

SocialCash Privacy Policy

Effective February 09 2009

SocialCash is a provider of technology and related services that connects advertisers, websites, applications, and other publishers ("Publishers" or "Our Clients") through a proprietary suite of marketing technologies and services. Our services are provided to help Publishers best monetize traffic while at the same time improving the end user's online experience, primarily through the delivery of relevant advertising. Protecting the privacy of Internet users is important to SocialCash. This policy addresses the SocialCash privacy and data protection practices and also outlines our business, how we work, and how our technology interacts with personal information from three distinct sources:

1. Visitors to www.socialcash.com
2. Registered members of www.socialcash.com
3. Web users who interact with Headliners or PointCash, our Publishers, Ad Units and Advertisers on third party sites

By visiting SocialCash.com or voluntarily completing the registration process, both of which provide the opportunity to review our privacy policy, you agree to how we interact with your personal information as outlined below. Users who interact with Publishers and advertising on third party web sites using SocialCash should also review this privacy policy.

If any user does not agree to the terms, please do not use this website. This policy does not apply to the privacy practices of our partners or any other organization we do not own or control.

Users who are covered by this privacy policy:

1. Visitors to socialcash.com:

When you visit Socialcash.com, we automatically receive and record information from your computer's browser including your IP address, cookie information, software and hardware attributes and the pages that your browser requested. From this data, we may assemble a "Click Stream" record that allows us to understand how users interact with the site. We use this information to improve our services, research site interaction and provide anonymous reporting for internal or external clients. This data does not include your name, address, telephone number, email address, or other contact information.

2. Registered members of socialcash.com:

Individuals who are interested in becoming a SocialCash client may register on Socialcash.com. When you use our online registration form, we collect Personally Identifiable Information ("PII") data you provide to us, including your name, email address, and phone number. We will use the information provided to establish your account, communicate with you, process payments and perform other administrative activities. We may share this information with third parties who provide related administrative services on our behalf. These service providers are required to maintain the confidentiality of the information furnished by us.

If a registered user would like to correct or delete the information they provided or deactivate their registration, they can send a request to privacy@SocialCash.com. We will update or correct any personal data that they have previously submitted via this Website, and will endeavor to process the request within a reasonable amount of time after it is received.

3. Web users who interact with Headliners or PointCash, our Publishers, Ad Units and Advertisers on Third Party Sites

Publishers use Headliners to display (or "serve") relevant, targeted, interesting advertising and marketing offers to users through websites or applications ("Properties") they own, as well as to analyze usage and engagement patterns. Publishers use PointCash to maintain virtual currencies within their Properties. PointCash is a service that displays marketing offers to users of the Properties in order for the users to earn points or currency within a Property. SocialCash

refers to Headliners, Pointcash, and any other technology and tools made available to SocialCash clients as our “Services.”

The majority of Properties are hosted and served within or in partnership with Social Networks. The Services may display advertisements, links, banners, buttons, or other interactive features displayed on or within our client's Properties.

A. Customized Advertising:

When you establish an account on a Social Network, you voluntarily provide them with certain PII and non-PII data. By using a Property operated by one of our Publishers, you permit them to access your personal information in accordance with your own privacy settings as well as any terms outlined by the Publisher.

Our Services allow publishers to use your user profile and friend data to select and customize the advertisements they show to you. Our Services may use your user and friend data to infer the types of advertisements we think are most likely to be of interest to you. User profile and friend data, other than the social network ID, is not stored on SocialCash's servers.

B. Performance Analysis:

Our Services track “click stream data”, including information such as a web surfer's IP address, web pages which have been viewed by a web surfer, date and time, domain type, and responses to advertisements delivered by our services (impressions, clicks and completed offers) to allow SocialCash to maximize the display of relevant offers. SocialCash will collect your social network id as part of the data collection of “click stream” data. SocialCash clients may use SocialCash Services, including tags placed in an application, to help map users to audience segments. Audience segments are used to match advertisements with an aggregate set of users and choose which advertisements to display to the user. SocialCash records aggregate non-PII statistics about user interactions with advertising and may share this information with internal and external clients in order to demonstrate, on an aggregate and anonymous basis, the effectiveness of our advertising.

The PointCash service requires that completed offers be associated with individual users and the Publisher. Once the user completes an offer, SocialCash will notify the publisher to credit the user for the amount of points earned for that offer. Various technologies may be used to report back a completed offer, including cookies, third party service providers (used for performance reporting) or similar technologies.

C. Customer Service

If a user contacts customer service, SocialCash may create a unique record for that user and track any communication between SocialCash and that user, as well as any account resolution activities including crediting for completed offers. SocialCash will store the Social Network user id, Property name, name and email address used to contact customer service as part of this process. SocialCash will use the Social Network user id provided to investigate any questions regarding whether a user received credit for completed offers, and will use the email address to communicate with the user regarding the customer service issue. Information collected as part of the customer service process will not be combined with other user data; it may be used in association with “Click Stream” data to verify any questions on user credit (for example, we may examine when a user clicked or completed an offer to determine if they were properly credited).

D. Opt-Out:

If you do not wish to receive advertisements that were selected and customized based on your profile data within an application hosted by a SocialCash client Headliners, you can update the privacy settings within your Social Network to disable access to this information.

Important Note: Applications hosted by SocialCash clients may display customized advertising to your friends who have not opted-out. These friends may see advertisements containing elements from your profile due to the friend relationship you share. You can control whether your information appears in these ads displayed to your friends by changing your privacy settings on the Social Network's applications privacy page to restrict sharing of your data.

Use of Cookies:

SocialCash relies upon available technology for the tracking of browser activity. This information often includes but is not limited to a User's IP address, browser type, operating system and "cookies", which are small text files stored on a User's computer tied to information about the User. The data stored in cookies may include information related to a user's interaction with advertisements (impressions, clicks and completed offers), personal information or other data attributed to the individual. We may at times also use "web beacons" (also known as "1x1 gifs"). These elements are used to monitor user activity, help us improve site navigation, advertising effectiveness and e-mail response activity.

Children Under Age 13:

SocialCash.com, its member portal and all associated technology is not directed to children, intended for use by children, and we do not knowingly access or collect personal information from children under the age of 13. SocialCash encourages parents and guardians to be familiar with the Websites that their children visit. In the event that SocialCash has learned it has collected personal information for someone under the age of 13, SocialCash will remove any user data from our database within a reasonable period of time. If you believe that we have any information about a child under the age of 13, please contact us at privacy@SocialCash.com. The Federal Trade Commission regulates the means by which Website operators collect and use personal information from children under 13, pursuant to the Children's Online Privacy Protection Act of 1998. For more information about the Act and children's on-line privacy in general, visit the FTC's Website at <http://www.ftc.gov>.

Data Handling and Disclosure of Information to Third Parties:

Except as otherwise set forth in this policy, SocialCash will not disclose any of your collected PII directly to a third party except under special circumstances, such as when we believe in good faith that the law requires it or under circumstances described in this Privacy Policy. The following describes some of the additional ways that PII or non-PII may be disclosed without your consent:

- **Business partners:** We will enter into business relationships with select partners in which we direct users to offers that we believe are of interest to them. SocialCash may pass data to a business partner when a user has participated in a survey we have created in connection with the business partner or taken a similar action that gives consent to the transfer.
- **Legal requirements:** SocialCash may disclose account information in special cases when we have reason to believe that disclosing this information is necessary to investigate, identify, contact or bring legal action against someone who may be violating SocialCash's policies, intellectual property or other rights. SocialCash may also disclose information when we have a good-faith belief that access, use, preservation or disclosure of such information is reasonably necessary to satisfy any applicable law, regulation, legal process, or governmental request; to detect, prevent, or otherwise address fraud, security, or technical issues; and to protect against imminent harm to an individual's safety or rights.
- **Acquisition:** As SocialCash develops, we may buy other businesses or their assets or sell our business assets. Customer information is generally one of the business assets involved in such transactions. In the event that SocialCash or substantially all of its assets are acquired, we may transfer information, including any PII or non-PII, to a successor entity.

Data Processing in the United States of America:

Your information may be transferred to computers located outside your state, province, country or other jurisdiction where the privacy laws may not be deemed as protective as those in your jurisdiction. If you are located outside the United States, please be advised that we process and retain information in the United States. By using this website or submitting information via registration on this site, you agree to the retention in the United States of any data provided.

Security:

We use commercially reasonable security measures to protect the confidentiality, security, and integrity of your personal information from loss, misuse or alteration. Security is never perfect and, therefore, we make no guarantees about the safety or security of your personal information. When using the SocialCash website as a member, please remember to never divulge your account information to anyone, and sign-out and close your browser window when you are done interacting with the website. If you believe a third party has access to your account, please notify us immediately at privacy@SocialCash.com

Links:

Our advertisements and services may contain links to websites operated by business partners whose privacy practices may be different from ours. We endeavor to enter into partnerships with reputable companies; however, we are not responsible for the privacy practices of third party websites that you visit. We encourage you to review carefully the privacy policy of any website you visit.

Changes to this Privacy Policy:

SocialCash reserves the right to modify this privacy policy at any time. If we make any material or substantive changes in the way that we use the PII collected through this Website, we will post a clear and conspicuous notice of those changes in our revised policy. The last date this privacy policy was revised or modified is set forth above as the Effective Date. We encourage you to check this policy regularly for possible updates.

This privacy policy applies to all information collected by SocialCash beginning on the effective date. It does not apply to information previously received by our corporate parent or affiliates in connection with any other program or offer. Any such information will be treated in accordance with the policies in place at the time it was collected.

Contact Information:

If you have questions regarding our policy or privacy practices, please contact us by one of the following means and we will endeavor to respond to your request, and take steps to correct a problem when appropriate.

You may send an email to privacy@SocialCash.com.

You may send a letter by postal mail addressed to:

SocialCash
Attention: Customer Care/Privacy
2020 Pennsylvania Ave NW, #330
Washington DC 20006

SocialCash will endeavor to provide an email response within a reasonable period after receiving your request.

DATE OF LAST MODIFICATION: February 10, 2009