

## **Privacy Policy**

This site is owned, operated and/or administered by Million Dollar Media ("MDM"). MDM's privacy policy covers the collection, use and dissemination of personal information that may be collected through this website, through your participation in the contest, promotion or sweepstakes, your registration for any club, or when you contact MDM. This policy outlines our treatment of personally identifiable information we collect on behalf of our clients, sponsors and for our own use. Please take a moment to read the following to learn more about our information practices, including what type of information is gathered, how the information is used and for what purposes, to whom we disclose the information, and how we safeguard your personal information.

### **Why we collect information.**

MDM is a company that primarily assists our clients, sponsors and other businesses ("sponsor(s)") operate contests, sweepstakes and promotions ("Contests"), which includes among other areas, the administration of contests executed through websites. Such Contests gather personally identifiable information from those individuals who choose to enter or participate in a particular Contest, through MDM's proprietary online technology and other offline methods of entry, and anonymous data regarding the Contest itself. MDM collects such personally identifiable information solely for the use of the sponsor(s) and the operation of the Contest.

### **How we use the information collected.**

If you enter a contest, sweepstakes or promotion on any website managed or administered by MDM, we will ask you to provide information about yourself (such as your name, address, phone number, date of birth, and valid email address, along with any other optional information as requested from the contest sponsor(s)). Among other things, we will need this information to verify your eligibility, ensure compliance with the Official Rules of the contest, notify potential winners, coordinate shipping or delivery of any prize awards, responding to your inquiries, customizing your experience, improving our contests, and/or communicating with you. This information will also be used for marketing purposes by any and all related sponsor(s) or other participating parties, including to alert you of future promotions held by any participating sponsor(s), promote special offers, products, features, sales or services of sponsor(s), and other marketing analysis.

We will share this information with any and all sponsor(s) of the contest; and such sponsor(s) will be identified in the official rules of the contest. We may also share this information with other third-party service providers that are involved with or provide assistance in the administration of the contest, such as by conducting drawings, contacting participants, and/or delivering prizes. If you do not want to provide the requested information or have the information provided to sponsor(s) or other third-party service providers, please do not enter the contest. MDM does not sell your information to any unrelated third parties, who have not sponsored or are not involved in the administration or execution of the Contest.

MDM strictly limits access to personally identifiable information within its organization, and except as noted above, data is never shared outside of the company for any reason whatsoever (with the exception of its clients, appropriate governmental or legal requests). Personally identifiable information collected from different Contests is never shared with anyone other than the sponsor(s) on whose behalf the information was collected. Personally identifiable information collected by MDM on behalf of sponsor(s) belongs solely to the sponsor(s) and will be used solely in accordance with each particular sponsor(s) Privacy Policy.

An individual's desire to "opt-out" of receiving marketing or other information from a sponsor will be handled in accordance with a particular sponsor's Privacy Policy. MDM instructs its clients and sponsors to use the data which MDM collects on its behalf in accordance with generally accepted privacy standards for both offline and online data, which includes an "opt-out" method for individuals who have provided personally identifiable information. Ultimately, however, MDM is not responsible for data collected on behalf of its clients or sponsors when such data is in its client's or sponsor's possession.

### **What information we collect.**

The information we collect helps us personalize and continually improve our contest websites, as well as offers, information, content, and communication regarding products and services from related sponsor(s). Here are the types of information we gather.

### **Automatic Information:**

Our servers automatically collect certain non-personally identifying information, such as your computer's IP address, the type of browser in use, and pages viewed when you visit our Sites. We use this information to understand how visitors navigate

through our Sites, participate in the Contest, use sponsors' products, to enhance your experience while using our Sites, and to make the materials we post as valuable to visitors as possible. Such information may be linked to personally identifiable information.

**Information You Give Us:**

We receive and store any information you enter during contest registration, account creation or any information you voluntarily provide us in any other way, including opt-in question responses.

**Million Dollar Media's Online Promotion Technology.**

MDM's proprietary Promotion technology has the ability to collect data other than personally identifiable information for any of the Promotions it operates online. MDM may collect information about your computer configuration, such as your browser type, operating system, or ISP domain name. MDM may collect information about the site you last visited prior to the Contest or about your activity during your visit to the Contest site. This information may be used by MDM to administer the technical and operational aspects of this site, and may include using your IP address to help diagnose problems with our server. Your IP address may also be used to gather broad demographic information for aggregate use. MDM may use a cookie, a piece of data stored on the user's hard drive containing information about the user, to assist in performing some or all of these activities and also to limit your ability to play a Contest more times than allowed. You can set your browser to accept all, some, or no cookies. If you set your browser to reject all cookies, you may be limited in your ability to access some, or all aspects of a particular Contest. MDM may also use other technologies to help us understand which parts of our websites are the most popular, where our visitors are going, how much time they spend there, assist in the return visit and log-in process for entrants, and other uses.

Our clients, sponsors or other 3<sup>rd</sup> party partners will often employ the use of a "click-through URL" linked to content on their website. When a participant clicks one of these URLs, they may pass through a web server before arriving at the destination web page. We may track this click-through data to help determine general interest and measure the effectiveness of communications and the website content.

**Security of personal information.**

MDM takes its privacy obligations both to its clients, sponsors and to individuals who enter its Contests very seriously. The security and confidentiality of your information is extremely important to us. We have implemented technical, administrative, and physical security measures to try to protect collected information from unauthorized access and improper use. From time to time, we review our security procedures in order to consider appropriate new technology and methods.

MDM shall make all reasonable efforts to comply with this privacy policy; however, this policy should not be construed as a contractual undertaking and MDM cannot warrant the security of any information that you transmit to us. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable and by transmitting personal information over the internet to us, you are accepting any risks associated with doing so. In addition, you are responsible for taking appropriate measures to protect and secure all passwords, log-on or membership identification information and account information.

**Intended Audience.**

MDM websites are intended for United States audiences over the age of 13. All of our services are operated in accordance with the laws of the United States. We make no representation that any service or product offered by MDM is operated in accordance with the laws or governed by other nations. Please be aware that any personal information you transfer to us will be transferred to the U.S and is subject to U.S. law. We will reject or delete any personally identifiable information that we believe in good faith to be inconsistent with this Privacy Policy.

**Children's Privacy Policy.**

Unless otherwise specifically indicated, contests, sweepstakes and promotions and/or other websites administered by MDM are not available to anyone under the age of thirteen (13). Although persons of all ages may be allowed to visit our websites or participate in activities that do not require the collection of personal information, we do not knowingly or intentionally collect personal information from children under the age of 13. Except for the limited circumstances listed above and below, we will automatically reject and delete the registration or entry of any person we believe in good faith to be underage. Any false or fraudulent registration or entry from a minor will be deemed to be ineligible and will disqualify the minor from the receipt of a

prize, benefit, or other participation. Except to meet Federal regulations, as required by applicable laws, or other regulatory and legal purposes, we will not knowingly use, store, or disclose any child's personal information to a third party without prior parental consent.

#### **Special Note about Children.**

Whenever MDM does operate a Promotion on behalf of its clients which collect personally identifiable information from children under the age of thirteen (13), MDM and its clients comply fully with all aspects of the Children's Online Privacy Protection Act ("COPPA") in the operation of the Promotion, in the collection of the information itself and in the subsequent use of the data collected. Personally identifiable information will not be collected from children under the age of thirteen (13) without parental consent in compliance with the COPPA guidelines.

#### **Links to other websites.**

MDM websites will often contain links to other client or sponsor websites and products. MDM is not responsible for the privacy practices or the content of such websites or products. Please visit the privacy policies of these third party sites in order to understand their privacy policies and data collection practices. MDM has no liability for these third party sites, their policies or actions.

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

**California Residents – Your California Privacy Rights** *(As provided by California Civil Code Section 1798.83).*

California Civil Code Section 1798.83 permits individuals who are California residents to request certain information regarding disclosure of personal information to third parties for their direct marketing purposes. A California resident who has provided personal information to a business with whom he/she has established a business relationship for personal, family, or household purposes ("California customer") is entitled to request information about whether the business has disclosed personal information to any third parties for the third parties' direct marketing purposes. In general, if the business has made such a disclosure of personal information, upon receipt of a request by a California customer, the business is required to provide a list of all third parties to whom personal information was disclosed in the preceding calendar year, as well as a list of the categories of personal information that were disclosed. However, under the law, a business is not required to provide the above-described lists if the business adopts and discloses to the public (in its privacy policy) a policy of not disclosing customer's personal information to third parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, as long as the business maintains and discloses this policy. Rather, the business may comply with the law by notifying the customer of his or her right to prevent disclosure of personal information and providing a cost free means to exercise that right.

#### **How to Make Requests**

If you are a California resident, you may make a request for the disclosures described above or make a request to delete personal information we collected from you, by contacting us at:

<https://www.mdmgames.com/privacy-request.asp>

**NOTE:** This form is intended only for consumers as defined under the California Consumer Privacy Act.

Consumers are natural persons who reside in California. Million Dollar Media will not respond to requests from any individuals who are not consumers or authorized agents as defined under the CCPA.

#### **Changes to this policy.**

We may revise or make material changes to this Privacy Policy from time to time to keep it up to date with MDM's current policies, practices, products, technologies, services and web pages. MDM reserves the right to revise, change or modify this policy at any time for any reason. "Updated" may be used to alert users to recent changes and to the date of the last update. We also post FAQ's from time to time on specific contest websites.

#### **Privacy questions.**

If you have questions or concerns about MDM's Privacy Policy or data processing or use, please contact us per the below. We will respond to your inquiry within 30 days.

#### **Contact Million Dollar Media.**

If you wish to contact MDM about privacy related issues, California resident inquiries or for any reason at all, you may do so in by mail:

**Mail to:**

Million Dollar Media

Privacy Policy

P.O. Box 278

Woodbridge, NJ 07095

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