# LULU AND MAXWELL PRIVACY POLICY

At Twin Kids Media Inc. ("TK") we are committed to helping to keep children and their families safe while online on our website (the "Site"). We have designed out Site as a community with activities and promotions for children and for the young at heart. Parents are encouraged to monitor their children's activity on the Site; children (specifically those under the legal age of majority in their home province) are prohibited from using the Site without parental supervision.

Parents and guardians can help educate children in how to safeguard their personal information when using the Site. The term "personal information" includes any information that can identify a user and includes the user's name, address, age, credit information, or other identifying factors.

This Privacy Policy (the "Policy") sets out how TK collects, protects and shares information collected when people use the Site. The Policy is applied with all services and products offered by TK.

#### **Personal Information**

TK collects personal information when a user submits it in order to register with the Site, or for the provision of goods and services offered on the Site. Users submit personal information voluntarily to TK. If a user refuses to submit the personal information required this may prevent TK from allowing the user to participate in Site-related activities or contests.

#### **Other Information**

TK may also collect other information about people who visit the Site, information that cannot be used to identify a single user. Such information may include the name of the service provider, technical information on the equipment used to access the Site, and other information.

#### Cookies

"Cookies" are used on the Site for record keeping and to enhance the functions on the Site. Users are free to refuse to accept cookies. This may affect the performance of some of the features on the Site.

## **Use of Personal Information**

If you provide your personal information to us, you are providing implied consent for us to use the personal information for the stated purpose. For example, we will use the personal information to:

- 1. Process orders for good and services and obtain credit information;
  - a. Your information will be used to fill the order and for any related service
- 2. Track customer service response times and satisfaction levels;
- 3. Monitor consumer feedback;
  - a. Consumer comments and suggestions will be complied and recorded and may be attributed or submitted on an anonymous basis. Consumers will not be contacted unless they indicate a willingness to discuss their feedback with TK. We do not contact individuals under the age of majority directly. Only parents or others who indicate that they are over the age of majority will be contacted.
- 4. Participate in contests or other promotions;
  - a. Each contest or promotion will be governed by terms and conditions regarding participation and selection. Please review these terms carefully.
- 5. Participate in newsletters or other periodic notifications; and
  - a. Consumers may indicate their interest in receiving newsletters and other promotions by opt-in to the mailing list request provided. Consumers may opt-out of receiving additional emails at any time by following the instructions contained in each email
- 6. To comply with any legal requirements.

We only share personal information with third parties when necessary to provide the goods or services requested. TK retains personal information for so long as needed to affect the purpose for which the information was provided.

TK has established procedures for the protection of personal information, including measures designed to protect against unauthorized access or disclosure of information. Sensitive information, including passwords, transaction data and credit information is protected by \*. Information is secured on a secure server and protected by a firewall. Access to personal information is strictly controlled.

TK does not sell or otherwise permit personal information collected on the Site to be used by third parties. We may employ third party services to administer the Site or activities promoted on the Site; in such cases the third parties would share the personal information under strict contractual guidelines in keeping with the procedures described in this Policy. TK will provide users with a summary of the personal information of the user currently held by it on written request. A user may request the correction of inaccurate information

#### Questions

If you have any questions about this Policy, how to delete personal information provided, or TK's privacy practices, please contact our Privacy Officer:

## BY MAIL

Attn: Business Affairs/ PRIVACY OFFICER 949 Avenue Road Toronto, On M5P 2K9

#### BY EMAIL

privacy@twinkidsmedia.com

# CHANGES

TK will update this Policy as it continues to add functions and activities to the Site. Please review this Policy periodically in order to stay abreast of developments and issues involved in the use of the Site. Your use of this Site means that you agree to the terms of the Policy. Similarly, your use of the Site following any amendments to the Policy will mean that you have accepted the changes to this Policy as posted to the Site.