

About privacy on SPARK Apps

February 28rd, 2019

ALFA and Friends ("ALFA and Friends," "we," or "us") knows that you care how information about you is used and shared. This Privacy Policy explains what information of yours will be collected by ALFA and Friends when you use SPARK Apps and related services (the "Service"), how the information will be used, and how you can control the collection, correction and/or deletion of information. We will not use or share your information with anyone except as described in this Privacy Policy.

Practices specific to SPARK Apps

The privacy practices that are specific to comics on SPARK Apps are:

- To fulfill contractual commitments to rightsholders who license us comics, we enforce certain security limits (for example, to prevent abusive sharing of purchased comics and to enforce page view limits on some comics previews). In order to enforce limits on numbers of devices, we will store the unique ID numbers of your devices on our servers. You can delete a device ID number when you wish to stop using that device.
- You will need to be a member of SPARK Club in order to purchase comics because account information is necessary to provide access to users who bought the comics. We limit the information (such as comics titles) we provide to credit card companies, and enable you to delete purchased comics from your Apps. However, you will not be able to delete the record of your purchase transaction (including the title of the comic) from your payment account history.
- If you are part of a family group on SPARK Apps and purchase comic using a family payment method, your family manager will be responsible for these purchases and will therefore see a record of your comics purchases made using the family payment method, including titles and genres. Although you will be able to delete purchased comics from your SPARK Club membership, you will not be able to delete the family manager's records of the purchase transactions.
- Special legal privacy protections for users may apply. Some jurisdictions have special "comics laws" saying that this information is not available unless the person asking for it meets a special, high standard such as proving to a court that there is a compelling need for the information, and that this need outweighs the reader's interest in reading anonymously under the United States First Amendment or other applicable laws. Where these "comics laws" exist and apply to comics on Google Play, we will raise them. We will also continue our strong history of fighting for high standards to protect users, regardless of whether a particular "comics law" applies. In addition, we are committed to notifying the affected user if we receive such a request that may lead to disclosure of their information; if we are permitted to do so by law and if we have an effective way to contact the user, we will seek to do so in time for the user to challenge the request.

Information We Collect

User-Provided Information: You provide us information about yourself, such as your name and e-mail address, when you register with the Service. If you correspond with us by email, we may retain the content of your email messages, your email address and our responses. In addition, you may choose to add information about yourself to your profile that you can then share with friends. You can modify, delete, and set your privacy setting for this information any time in the My Account section of the site after you have signed in using your personal password.

Cookies Information: When you use SPARK Apps, we may send one or more cookies - a small text file containing a string of alphanumeric characters - to your computer that uniquely identifies your browser and lets SPARK Apps help you log in faster and enhance your navigation through the site. A cookie does not collect personal information about you. SPARK Apps uses both session cookies and persistent cookies. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser's directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Service may not function properly if the ability to accept cookies is disabled.

Log File Information: Log file information is automatically reported by your browser each time you access a web page. When you register with or view our site, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other such information.

How We Use Your Information

We use the personal information you submit to operate, maintain, and provide to you the features and functionality of the Service. ALFA and Friends never discloses your personal information to any third party unless you have instructed us to do so.

Any personal information or content that you voluntarily disclose for posting to the Service (for instance, in User Content you post) becomes available to the public via the Service and our business partners. User Content includes, but is not limited to, reviews, comments, and trivia questions. If you remove User Content, copies may remain viewable in cached and archived pages or if other users have copied or stored your User Content.

By providing ALFA and Friends your email address you consent to our using the email address to send you Service-related notices, including any notices required by law, in lieu of communication by postal mail. We may also use your email address to send you other messages, such as newsletters, changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out by changing your settings on the My Account page. Opting out may prevent you from receiving email messages regarding updates, improvements, or offers. You may not opt out of Service-related e-mails.

Your name and, depending on privacy settings, email address, are used when you invite another person to join SPARK Club, or when a you request to add another member to your friends list.

SPARK Apps may use certain information about you and/or your User Content without identifying you as an individual to third parties. We do this for purposes such as analyzing how the Service is used, diagnosing service or technical problems, maintaining security, and personalizing advertisements and promotions.

ALFA and Friends may develop special sites in cooperation with other companies. If you register at these "co-branded" sites, we may share your registration information (such as name and email address) with that company.

ALFA and Friends reserves the right, but has no obligation, to monitor the User Content you post on the site. ALFA and Friends has the right to remove any such information or material for any reason or no reason, including without limitation, if in its sole opinion, such information or material violates, or may violate, any applicable law or our Terms of Use Agreement or to protect or defend its rights or

property or those of any third party. ALFA and Friends also reserves the right to remove information upon the request of any third party.

We use cookies, clear gifs, and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our service; (d) monitor aggregate metrics such as total number of visitors and traffic; (e) diagnose or fix technology problems reported by our users or engineers that are associated with the IP addresses controlled by a specific web company or ISP; and (f) help you efficiently access your information after you sign in.

How We Share Your Information

Personally Identifiable Information: ALFA and Friends will not rent or sell your personally identifiable information to others. ALFA and Friends may share your personally identifiable information with third parties solely for the purpose of providing services to you. If we do this, such third parties' use of your information will be bound by this Privacy Policy. We may store personal information in locations outside the direct control of ALFA and Friends (for instance, on servers or databases co-located with hosting providers).

As we develop our business, we may buy or sell assets or business offerings. Customer, email, and visitor information is generally one of the transferred business assets in these types of transactions. We may also transfer such information in the course of corporate divestitures, mergers, or dissolution.

Except as otherwise described in this privacy statement, ALFA and Friends will not disclose personal information to any third party unless required to do so by law or subpoena or if we believe that such action is necessary to (a) conform to the law, comply with legal process served on us or our affiliates, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) to enforce our Terms of Use, take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, to assist government enforcement agencies, or to protect the security or integrity of our site; and (c) to exercise or protect the rights, property, or personal safety of ALFA and Friends, our users or others.

Non-Personally Identifiable Information: We may share non-personally identifiable information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain ALFA and Friends services.

ALFA and Friends allows other companies, called third-party ad servers or ad networks, to serve advertisements on the ALFA and Friends (SPARK) site. These third-party ad servers or ad networks use technology to send, directly to your browser, the advertisements and links that appear on ALFA and Friends. They automatically receive your IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalize the advertising content.

ALFA and Friends does not provide any personally identifiable information to these third-party ad servers or ad networks without your consent. However, please note that if an advertiser asks ALFA and Friends to show an advertisement to a certain audience and you respond to that advertisement, the advertiser or ad-server may conclude that you fit the description of the audience they are trying to reach.

You should consult the respective privacy policies of these third-party ad servers or ad networks. The ALFA and Friends privacy policy does not apply to, and we cannot control the activities of, such advertisers.

How We Protect Your Information

ALFA and Friends uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. We cannot, however, ensure or warrant the security of any information you transmit to ALFA and Friends and you do so at your own risk. Once we receive your transmission of information, ALFA and Friends makes commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

To protect your privacy and security, we take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from ALFA and Friends, at all times.

Compromise of Personal Information

In the event that personal information is compromised as a result of a breach of security, ALFA and Friends will promptly notify those persons whose personal information has been compromised, in accordance with the notification procedures set forth in this Privacy Policy, or as otherwise required by applicable law.

Your Choices About Your Information

You may access or change your information and preferences at any time in your My Account area once you have signed in with your personal password. For example, you can control which actions, if any, will appear on your update feed, whether to display your email address, whether to display your last name, and what sort of email notifications you will receive from the Service. You may, of course, decline to submit personally identifiable information through ALFA and Friends, in which case ALFA and Friends may not be able to provide certain services to you.

Children's Privacy

Protecting the privacy of young children is especially important. For that reason, ALFA and Friends does not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register. If you are under 13, please do not send any information about yourself to us, including your name, address, telephone number, or email address. No one under age 13 is allowed to provide any personal information to or on SPARK APps. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us.

Links to Other Web Sites

We are not responsible for the practices employed by Web sites linked to or from our Web site nor the information or content contained therein. Please remember that when you use a link to go from our

Web site to another Web site, our Privacy Policy is no longer in effect. Your browsing and interaction on any other Web site, including those that have a link on our Web site, is subject to that Web site's own rules and policies. Please read over those rules and policies before proceeding.

Notification Procedures

It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on our Website page, as determined by ALFA and Friends to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.

Changes to Our Privacy Policy

If we change our privacy policies and procedures, we will post those changes on our website to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it. Changes to this Privacy Policy are effective when they are posted on this page.