

Privacy Policy

Effective Date: March 18, 2019

Impulse Screen Media (“ISM”) values your privacy and ISM desires to ensure your experience with ISM and its subsidiaries and related companies (collectively “ISM”, “we,” “our” or “us”) and all our websites and all our related subdomains (the “Sites”) and all our products, mobile applications, software, blogs, forums, channels and sharing services (collectively with the Sites, the “Services”) are as satisfying and safe as possible. In that regard, we have established for the Sites and/or Services the following privacy policy to explain and describe what personal information ISM collects on our Sites and/or Services, how ISM uses it and your options regarding information ISM may collect about you. By accepting this Privacy Policy, you expressly consent to the information handling practices described in this Policy. This Privacy Policy is a part of and incorporated into ISM’s Terms of Use and End user License Agreements associated with its Sites and/or Services. In addition, by accepting this Privacy Policy you expressly represent: (a) that you are over the age of 18 and/or not considered a minor in the jurisdiction for which you reside; or (b) that you are a parent or guardian of a minor child and you who have expressly consented to handling of the minor’s personal information as described in this Policy; or (c) that you are a school, district and/or teacher which has contracted with ISM to collect Personal Information of your students. Your continued use of our Sites and/or Services or any other content, products or other services covered by this Policy constitutes your acceptance and agreement to this Policy and any updates.

Contacting Us

If you have questions about this policy, please feel free to contact us at:

Impulse Screen Media Pty. Ltd.

Suite 301, 123 Walker Street North Sydney NSW, Australia 2060

contact@impulscreen.com

For a guide to saying safe and secure online visit www.google.com.au/goodtoknow/

1. Information We Collect

In describing our collection, use, and sharing of information in this Policy, we refer to our collection and use of "Personal Information." "Personal Information," as used in this Policy, is personally identifiable information, which is information that directly identifies an individual, such as first and last name, mailing address, email address, billing information, IP addresses, demographics, passwords or other online contact information, or telephone number. We collect Personal Information, as well as non-personally identifiable information on ISM Sites and/or Services.

We collect Personal Information in two ways. First, we collect information you provide to us in optional, voluntary submissions, such as in registration forms, user profiles, promotional signups, sweepstakes/contest entries, requests for customer service, software and mobile applications downloads and curriculum vitae submissions. Second, some Personal Information may be collected automatically. This is described below in "Passive Data Collection."

We may also obtain information, including Personal Information, from third party sources. If we directly combine information from third parties with Personal Information that we have collected, we will treat the combined information as Personal Information and handle it in accordance with this Policy. In addition, please note that we may solicit third parties to collect Personal Information on our behalf and in such cases we instruct those third parties to comply with this Policy and all applicable data protection laws.

Please be aware that we are prohibited from conditioning a child's participation in any activity on that child disclosing more personal information than is reasonably necessary to participate in that activity. You are under no obligation to provide, and can decline to provide, any requested information at any time. However, if you decline to provide personal information that is reasonably necessary to participate in certain activities, you may not be able to participate in those activities on certain Sites and/or Services.

Passive Data Collection

We may receive passively-collected information through a variety of methods including but not limited to:

Cookies

We may use a variety of methods, including "cookies" to collect information.

What is a cookie?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie.

Cookies are useful because they allow a website to recognize a user's device. You can find more information about cookies at: www.allaboutcookies.org and <http://www.youronlinechoices.com/uk/>.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that advertisements you see online are more relevant to you and your interests.

The cookies used on our Sites and/or Services have been categorized based on the categories found in the ICC UK Cookie guide. A list of all the cookies used on our Sites and/or Services by category is set out below.

Performance Cookies

ISM may collect cookies on our Sites and/or Services to capture information about page visits (e.g. "performance cookies.") This information is anonymous and ISM uses this information only internally - to deliver the most effective content to our visitors.

Information from the cookie is used to gauge page popularity, analyze traffic patterns on our Sites and/or Services and guide development of other improvements to our Sites and/or Services.

Targeting, Performance, and Functionality Cookies

In our email programs, ISM may employ some tracking methods (e.g. "targeting, performance, and functionality cookies"). We track "opens" via a tracking pixel in the email- meaning we track who opens our e-mail messages and when you open our e-mail messages; and we track "clicks" via encoded URLs-meaning we track whether you click on the links contained in our e-mail messages. This information is used internally only to help us deliver relevant messaging, and is not shared with any third parties.

Functionality and Necessary Cookies

ISM does not require that you accept cookies and/or you may withdraw your consent to our use of cookies at any time by adjusting your browser's privacy settings, however, some functionality on our Sites (e.g. “functionality cookies”), our product or service check-out process, and Services may be disabled if you decline to accept cookies (e.g. “necessary cookies”).

Opting Out of Cookies

You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. You may also change your cookie settings through preference options in our Sites and/or Services, where applicable. We will indicate that upon selecting your preferences, that we will use a cookie to remember your preferences.

ISM never gives away information about our users. If you choose to provide Personal Information about yourself, ISM will use this information only to communicate directly with you. ISM will not sell, rent or otherwise disclose that information to third parties unless such disclosure is necessary for the purposes set forth in this Policy, by law or a policy or notice contained or associated with a specific Site(s) and/or Service(s).

Location-Based Services

We may collect, use, and share (with ISM partners, service providers and licensees) precise location data, including the real-time location of your mobile or fixed location device.

Analytics Tools

We use analytics tools and other third party technologies, such as Google Analytics, to collect non-personal information in the form of various usage and user metrics when you use our online Sites and/or Services. These tools and technologies collect and analyze certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behavior and usage information, feature use metrics and statistics, usage and purchase history, MAC Address, mobile unique device ID, and other similar information.

The third party analytics companies who collect information on our Sites and/or Services and other online products and/or services may combine the information collected with other information they have independently collected from other websites and/or other

online or mobile products and services relating to your activities across their network of websites as well as online and/or mobile products and services. Many of these companies collect and use information under their own privacy policies.

In addition to our use of technologies as described herein, we may permit certain third party companies to help us tailor advertising that we think may be of interest to you based on your use of ISM Sites and/or Services and to otherwise collect and use data about your use of ISM Sites and/or Services. For more information about this practice, please see the "Third Party Advertising Technologies" section below.

You may opt out of Google Analytics by visiting the [Google Analytics opt-out page](#).

Google has additional information available about their [Remarketing Privacy Guidelines, Policies](#), and [Restrictions](#).

2. How We Use Information

Generally, we use Personal Information to establish and enhance our relationship with our users through four main categories: (1) Communication; (2) Optimization; (3) Advertising; and (4) Sharing Features. Below, we provide some specific examples of how we use the Personal Information and other information we collect.

Communication and Responding to Requests

We may use your information, including Personal Information to provide you with customer support, process transactions, respond to users' requests, send newsletters and updates, send special offers and advertisements, seek your opinions and feedback, and connect users to ISM Sites and/or Services, and to products and services of our partners and licensees.

Optimization

We may use user information, including Personal Information, behavioral metrics, and other non-personally identifiable information to operate, provide, improve, and maintain our Sites and Services, to develop new products and services, to prevent abuse and fraud, to personalize and display advertisements and other content for you, and for other administrative and internal business purposes.

Advertising

We use user information, including Personal Information, behavioral metrics, geo-location data, demographic data and marketing preferences to personalize and display advertisements and other content for you.

Sharing Features

We use your information, including Personal Information and any other information you submit directly or through passive means to provide you with various ways to connect and share content (e.g., web content, user generated videos, text, drawings, and screen captures, media, tools, services and other products) with third parties. For example, we may provide you with the opportunity to email a link to certain content to another person. To use this feature, we may require you to provide certain Personal Information including your email address and the email address of each person to whom you send the link.

We also may allow you to share links to content with users of various third party services (e.g., social networking, search and sharing services). When sharing links using one of these third party services, if you are not already logged in to the third party service, you will need to supply login credentials for it. If you are not a registered user of the third party service, you will need to sign up for it. You are supplying the registration information or login credentials for the third party service directly to that third party, and not to us. By using any of these third party services to share links to content, you permit us to access, use and disclose any information relating to your account on each such third party service (such as your user name and profile information) that is available to us through the third party service, including through its application programming interface (API) pursuant to this Policy.

3. When We Disclose Personal Information

We do not share Personal Information with third parties except in the limited circumstances described in this Policy.

Service Providers

We may provide Personal Information to third parties for their use in performing internal business functions (e.g., payment processing, customer service, maintenance, security, data analysis, email transmission, beta testing, or data hosting) on our behalf.

Additionally, some third party service providers may collect information, including Personal Information, on our behalf. Whenever possible, we require such third-parties to only collect and use Personal Information in accordance with this Policy, to maintain the confidentiality, security, and integrity of such Personal Information, and for no purpose other than providing us with our requested services.

Partners

When you visit or use a part of any website, mobile application, or other consumer product that is co-branded or that is a part of a joint promotion involving ISM and one or more third parties (each a "Co-Branded Party" for example ICE-TV), you are providing and consenting to provide and are transmitting your Personal Information and other information provided to, or collected, or obtained by ISM and any Co-Branded Parties involved, to ISM and each of the Co-Branded Parties without any other notice or further consent. Please note that we do not control any Co-Branded Parties' use or treatment of information you provide to them and you should consult each of their privacy policies or any separate Co-Branded privacy policy posted on or linked from the Co-Branded site to determine your rights with respect to their use and treatment of your information. You will need to communicate with us and each Co-Branded Party directly, as applicable, if you decide you no longer wish to receive communications or if you wish to change any information you have supplied.

Legal Requirements

We may disclose Personal Information if we have a good-faith belief that doing so is required by a subpoena, warrant, or other judicial or administrative order or otherwise required by law. Additionally, we may disclose Personal Information where we, in good faith, deem it appropriate or necessary to prevent violation of our Terms of Use or End User License Agreements, or our other agreements; take precautions against liability; protect our rights, property, or safety, or those of a partner, any individual or the general public; maintain and protect the security and integrity of our Sites and/or Services or infrastructure; protect ourselves and our Sites and/or Services from fraudulent, abusive, or unlawful uses; investigate and defend ourselves against third party claims or allegations; or assist government regulatory agencies.

Change of Ownership

Information about our users, including Personal Information, may be disclosed as part of any bankruptcy, merger, sale, transfer of company assets, acquisition, or similar transaction. In the event of such a transaction in which your Personal Information would be transferred to a third party, we will make reasonable efforts to notify you. For example, we will post a notice of the transfer of Personal Information on our Sites and/or Services and, if we have your email address, we will send notice of the transfer of Personal Information to that email address.

Interactive Features

If you use a forum, blog, channel, bulletin board, chat room, user commenting features, or other interactive sharing or social features that may be offered through any of our Sites and/or Services, you should be aware that any Personal Information you submit, display, or publish there is considered publicly available and can be read, collected, used, and disclosed by other users of those features, by us, and other third parties without restriction, except to the extent limited access features are available, if any. To request removal of your personal information from our blog, sharing service or community forum, for example, contact us at the information provided in this Policy. In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to do so and why.

4. Third Party Advertising Technologies

In addition to using cookies and related technologies as described above, we also may permit certain third party companies to help us tailor advertising that we think may be of interest to users and to collect and use other data about user activities on our Sites and/or Services (e.g., to allow them to tailor ads on third party services). These companies may deliver ads that might also place cookies and otherwise track user behavior. These companies may use information about user behavior in order to provide customized advertisements across various services and products. In the course of providing these services, products or placing advertisements, these third party companies may place or recognize a unique cookie on your computer, and may record information to these cookies based upon your activities on any of our Sites and/or Services and on third party websites. Each of these companies uses this cookie information according to their own privacy and security policies. If you wish to not have

this information used for the purpose of serving you targeted ads, you may opt-out as indicated in this Policy. Please note this does not opt you out of being delivered advertising. You will continue to receive generic ads.

5. Children Under 13

We do not knowingly seek or collect Personal Information from users under the age of 13, except to the extent that ISM may collect limited personal information from students (but not their email addresses), **but only where that student's school, district, and/or teacher has contracted with ISM to collect the personal information from students for the use and benefit of the learning environment.** Children under 13 years old are not allowed to create an account without a parent's or guardian's express consent. We recommend that minors over the age of 13 ask their parents for permission before sending any information about themselves to anyone over the Internet.

We require schools, districts, and/or teachers to obtain parental or guardian consent from a students' parent or guardian before collecting any such student Personal Information. If you are a student, please do not send any Personal Information about yourself to us, other than what we request from you when you sign up for any of our Sites and/or Services. In the event that we learn that we have collected personal information from a student without parental consent being obtained by his or her school, district, and/or teacher, or if we learn a student has provided us Personal Information beyond what we request when he or she signs up for any of our Sites and/or Services, we will delete that information as quickly as possible. If you believe that a student may have provided us Personal Information beyond what is requested when signing up for any of our Sites and/or Services, or that a student's school, district, or teacher has not obtained parental consent, please contact us at contact@impulsescreen.com.

Notwithstanding anything to the contrary contained in this Policy, if you are a student as described above, and your parent or guardian signed up for our Sites and/or Service with a password or access ID provided by your teacher, you understand that your parent or guardian may be able to view all information within or associated with your account, including, without limitation, messages between you and your teacher and grades you received on your assignment.

Users under 13 years of age who are not students as described above, your continued use of the Site and/or Service will be considered by ISM as confirmation that your parent

or guardian has expressly consented to the handling of your personal information as described in this Policy as further indicated in the opening paragraph of this Policy.

6. Your Choices

Submitting Personal Information

If you do not want to submit Personal Information that is necessary to provide or use our Sites and/or Services or to fulfill your request, you will not be able to access and/or participate in certain ISM Sites and/or Services. For example, you will not be able to register for an account with us or participate in certain contests or promotions, or access and/or use certain ISM product features or mobile and online services. In addition, your refusal to submit Personal Information may limit our ability to respond to your customer support inquiry in a timely fashion.

Editing Personal Information

You may, at any time, update, correct, or delete certain Personal Information that you have provided to us by contacting us at the mailing or email address provided set forth in this Policy.

Marketing Choices

If you want to remove yourself from individual communications, including marketing promotions, advertisements, updates and email newsletters, simply click the unsubscribe link in the communication or access your Account Settings page when logged in. You also acknowledge and agree that there may be instances where we may elect to notify you about administrative notices regarding your account with us, such as to inform you about changes to our terms, conditions, and policies, that your account may be expiring, or to provide you with other relevant administrative information about your account. Because this information is important to your interaction with us, you may not opt out of receiving these communications.

Account Deletion

If you submit Personal Information, you may delete your account with us at any time. If you delete your account, your Personal Information and any and all other account related information including, but not limited to, user profile data, purchasing history, sharing data and any other data, credits, or content specifically associated with your

account are also permanently deleted. Deletion of your data may take up to 30 days from accessible systems and up to 90 days from backup systems. If you choose to have an account with us in the future, you will have to sign up for a new account as none of the information you previously provided or saved within your account will have been saved.

7. Security

We take reasonable measures, including the implementation and maintenance of physical, electronic, and managerial procedures, in an effort to assure the security, integrity, and accuracy of all Personal Information that we collect. Our efforts include procedures designed to avoid unauthorized access, alteration, misuse or disclosure of Personal Information.

If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the ISM Sites and/or Services covered by this Policy and providing Personal Information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your account information and usage.

8. Data Integrity and Data Retention

We collect and use Personal Information in accordance with this Policy and only for the purposes stated in this Policy and/or at the time we request such Personal Information from our users, or for such purposes to which a user may otherwise consent. We do not use or share our users' Personal Information in a way that is incompatible with the purposes for which such Personal Information was requested and authorized for use by us. We retain Personal Information for no longer than is commercially useful to carry out our business purposes, or as we believe may be legally required. When Personal Information is deleted or updated by you, it may take up to 30 days from accessible systems, and up to 90 days from backup systems, for us to delete such Personal Information.

9. Access to Personal Information

You may view, correct, or delete the Personal Information ISM stores about you. Most of your Personal Information may be accessed and corrected by simply logging into your account and accessing your profile. If you wish to obtain a report of the Personal Information ISM has about you, please send us a written request at the address set forth in this Policy.

10. Third Party Login Functionality

We may permit users with accounts on certain third party services, including but not limited to, social networking, search, sharing, and other services delivered by third-parties, to bypass the standard applicable registration process. If you connect through an authorized third party service, you will be able to use your third party login information to log in to your ISM account or access ISM content, Sites and/or Services. We are not responsible for the sharing, posting, commenting, or other content and information gathering practices of any third party services that may be triggered by using these third party login services. Please review their terms of service and privacy policies carefully before using third party login functionality to access any ISM Sites and/or Services.

By using any third party services to log in to your ISM account or access ISM Sites and/or Services, you permit us to access, store and use all information related to your third party account that may be accessible to us through the third party service, including through its application programming interface (API), pursuant to this Policy.

11. Third Party Services and Links

ISM's content, including forums contests, products, services, newsletters and communications that we send to our users, may contain links to content provided by third-parties. For example, our communications may contain links to third party merchants (i.e. eBay) from whom you may purchase products. To purchase products from these third party merchants, you may be required to provide Personal Information, including your credit card or other payment information.

12. Changes and Updates to This Policy

We may update this Policy from time to time. If we do, we will update the "effective date" at the top of the Policy. If we make material changes to how we use Personal Information, we will attempt to notify you of the change and to give you the opportunity to exercise choice as to how your Personal Information is used. We will post the updated Policy on the affected Sites and/or Service, and if we have your email address, we will send notice of the update to that email address.

We encourage you to review this Policy periodically to stay informed about our collection, use and disclosure of Personal Information. Your continued use of our Sites and/or Services or any other content, products or other services covered by this Policy constitutes your agreement to this Policy and any updates.

14. International Users & U.S.-EU Switzerland Safe Harbor

ISM Sites and/or Services may be hosted outside Australia. If you utilize our Sites and/or Services from the USA, European Union or Switzerland, or any other region with laws governing data collection and use that may differ from Australian law, please note that you are transferring your personal data outside of those jurisdictions. By providing Personal Information under this Policy, you consent to the use of your Personal Information in accordance with this Policy and the transfer of your Personal Information to the hosting country of our servers.

The Personal Information practices set out in this Privacy Policy apply to all ISM Sites and/or Services, and customers worldwide. You have a right of access and to correct such data and/or Personal Information. To exercise these rights, or for other data privacy questions, please contact/send an email to contact@impulscreen.com.

ISM is committed to complying with [the Australian Privacy Principles \(APPs\)](#)

15. Enforcement

ISM regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Policy or ISM's treatment of Personal Information by contacting us through this Site at contact@impulscreen.com or by writing to us at Impulse Screen Media Suite 301, 123 Walker St, North Sydney, NSW

Australia 2060. When ISM receives a formal written complaint at this address, it is ISM's policy to contact the complaining party regarding the concerns. ISM will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved by ISM and an individual.

16. No Error Free Performance

ISM does not guarantee error-free performance under this Privacy Policy. ISM will use reasonable efforts to comply with this Privacy Policy and will take prompt corrective action when ISM learns of any failure to comply with our Privacy Policy. ISM shall not be liable for any incidental, consequential or punitive damages relating to this Privacy Policy. This Privacy Policy shall be governed by the laws of New South Wales and Australia, to the extent applicable.