

## **THE RETHINK GROUP PRIVACY POLICY**

The policy below describes RT's privacy practices for the Sites and the Services (defined below), including the Site or Service you are currently accessing. The websites (individually a "Site", and collectively, the "Sites"), mobile applications, and software (individually a "Service", and collectively, the "Services") operated by The reThink Group, Inc. ("RT" or "we" or "us") are intended to provide resources and tools to assist churches and families help children discover and embrace a growing relationship with Jesus Christ. Many of the Sites and Services are directed at church leaders, with some aspects directed at parents and families as well.

This privacy statement (the "Privacy Policy") applies to all personally identifiable information (collectively, "Personal Data") and other information that is collected by RT through the Sites and the Services. Please review this Privacy Policy carefully before using the Sites or Services. By using any Site or Service, you consent to these practices.

### **What Information Do We Collect?**

We collect Personal Data from you when you subscribe to our curriculum, register for certain programs, newsletters, and events, download a mobile application or other Service, or when you voluntarily choose to provide such information, such as when you purchase products or otherwise enter your Personal Data on a Site, through a Service, or contact us via a third party (e.g. social media page).

We may also collect Personal Data from you so that RT may improve its products and provide you with efficient customer service. From time to time, RT may request information, including Personal Data, about you and/or your organization. Information we may collect includes Personal Data such as names, phone numbers, postal addresses, email addresses, place of employment, and credit card or other payment information, as well as demographic information such as age, gender, and zip code, and information regarding the demographics of your organization. We also may collect non-personally identifiable technical data such as your browser type, IP address, domain, access times, installation data, error and other use codes, and referring web site address.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data to us via a Site or Service, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of RT and the authorized third parties referred to herein, with may be within the United States, for the purposes described in this Privacy Policy.

**Information Collected from Children:** RT does not knowingly collect Personal Data from children under the age of 13 in association with a Site or Service except as provided herein. If you are under the age of 18, you may only use a Site or Service in the presence and with the approval of a parent or legal guardian. Parents may contact us at [customerservice@rethinkgroup.org](mailto:customerservice@rethinkgroup.org) to request that any Personal Data provided to us by their child be removed.

The studio252.tv Site offers children the opportunity to sign up for the Site and create a "StudioID" and password. To comply with the Children's Online Privacy Protection Act, for users under the age of 13, we collect a parent's email address, the child's account name, and the child's password during the initial registration process. We do not collect the child's personal name. The studio252.tv Site requires child

users or their parent or guardian to provide a parent's or guardian's valid email address in order to register on the studio252.tv Site. We use this information to send the parent or guardian a message that can be used to activate the studio252.tv account, to notify the parent or guardian about our privacy practices, to send the parent or guardian communications either about studio252.tv accounts or about features of the Site, and for the other purposes described in this Privacy Policy. The child's account is not activated until the parent or guardian completes this registration process. The parent's or guardian's email address is correlated with the "StudioID" user name. Parents or guardians are required to approve all changes to the account and are given access to view all information correlated with the "StudioID," including analytics regarding what the child has viewed on the Site. Children may vote for content they like and otherwise interact with the Site through their "StudioID." Parents or guardians may at any time cancel the child's account and ask that RT remove Personal Data associated with their child's "StudioID."

**Posting Content:** Certain Sites and Services offer families the opportunity to upload their images, videos, stories, and other content to share with other users of the Site or Service. The parent or guardian is required to log in to the Site or Service to upload any such content, which is stored and displayed in connection with the designated account or "StudioID." Children are not permitted to upload such content themselves. You acknowledge by uploading such content that you own copyright to the content uploaded, that other users of the Site or Service are permitted to view the content, and that RT may use the content on the Site or Service and in promotional and marketing materials related to the Sites, Services, or RT.

**Testimonials:** The testimonials section of the Sites and Services is for the purpose of sharing positive experiences. RT may moderate the testimonials section to ensure accurate and positive testimonials. Published testimonials are genuine but RT reserves the right to edit or alter testimonials for items including but not limited to spelling, grammar, length, or appropriateness. RT reserves the right to post or remove any testimonial at its discretion.

**Offers:** From time-to-time we may give you the opportunity to opt in to offers from unaffiliated third parties that we deem valuable. If you decide to accept these offers, we will provide your Personal Data to the applicable third party. However, you should note that this Privacy Policy does not apply to Personal Data that you permit us to give to unaffiliated third parties. Any information users provide to another party is governed by the rules of that party's privacy policy, which may differ from this Privacy Policy. RT is not responsible for information given to other parties. Please review their privacy policies prior to providing any information to third parties.

**Log Files:** We use IP addresses to analyze trends and use of content, administer the Sites and Services, evaluate content of and for RT curriculum and products, track user movements and interaction with content in the Sites and Services, and gather broad demographic information for aggregate use. IP addresses are not linked to Personal Data and are not themselves considered Personal Data.

**Visitors From Outside of the US:** The Sites and Services and the servers upon which they are hosted are located in the United States. All matters and material related to the Sites and Services are governed by the laws of the State of Georgia in the United States. Any Personal Data that users outside of the U.S. provide via the Sites or Services will be transferred to the United States, and by visiting the Sites or Services and submitting Personal Data, you authorize this transfer.

**Aggregate Information:** We may occasionally generate reports or other information for advertisers containing aggregate information about our users such as demographics and online usage trends. This allows us to provide content and advertiser offers that are most relevant and beneficial to our users. Except as otherwise disclosed herein, we will not include any Personal Data in these reports and will not link the aggregated data to Personal Data.

**Sharing and Disclosing Your Personal Data:** In addition to the disclosures of Personal Data described above, there are certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

**Churches:** We may share with churches aggregate information regarding their members' purchase of our materials, including the number of families from the church that are using products (such as CUE™ box) that we ship directly to families.

**Exhibitors:** When you register to attend a RT conference or events (e.g. Orange Conference), we may share your Personal Data with exhibitors or other third parties that may be present at or are otherwise related to the applicable conference or event.

**Transfer:** All information, including Personal Data, collected by or for RT through the Sites and Services or otherwise, is considered a trade secret of RT. As the owner of such information, we may assign such Personal Data in conjunction with the merger or other transfer of our non-profit organization to another organization or with the transfer of all or a portion of our assets.

**Agents, Consultants, and Related Third Parties:** RT sometimes hires other companies to perform certain business-related functions. Examples include mailing information, fulfilling orders, maintaining databases, and processing payments. When we employ another company to perform a function of this nature, we may provide them with the Personal Data or other information needed to perform their specific function.

**Legal Requirements:** RT reserves the right to use or disclose any Personal Data without notice or consent as needed to comply with federal and state law or law enforcement investigation; to conduct investigations of complaints; to protect the integrity of the Sites; to protect the safety of our visitors or others; and to cooperate in any legal investigations.

**Parent Cue App:** Notwithstanding any other provision in this Privacy Policy, if you submit Personal Data about your minor children through the Parent Cue app ("Parent Cue Data"), this Parent Cue Data will not be shared with any third party except for the Merger, Related Third Parties, and Legal Requirements exceptions provided above. By submitting Parent Cue Data to the Parent Cue app, you represent and warrant that you are the parent or legal guardian of the child or ward whose Parent Cue Data you submit to the app and that you have the necessary parental rights to grant this authority. You may contact us at [customerservice@rethinkgroup.org](mailto:customerservice@rethinkgroup.org) to request that any Parent Cue Data you previously submitted to the app be removed. Your request will be complied with within a reasonable time.

## **Linking and Framing**

**Framed Site:** RT does not control and has no liability with respect to content which is incorporated from a framed site (a website operated by another entity whose material is presented in a browser window

frame alongside material from our Sites). Use of such content may be subject to other terms and conditions imposed by the operator of such site. This Privacy Policy does not apply to information that may be collected by such third party site.

**Links:** The Sites and Services may contain links to other sites. RT is not responsible for the privacy practices of such other websites. We encourage you to be aware when you leave the Sites and Services and to read the privacy policies of every website that collects Personal Data. This Privacy Policy applies solely to information collected by RT.

**User Agreement:** Your access to and use of the Sites and Services constitutes acceptance of the RT [Terms of Use](#) displayed on the Sites or within a Service.

**What Information We Collect When You Purchase from the Sites/Services:** RT respects the privacy of its on-line visitors and those that purchase from the Sites and Services. In order to make a purchase on the Sites or within the Services, you will be required to provide the following:

- Full name
- Shipping street address
- Phone number
- Email address
- Billing address
- Credit card type
- Card number
- Name on card
- Expiration date
- Card verification code

**On-line Polls and Surveys:** Occasionally we collect poll or survey responses to find out what RT users think, or for statistical or research purposes. Our polls and surveys do not collect, nor are they linked to, any Personal Data, and they are voluntary. The results of our demographic and opinion surveys are grouped and analyzed as a whole - in the aggregate. RT may share this aggregated information with other parties.

**Cookies and Similar Technology:** We use cookies and similar technologies like pixels, tags, web beacons, and other identifiers to collect non-personal information about our visitors and help us personalize Sites or Services for you. Information we collect may include the type of browser software a visitor uses to access the Internet (i.e. Internet Explorer, Firefox, Netscape, etc.); type of operating system (i.e. Windows, Macintosh, etc.); or the domain name of the visitor's Internet service provider. We also count the number of visitors who come to our site each day in an aggregate form. Such information allows us to better assess which attractions are best meeting our audience's needs. We also use "cookie" technology to track and provide visitor scores on designated contests and multi-player games.

**Pixels:** In addition to cookies, we sometimes use small graphic images known as "pixels" (also known as web beacons, clear GIFs, or pixel tags). We may use pixels in our email communications to you to help us understand whether our email communication has been viewed. We also use third-party pixels (such as those from Google, Facebook, and other advertising networks) to help us provide advertising that is relevant to your interests.

**Marketing Tools:** RT may work with third-party advertisers that use cookies and similar technologies to provide more relevant advertising about RT products and services on the Sites, in Services, or otherwise on the internet. To provide this 'interest-based advertising', we may combine non-personal data about your online activities acquired over time with those of these third parties, helping to tailor advertising to you that may be more relevant. For example, you may see a RT advertisement on a Facebook page, a Google search results page, or on YouTube. We do not share your personal information as part of this process. Where necessary we obtain your consent to this process. At all times, you can opt out of these personalized ads from third-party advertisers and ad networks who are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising by visiting the opt-out pages on the NAI websites and DAA websites. Opting out may make the ads you see across the internet less relevant to you.

**Independent Contractors:** RT may use certain independent contractors and other third parties to operate components of the Sites or Services, fulfill orders, and assist RT in operating and improving the Sites or Services. In this capacity, RT may allow these independent contractors and third parties to collect the information, including Personal Data, described in this Privacy Policy for RT.

**Notification of Changes:** From time to time we may make changes to our Privacy Policy. If we make changes, we will post them on the Sites to make users aware of what the changes are so users will always be aware of what information we collect, how we use it, and when we may disclose it. A user is bound by any changes to the policy when she or he uses the Sites or Services after those changes have been posted. If, however, we are going to use users' Personal Data in a manner materially different from that stated at the time of collection we will notify by posting a notice on our Sites for 30 days.

**Do Not Track:** RT's Sites and Services do not respond to the Do Not Track setting of your web browser.

**Rights of European Union Residents:** The European Union's General Data Protection Regulation (GDPR) applies to the processing of personal data of E.U. users. This section provides information regarding the rights GDPR grants to E.U. residents and the responsibilities of RT under such regulations.

### 1. E.U. User Rights

If you are an E.U. resident and submit your Personal Data to us or we otherwise collect Personal Data about you as defined by GDPR, you have the following rights regarding how we manage your Personal Data. For purposes of this "EU User Rights" section, "Personal Data" means Personal Data, as defined above in this Privacy Policy, as well as any information which RT may link or otherwise connect with your account or identity. To exercise the rights provided below, please submit your request to [customerservice@rethinkgroup.org](mailto:customerservice@rethinkgroup.org) with the subject EU Privacy Request.

**Explanation and access to your Personal Data:** You have the right to be informed about your Personal Data RT has in its possession. You also have the right to request a copy of all Personal Data in RT's possession if RT collected such Personal Data based on consent or because it is required to provide a service that you requested from RT.

**Data Deletion:** You may request the deletion of your account and all Personal Data in our possession. RT may retain certain Personal Data if required by law or for legitimate business purposes as permitted by GDPR.

**Data Correction:** If you believe in Personal Data in RT's possession is inaccurate, you may request correction of such Personal Data.

**Objections:** You may object to RT's processing of your Personal Data (including for marketing purposes), based on profiling or automated decision-making. However, RT may continue to process your Personal Data if it is doing so in accordance with GDPR regulations. You may file a complaint with the appropriate European governmental agency if you believe RT's management of your Personal Data is not in accordance with GDPR.

## 2. Grounds for Processing Personal Data.

- a. Consent
  - i. RT may collect and use your Personal Data based on your consent. You may revoke your consent at any time but doing so will prevent you from accessing any service or feature that requires collection or use of the Personal Data RT collected or used based on consent.
  - ii. RT relies on consent in connection with data collections or uses of Personal Data that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you.
- b. To provide certain services you request. To provide you with certain services that you request from RT, we may collect and use Personal Data such as:
  - i. Information necessary for your account or user profile, for communicating with you, for verifying your identity, to fulfill orders for products or services, or to make or receive payments;
  - ii. Transaction information about a specific transaction you have initiated with RT; or
  - iii. Usage information, which is necessary to maintain, optimize, and enhance RT's services, such as products or features on our website which generate greater traffic.
- c. Compliance with legal obligations, protecting the vital interests of a third party or general public.
  - i. RT may process or disclose Personal Data to comply with a legal investigation, at the request or law enforcement, if there is a threat to the safety or property of another person, or a substantial public interest.
- d. Necessary for RT's legitimate interests.
  - i. To prevent, detect and combat fraud in connection with the use of our services.
  - ii. To provide customer support.
  - iii. To optimize our service and develop new services.
  - iv. For research and analytical purposes. This includes, for example, analyzing usage trends to improve the user experience.
  - v. For direct marketing purposes. This includes, for example, analyzing data to identify trends and tailor marketing messages to user needs.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

Beginning on January 1, 2005, California Civil Code Section 1798.83 permits California residents who provide Personal Data in obtaining products or services for personal, family, or household use are entitled to request and obtain from RT once a calendar year information about the Personal Data RT shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of Personal Data and the names and addresses of those businesses with which RT shared Personal for the immediately prior calendar year (e.g., requests made in 2018 will receive information regarding 2017 sharing activities).

To obtain this information from RT please contact us via [customerservice@rethinkgroup.org](mailto:customerservice@rethinkgroup.org) with "Request for California Privacy Information" in the subject line of your email. The requested information, if required by law, will be provided to you at your email inbox.

The reThink Group, Inc.  
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If you have any questions concerning this privacy policy, please email us at [customerservice@rethinkgroup.org](mailto:customerservice@rethinkgroup.org).

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