iSWiFTER Inc. Privacy Policy

Last Updated: November 30, 2011

iSWiFTER Inc., ("iSWiFTER", “us”, “our” or "we") is dedicated to respecting the privacy rights of our users ("users" or "you"). This Privacy Policy (“Policy”) describes the ways we collect, store, use, and manage the information you provide in connection with our websites, including http://www.iswifter.net, (“Site(s)”) or any iSWiFTER application (Sites and applications collectively, the "Service") where this Policy is displayed. Please note that the scope of this Policy is limited to information collected by iSWiFTER through your use of the Service. This Policy does not apply to websites, applications or services that display or link to different privacy statements.

We may update this Policy from time to time. If we make any changes to this Policy, we will change the "Last Updated" date above.

Information Collected

When you use our Services, we may collect and record information about you. We may collect information about you when you use our Service through a third party social networking platform or another third party source.

We may collect information about you such as your name, email address, postal address, phone number and demographics such as your age or birthdate, gender or interests. We may also collect credit card numbers and other payment information if you make purchases through our Services. We may obtain information from other sources, including third party social networking platforms you use with our Services and combine that with information we collect through our Services.

When you access the Services through a social networking platform we may collect information made available through the social networking platform such as your: (1) real name, (2) user identification number and/or user name, (3) locale, city, state and country, (4) gender, (5) birthdate, (6) time zone and (7) email address.

When you visit our Services, your computer’s or device’s operating system, Internet Protocol (IP) address, access times, browser type and language and website you visited before coming to our Site, may be logged automatically. We also collect information about your usage and activity, such as number of clicks, pages viewed and the order of those pages, the amount of time spent on particular pages, links you click, and the date and time of this activity. We use this information to monitor and analyze use of the Services and to analyze certain data, such as the average time a user spends using the Service in a day and the average number of visits to the Service per day, month, etc.

If you use or launch our Services on a mobile device or tablet computer such as an iPad, we may collect information regarding your device type, operating system and version, IP address and unique device ID. In some cases, we may provide device IDs to a third party to help us analyze user activity.

Cookies

A cookie is a small text file that we transfer to your computer and/or device, to identify a user's computer/device and to "remember" things about your visit, such as your preferences or a user name and password. Information contained in a cookie may be linked to your personal information (except when used with the Education Application) for purposes such as improving the quality of our Services, tailoring recommendations to your interests, and making the Services easier to use. You can disable cookies at any time, although you may not be able to access or use features of our Services.

We may feature advertisements served by third parties (including, but not limited to, YuMe) that deliver cookies to your computer/device so the content you access and advertisements you see can be tracked. Since the third party advertising companies associate your computer/device with a number, they will be able to recognize your computer/device each time they send you an advertisement. These advertisers may use information about your visits to our Service and third party sites and applications in order to measure advertisement performance and to provide advertisements about goods and services of interest to you. We will not provide these third party advertisers with any personal information. This policy does not apply to, and we are not responsible for the data collection practices of these third party advertisers, and we encourage you to check their privacy policies to learn more about their use of cookies and other technology.

Web Beacons

We and third party advertising companies (including, but not limited to, YuMe) may collect information using Web beacons. Web beacons or "gifs," are electronic images that may be used in our Services or in our emails. We use Web beacons to deliver cookies, count visits and to tell if an email has been opened and acted upon. Advertisers such as YuMe use web beacons in connection with our Services in order to collect and use data regarding the viewing and usage of content, advertisement performance and your interests for the purpose of delivering relevant advertising to you.

Information for Opting-Out of Cookies and Web Beacons

You may click on the following link: http://www.networkadvertising.org for information on how to opt-out of the use of cookies for the delivery of more relevant advertising.

Use of Information

We use personal information collected through our Services for purposes described in this Privacy Policy or disclosed to you in connection with our Services. For example, we may use your information to:

- operate and improve our Services;
- understand you and your preferences to enhance your experience and enjoyment using our Services;
- respond to your comments and questions and provide customer service;
- provide and deliver products and services you request;
- to send you related information, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- communicate with you about promotions, rewards, upcoming events, and other news about products and services offered by iSWiFTER and our selected partners; or
- link or combine it with other information we get from third parties, to help understand your preferences and provide you with better services.

Disclosure of Your Information

iSWiFTER may share aggregate or deidentified information about you and/or your customers with advertisers, publishers, business partners, sponsors, and other third parties.

iSWiFTER does not share your personal information except as described below:

* With your consent, for example, when you agree to our sharing your information with other third parties for their own marketing purposes subject to their separate privacy policies.
* Agents and Service Providers: iSWiFTER may use companies and individuals to perform services on our behalf. These agents and service providers may have access to your personal information in connection with the performance of services for iSWiFTER.
* Protection of iSWiFTER and Others: We may release personal information when we believe that release is appropriate to comply with the law or respond to lawful requests or legal process; in an emergency to protect the personal safety of any individual; to enforce or apply our rights; or to protect the rights, property, or safety of iSWiFTER our users, or others. This includes exchanging information with other companies and organizations for fraud protection.
* Corporate Transfers and Financings: iSWiFTER may share your personal information in connection with any merger, sale of iSWiFTER assets, or a financing or acquisition of all or a portion of our business to another company.

Third Party Sites and Applications

In addition to third party advertisements, our Service may contain links to third party websites or provide access to third party applications. The Service may also be accessed through third party sources including social networking platforms. iSWiFTER is in no way responsible for the privacy policies or practices of these third parties. Please be sure to read the privacy policies and terms of those third parties to learn about their use of information about you.

Changing or Deleting Your Information

You may request to review, update, correct or delete any personal information by contacting us at privacy@iswifter.net. If iSWiFTER sends you promotional emails, you may opt out of receiving them by following the instructions in those emails. If you opt out, we may still send you non-promotional emails, such as emails about your accounts or our ongoing business relations.

Security

We have put in place reasonable technical and organizational measures designed to help secure your personal information from accidental loss and from unauthorized access, use, alteration or disclosure. However, we cannot guarantee that unauthorized third parties will never be able to overcome those measures or use your personal information for improper purposes. Also please note that email and messaging systems are not considered secure, so we discourage you from sending us personal information through these mediums.

International Transfer

We may transfer information that we collect about you, including personal information, across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring information, including personal information, to a country and jurisdiction that may not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. and the use and disclosure of information about you, including personal information, as described in this Policy.

Our Policy Regarding Children

We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register on the Sites or for the iSWiFTER Services. If you are under 13, please do not attempt to register or send any information about yourself to us, including your name, address, telephone number, or email address. No one under the age of 13 may provide any personal

information to us. In the event that we learn that we have collected personal information from a child under age 13 we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under the age of 13, please contact us at privacy@iswifter.net.

Contacting Us

If you have any questions about this Policy, please contact us at privacy@iswifter.net.

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