

## THE RETHINK GROUP PRIVACY POLICY

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. The Sites include but are not limited to: [rethinkgroup.org](http://rethinkgroup.org), [whatisorange.org](http://whatisorange.org), [theorangeconference.com](http://theorangeconference.com), [myfirstlook.org](http://myfirstlook.org), [252basics.org](http://252basics.org), [orangeleaders.com](http://orangeleaders.com), [campkidjam.com](http://campkidjam.com), [marriedpeople.org](http://marriedpeople.org), [familytimes.org](http://familytimes.org), [amberskyrecords.com](http://amberskyrecords.com), [studio252.tv](http://studio252.tv), [ThinkOrange.com](http://ThinkOrange.com), [XP3Students.com](http://XP3Students.com), [OrangeTour.org](http://OrangeTour.org), [HighSchoolCamp.com](http://HighSchoolCamp.com), [OrangeBlogs.org](http://OrangeBlogs.org), [OrangeParents.org](http://OrangeParents.org), [ThereThinkStore.com](http://ThereThinkStore.com), [leadsmall.org](http://leadsmall.org), [theparentcue.org](http://theparentcue.org), [LegacyMarbles.com](http://LegacyMarbles.com) and [DoMinistryBetter.com](http://DoMinistryBetter.com), among others. The Services include but are not limited to the Lead Small app, other mobile applications, and related software and content management systems. Many of the Sites and Services are directed at church leaders, with some aspects directed at parents and families as well. As we encourage our users to explore and interact with the Sites and Services, we also take seriously the obligation to educate users about how to maintain appropriate privacy when using online media. Included in this obligation is a commitment to comply fully with the Children’s Online Privacy Protection Act of 1998. The policy below describes RT’s information collection practices for the Sites and the Services.

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 or through a Service. Wherever we collect Personal Data we make an effort to provide a link to this Privacy Policy.

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 your organization. Information we may collect includes Personal Data such as names, phone numbers, postal addresses, and email addresses, 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 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. If you are under the age of 18, you may only use a Site

or Service in the presence of an approving parent or 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 to provide a parent's valid email address in order to register on the website. We use this information to send the parent a message that can be used to activate the studio252.tv account, to notify the parent about our privacy practices, to send the parent 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 completes this registration process. The parent's email address is correlated with the "StudioID" user name. Parents 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 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 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 give 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 that may be present at the applicable conference or event.

**Merger:** 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 information in conjunction with the merger or other transfer of our non-profit organization to another organization or with the transfer of 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 endeavor to provide them only with the information that they need to perform their specific function; at times, this may include Personal Data.

**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; 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.

## **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. Please be aware that 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 the Sites and Services.

**User Agreement:** Your access to and use of the Sites and Services constitutes acceptance of the [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

**Security:** At RT we take the issue of security very seriously. It is a top priority to ensure that all current and future information collected from our users is secure. We are careful to maintain commercial standards in electronic security and password protection.

**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.

**Using "Cookie" Technology:** We use a software technology called "cookies" to collect non-personal information about our visitors. Such information includes: 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.

**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.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

Beginning on January 1, 2005, California Civil Code Section 1798.83 permits users who are California residents to request certain information regarding the Sites' and Services' disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [customerservice@rethinkgroup.org](mailto:customerservice@rethinkgroup.org) or write us at the address below.

The reThink Group, Inc.  
5870 Charlotte Lane, Ste 300  
Cumming, GA 30040

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

[Last updated: May 30, 2014]