

Pond Punkies® Children's Online Privacy Policy

We value the trust you place in Pond Punkies. Accordingly, Pond Punkies adheres to the highest ethical standards in gathering, using and safeguarding children's online information that is entrusted to the company.

The Children's Online Privacy Protection Act ("COPPA") requires that we inform parents and legal guardians about how we collect, use, and disclose personal information from children under 13 years of age; and that we obtain the consent of parents and guardians in order for children under 13 years of age to use certain features of our Web sites. Below we explain how we do that for these children. In addition, when we use the term "parent" below, we mean to include legal guardians.

This privacy policy addresses Pond Punkies general policy regarding the following:

- What type of information does Pond Punkies collect from children?
- What does Pond Punkies do with this information?
- How does Pond Punkies obtain parental consent?
- How can parents review the information that their child provided to Pond Punkies?
- How does Pond Punkies notify parents of their Privacy Policy changes?
- Whom do parents contact with concerns about our Children's Privacy Policy?

What type of information does Pond Punkies collect from children?

Pond Punkies websites may collect online contact information from children under the age of 13 in order to respond to a specific request from a child. For example, Pond Punkies websites may allow children to submit questions in a comment section on the contact us now page in order to get a response from a Pond Punkie expert. Online contact information that is collected in this manner will only be shared with Pond Punkie affiliates.

Pond Punkies websites may collect online contact information from children under the age of 13 in order to respond more than once to a specific request from a child or to protect the safety of the child. For example, some Pond Punkies websites may collect online contact information to allow a child to sign up for an online newsletter, special activity, or contest. Each Pond Punkies website that collects such online contact information requires the child to provide a first name, child's parent or guardian's e-mail address, and child's date of birth. We collect the date of birth to validate the ages of our guests, including children. Pond Punkies will send the child's parent or guardian a notice regarding Pond Punkies children's online information practices. In such situations, the contact information is only used to respond to the child's request and to notify the child's parent or guardian that the child contacted Pond Punkies. Pond Punkies will not condition a child's participation in an activity on the provision of more information than is reasonably necessary for the activity.

What does Pond Punkies do with this information?

Pond Punkies does not rent or sell guest's information, including information provided by children, to outside marketers. In certain circumstances, Pond Punkies may share guest information with trusted service providers that need access to your information to provide operational or other support services. To

ensure the confidentiality and security of this information, service providers must agree to safeguard all information in strict compliance with our policy.

If a child registers for a sweepstakes or contest, we use the parent's e-mail address to notify the parent of the child's registration request.

We also may provide information to regulatory authorities and law enforcement officials in accordance with applicable law or when we otherwise believe in good faith that the law requires it. In the event of a sale of all or part of one of our businesses, we may share customer information related to that business as part of the transaction.

How does Pond Punkies obtain parental consent?

Pond Punkies websites may collect online contact information from children under the age of 13 for participation in promotions or ongoing programs. Each Pond Punkies website that collects such information uses reasonable efforts to obtain verifiable parental consent before collecting such information from a child. Parents or guardians are required to demonstrate their consent for their child's participation in the promotion or program by submitting an e-mail message. The method of parental consent will vary, depending upon the specific promotion or program. Additional consent mechanisms may be used in the future. Whenever parental consent is obtained, the parent or guardian will be asked to choose or be given an identification code so that Pond Punkies can identify and authenticate future requests from that parent or guardian.

How can parents review the information that their child provided to Pond Punkies?

Parents or guardians whose children have provided information to Pond Punkies may review the information provided by their child by sending an e-mail message to the e-mail address listed on the Pond Punkies.com site that collected their child's information. For verification and security purposes, Pond Punkies may request that such parental requests must contain the parent's or guardian's name and identification code as well as a valid e-mail address, a street address, or a phone number. Parents or guardians may also request that Pond Punkies delete their child's information. If such a parental request is received, Pond Punkies will make all reasonable efforts to delete the information from its files.

How does Pond Punkies notify parents if their Children's Privacy Policy changes?

As mentioned above, this policy is subject to change and the changes will become effective immediately. If there are material changes to this policy, we will provide notice of the changes by posting the amended policy on Pond Punkies.com and by revising the effective date of the Children's Privacy Policy textual link appearing at the bottom of the page.

Who do parents or guardians contact with questions or concerns about our Children's Privacy Policy?

If you need further assistance, please send an e-mail with your questions or comments to support@pondpunkies.com

Effective Date: August 1, 2008