

# Privacy Policy

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## PRIVACY POLICY

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### 1. INTRODUCTION

Printers Row Publishing Group (“PRPG”, “we”, “us” or “our”) wants you to be familiar with how we collect, use and disclose information from and about you. This is the Privacy Policy for (a) [www.printersrowpublishinggroup.com](http://www.printersrowpublishinggroup.com), [www.silverdolphinbooks.com](http://www.silverdolphinbooks.com), [www.bathroomreader.com](http://www.bathroomreader.com), [www.thunderbaybooks.com](http://www.thunderbaybooks.com), [www.portablepress.com](http://www.portablepress.com) and all corresponding domains, subdomains, web pages and websites associated therewith that link to this Privacy Policy (the “Site”) and (b) any other content, applications, features, functionality, information and services offered by us through the Site (the foregoing subsections (a) and (b) are collectively referred to herein as the “Services”), and it applies to all Users of the Services, whether you are accessing and/or using the Services as a registered User or otherwise. Please review our [Terms of Use Agreement](#), which governs your use of the Services. Any capitalized terms that are not defined in this Privacy Policy shall have the meaning given in the [Terms of Use Agreement](#). By accessing or using the Services, you affirmatively consent to this Privacy Policy (and the practices described herein), which will remain in full force and effect, even if your use of the Services or any particular feature or other activity offered in connection therewith terminates, expires or is deactivated for any reason. If you do not agree with this Privacy Policy, please do not access and/or use the Services or any features, activities, products or services offered through or in connection therewith.

### 2. GENERAL APPLICABILITY OF THIS PRIVACY POLICY

This Privacy Policy governs only the information we collect (a) from you and (b) from Third Party Services (e.g., Facebook, etc.) and Operators about you, in each instance, on or in connection with your use of the Services, and does not cover any other information collected in any other manner or collected by any other entity, unless specifically stated. Where you have provided your information to third parties such as affiliated companies, marketing companies, platform operators, technology providers, including our advertisers, sponsors and/or other promotional partners, including Third Party Services, and have agreed

to share that information with us, we may obtain such information and combine it with the information we collect, and, if we do so, our use of the resulting combined information will be subject to this Privacy Policy.

### 3. INFORMATION WE COLLECT

We generally collect two types of information from and about you:

- **Personal Information:** Personally identifiable information that we collect on or in connection with the Services that would allow someone to identify you or contact you, such as your full name, address, e-mail address or telephone number.
- **Non-Personal Information:** All other information that we collect on or in connection with the Services other than Personal Information, which does not personally identify you (Personal Information and Non-Personal Information is collectively referred to herein as "Information").

And we collect such Information in multiple ways, as follows:

- **When you provide it to us or when you give us permission to obtain it**, which may include, without limitation, the following types of Information:
  - Registration Information: Information you submit to register for the Services, including, without limitation, in order to create your User Account. Such Information may include, without limitation, name, email address, gender, zip code, legal address, date of birth, etc.
  - Fee-Based Services Information: If you engage in any Fee-Based Services or other transaction offered on or in connection with the Services, we may require certain Information, for example, your full name, physical address, telephone number(s), applicable payment data (e.g., credit card number, expiration date, etc.), your date of birth and address.
  - Information Collected Through Features and Functions of the Services: The Services may provide you with access to certain features and functionality, such as interactive and community features, message and comment functionality, posting and other functionality, which may, in certain instances, be subject to Additional Terms and requirements which will determine who can see such Information. To participate in these features and functionalities, you may be asked to provide certain Information about yourself and provide additional consent in order to personalize and/or permit your use these features and functions, such as when you share information about your use of the Services to other Users.
  - Communications Information: The Services may present you with the opportunity to sign up to receive newsletters, email correspondence and/or other communications from us in order for us to provide up-to-date information about the Services, and to publicize and promote certain content, products and services offered by us, our business partners and/or other third parties. When there is a separate sign-up for communications, we may ask for your contact information such as name and email address, and, sometimes, demographic and profile information. We will ask you to confirm your consent to any such uses at the time you sign up for these services or communications.
  - Technical, Operational and Customer Support Information and Feedback: When you use our customer support system, contact us for technical, operational or other support or otherwise provide any comments or feedback to us, you may be required to provide certain Information relevant to your applicable issue or to contact you with respect to resolving the issue.
  - Information Related to Promotions, Contests and Sweepstakes: To participate in certain Promotions, including contests, sweepstakes and surveys, there may be a separate registration or sign up process, which may require the submission of Information (e.g., your full name, email address, mailing address, telephone number, demographic and/or profile information, etc.).
    - **If you log into the Services using account information from a Third Party Service (e.g., Facebook, etc.), connect a Third Party Service to the Service or enable functionality from**

**Third Party Services as part of your use of the Services**, we may receive information from the applicable provider of the Third Party Service that you have consented be shared pursuant to its terms and conditions, whether made available via an application programming interface (“API”) or otherwise. Such information may include, for example, your first and last name, gender, your physical location and that of your Devices, your date of birth, certain profile information, your public ID on or associated with the Third Party Service, profile page URL and e-mail address. We will, as reasonably practicable (e.g., by implementing a compatible disclosure feature offered by the Third Party Service, etc.), disclose what information we collect from the Third Party Services when you connect the Services to the Third Party Service. In addition, if you connect a Third Party Service to the Service or enable functionality from the Services as part of your use of a Third Party Service, we may receive information from the provider of that Third Party Service about you or your use of the Services within that Third Party Service; such functionality may also perform actions on your behalf on the Third Party Service that are known to the Third Party Service or others. Even if you delete your account on a Third Party Service, we will retain any Information provided by that Third Party Service. Similarly, if you delete or deactivate your account on the Services, any Information that we have shared with Third Party Services (in accordance with this Privacy Policy) may be retained by those Third Party Services.

- **By using certain automatic data collection technologies when you visit, access and/or interact with the Services, we may automatically collect certain Information about your equipment, browsing actions and other patterns, including:**
  - **Log Files:** When you use the Services, our servers automatically collect certain Information including Information that your browser and/or Device sends whenever you visit a website and/or use the applicable Device. Such Information may include your IP address, browser type and settings, and other usage data.
  - **Information about Your Device:** We may also collect Information about the Device through which you access and/or use the Services, including, but not limited to, what type of Device it is, unique Device identifiers, and other data provided by your applicable third party service provider and/or Device manufacturer. You should read the policies of such third parties in order to learn more about what Information your Device makes available.
  - **Other Non-Personal Information:** Other Non-Personal Information related to your use of the Services, including usage, traffic data and other communication data and resources that you access when you interact with the Services.

The Information we collect automatically is Non-Personal Information. It helps us to improve our Services and to deliver a better and more personalized user experience by enabling us, among other things, to store information about your preferences, to customize our Services according to your individual interests, speed up your searches, and recognize you when you return to the Services.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies):** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of the Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Services.
- **Flash Cookies:** Certain features of the Services may use local stored objects (or Flash cookies) to collect and store Information about your preferences and navigation to, from and on the Services. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons:** Pages of the Services may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit PRPG, for example, to count users who have visited those pages and/or for other related statistics (e.g., recording the popularity of certain content and verifying system and server integrity, etc.).
- **Local Storage:** Local storage is an industry standard method we may use to store and retrieve Information on a User’s computer and/or Device (e.g., caching, HTML5, etc.) in a web browser. Your

web browser may offer settings for you to control local storage options. Please see [Section 6](#) below for more details.

We do not collect Personal Information automatically; however, we may associate the Information obtained through these technologies with your Personal Information so we can, among other things, better customize your experience using the Services and/or the advertisements and promotions you see. By visiting the Services, whether as a registered user, or otherwise, via a Third Party Service, or otherwise, you acknowledge, understand and hereby agree that you are giving us your consent to store your activities and your use of the Services as described in this Privacy Policy. Please see [Section 7](#) below for more information on how to opt-out of the collection and use of Information collected via certain automatic collection technologies.

- **Information from Other Sources.** We may supplement the Information we collect with information from other sources, such as publicly available information from commercially available sources and information from our affiliates or business partners.

#### **4. THIRD PARTY ADVERTISING/ANALYTICS SERVICE PROVIDERS**

The Services may also use a variety of third party advertising networks, data exchanges, traffic measurement service providers, marketing analytics service providers and other third parties (collectively, "[Third Party Advertising/Analytics Service Providers](#)") to, for example, serve advertisements on the Services, facilitate targeting of advertisements and/or measure and analyze advertising effectiveness and/or traffic on the Services. These Third Party Advertising/Analytics Service Providers do not have access to any tracking technologies set by the Services except to the extent necessary to provide services to us in connection with the Services; however, these Third Party Advertising/Analytics Service Providers may use their own tracking technologies (as described above) to collect similar Information. PRPG does not control these Third Party Advertising/Analytics Service Providers, and/or their use of tracking technologies, which is instead governed by the privacy policies of any such Third Party Advertising Service Provider. Please see [Section 7](#) below for more information on how to opt-out of the collection and use of Information collected via certain automatic collection technologies.

#### **5. HOW WE MAY USE AND DISCLOSE YOUR INFORMATION**

We use the Information we collect to provide the Services (and all features of the Services) to you, including, without limitation, to (a) measure and improve the Services, (b) improve your experience with both online and off-line Services by delivering content that you will find relevant and interesting, including advertising and marketing messages, (c) allow you to comment on content; and (d) provide you with customer support and to respond to inquiries. Additionally, we may also use the Information we collect from and about you as follows:

- **To allow service providers, contractors and other third parties to assist us in providing and managing the Services:** PRPG may make your Information available to certain third party service providers, such as contractors, agents or sponsors, who help us manage or provide the Services.
- **To provide co-branded services and features:** We may offer co-branded services or features, such promotions, together with a third party ("[Co-Branded Services](#)"). These Co-Branded Services may be hosted on the Services or on the third party's service. By virtue of these relationships, we may share the Information you submit in connection with the Co-Branded Service with the third party. The third party's use of your Information will be governed by the third party's privacy policy.
- **To deliver relevant advertisements:** PRPG and our service providers may use the Information we collect from and about you to deliver relevant advertisements to you when you use the Services or another service.
- **To contact you:** PRPG may periodically send promotional materials or notifications related to the Services and/or your User Account.

- **To share with our affiliates:** PRPG may share your Information with affiliates of PRPG for the purposes described in this Privacy Policy.
- **To share with business partners:** PRPG may share your Information with business partners to permit them to send you marketing communications consistent with your choices and preferences.
- **To disclose certain Information in User Content intended for disclosure:** The Services may provide you and other Users with an opportunity to participate in viewing communities and other message, comment and communication features on the Services, including in connection with Third Party Services, and may provide you with the opportunity to submit, post, publish and otherwise make available User Content to other Users of the Services or to the public. Certain Personal Information associated with the User Content, for example, your name or photograph, may be intended for disclosure. We will disclose any such Personal Information in connection with the display of, and other services relating to, such User Content and by submitting User Content on the Services, you affirmatively consent to the distribution of your Personal Information in the context of that User Content and have no expectation of privacy or confidentiality in connection therewith. You acknowledge that once submitted, posted, published and/or otherwise made available, User Content may be distributed outside the Services by users with access to such User Content and information, and that the Services do not completely control who views or distributes same. You may not be able to “undo” or “delete” any User Content. Accordingly, you should not submit, post, publish or otherwise make available any User Content you wish to remain private or confidential or which may contain any sensitive information. Please see the [Terms of Use Agreement](#) for more information regarding User Content and the terms and conditions associated therewith.
- **To protect the rights of PRPG and others:** PRPG may disclose your Information where PRPG has a good faith belief that such disclosure is necessary in order to: (i) protect, enforce, or defend the legal rights, privacy, safety, or property of PRPG and our affiliates and their respective employees, agents and contractors (including enforcement of our agreements and our Terms of Use Agreement); (ii) protect the safety, privacy, and security of Users of the Services or members of the public; (iii) protect against fraud or for risk management purposes; (iv) comply with the law or legal process; and/or (v) respond to requests from public and government authorities.
- **To complete a merger or sale of assets:** If PRPG sells all or part of its business or makes a sale or transfer of its assets or is otherwise involved in a merger or transfer of all or a material part of its business, PRPG may transfer your Information to the party or parties involved in the transaction as part of that transaction.
- **In any other way we may describe when you provide the Information and/or receive your consent:**

Notwithstanding the foregoing, we may use any and all Non-Personal Information collected from or about you for any reasonable purpose that is necessary to provide the Services or other related product and/or service requested. You can choose to opt-out of certain such uses as described in [Section 6](#) and [Section 7](#) below.

## 6. USER CHOICE AND ACCESS

We strive to provide you with as many choices as possible to access, review, correct, update, suppress, or otherwise limit our use of the Information you have previously provided directly to us, including:

- **User Account Settings:** If you have registered for a User Account, you may have the ability to access and use certain features and functionality that provide you with the ability to set certain privacy, permission and User Account options on the Services that, among other things, (a) allow you to control the visibility of your User profile and User Content with the public and/or other Users of the Services, (b) limit the provision of certain Information to us, (c) limit our ability to take certain actions that may disclose your Information, and/or (d) update and revise certain Information you have previously provided. Please be aware that that if you limit the collection of certain Information, you may not be able to use all of the features and functionality of the Services.
- **Email:** You may also contact us by email at [prpgpublicity@readerlink.com](mailto:prpgpublicity@readerlink.com). In your request, please include your email address, name, address, and telephone number and specify clearly what information you would like to access, change, update, or suppress.

Additionally, you may opt-out of:

- **Receiving electronic communications from us:** If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out of receiving these marketing-related emails by (a) changing or editing your preferences of your User Account using the User Account settings (as described above), (b) contacting us via email in accordance with the procedure set forth above, and/or (c) using the opt-out mechanism that is contained in each such email. Please note that there are certain service notification emails that you may not opt-out of, such as notifications of changes to the Services or policies.
- **Our sharing of your Personal Information with third parties for their marketing purposes:** You may request that we do not share your Personal Information on a going-forward basis with third parties for their direct marketing purposes by contacting us via email in accordance with the procedure set forth above.

We will try to comply with your request(s) as soon as reasonably practicable.

## 7. OPTING-OUT OF USE OF CERTAIN INFORMATION THAT MAY BE COLLECTED BY TRACKING TECHNOLOGIES

- **Tracking Technologies Set by Third Party Advertising/Analytics Service Providers and Similar Third Parties:** For more information about Third Party Advertising/Analytics Service Providers and similar entities that use tracking technologies, see <http://www.aboutads.info/consumers>, and to opt-out of such Third Party Advertising/Analytics Service Providers advertising practices, go to <http://www.aboutads.info/choices/>.
- **Tracking Technologies That We Use and Set on the Services:** Most browsers are initially set to accept cookies (other than Flash cookies) and allow local storage, but you should be able to change your settings to notify you when a cookie is being set or updated, local storage is being used, and/or to block cookies and/or the use of local storage altogether. Please consult the “Help” section of your browser for more information.
- **Flash Cookies:** Users can manage the use of Flash technologies, with the Flash management tools available at Adobe’s website, see <http://www.adobe.com/privacy/flash-player.html>.
- **Do-Not-Track Signals:** Certain browsers transmit “do-not-track” signals to the websites in which such browsers communicate with; however, this feature, and how it is used and activated, varies from browser to browser. Therefore, it is not clear whether the signals are intentionally transmitted by a User, or whether a User is even aware of this. Despite current efforts, there is still disagreement amongst leading Internet standards organizations, industry groups, technology companies and regulators, concerning what, if anything, websites should do when they receive such signals and no standard has been adopted to date. PRPG takes privacy and security very seriously. With respect to “do not track signals”, we currently do not take action in response to these signals, but, if a standard is established and accepted, we may reassess how to respond to these signals.

Please note that by blocking any or all cookies you may not have access to certain features, content and/or other personalization available through the Services.

## 8. DATA COLLECTION FROM CHILDREN

Our Services are not directed to persons under 13 years of age. If you become aware that your child has provided us with personal information without your consent, please contact us at [prppublicity@readerlink.com](mailto:prppublicity@readerlink.com). We do not knowingly collect personal information from children under 13, and if we become aware that a child under 13 has provided us with personal information, we take steps to remove such information and terminate the child’s account. Please visit <http://www.onguardonline.gov/articles/0031-protecting-your-childs-privacy-online> for information from the Federal Trade Commission about protecting children’s privacy online.

## 9. SECURITY

While no data transmission over the Internet is 100% secure from intrusion, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your Information. However, regardless of our efforts and the Device you use to access the Services, it is possible that third parties may unlawfully intercept or access transmissions or private communications over an unsecured

transmission. We also limit access to the Services by our own employees, contractors, service providers and those individuals who are authorized for the proper handling of such information. We request that our third party contractors and service providers follow similar standards of security and confidentiality. However, regardless of our efforts, no one can guarantee the complete safety of your Information.

#### **10. DATA RETENTION**

We will retain your Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law. Please be aware that even after you cancel your User Account, copies of certain Information from your User Account may remain viewable under certain circumstances. Because of the nature of caching technology, your User Account may not be instantly inaccessible to others. We may also retain backup information related to your User Account on our servers for some time after cancellation for fraud detection or to comply with applicable law or our internal security policies. Further, you acknowledge that it is not always possible to completely remove or delete all of your Information due to technical constraints, contractual, financial or legal requirements.

#### **11. YOUR CALIFORNIA PRIVACY RIGHTS**

If you are a resident of the State of California, we provide you with information above on how to exercise your choice options such as your right to opt-out or opt-in for use of your Personal Information by third parties for marketing purposes. Therefore, pursuant to the California Civil Code, we are not required to maintain or disclose a list of the third parties that received your Personal Information for marketing purposes during the preceding year. If you are a California resident and wish to request information about how to exercise your third party disclosure choices or other rights afforded under the law of the State of California, please send a request by email to our Privacy Administrator at [prppublicity@readerlink.com](mailto:prppublicity@readerlink.com), or reach out to us by postal mail to address set forth in [Section 15](#) below. **All requests must be labeled “Your California Privacy Rights” on the email subject line or envelope or post card.** For all requests, please clearly state that the request is related to “Your California Privacy Rights”, include your name, street address, city, state, zip code and e-mail address (your street address is optional if you wish to receive a response to your request via email) and indicate your preference on how our response to your request should be sent (email or postal mail). **We will not accept requests via the telephone or by fax.** We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

#### **12. LINKED SERVICES**

The Services may be linked to other sites and platforms operated by other companies, including, without limitation, Third Party Services. The Services may also feature advertisements from other third parties. PRPG is not responsible for the privacy practices of such other sites and platforms or other services operated by third parties that are linked to or integrated with the Services or for the privacy practices of Third Party Online Advertising Services. Once you leave the Services via such a link, access a third party application or click on an advertisement, you should check the applicable privacy policy of the third party to determine, among other things, how they will handle any personally identifiable or other information that they may collect from you.

#### **13. CHANGES TO OUR PRIVACY POLICY**

PRPG may modify this Privacy Policy from time to time to reflect industry initiatives, changes in the law or technology, or changes in our practices regarding information collection and use. Please look at the Effective Date at the top of this Privacy Policy to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the

Services. If we make material changes to this Privacy Policy that expand our rights to use the Personal Information we have already collected from you, we will notify you and provide you with a choice about our future use of such Personal Information.

#### **14. International Visitors**

The Services are hosted in and managed from the United States of America ("U.S."). If you visit the Services from a location outside the U.S., please be advised that any Information you provide may be processed in and/or transferred to or from the U.S. or other jurisdictions, where privacy protections may not be as comprehensive as those in your jurisdiction. We will only process your Information in accordance with this Privacy Policy. By using the Services, you affirmatively consent to this transfer and to the use of your Information as described herein.

#### **15. CONTACT US**

If you have questions about this Privacy Policy, please contact us at:

Email: [prppublicity@readerlink.com](mailto:prppublicity@readerlink.com)

Mail: 10350 Barnes Canyon Rd. Ste. 100, San Diego, CA 92121

This Privacy Policy was last modified on the date indicated above and is effective immediately.

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