

PROJECT LULU PRIVACY POLICY

This Privacy Policy (“Policy”) describes the privacy practices of Project Lulu (“we,” “us” or “our”). This Policy applies to Project Lulu’s Website (the “Site”) with respect to the Site’s visitors and members (collectively, “you”). This Policy does not apply to any other website, including websites that you may access via a hyperlink from the Site. This Policy may not cover the content you share with third party advertisers, web developers, or service providers that may appear on the Site. Your continued use of the Site constitutes your acceptance of this Policy.

COLLECTED INFORMATION

Registration and Profile

Project Lulu may collect certain information about you when you register for the Site and create a profile, including your name, contact information, email, date of birth, and health information (collectively “identifiable personal information”). You agree not to share, post or enter on the Site any information or content that violates any applicable law or regulation, including The Health Insurance Portability and Accountability Act.

User Data and Transactions

Project Lulu may collect and retain information regarding transactions made on the Site as well as transactions involving third party products, services, and other offerings. Project Lulu may collect information about you or your activities on the Site, including IP address, browser and operating system, geographic location and the pages you view or information you download. By posting on the Site, you may display your IP address to other Site users and members, depending on the settings of the community. IP addresses, browser, and session information may be used for a variety of reasons, including: diagnosis and prevention of service or technology problems reported by users; estimation of the number of users visiting Project Lulu from various geographic regions; monitoring and prevention of fraud, spam, and abuse; and delivery of more relevant content and/or advertisements.

Use of Cookies

A cookie is a small amount of data that often includes a unique identifier that is sent to your browser from a web site's computer and is stored on your computer's hard drive. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. If you configure your browser to reject cookies, however, you may not be able to use some Project Lulu or third party products or services. Some third parties that advertise and/or offer products and services on the Site may set and access cookies, web beacons (which are small, transparent graphic images) and or other technologies to enable or enhance their advertisements or offers and sales.

USE AND SHARING OF INFORMATION

Use by Project Lulu and Sharing with Affiliates

Project Lulu may use your identifiable personal information and non-identifiable personal information (such as IP address and geographic location), for its own marketing purposes, and for non-marketing purposes. Project Lulu may share your information for any purpose with organizations that may hold an interest in Project Lulu (including their affiliates, divisions and/or

subsidiaries, and/or assigns) and the affiliates, divisions and/or subsidiaries, and/or assigns of Project Lulu (collectively, “Affiliates”). Where possible, Project Lulu may link your identifiable personal information with non-identifiable personal information (such as IP address) or publicly available information about you.

Email

Project Lulu may use your email address to contact you regarding important account or service updates.

Username

Whenever you post content or send a message on the Site, your Project Lulu ID (“Username”) may be visible to other users, depending on your privacy settings. Any information you post on the Site, including, but not limited to, content posted in your Journal, may be accessible through the use of your Username and password. Please safeguard your Username and password.

Shared Content

Whenever you post content on the Site and set the privacy setting to “Share in Reading Room,” or a successor designation, you understand that this information may be accessible by anyone within your Project Lulu group. In addition, any content you post publicly may result in unsolicited communications from other parties. You should further understand that any information (including personally identifiable information) and/or content that you post on Project Lulu that is viewable by other users may be copied and/or shared without your consent. Project Lulu cannot be responsible for any loss or damages relating to any information you post on the Site. Project Lulu may repost shared entries, in whole or in part, on the Project Lulu homepage or other Project Lulu pages in order to help users find friends and communities based on mutual interests.

Sharing with Non-Affiliated Parties for Marketing Purposes

Identifiable Personal Information: Project Lulu will not share your identifiable personal information with third parties that are not Affiliates for their own direct marketing purposes.

Ad Service: Project Lulu may deliver relevant ads to you based on general demographic data, stated interests, and/or your use of, and interaction with, any part of the Site, subject to our Terms of Service (“TOS”), which is integrated by reference herein. Project Lulu may aggregate and share non-identifiable generalized data about you with third parties, including demographic information and your viewing of, and interaction with, advertisements displayed on the Site in order to improve the relevancy of ad service, third party offerings, and related campaigns.

Ad Networks: Advertisements that appear on Project Lulu may be delivered to users by Project Lulu or one of our advertising partners (or “ad networks”). Ad networks include third party ad servers, ad technology vendors, and/or research firms. Ad networks may set cookies and/or include a file, called a web beacon, enabling ad networks to provide auditing, research, and/or reporting to advertisers. Please note that your identifiable

personal information is not shared with our advertisers through their use of cookies or web beacons.

Third Parties: Project Lulu works with third parties, including advertising companies and website analysis firms, who use their own cookies to collect non-personally identifiable information about your surfing activities when you visit our Site and other third party sites. This non-personally identifiable information is typically used by these third party advertising networks to serve you advertisements tailored to meet your preferences (and likely interests) while you are on our Site and others. If you want more information about third-party advertising, including how you may opt-out of some uses of information collected by members of the Network Advertising Initiative that may collect information from the Site, click here: http://www.networkadvertising.org/optout_nonpii.asp.

Sponsored Contests and Giveaways: Should you choose to participate in a sponsored contest, sweepstake, or give-away and/or if you request information from a third party advertiser or service provider, we may transfer personal information that you have specifically agreed to share.

Sharing with Non-Affiliated Parties for Non-Marketing Purposes

Project Lulu may share your identifiable and non-identifiable personal information with third parties that are not Affiliates for non-marketing purposes, including the following:

Operations: In the course of business, it may be necessary to grant access to internal systems that contain your personal information in order to improve our operations and Site, including, but not limited to, outside service providers, contractors, and vendors. Whenever practicable, we will obtain agreements with these parties that are consistent with this Policy and require these parties to restrict the use of personal information to the purposes for which it was provided to them.

Legal Process: We may share your personal information to respond to search warrants, subpoenas, court orders, or legal process, to establish and/or exercise our legal rights, or to defend against legal claims under U.S. law.

Safety and Security: We may share your personal information with U.S. Law enforcement officers to investigate, prevent, or take action to prevent or stop illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Project Lulu's Terms of Service, and/or if it is necessary to comply with, and/or cure a potential violation or breach of, U.S. law.

Certain Business Transactions: In the course of business, we might negotiate to sell, transfer, or reorganize all or part of our business. In such transactions, your personal information may be shared or transferred to the successor, but shall remain subject to this Policy. Such Policy may, however, be updated or amended at any time. The revised policy will be posted here for your review.

CONFIDENTIALITY AND SECURITY

Internet Security

Any content posted over the Internet or a wireless network cannot be guaranteed 100% private or secure. Whenever you post content anywhere on the Site, we will make reasonable efforts to ensure your privacy in the following manner:

Safeguards

We use physical, electronic, and procedural safeguards to protect your personal information. However, no security system is impenetrable and these systems could be accessed in the event of a security breach. We also cannot enforce or control the security of the computers, electronic devices, or electronic communication method that you may use to send e-mails and submit information to us over the Internet. You are responsible for ensuring that the computers, electronic devices and electronic communication methods you use will provide adequate security for communicating with us. We are not responsible for the disclosure or interception of information that you send us before we receive it.

Passwords

We require you log-in with a password to access personal account information.

Encryption

In certain areas, Project Lulu uses industry-standard encryption to protect data transmissions. Please note that this is not a guarantee that such information may not be accessed, disclosed, or altered by breach of our firewalls and secure server software.

Security Breach

If Project Lulu learns of a security system breach, we may attempt to notify you electronically so that you can take appropriate protective steps, and you agree to accept electronic notification. We may also post to the Project Lulu News and/or Support pages.

Email

By using this web site or providing personal information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues. Please note that we will never ask you to submit personal information or to verify the status of your personal information in any electronic communication. Should you ever receive an email that appears to be from Project Lulu asking for your personal information, do not respond to that email, and forward it to us at info@projectlulu.com.

EDITING OR DELETING YOUR ACCOUNT

Account Information

You can edit your Project Lulu account information at any time.

Account Deletion

You can delete your Project Lulu account at any time by visiting our Account Deletion page. Please notice that it may take some time for all of your content to be deleted and purged from our servers. We reserve the right to retain and/or keep records of your personal information to the extent it is necessary or desirable to protect Project Lulu's legal interests or comply with court orders, legal process, or other regulatory requirements under U.S. law.

CONTACT PROJECT LULU

If you have a question about this Policy or have an outstanding issue regarding privacy on Project Lulu, you can email us at info@projectlulu.com. Please note that we will respond as quickly as possible, but it may take a few days for us to respond to your request.

NOTICE

We may amend this Privacy Policy at any time by posting the amended terms on the Site. All amended terms shall automatically be effective immediately and we are not required to notify you of the changes. Your continued use of the Site after any such changes constitutes your acceptance of the revised Privacy Policy. If you do not agree with a revised Policy or any future revisions, please do not use or access the Site. It is your responsibility to regularly check the Site to determine if there have been any changes made and to review such changes.

Effective: June 21, 2013