LifeZette Privacy Policy (EFFECTIVE: May 25, 2018)

LifeZette, Inc. ("LifeZette," "us," and "we") has prepared this Privacy Policy to describe to you our practices regarding the collection, use and disclosure of personal information we collect from users of our website located at www.LifeZette.com (the "Site") and the Services (as defined below). LifeZette provides an online platform designed to allow users (each a "User") to access and view traditional and conservative news stories and various media centered around five core values through our services (the "Services") These five core values are: politics, parenting, health and wellness, pop culture and faith.

PLEASE BE ADVISED THAT THIS AGREEMENT IS SUPPLEMENTED BY the GDPR Addendum. PLEASE CAREFULLY REVIEW ALL SUPPLEMENTS.

Types of Information We Collect. We collect your information as described below.

(a) Information You Provide to Us.

- We may collect personal information from you, such as your first and last name, email address, company name, address, work experience and interests, phone number and password, when you create an account to log in to the Site ("Account").
- When you participate in one of our surveys, we may collect additional profile information.
- When you register for an Account, you will be opting-in to receive LifeZette notification emails, newsletters, surveys, marketing and/or promotional materials.
- We may collect your phone number and the unique device id number of the mobile device on which you use the Services if accessed from your mobile device.
- If you tell us where you are (e.g., by allowing your mobile device to send us your location), we may store and use that information to provide you with location-based information and advertising. If you want to deactivate this feature, you can disable location services on your device or deactivate GPS on your mobile device.
- We retain information on your behalf, such as files and messages that you store using your Account.
- When you use the Services to make or receive payments, we will collect all information necessary to complete the transaction, including your name, payment information, and billing information.
- We may collect additional personal information to validate your identity, such as your date of birth, place of birth or taxpayer identification number. We may request documents to verify this information, such as a copy of your government-issued identification or photo, and we may authenticate it against third party databases.
- If you participate in a contest, sweepstakes or other promotion, we will collect any data you provide in connection with that promotion.
- If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.
- When you post messages through the Services and/or comment on content available through the Site, the information contained in your posting and/or comment will be stored on our servers and other users will be able to see it.
- We also collect other types of personal information that you provide to us voluntarily, such as your
 operating system and version, product registration number, and other requested information if you
 contact us via e-mail regarding support for the Services.
- We may also obtain information from other sources and combine that with information we collect on our Services.
- We may also collect personal information at other points in our Site that state that personal information is being collected.
- (b) Information Collected via Social Networking Sites. The Services may allow users to log in through or connect with various social networking sites, such as LinkedIn, Facebook, Twitter, Instagram, and Google (each an "SNS"). We may allow you to use your Google ID to set up an Account. If you wish to use your Google account you are taken to the Google website to login to your account and this information is then shared

with us for the sole purpose of setting up your Account. By logging in with or connecting with an SNS, you are allowing the Services to access your information and you are agreeing to the SNS's Terms of Use in your use of the Services. We may receive information from an SNS and that information may be imported to the Site (either as a part of your Account or otherwise). Once you log in through or connect with an SNS, you may be able to post recent activity or content back to the SNS. Any information that we collect from an SNS may depend on your SNS privacy settings, so please consult the SNS' privacy and data practices. Further, you can edit privacy settings via the SNS, or disable the connection with the SNS by visiting the applicable SNS. You can disable the link between your Account and your SNS account at any time through the "Settings" section of the Services. You acknowledge and agree that you are solely responsible for your use of those websites and that it is your responsibility to review the terms of use and privacy policy of the SNSs. We will not be liable for: (i) the availability or accuracy of such SNSs; (ii) the content, products or services on or available on such SNSs; or (iii) your use of any such SNSs

(c) Information Collected via Technology.

- <u>Generally</u>. When you use our Services, some information is automatically collected. For example, when you use our Services, your geographic location, how you use the Services, information about the type of device you use, date/time stamps for your visit, your browser type, operating system, Internet Protocol (IP) address, and domain name are all collected. This information is generally used to help us deliver the most relevant information to you and administer and improve the Services. We may also use cookies to collect information "**Cookies**" to track and collect certain information.
- <u>Log Files</u>. We gather certain information automatically and store it in log files, including IP addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to improve the content of the Site, market research purposes, to communicate information to visitors and to better tailor our Services to our users' needs.
- Analytics. We use analytics services (including, but not limited to, Google Analytics) to help analyze how Users use the Services. Analytics services use Cookies to collect information such as how often Users visit the Site and we use the information to improve our Site and Services. The analytics services' ability to use and share information collected by them is restricted by their terms of use and privacy policy, which you should refer to for more information about how these entities use this information, and how you can opt-out of their use of such information.
- (d) Location Information. If you have enabled location services on your mobile device, we collect your location information to make a map available to the recipients of your messages showing your location as you have authorized. If you do not want this information collected by us, you can disable location services on your mobile device.

2. Use of Your Personal Information

- (a) General Use. We use personal information collected through our Services for purposes described in this Privacy Policy or disclosed to you in connection with our Services. For example, we may use your personal information to:
 - identify and authenticate you as a user in our system;
 - operate and improve our Site and Services;
 - facilitate the creation of and secure your Account on our network;
 - facilitate your transactions;
 - administer and respond to your requests;
 - contact you and send you related information;
 - to send you LifeZette notification emails, newsletters, surveys, marketing and/or promotional materials;
 - develop and improve marketing and advertising for the Services;

- to market and sell to you products or services that may be of interest to you;
- to advertise products, services, companies and events that we think might interest you;
- to troubleshoot issues with the Services;
- to call or text you in order to provide the Services;
- link or combine it with other personal information we get from third parties, to help understand your needs and provide you with better service;
- link or combine it with non-personal information, to serve you specifically, such as by offering a product or service to you that may interest you;
- enforce our Terms of Use; and
- protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

We may store and process personal information in the United States and other countries.

We may also create anonymous and/or deidentified data records from your personal information by excluding information (such as your name) that makes the data personally identifiable to you. We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties in our sole discretion.

We may get information about you from other sources. We may add this to information we get from the Services.

(b) User Testimonials and Feedback. We may receive testimonials, comments and other feedback ("**Feedback**") from users regarding our Services. Such content may be publicly viewable on the Site. When we publish this Feedback, we may identify our users by name. If we choose to post your name along with your Feedback, we will obtain your consent prior to posting you name with your Feedback.

3. Disclosure of Your Personal Information.

- (a) Information You Share. Our Services may allow you to connect and share content and information. Please be mindful of your own privacy needs as you choose who to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public on the Site. If you share information about others, we suggest you get consent for any information you may share about them.
- **(b)** Information We Share. We may disclose personal information that we collect or you provide. We may disclose aggregated information about our Users and information that does not identify any individual without restriction:
 - to fulfill the purpose for which you provide it, for any other purpose disclosed by us when you provide the information, or with your consent;
 - to third parties designated by you;
 - to our partners who are bound by confidentiality obligations with respect to such personal information;
 - with third parties to help facilitate transactions;
 - with contractors, service providers and other third parties we use to support our business who are bound by confidentiality obligations with respect to such personal information;
 - with an SNS if you choose to post content to an SNS through the Service;
 - We may share some or all of your personal information in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the personal information collected by us and will assume the rights and obligations regarding your personal information as described in this Privacy Policy.; and

• to comply with any court order, law or legal process, including responding to any government or regulatory request; to enforce our rights arising from any contracts entered into between you and us; and/or if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of LifeZette, our customers or others.

Content you submit to public areas of the Site through the Services are posted in public areas and are not subject to the restrictions set forth in this Privacy Policy.

- Public Profile. We may offer the option of a public Profile that you can create. In the event a Public profile is offered, certain portions of the information you provide to us may also be displayed in your Profile. By default, your Profile is public. Content you post through the Services is also meant for public consumption. We may display this content on the Site, and further distribute it to a wider audience through third party sites and services. Once displayed on publicly viewable web pages, that information can be collected and used by others. We cannot control who reads your posting or what other Users may do with the information that you voluntarily post, so it is very important that you do not put personal information in your posts. Once you have posted information publicly, while you will still be able to edit and delete it on the Services, you will not be able to edit or delete such information cached, collected, and stored elsewhere by others (e.g., search engines).
- 4. Third Party Websites. Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site and go to another site and another entity may collect information from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites. Our partners may sponsor promotions, contests and sweepstakes that require you to reveal details such as your name, address or phone number. When a partner-sponsored contest or sweepstakes is made available through the site, it will contain a link to the partner's privacy policy. Always check their privacy policy before revealing information about yourself. If you do not want these sponsors to have your Personal Information, you can choose to not participate in their contests, sweepstakes and other offerings.
- Your Choices Regarding Your Personal Information. If you decide at any time that you no longer wish to receive promotional emails from us, you can opt-out or customize the type of messages you receive from LifeZette by clicking on the "unsubscribe" link in the promotional email. In the event that we offer public Profiles, you may unsubscribe from receiving these promotional emails and notifications by visiting the "Notifications" section under "Account Settings," by clicking on the unsubscribe link included at the bottom of such emails, or by emailing us at privacypolicy@lifezette.com. Please note that any such opt-out applies solely to promotional emails. If you opt out, we may still send you non-promotional emails, such as emails about your account or our ongoing business relations. If you decide at any time that you no longer wish to accept Cookies from our Service for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser's technical information. If you do not accept Cookies, however, you may not be able to use all portions of the Services or all functionality of the Services. If you decide at any time that you no longer wish to have your SNS account linked to your Account, you can disable the link between your Account and your SNS account at any time though the "Settings" section of the Site. If your SNS account terminates, then functions enabled through the link between your Account and your SNS account will terminate as well. In the future, we may offer text alerts to communicate with you about our Site and Services. You may opt-out of receiving text (SMS) messages from LifeZette at any time by texting LifeZette the word STOP from the mobile device receiving the messages. Opting out of receiving text (SMS) messages may impact your use of the Site. If you would like to opt out from the onward transfer of your information to our non-agent partners, you may send us an email at privacypolicy@lifezette.com. Include the word "privacy" in the subject line of the email and all your registration information in the body of the email.

- **6. Changing or Deleting Your Personal Information.** You may review, update, correct, or delete your personal information on the Site by emailing us at privacypolicy@lifezette.com or by making edits via your Account. If you completely delete all such information, then your account may become deactivated. If you would like us to delete your account in our system, please contact us at privacypolicy@lifezette.com. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.
- **7. A Note about Children.** We do not intentionally gather personal information from users who are under the age of 13. If we become aware that any child under 13 submits personal information to LifeZette, we will attempt to delete the information from our files. If you believe that we might have any personal information from a child under 13, please contact us at privacypolicy@lifezette.com.
- **8. Governing Law.** The Privacy Policy and any action related thereto will be governed and interpreted by and under the laws of the District of Columbia, consistent with the Federal Arbitration Act, without giving effect to any principles that provide for the application of the law of another jurisdiction. The United Nations Convention on Contracts for the International Sale of Goods does not apply to these Terms.
- **9. Users Outside of the United States.** If you are a non U.S. user of the Services, by using our Services, you acknowledge and agree that your personal information may be processed for the purposes identified in the Privacy Policy. In addition, your personal information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of personal information may be less stringent than the laws in your country. By providing your data, you consent to such transfer.
- **10. Changes to This Privacy Policy.** This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy here.
- **11. Contact Information.** If you have any questions about this Privacy Policy, please contact us by email at privacypolicy@lifezette.com