

Privacy Policy

This Privacy Policy describes how The Reward Company, Inc. d/b/a TLC Marketing ("TLC Marketing") collects, uses and discloses personally identifiable information. This Privacy Policy relates to our use of any personal information you provide to us via websites, phone, email and post. All websites controlled by TLC Marketing where this privacy policy is posted or referenced (collectively, the "Sites") are covered by this policy.

By using or accessing the Sites, or by otherwise choosing to submit Personally Identifiable Information to us, you signify your consent to all of the terms of this Privacy Policy. If you do not agree with any terms of this Privacy Policy, you may not use the Sites or submit any Personally Identifiable Information to us.

This Privacy Policy includes the following sections. You should read the entire policy.

- 1. **Information Collected.** The Personally Identifiable Information we collect depends on how you interact with us. We may collect information such as name, email address, mailing address, phone number, date of birth and the receipts you provide. We may also collect technological information such as IP address, browser type, pages viewed, pin codes, and cookies.
- 2. **Use of Information.** We use the Personally Identifiable Information we collect to fulfill and administer reward requests, provide you with information, to ensure our Sites are relevant and to restrict access to some areas of the Sites, to protect against fraud, and to contact you.
- 3. **Sharing and Disclosure of Information.** We may disclose Personally Identifiable Information if required or permitted by law, to protect our rights, or those of our users. We may disclose information to services providers who help us process it. We may also disclose information in the context of a business transaction.
- 4. **International Transfer of Information.** We may transfer Personally Identifiable Information to other countries. As a result, such information may be accessed by law enforcement and governments in those countries.
- 5. **Retention of Data.** We store Personally Identifiable Information for the duration of the campaign you enter, and for as long as needed for the other purposes for which we process it.
- 6. Opt-Out. You can opt-out of our commercial email.
- 7. **Cookies.** When you visit our Site, we may use technology such as cookies, to remember your preferences, improve the efficiency of the Site, and better understand how the Site is used. You can reject cookies, but the Site may not work as well.
- 8. Changes to this Privacy Policy. We may change this policy.
- 9. **Security.** We take technological, physical and organizational steps to protect Personally Identifiable Information. However, information cannot be 100% secure, and we cannot promise absolute security.
- 10. **Third Party Sites.** This Site may link to other websites we do not control. We are not responsible for such websites or their privacy practices.
- 11. **Contacting TLC Marketing.** You can contact us at support@tlcmarketing.zendesk.com.



1 Information Collected

We collect two types of information from visitors to the Sites and participants in promotional campaigns:

- Personally Identifiable Information
- Technological Information

1.1 Personally Identifiable Information

"Personally Identifiable Information" is information that identifies you, such as your name, address, telephone number, email address, or company name. TLC Marketing may collect and store the Personally Identifiable Information that you have provided to us. Here are some examples of manners in which we may collect your Personally Identifiable Information:

- We may collect your name, email address, mailing address, phone number, and the receipts you provide, and additional information contained in an online form on the Sites to us if you participate in a promotional campaign
- We may collect your name, email address, mailing address, phone number, and the receipts you provide, and additional information contained in a printed form and posted to us if you participate in a promotional campaign
- We may collect your name, email address, phone number and additional information if you contact us with a question related to our services or promotional campaigns
- We may collect date of birth if you participate in a campaign where there are age restrictions on participation or a prize draw

The above list is not exhaustive but provides examples of the Personally Identifiable Information that may be collected. If you do not want TLC Marketing to collect your Personally Identifiable Information, please do not provide it to us. If you have already provided us with your Personally Identifiable Information, please contact us via email on support@tlcmarketing.zendesk.com and request a deletion of your record.

1.2 Technological Information

"Technological Information" is information we collect through the use of technology on our Sites, including through our use of cookies and related technologies. Some examples of the Technological Information that is collected via our Sites are:

- Internet Protocol (IP) address. Your IP address is the address used to locate your computer on the Internet
- Internet Browser type (Internet Explorer, Firefox, Safari, etc.)
- Statistics on page views
- Pin code that provides access to participate in a promotional campaign
- Cookies



We collect the above Technological Information from all visitors to our Sites. For more information on our use of cookies, please see section 7 below. If you do not want us to collect this data, please do not visit our sites and remove all cookies from your preferred web browser. Further details on removing Cookies is available on www.aboutcookies.org.

2 Use of Information

2.1 Personally Identifiable Information

We use your Personally Identifiable Information that is collected primarily for the followina:

- To fulfill reward requests from promotional campaigns that you are participating in, including to verify that you are eligible to participate
- To provide you with information on products or services you have requested
- To ensure the Sites are relevant to your needs
- To allow you access to limited-entry areas of the Sites
- To protect against potential fraud, we may verify the information collected from these Sites
- To contact you in response to sign up forms such as Contact Us or other inquiry
- If you have opted in to receive notifications on future rewards or other information from TLC Marketing
- For testing, research, analysis and product development
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others
- We may use Personally Identifiable Information to produce anonymous nonidentifiable information, and to use or disclose such non-identifiable information in any manner we deem appropriate

2.2 Technological Information

Technological Information is used as described above, in section 7, Cookies, below, and in other ways as permitted by applicable laws, including combining Technological Information with Personally Identifiable Information. Where such information is combined with Personally Identifiable Information, we treat it as Personally Identifiable Information, and use and disclose it as described in this Privacy Policy.

3 Sharing and Disclosure of Information

3.1 Personally Identifiable Information

We may share or disclose your Personally Identifiable Information in the following instances:

• To comply with the requirements of law or comply with legal process served on us, protect and defend our rights or property, including the rights and



- property of TLC Marketing. or act in urgent circumstances to protect the personal safety of our end users.
- We may retain service providers to perform functions on our behalf, including those practices described in this Privacy Policy. When we disclose information to service providers, the service provider will have access to that information necessary to permit the service provider to perform its function.
- To provide you with information, products or services that you request from us, or which we feel may interest you, where you have consented to be contacted for such purposes.
- We reserve the right to transfer any Personally Identifiable Information we have about you in the event that we merge with or are acquired by a third party or should any such transaction be proposed.

3.2 Technological Information

We may share Technological Information and other non-identifiable information, with third parties.

4 International Transfer of Information

If you provide us with Personally Identifiable Information, TLC Marketing may transfer that information to other group companies or affiliates or to other third parties, across borders, and from your country or jurisdiction to other countries or jurisdictions around the world. If you are visiting from a country outside the UK, please note that you are transferring your Personally Identifiable Information to the UK, Brazil, France, Germany, Italy, Portugal, Spain, South Africa Some Personally Identifiable Information collected by TLC Marketing may therefore be retained in countries other than your country where privacy laws may offer different levels of protection. Personally Identifiable Information may be subject to access by and disclosure to governments and law enforcement agencies in those jurisdictions.

By providing your Personally Identifiable Information you consent to:

- The use of your Personally Identifiable Information for the uses identified above in accordance with this privacy policy.
- The transfer of your Personally Identifiable Information to the UK and other countries as indicated above.

5 Retention of Data

If you provide information as part of a promotional campaign your Personally Identifiable Information will normally be stored in database for the duration of the campaign.

Data and records will not be kept for longer than is necessary for the purposes for which the data was collected or used.



6 Opt-Out

We generally communicate with users who subscribe to our services via email. Although you may opt out of marketing messages, please note that it is in your interest to ensure that we are able to deliver certain non-marketing related messages and that we may be required to deliver certain notices to you by law.

We will provide you the opportunity to exercise an opt-out choice if you do not want to receive other types of communication from us, such as emails or updates from us regarding new services and products offered on the Sites. The opt-out choice may be exercised by ticking or un-ticking the appropriate box provided at the points where Personally Identifiable Information is collected, or by contacting us using the contact details provided at support@tlcmarketing.zendesk.com.

7 Cookies

7.1 What are Cookies?

Cookies are small text files placed on your computer or mobile device by websites. They store preferences and other information to allow you to use the website efficiently and also provide information on how websites are used. Some cookies are essential for the website to function, others are optional.

With most Internet Browsers, you can erase Cookies from your computer hard drive, block all Cookies, or receive a warning before a Cookie is stored. Further details on removing Cookies is available on www.aboutcookies.org. Please note that removing or blocking Cookies may interfere with your full use of our Sites

7.2 Essential Cookies

We use session cookies to store information that are essential for the website to function. This includes cookies that store code validation and reward information. These cookies expire when you terminate your browser session.

7.3 Performance Cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies do not collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is used to improve how a website works.



We use cookies to "remember" what interactions the user has had with the site and the web pages the user has viewed, for example the URL of the page.

7. 4 Which first party cookies does this site use?

Cookie	Name	Purpose	Expiry
THE REWARD COMPANY, Inc. d/b/a TLC Marketing Worldwide Temporary .NET Sessions State	ASP.NET_SessionIc	Used to maintain an anonymized user session by our web servers. When you leave the site, this cookie will be removed.	On close of current web session
THE REWARD COMPANY, Inc. d/b/a TLC Marketing Worldwide Persistent Cookie Consent pop up	CC_analytics	Cookie Consent cookies which appear after you have clicked on the 'allow cookies' in the floating footer. More info http://silktide.com/cookieconsent	1 year from creation

Cookie Name Purpose

Expiry

These cookies are used to collect information about how visitors use a THE REWARD COMPANY, Inc. d/b/a TLC Marketing Worldwide site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

	Google stores the information collected	2 years
_utmb	by the cookies on servers in the United States. Google may also transfer this	30 minutes
GoogleAnalytics _utmc	information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate	On close of web session
_utmz	your IP address with any other data held by Google.	6 months



Cookie Name Purpose Expiry

Unless you opt-out of the Google Cookie, by using this site you consent to the use of the Google Cookie and any information generated by Google Analytics.

You can find an overview of privacy at Google <u>here.</u> For information on how to opt-out from all Google Analytics cookies (from all sites not just from THE REWARD COMPANY, Inc. d/b/a TLC Marketing Worldwide visit **Google.**

The above list is not exhaustive and comprises the standard set of Cookies used by THE REWARD COMPANY, Inc. d/b/a TLC Marketing Worldwide when building a site.

If you would like more information on the Cookies used by our site (and any other site) you can do so from within your web browser by following these steps: http://www.wikihow.com/View-Cookies

8 Changes to this Privacy Policy

We reserve the right to change this privacy policy from time to time in our sole discretion. When we do, we will also revise the "Last Updated" date at the bottom of this privacy policy.

9 Security

Data transmissions over the Internet cannot be auaranteed to be 100% secure. However, we take steps including technological, physical and organizational measures, to help ensure security of our systems and protection of the data. Personally Identifiable Information may be accessed by persons within our organization, or our third party service providers, who require such access to carry out the purposes indicated above, or such other purposes as may be permitted or required by applicable laws. Personally Identifiable Information we collect is managed from our offices at 19 Harcourt Street, London, W1H 4HFIf we learn of a security systems breach we may attempt to notify you in accordance with the applicable law so that you can take appropriate protective steps. By using these Sites or providing Personally Identifiable Information to us you garee that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of these Sites. We may post a notice on our Sites if a security breach occurs or we may send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.



10 Third Party Sites

Our site may contain links to websites owned by third parties. These other websites may have their own privacy policies and terms and conditions that are not governed by this Privacy Policy. We are not responsible for the privacy practices or the content of any website(s) owned and operated by third parties. Other websites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy for each website you visit. Any links from this site to other websites, or references to products, services or publications other than those of TLC Marketing do not imply the endorsement or approval of such websites, products, services or publications by TLC Marketing.

11 Contacting TLC Marketing

Please address requests for information or questions regarding this Privacy Policy to:

The Data Protection Officer
The Rewards Company, Inc. d/b/a TLC Marketing.
19 Harcourt Street
London
W1H 4HF
privacy@tlcmarketing.com