## **Analytics**

We may use third-party vendors, including Google, who use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize and serve ads based on your past activity on the App, including Google Analytics for Display Advertising. The information collected may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. If you do not want any information to be collected and used by Google Analytics, you can install an opt-out in your web browser (<https://tools.google.com/dlpage/gaoptout/>) and/or opt out from Google Analytics for Display Advertising or the Google Display Network by using Google's Ads Settings ([www.google.com/settings/ads](http://www.google.com/settings/ads)).

## **Aggregated and Non-Personally-Identifying Information**

We may share aggregated and Non-Personally Identifying Information we collect under any of the above circumstances. We may also share it with third parties and our affiliate companies to develop and deliver targeted advertising on the App and on Apps of third parties. We may combine Non-Personally Identifying Information we collect with additional Non-Personally Identifying Information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis. For example, we may tell our advertisers the number of visitors to the App and the most popular features or services accessed. This information does not contain any Personally-Identifying Information and may be used to develop App content and services that we hope you and other users will find of interest and to target content and advertising.

## **Mobile Device Additional Terms**

- **Mobile Device.** If you use a mobile device to access the App or download any of our applications, we may collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.
- **Geo-Location Information.** Unless we have received your prior consent, we do not access or track any location-based information from your mobile device at any time while downloading or using our mobile application or our services, except that it may be possible for Power Graphics 360 LLC to determine from an IP address the geographic location of your point of connectivity, in which case we may gather and use such general location data.
- **Push Notifications.** We send you push notifications if you choose to receive them, letting you know when someone has sent you a message or for other service-related matters. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.
- **Mobile Analytics.** We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information, such as how often you use the application, the events that occur within the application, aggregated usage, performance data and where the application was downloaded from. We do not link the information we store within the analytics software to any Personally-Identifying Information you submit within the mobile application.

## **SOCIAL MEDIA**

We may provide you the option to connect your account on the App to your account on some social networking sites for the purpose of logging in, uploading information or enabling certain features on the App. When logging in using your social network credentials, we may collect the Personally-Identifying Information you have made publicly available on the social networking site, such as your name, profile picture, cover photo, username, gender, friends network, age range, locale, friend list and any other information you have made public. Once connected, other users may also be able to see information about your social network, such as the size of your network and your friends, including common friends. By connecting your account on the App to your account on any social networking site, you hereby consent to the continuous release of information about you to us. We will not send any of your account information to the connected social networking site without first disclosing that to you. Each social network may further allow you to set privacy controls around your information on their system, and our collection of information will always follow such controls and permissions. This feature is subject to continuous change and improvement by us and each social networking site involved, and therefore the available features and shared information are subject to change without notice to you.

We may use hyperlinks on the App which will redirect you to a social network if you click on the respective link. However, when you click on a social plug-in, such as Facebook's "Like" button, Twitter's "tweet" button or the Google+, that particular social network's plugin will be activated and your browser will directly connect to that provider's servers. If you do not use these buttons none, of your data will be sent to the respective social network's plugin provider. So for example, when you click on the Facebook's "Like" button on the App, Facebook will receive your IP address, the browser version and screen resolution, and the operating system of the device you have used to access the App. Settings regarding privacy protection can be found on the Apps of these social networks and are not within our control.

## **COLLECTION, USE AND DISCLOSURE OF PERSONALLY-IDENTIFYING INFORMATION**

### **App Registration**

As defined above, Personally-Identifying Information is information that can be directly associated with a specific person. Power Graphics 360 LLC may collect a range of Personally-Identifying Information from and about App users. Much of the Personally-Identifying Information collected by Power Graphics 360 LLC about users is information provided by users themselves when (1) registering for our service, (2) logging in with social network credentials, (3) participating in polls, contests, surveys or other features of our service, or responding to offers or advertisements, (4) communicating with us, (5) creating a public profile or (6) signing up to receive newsletters. That information may include each user's name, address, email address and telephone number, and, if you transact business with us, financial information such as your payment method (valid credit card number, type, expiration date or other financial information). We also may request information about your interests and activities, your gender, age, date of birth, username, hometown and other demographic or relevant information as determined by Power Graphics 360 LLC from time to time. Users of the App are under no obligation to provide Power Graphics 360 LLC with Personally-Identifying Information of any kind, with the caveat that a user's refusal to do so may prevent the user from using certain App features.

BY REGISTERING WITH OR USING THE APP, YOU CONSENT TO THE USE AND DISCLOSURE OF YOUR PERSONALLY-IDENTIFYING INFORMATION AS DESCRIBED IN THIS "COLLECTION, USE AND DISCLOSURE OF PERSONALLY-IDENTIFYING INFORMATION" SECTION.

## Online Postings

Certain Personally-Identifying Information collected from users may be disclosed as a matter of course as a result of your use of the App. We may provide areas on the App where you can post reviews and other information relating to your activities on the App. Such postings are governed by our Terms of Use. In addition, such postings may appear on other Apps or when searches are executed on the subject of your posting. Also, whenever you voluntarily disclose personal information on publicly-viewable web pages, that information will be publicly available and can be collected and used by others. For example, if you post your email address, you may receive unsolicited messages. We cannot control who reads your posting or what other users may do with the information you voluntarily post, so we encourage you to exercise discretion and caution with respect to your personal information. **USERS ASSUME ALL RESPONSIBILITY FOR ANY LOSS OF PRIVACY OR OTHER HARM RESULTING FROM THEIR VOLUNTARY DISCLOSURE OF PERSONALLY IDENTIFYING INFORMATION.**

## Power Graphics 360 LLC Communications

We may occasionally use your name and email address to send you notifications regarding new services offered by the App that we think you may find valuable. We may also send you service-related announcements from time to time through the general operation of the service. Generally, you may opt out of such emails at the time of registration or through your account settings, though we reserve the right to send you notices about your account, such as service announcements and administrative messages, even if you opt out of all voluntary email notifications.

## Power Graphics 360 LLC Disclosures

Power Graphics 360 LLC will disclose Personally-Identifying Information under the following circumstances:

- **By Law or to Protect Rights.** When we believe disclosure is appropriate, we may disclose Personally-Identifying Information in connection with efforts to investigate, prevent or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of Power Graphics 360 LLC, our users, our employees or others; to comply with applicable law or cooperate with law enforcement; to enforce our Terms of Use or other agreements or policies, in response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.
- **Marketing Communications.** Unless users opt-out from receiving Power Graphics 360 LLC marketing materials upon registration, Power Graphics 360 LLC may email users about products and services that Power Graphics 360 LLC believes may be of interest to them. If you wish to opt-out of receiving marketing materials from Power Graphics 360 LLC, you may do so by following the unsubscribe link in the email communications, by going to your account settings (if applicable) or contacting us using the contact information below.
- **Third-Party Marketing Communications.** Unless users opt-out from receiving marketing materials upon registration, Power Graphics 360 LLC may provide users' email information to third parties, so that those third parties may directly contact them about additional products and services. To cease having your email information

provided to third parties, you may do so by going to your account settings (if applicable) or contacting us using the contact information below. Even after opting-out, you may continue to receive marketing emails from third parties to whom Power Graphics 360 LLC already has provided your email information. You will be responsible for directly contacting such third parties to request cessation of further marketing emails.

- **Third-Party Service Providers.** We may share your Personally-Identifying Information, which may include your name and contact information (including email address) with our authorized service providers that perform certain services on our behalf. These services may include fulfilling orders, providing customer service and marketing assistance, performing business and sales analysis, supporting the App's functionality and supporting contests, sweepstakes, surveys and other features offered through the App. We may also share your name, contact information and credit card information with our authorized service providers who process credit card payments. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purpose.

- **Business Transfers; Bankruptcy.** Power Graphics 360 LLC reserves the right to transfer all Personally-Identifying Information in its possession to a successor organization in the event of a merger, acquisition, bankruptcy or other sale of all or a portion of Power Graphics 360 LLC's assets. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred Personally-Identifying Information will be subject to this Privacy Policy, or to a new privacy policy if you are given notice of that new privacy policy and are given an opportunity to affirmatively opt-out of it. Personally-Identifying Information submitted or collected after a transfer, however, may be subject to a new privacy policy adopted by the successor organization.

## **Changing Personally-Identifying Information; Account Termination**

You may at any time review or change your Personally-Identifying Information by going to your account settings (if applicable) or contacting us using the contact information below. Upon your request, we will deactivate or delete your account and contact information from our active databases. Such information will be deactivated or deleted as soon as practicable based on your account activity and accordance with our deactivation policy and applicable law. To make this request, either go to your account settings (if applicable) or contact us as provided below. We will retain in our files some Personally-Identifying Information to prevent fraud, to troubleshoot problems, to assist with any investigations, to enforce our Terms of Use and to comply with legal requirements as is permitted by law. Therefore, you should not expect that all your Personally-Identifying Information will be completely removed from our databases in response to your requests. Additionally, we keep a history of changed information to investigate suspected fraud with your account.

## **General Use**

Power Graphics 360 LLC uses the Personally-Identifying Information in the file we maintain about you, and other information we obtain from your current and past activities on the App (1) to deliver the products and services that you have requested; (2) to manage your account and provide you with customer support; (3) to communicate with you by email, postal mail, telephone and/or mobile devices about products or services that may be of interest to you either from us, our affiliate companies or other third parties; (4) to develop and display content and advertising tailored to your interests on the App and other sites; (5) to resolve disputes and

troubleshoot problems; (6) to measure consumer interest in our services; (7) to inform you of updates; (8) to customize your experience; (9) to detect and protect us against error, fraud and other criminal activity; (10) to enforce our Terms of Use; and (11) to do as otherwise described to you at the time of collection. At times, we may look across multiple users to identify problems. In particular, we may examine your Personally-Identifying Information to identify users using multiple user IDs or aliases. We may compare and review your Personally-Identifying Information for accuracy and to detect errors and omissions. We may use financial information or payment method to process payment for any purchases made on the App, enroll you in the discount, rebate, and other programs in which you elect to participate, to protect against or identify possible fraudulent transactions and otherwise as needed to manage our business.

## **COLLECTION AND USE OF INFORMATION BY THIRD PARTIES GENERALLY**

Power Graphics 360 LLC contractually prohibits its contractors, affiliates, vendors and suppliers from disclosing Personally-Identifying Information received from Power Graphics 360 LLC, other than in accordance with this Privacy Policy. However, third parties are under no obligation to comply with this Privacy Policy with respect to Personally-Identifying Information that users provide directly to those third parties, or that those third parties collect for themselves. These third parties include advertisers, providers of games, utilities, widgets and a variety of other third-party applications accessible through the App. Power Graphics 360 LLC neither owns nor controls the third-party Apps and applications accessible through the App. Thus, this Privacy Policy does not apply to information provided to or gathered by the third parties that operate them. Before visiting a third party, or using a third-party application, whether by means of a link on the App, directly through the App or otherwise, and before providing any Personally-Identifying Information to any such third party, users should inform themselves of the privacy policies and practices (if any) of the third party responsible for that App or application, and should take those steps necessary to, in those users' discretion, protect their privacy.

## **SECURITY**

We take the security of your Personally-Identifying Information seriously and use reasonable electronic, personnel and physical measures to protect it from loss, theft, alteration or misuse. However, please be advised that even the best security measures cannot fully eliminate all risks. We cannot guarantee that only authorized persons will view your information. We are not responsible for third-party circumvention of any privacy settings or security measures.

We are dedicated to protect all information on the App as is necessary. However, you are responsible for maintaining the confidentiality of your Personally-Identifying Information by keeping your password confidential. You should change your password immediately if you believe someone has gained unauthorized access to it or your account. If you lose control of your account, you should notify us immediately.

## **PRIVACY POLICY CHANGES**

Power Graphics 360 LLC may, in its sole discretion, change this Privacy Policy from time to time. Any and all changes to Power Graphics 360 LLC's Privacy Policy will be reflected on this page and the date new versions are posted will be stated at the top of this Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. Users should regularly check this page for any changes to this Privacy Policy. Power Graphics 360 LLC will always post new versions of the Privacy Policy on the App. However, Power Graphics 360 LLC may, as determined in its discretion, decide to

notify users of changes made to this Privacy Policy via email or otherwise. Accordingly, it is important that users always maintain and update their contact information.

## **CHILDREN**

The Children's Online Privacy Protection Act ("COPPA") protects the online privacy of children under 13 years of age. We do not knowingly collect or maintain Personally-Identifying Information from anyone under the age of 13, unless or except as permitted by law. Any person who provides Personally-Identifying Information through the App represents to us that he or she is 13 years of age or older. If we learn that Personally-Identifying Information has been collected from a user under 13 years of age on or through the App, then we will take the appropriate steps to cause this information to be deleted. If you are the parent or legal guardian of a child under 13 who has become a member of the App or has otherwise transferred Personally-Identifying Information to the App, please contact Power Graphics 360 LLC using our contact information below to have that child's account terminated and information deleted.

## **CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about the Personally-Identifying Information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of the Personally-Identifying Information that was shared and the names and addresses of all third parties with which we shared Personally-Identifying Information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to our privacy officer as listed below.

## **DO-NOT-TRACK POLICY**

Most web browsers and some mobile operating systems include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. Because there is not yet a common understanding of how to interpret the DNT signal, the App currently does not respond to DNT browser signals or mechanisms.

## **CONTACT**

If you have any questions regarding our Privacy Policy, please contact us using the Feedback option.