

# Social Strata Privacy Policy

Last Updated: September 10, 2013

This Privacy Policy (“Policy”) applies to all products, services, and websites operated by Social Strata, Inc. (“Social Strata”).

Social Strata is registered with the U.S. Department of Commerce's Safe Harbor Program. This means that we comply with the Safe Harbor principles of Notice, Choice, Onward Transfer, Security, Data Integrity, Access, and Enforcement. To learn more about the Safe Harbor program, and to view Social Strata's certification, please visit <http://www.export.gov/safeharbor/>.

## Information That We Collect

### Information That You Provide Us

When you sign up for any account or service operated by Social Strata, we store all information that you provide to us. This may include personal information like email addresses, your name, passwords, phone numbers, birth date, gender, and address information. For services that require payment, we also collect credit card information, which is stored in encrypted form on secure servers, including PCI-compliant third-party vendors. Once you register and sign in to one of our services, you are not anonymous to us. In addition, we collect and store information based on the services that you are using. For instance, we may store the names of communities that you join, the people that you mark as your buddies, content that you watch, etc.

### Browser Cookies

When you use a Social Strata service, we may store certain information in browser cookies. These cookies identify your browser and allow us to enhance your online experience. Most browsers are configured to accept cookies, but you may change your browser's settings so that you are informed every time a cookie is set, or to prevent cookies from being set at all. Please note, however, that many Social Strata services do not function properly if cookies are disabled.

Advertisers or other third parties do not have access to Social Strata's cookies. However, such advertisers may set their own cookies. Such cookies are subject to the advertisers' own privacy policies, not this Policy.

### Visit Information Via Server Logs

Social Strata records information on our server logs from your browser, including your IP address, cookie information, and page request.

### User Communications

Any email or written correspondence that you send us may be stored.

### Transaction Records

Data from any monetary transaction taking place via Social Strata's service may be stored.

## Uses of Collected Information

Social Strata uses collected information to enhance your experience online, authenticate you when you sign in, send notifications, fulfill your requests for services, contact you, customize the advertising or content that you see, and provide anonymous reporting for internal and external clients.

## **Information Sharing**

Social Strata does not share personal information with other individuals, organizations, or companies outside of Social Strata, unless we have your consent or unless:

- We are working with trusted partners who agree to abide by the rules of this Policy and have signed a confidentiality agreement.
- We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.
- We believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, or potential threats to the physical safety of any person.
- If Social Strata is involved in a merger, acquisition, or any form of sale of some or all of its assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.

Note that we may share certain aggregated, non-personal information, such as demographic information, browser type, and usage statistics. In such cases, the information does not identify you personally.

Profile information collected by sites hosted by Social Strata is collected by the sites themselves. Thus, you should review the privacy policy for each site before joining sites hosted by Social Strata.

While Social Strata does not provide any personal information to advertisers, it is possible that, if you view a certain ad, it may have been delivered to you based on targeting demographic criteria (for example, men who are between 18-24 years of age). Please note that in such situations, the advertiser does not know any specific personal information about you. You understand, however, that the advertiser will make the assumption that you meet its particular targeting criteria. Social Strata may also share conversion data with advertisers.

## **Data Integrity**

Social Strata processes personal information only for the purposes for which it was collected, and in accordance with the Policy. We review our data collection, storage, and processing practices to ensure that we only collect, store, and process the personal information needed to provide our services. We depend on our users to update or correct their own personal information.

## **Enforcement**

Social Strata periodically reviews its compliance with the Policy. If you have questions or concerns, please contact us at: Social Strata, Inc., ATTN: Social Strata Privacy Administrator, 1985 Riviera Drive, Mount Pleasant, SC 29464, USA. If you contact us at this address with your concerns/questions, we will respond. Social Strata will also cooperate with the appropriate regulatory authorities to resolve any complaints regarding the transfer of personal information that cannot be resolved between Social Strata and you.

## **Confidentiality and Security**

Social Strata restricts access to personal information to Social Strata employees, contractors, and agents who need to access the information in order to operate, sustain, improve, or repair our services. These individuals are bound to confidentiality agreements and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

We take appropriate security measures to protect your information. These measures include physical, electronic, and procedural safeguards, as well as software/system security reviews.

## **Updating Your Personal Information**

If you have a hoo.do account, you can edit your account information at any time online. You will need to sign in to edit your account information. You may also request to have your account deleted entirely. Please note, however, that requests for account deletion may take up to 30 days to process and archived versions of your information may remain in our system after deletion.

## **Changes to This Policy**

Social Strata may revise this Policy in the future. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address on your account or through our help center at <http://help.socialstrata.com>.

## **Questions/Comments**

If you have any questions or comments regarding Social Strata's Privacy Policy, please contact us at:  
Social Strata, Inc.  
Social Strata Privacy Administrator  
1985 Riviera Drive  
Suite 103-114  
Mount Pleasant, SC 29464 USA