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# **Privacy Policy**

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Your privacy is important to us. This Privacy Policy describes how Time for Kids ("TFK," "we," or "our") collects, uses, and discloses information when you interact with us, including via our website (<u>https://www.timeforkids.com/</u>), mobile apps, email newsletters, online subscriptions, other product offerings, and any other services that display this Privacy Policy (collectively referred to as the "Services"). This Privacy Policy also applies to any offline data collection, such as the contact information you provide to create or update your print subscriptions.

In this Policy, unless otherwise indicated, "personal information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual.

Individuals from different countries or jurisdictions may have different rights with respect to their personal information. In particular, the <u>European Union Privacy Policy</u> applies to individuals in the European Union, United Kingdom, Switzerland, Norway, Lichtenstein, Iceland, Australia, and New Zealand in lieu of this Privacy Policy. We reserve the ability to limit our response to any request to exercise your rights based on the law that is applicable to you.

# 1. Note to Parents and Teachers about Our Data Collection from Kids

If you have questions about how TFK addresses the Children's Online Privacy Protection Act ("COPPA") (or US-state equivalents) or the Family Education Rights and Privacy Act ("FERPA"), please contact us using the contact information below.

TFK is a teaching tool designed for teachers and their **students**, and parents and their children. TFK offers news and editorial content tailored to specific age ranges, companion materials such as quizzes and teaching aides, and the ability to take advantage of TFK's partnerships with other companies that offer educational content for children. Parents and teachers create accounts with TFK to access these materials and may distribute them to **students** or children using the links that TFK provides and/or Google Classroom (teachers

must have their own accounts with Google Classroom to take advantage of this integration). Parents and teachers can access their accounts <u>here</u>.

We have taken steps numerous steps to minimize our data collection:

- TFK does **not** collect any information that personally identifies **students** or children, such as name. Nor are we capable of identifying **students** or children based on the information we do receive. Furthermore, the TFK website does **not** use third-party integrations, tracking technologies, or cookies that collect information to deliver personalized advertising.
- The TFK website uses Google Analytics to collect information about how users interact with the website. Having this information is important because it allows TFK to understand what works (or doesn't) on the website. Google Analytics collects device identifiers, and if a child visits the TFK website on their own device or is given a device by a teacher or parent (for example, to read an article assigned by a teacher), Google Analytics will collect information about that device and how the user interacts with the website. The device identifiers Google Analytics collects do not personally identify children, and TFK does not use them as "persistent identifiers" capable of tracking a user across the internet.
- TFK makes its teaching aides and other resources available to parents and teachers as downloadable files or links to Google Forms. Teachers with Google Classroom accounts have the option to send a teaching aide to their Google Classroom account. In no event does TFK collect information about a student or child from these teaching aides, Google Forms, or the Google Classroom integration. Parents and teachers should consult Google's privacy notices for more information about how Google may collect information from them.
- TFK may give parents and teachers the opportunity to use other companies' services via links on the TFK website. While TFK offers links to those services, TFK does not collect any information from them about **students** or children.

The Services do not display advertising or collect information to display targeted advertising on third-party websites or apps.

# 2. The Information We Collect

We collect the following types of personal information.

- Personal Identifiers: When you sign up for an account or make a purchase, we collect:
  - Name, phone number, email address, contact address, and institutional affiliation (if you are a teacher).
  - Credit card number (through a service provider). You have the option to store this information as part of your account.
- **Commercial Information**: When you engage in transactions with us, we create records of Services purchased and obtain payment information.
- Internet or Other Electronic Network Activity Information: We or external parties
  operating on our behalf collect information about the device you use to access our
  Services, such as your IP address, a device ID, and information about your web
  browser.
- Audio, electronic, visual, thermal, olfactory, or similar information: If you contact us via phone, we may record the call. We will notify you if a call is being recorded at the beginning of the call.
- Education information: We collect education information you voluntarily provide.
- **Geolocation Data**: We collect your IP address automatically when you use our Services, from which we or external parties operating on our behalf may be able to determine

your general location.

**Information you give us about yourself or others**: We collect information that you give us about yourself or others directly, including personal identifiers, such as name and other contact details; commercial information such as payment details and order history; and audio information if you contact us via telephone for customer service purposes. You give information to us directly when, for example, you register for the Services.

You may give us personal information about other people, for example, when you fill out an order form and provide teacher names or sign up a friend for a gift subscription. Please ensure you have others' permission to give us their personal information. The types of personal information that we may collect in this context include recipient's name, address, e-mail address and telephone number. Please ensure that you notify the person whose information you are providing to us.

**Information we collect automatically**: When you interact with our Services, we (and our partners who provide analytics services i.e, Google Analytics) automatically collect certain network or other activity information, including through the use of cookies, to provide you with the Services and to analyze your use of the Services. For example, we collect IP addresses and device identifiers, including general location data derived from your IP address, and information about the webpages you view and how you move through our Services, how you reached our Services, how you interact with our social media pages, and how you interact with our email communications.

We use Google Analytics for these purposes. Google Analytics uses its own cookies. These cookies are only used to improve how our Services works. You can find out more information about Google Analytics cookies <u>here</u>. You can prevent the use of Google Analytics relating to your use of our Services by downloading and installing the browser plugin available <u>here</u>.

TFK does not use third parties to collect information for advertising purposes.

Please note that some of the information we request from you is required in order for you to use our Services. If you do not wish to provide such information to us, you are not obligated to, but as a result you may not be able to use the particular Service. However, some of the information we request from you is optional. This means that you can elect not to provide it to us and you will still be able to use the Service. If not all the information we request on a form is required, we may identify the required information to you such as by displaying an asterisk (\*) next to the field where we request the required information.

## 3. How We Use the Information We Collect

We may use the information we collect for the following purposes:

# **Provide the Services:**

- Deliver the Services.
- Establish and administer your account, including conducting billing and invoicing, contacting you about the expiry of your subscription and sending you service messages about your subscription. For example, once you are subscribed, we may store your subscription information, including its start date, renewal date, pricing, publication, and any customer service contacts you may have with us.
- Authenticate access to your account. For example, you may provide us with a username and password to get access to your account.

- Perform maintenance and operations, including management of the network and devices supporting the Services and our systems.
- Provide technical support and assure quality of customer service interactions.
- Facilitate hardware and software upgrades for devices and systems.
- Enable your participation in surveys, sweepstakes, contests, and promotions.

# Communicate with You:

- Respond to your inquiries.
- Personalize communications.
- Send you service-related announcements, such as when we make changes to subscriber agreements, or to contact you about your account.
- Market our Services, such as by offering you products, programs or services that may be of interest to you, and keeping you informed of new happenings at TFK.

## Make Improvements to Our Products and Services:

- Identify and develop new products and services.
- Improve the design of our Services.
- Understand how our Services are used, including by creating measurement and analytics reports.

# Investigate Theft or Other Illegal Activities and Ensure a Secure Online Environment:

- Detect the unauthorized use or abuse of the Service.
- Protect you and other subscribers from fraudulent, abusive, unlawful use of, or subscription to, the Service.
- Protect our rights, our personnel, and our property.
- Comply with applicable law.

We and our partners (i.e., Google Analytics) use cookies, tags, pixels, web beacons, or other means of collecting information automatically from users for analytics purposes only.

# 4. Disclosure of Information

**Publicly:** If you choose to submit content (e.g., a "letter to the editor" or a comment or other submission on our social media pages), and you give us your consent, we may publish your name, screen name and the information you provided to us, which will be public. TFK's website does not have community forums or other features that enabled user-generated submissions, and there are no means by which children can publicly post content.

**Affiliates:** We may transfer information to our affiliates, including TIME USA, LLC for internal management and administrative purposes where necessary for the performance or conclusion of our contractual obligations to you or for your benefit. We may combine information from the Services together and with other information we obtain from our business records.

**Sale or Merger of Business**: We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Policy.

**Service Providers**: We may disclose personal information to our service providers, which are companies that process information on our behalf, without your consent, to deliver the Service, and conduct business activities. We require our service providers to treat the information we disclose to them, or that they collect on our behalf, as confidential and to use the information only for the purposes for which they have been engaged. We engage with service providers to assist us with the following activities.

- Managing subscriptions, fulfilling orders, and delivering communications.
- Billing and payment processing, including billing and collection providers, such as payment processors and organizations that assist us in assessing your credit and payment status.
- Auditing and accounting.
- Professional consulting, such as law firms and firms that supply project-based resources and assistance.
- Analyzing web traffic. For more information, see our disclosure about our use of Google Analytics, above. We do not collect information from children for advertising purposes, and the device information we collect when a child uses our website does not personally identify the child.
- Securing our Services, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
- Managing information technology, such as entities that assist with website design, hosting, and maintenance, data and software storage, and network operation.

There are limited circumstances in which the service provider collects data directly from you where its privacy policies may also apply.

**Authorities**: We will disclose information we maintain when required to do so by law, for example, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request.

# 5. Third Party Websites

Our Services provide links to third party websites or offerings where data privacy practices may be different to that of TFK. The inclusion of any link does not imply our endorsement of any other company, its websites, or its products and/or services. These linked websites or offerings have separate and independent privacy policies, which we recommend you read carefully. We have no control over such websites or offerings and therefore have no responsibility or liability for the manner in which the organizations that operate such linked websites or offerings may collect, use, disclose, or otherwise treat your personal information.

## 6. Your California Privacy Rights: Notice to California Customers

**California Shine the Light**: California's "Shine the Light" law, Civil Code Section 1798.83, requires businesses that disclose personal information to third parties for those third parties' direct marketing purposes to give California customers the ability to opt-out of such disclosure. TFK does not disclose the personal information it collects on the Services to third parties for their direct marketing purposes.

## California Consumer Privacy Act ("CCPA"):

The California Consumer Privacy Act ("CCPA") grants residents of California certain rights with respect to their personal information and requires us to provide such individuals with certain information, as described in this section.

Your Rights:

#### TIME for Kids

- *Transparency*. At the time we collect personal information, you have the right to receive notice of the categories of personal information we collect, and the purposes for which those categories of personal information will be used.
- Access/Right to Know. You have the right to request access to personal information we collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You can make this access request by going to our <u>California</u> <u>Access/Deletion Page</u>. If you are a print subscriber, you can also access and update much of the personal information we have collected about you through your <u>account</u> page.
- Deletion. You have the right to request that we erase data we have collected from you. Please note that we may have a reason to deny your deletion request or delete data in a more limited way than you anticipated, e.g., because of a legal obligation to retain it or to provide a good or service that you request. You can make this deletion request by going to our <u>California Access/Deletion Page</u>.
- *Opt-Out of Sale*: You have the right to request that we stop "selling" your personal information as that that term is defined in the California Consumer Privacy Act. A "sale" of personal information is defined broadly: "selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to another business or a third party for monetary or other valuable consideration." TFK does not sell personal information it collects on the Services.
- Categories of personal information we collect. We collect the categories of information described above in the "Information We Collect" section for the purposes described in the "How We Use Information" section.
- *Categories of personal information we disclose*. We may disclose any of the categories of personal information listed above and use them for the above-listed purposes or for other business or operational purposes compatible with the context in which the personal information was collected. Our disclosures of personal information include disclosures to our "service providers," which are companies that we engage for business purposes to conduct activities on our behalf. The categories of service providers with whom we share information and the services they provide are described above.
- Categories of personal information we "sell". We do not sell personal information we collect on the Services.

You can also make a CCPA access or deletion request by calling the following toll-free number: +1 (888) 914-9661 PIN 430210.

# 7. Special Information for Nevada Residents

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to other companies who will sell or license their information to others. We do not sell personal information we collect on the Services. If you are a Nevada resident and would like more information about our data sharing practices, please contact us using the information below.

# 8. Your Opt-Out Choices

**Verification Procedures**: We must verify your identity for everyone's protection. To do so, we may require you to provide us with verification information prior to accessing any records containing personal information about you. We do this by:

- Asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email or telephone number stated in the request; or
- Having you submit your request through your account page (if you are a subscriber), which will automatically verify your identity and will result in faster processing of your request.

If you are a California resident, you may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf. If we receive a request from an authorized agent, we require that the authorized agent verify its identity with us, that you verify your identity with us, and that you or the agent provide us with proof that you authorized the authorized agent in writing to make the request.

We will use the information you provide for verification only for the purpose of verification. We may have a reason under the law why we do not have to respond to your request, or respond to it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**Your Account and Payment Information**: If you are a print subscriber, please visit the <u>Manage Account</u> page to update your contact information and payment method.

# Marketing and Other Communications:

- If you wish to unsubscribe from receiving future email marketing from TFK, please use the unsubscribe link that appears at the bottom of our marketing emails.
- If you are a newsletter subscriber, you may unsubscribe using the unsubscribe options in the newsletter emails.
- If you prefer not to receive traditional mail or other offline promotions from TFK, please email us <u>here</u>.
- Please note that even if you opt out of receiving marketing communications from us, we may continue to send you transactional communications about your subscription or orders.

# Cookie Management and "Do Not Track":

 You can control cookies using your web browser's settings. If you delete your cookies or if you set your browser to decline cookies, some features of the Services may not be available, work, or work as designed. Google Analytics uses its own cookies. These cookies are only used to improve how our Services work. You can find out more information about Google Analytics cookies <u>here</u>. You can prevent the use of Google Analytics relating to your use of our Services by downloading and installing the browser plugin available <u>here</u>.

If you delete your cookies, you may also delete your opt-out preferences.

Your browser or device may include "Do Not Track" functionality. At this time, TFK does not respond to browser "Do Not Track" signals.

#### 9. Security of Personal Information

We have put in place administrative, technical, and physical safeguards to help prevent unauthorized access, maintain data security and correctly use the information we collect. No system can be completely secure, however, and we do not guarantee that unauthorized disclosures and access will not happen.

# 10. Retention of Personal Information

We may retain information, including personal information we collect about you, for different periods of time consistent with the purposes of processing we describe in <u>How We</u> <u>Use the Information We Collect</u> and whether we are subject to a legal obligation to retain certain records.

# 11. Changes to this Privacy Policy

This Privacy Policy may be updated periodically to reflect changes to our information practices. The revised Privacy Policy will be posted on this website with the date of the last modification, and we will notify of the changes if required by the applicable law. We will treat your information in accordance with the privacy policy in place at the time of collection of such information, or as you otherwise indicate your preferences. We encourage you to check whenever you use our Services to see if the policy has been updated.

# 12. How to Contact Us

If you have any questions or concerns about this Privacy Policy, our data practices, or our compliance with applicable law please contact us by writing to us at <u>privacy@time.com</u>, or at:

Time USA, LLC Attention: Privacy Officer 3 Bryant Park New York, NY 10036

Toll-free: 800-843-8463

If you are a print subscriber located in the U.S. and have questions about your subscription, please contact us by writing to us at <u>tfkcustserv@cdsfulfillment.com</u>

or at:

Time Customer Service Attention: Consumer Affairs 3000 University Center Drive Tampa, Florida 33612-6408 Toll-free: 1-877-604-8017