

# Northstar Learning and Entertainment, EVN Marketing, and Shapels™ Privacy Policy

We are strongly committed to protecting the privacy of your personal information. The policies below are applicable for the shapels.com or related website(s). This Site(s) is maintained by Northstar Learning and Entertainment and EVN Marketing. We have established this privacy policy ("Privacy Policy") to let you know the kinds of personal information we may gather during your visit to this Site(s), why we gather your information, what we use your personal information for, when we might disclose your personal information, and how you can manage your personal information.

Please be advised that the practices described in this Privacy Policy apply only to information gathered online at our Site(s). It does not apply to information that you may submit to us offline, or to other Sites maintained by other companies or organizations to which we may link or who may link to us.

**By visiting our Site(s), you are accepting the practices described in our Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use this Site(s). We reserve the right to modify or amend the terms of our Privacy Policy from time to time without notice. Your continued use of our Site(s) following the posting of changes to these terms will mean you accept those changes. If we intend to apply the modifications or amendments to this Privacy Policy retroactively, we will provide you with notice of the modifications or amendments.**

If you have any questions about this Privacy Policy or don't see your concerns addressed here, you should contact us by email at [shapels@shapels.com](mailto:shapels@shapels.com).

## **Controllers of Personal Information**

Any personal information provided to or to be gathered by Northstar Learning and Entertainment and/or EVN Marketing is controlled primarily by Northstar Learning and Entertainment at 4 Ajellos Farm Road, Semour, CT 06483.

## **What Information About Me Is Collected and Stored?**

We collect two basic types of information from you in conjunction with your use of our Site(s), personal information and non-personal information. Personal information is information that you may supply to us, as described more fully below, i.e., when you subscribe, order, complete a survey, register for a Site(s) or any part thereof, enter a contest, upload content, participate in a community, or provide your e-mail address. Personal information is any information that can individually identify you and includes your name, e-mail address, telephone number, postal address, credit card, billing and contact information. Non-personal information includes information that does not personally identify you but may include tracking and usage information about your location, demographics, use of the Sites and the Internet.

### Personal Information

As a general matter, you can browse the Site(s) without submitting your personal information to us. However, there are a number of circumstances in which you may supply us with your personal information. The following lists the most common ways in which we may collect your personal information.

- Sign up to receive e-mail newsletters from us
- Request for customer service or other assistance
- Participation in surveys, panels, or market research
- Participation in special events and promotions
- Purchases on the Sites
- Entry in contests or sweepstakes
- Participation on social media accounts involving Shapels, our books, our brand, and products.
- Participation in communities, chat rooms, and other interactive services
- Submission of user generated content on any part of the Site that permit it
- Submission of a job application
- Any other place on the Site(s) where you knowingly volunteer personal information

### Collection of Personal Information From Social Media Sites

When you interact with any Shapels property page or account on a social media platform, such as Facebook,

Twitter, Google+, Tumblr, YouTube, Pinterest, or others, we may collect the personal information that you make available to us on that page or account including your account ID or "handle." However, we will comply with the privacy policies of the corresponding social media platform and we will only collect and store such personal information that we are permitted to collect by these social media platforms.

#### Non-Personal Information

In addition, when you interact with the Site(s), our servers may keep an activity log that does not identify you individually ("Non-Personal Information"). Generally, we collect and store the following categories of Non-Personal Information:

- Demographic data such as age, gender, and five digit zip code as part of collecting personal information
- Device information about your computer, mobile device, or other device that you use to access the Site. This information may include IP address, geo-location information, unique device identifiers, browser type, browser language, and other transactional information.
- Usage information about your use of the Site(s). This information includes a reading history of the pages you view. We use this information to provide you a more customized experience on the Site.
- Additional "traffic data" such as time of access, date of access, software crash reports, session identification number, access times, and referring website addresses.
- Your search terms and search results.
- Other information regarding our users' use of the Site(s).

#### Collection of Your Source IP Address/Location Information

We collect and store your device's source IP address which may disclose the location of your device at the time you access the Site. Advertisements and certain content may be directed to you as a result of this data.

In addition, in some cases the Site(s) can deliver content based on your current location if you choose to enable that feature. If you enable that feature, your current location will be stored locally on your device which will be used by the Site(s) to serve you certain content tied to your location. If you elect to have your location-based searches saved to your history, we will store such information on our servers.

#### Collection of Personal and Non-Personal Information From Other Sources

We also may collect and store information about you that we receive from other sources to, among other things, enable us to update and correct the information contained in our database and to better customize your experience on the Site(s).

#### Use of Cookies, Flash Cookies and Web Beacons

Like many websites, we use "cookies", which are small text files that are stored on your computer or equipment when you visit certain online pages that record your preferences and actions. We use cookies to track use of our Site(s) and online services. We may also use cookies to monitor traffic, improve the Site(s) and make it easier and/or relevant for your use. You may occasionally get cookies from companies advertising on our behalf. We do not control these cookies, and these cookies are not subject to this cookie policy.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but, if you prefer, you can usually modify your browser setting to decline cookies. For more information on cookies and how to disable them, you can consult the information provided by the Interactive Advertising Bureau at [www.allaboutcookies.org](http://www.allaboutcookies.org).

We may also use web beacons or flash cookies. A web beacon or flash cookie (also known as "action tags", "tracer tags", or "single-pixel gifs") is an invisible graphic on a web page that is programmed only to collect non-personal information about your use of a given website. We do not collect personally identifiable information, such as names, e-mail addresses and phone numbers, through such web beacons without your express permission.

We work with third-party advertising companies who also may utilize flash or enhanced cookies or web beacons to better provide advertisements about goods and services that may be of interest to you. These partners do not use this technology to collect personally identifiable information about you or have access to or use your name, address, e-mail address, telephone number or other personal information from us. They may, however, anonymously track your Internet usage across other websites in their networks beyond these Sites. To learn more about the use of this information or to choose not to have this information used by our third-party advertising partners by opting out please visit the Network Advertising Initiative by clicking [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

#### **Is Personal Information Collected From Children?**

Northstar Learning and Entertainment and EVN Marketing respects the privacy of children and we are committed to complying with the Children's Online Privacy Protection Act (COPPA). This Site(s) does not knowingly collect, use, or disclose personal information from children under the age of 13 without prior parental consent, except as permitted by COPPA. By providing your consent, you agree that we may collect, use, and disclose your child's personal information consistent with this Privacy Policy. If you have questions concerning our information practices

with respect to children, or if you would like to review, have deleted, or stop the further collection of your child's personal information in connection with the transaction for which it was originally collected, you may email us at [shapels@shapels.com](mailto:shapels@shapels.com). Please note that the Site(s) may link to other websites and online services operated by third parties, which include other product and books by other author sites hosted and maintained by others. These websites and applications operate independently from us, and we do not control their privacy practices. We encourage you to review the privacy policies of any third-party sites or applications to which your child provides personal information. For tips on protecting your child's privacy online, please see the U.S. Federal Trade Commission's brochure on this topic: [www.onquardonline.gov](http://www.onquardonline.gov)

### **How Do We Use Your Information?**

We use the information we learn from you to help us personalize and continually improve your experience on the Site(s). We may use your Personal and Non-Personal Information in the following ways:

#### General Uses

- Provide you with the products and services you request
- Post your user generated content to our Site(s) as you request
- Communicate with you about your account or transactions with us and send you information about features on our Site(s)
- Communicate with you about changes to our policies
- Personalize content and experiences on our Site(s), including providing you recommendations based on your preferences
- Send you newsletters, offers and promotions for our products and services, third party products and services, or special events by e-mail or other another medium
- Provide you with advertising including advertising based on your activity on our Site(s) or activity on third party sites and applications
- Administer any loyalty programs
- Administer contests, sweepstakes, promotions, and surveys
- Optimize or improve our products, services and operations
- Detect, investigate, and prevent activities that may violate our policies or be illegal
- Perform statistical, demographic, and marketing analyses of users of the Site(s) and their purchasing patterns
- 

#### Combination of Your Personal Information

We use the information from our Site(s). We may also use and/or combine information that we collect off-line or from third party sources to enhance and check the accuracy of your customer records.

#### Use of Your Location Information

We use your location information to:

- Provide you with the products and services you request
- Personalize content and experiences on our Site(s), including providing you recommendations based on your preferences
- Personalize your newsletters, offers and promotions for our products and services, third party products and services, or special events
- Personalize the advertising you receive, including advertising based on your activity on our Site(S) or activity on third party sites and applications
- Optimize or improve our products, services and operations
- Detect, investigate, and prevent activities that may violate our policies or be illegal
- Perform statistical, demographic, and marketing analyses of users of the Site(s) and their purchasing patterns

### **Who Do We Provide Your Information To?**

Except as disclosed in this Privacy Policy, we do not use or disclose information about your Personal Information collected online to any outside companies. We will not sell or rent your Personal Information as part of a customer list or similar transaction.

#### Third-Party Agents

We have third party agents, subsidiaries, affiliates and partners that perform functions on our behalf, such as hosting, billing, marketing, analytics, customer service, fraud protection, etc. These entities have access to the Personal Information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of that Personal Information. They are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services to the Site(s).

### Business Partners and Third Parties

We may share your Personal Information with our business partners or co-marketers from time to time. We may also share your Personal Information with third parties that provide products and services that we think you may be interested in. Although our treatment of your Personal Information is governed by this Privacy Policy, the business partner or third party's treatment of your Personal Information will be governed by the business partner or third party's privacy policy. You may withdraw your consent to our sharing of your Personal Information with business partners and third parties at any time by following the opt-out process described below.

### Emergency Situations

We may also use or disclose Personal Information if required to do so by law or in the good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or the Site(s); (b) protect and defend our rights or property, the Site(s) or our users, and (c) act under emergency circumstances to protect the personal safety of us, our affiliates, agents, or the users of the Site(s) or the public.

### Use of Non-Personal Information

We may disclose or share Non-Personal Information (or other information, other than Personal Information) in any other manner that we deem appropriate or necessary. Among other things, we will disclose Non-Personal Information to third parties to help us determine how people use parts of the Site(s) and who our users are so we can improve our Site(s). We will also disclose Non-Personal Information to our partners and other third parties about how our users collectively use the Site(s).

### **What Steps Are Taken To Keep Personal Information Secure?**

We are concerned about ensuring the security of your Personal Information. We exercise great care in providing secure transmission of your information from your device to our servers (3<sup>rd</sup> party service provider). Personal Information collected by our Site(s) is stored in secure operating environment that are not available to the public. Our security procedures mean that we may occasionally request proof of identity before we disclose your Personal Information to you. Please understand, however, that while we try our best to safeguard your Personal Information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure.

### **Your Obligations to Keep Your Access Rights Secure**

You promise to: (a) provide true, accurate, current and complete information about yourself and your business as prompted by a Website's registration form (such information being the "Registration Data") and (b) maintain and promptly update the Registration Data to keep it true, accurate, current and complete. If you provide any information that is untrue, inaccurate, not current or incomplete, Northstar Learning and Entertainment and/or EVN Marketing has reasonable grounds to suspect that such information is untrue, inaccurate, not current or incomplete, we has the right to suspend or terminate your account and refuse any and all current or future use of the Site(s) (or any portion thereof). You are entirely responsible for the security and confidentiality of any passwords or account. Furthermore, you are entirely responsible for any and all activities that occur under your account.

### **What Happens When I Link To or From Another Website?**

This Site(s) may contain links to other websites operated by affiliates of the Shapels Brand (Northstar Learning and Entertainment and/or EVN Marketing, or third parties. Please be advised that the practices described in this Privacy Policy for Northstar Learning and Entertainment and/or EVN Marketing do not apply to information gathered through these other websites. We are not responsible for the actions and privacy policies of third parties and other websites.

### **What About Contests and Sweepstakes?**

When we run a contest or sweepstakes relating to our Site(s), it will be accompanied by a set of rules. The rules for each contest/sweepstakes will specify how the information gathered from you for entry will be used and disclosed, if it is different than as described in this Privacy Policy. In conjunction with your entry in such contest or sweepstakes, Personal Information will be collected only if you voluntarily submit it to.

### **Public Areas, Chat Rooms, Reviews, and Community Areas**

Please remember that any information you share in public areas, such as message boards or feedback sections, becomes public and anyone may take and use that information. Please be careful about what you disclose and do not post any Personal Information that you expect to keep private. Please consult the applicable guidelines, if any, for use of our chat rooms and other community areas for more information.

### **Governing Law**

This Site(s) is published in the United States. We attempt to protect the Personal Information of all users of our Site(s) and we attempt to comply with local data protection and consumer rights laws to the extent they may apply to the Northstar Learning and Entertainment and/or EVN Marketing services, but our Site(s) is located and targeted to United States citizens and our policies are directed at compliance with those laws. If you are uncertain whether

this privacy policy conflicts with the applicable local privacy laws where you are located, you should not submit your Personal Information to us at [shapels@shapels.com](mailto:shapels@shapels.com).

#### **Assignment**

We may change our ownership or corporate organization while providing the Site(s) and related services. We may also sell certain assets associated with the Site(s). As a result, please be aware that in such event we may transfer some or all of your information to a company acquiring all or part of our assets or to another company with which we have merged. Under such circumstances we would, to the extent possible, require the acquiring party to follow the practices described in this Privacy Policy, as it may be amended from time to time. Nevertheless, we cannot promise that an acquiring company or the merged company will have the same privacy practices or treat your information the same as described in this Privacy Policy.

#### **Notice to Non-US Users**

If you are located outside the United States of America, you should be aware that your personally identifiable information will be transferred to the United States of America, the laws of which may be deemed by the your country to have inadequate data protection. If you are located in a country outside the United States of America and voluntarily submit personal information to us, you thereby consent to the general use of such information as provided in this privacy policy and to the transfer of that information to, and/or storage of that information in, the United States of America.

#### **Changes to This Policy**

As our Site(s) continue to develop we may add new services and features to our Site(s). In the event that these additions affect our Privacy Policy, this document will be updated appropriately. We will post those changes prominently so that you will always know what information we gather, how we might use that information and whether we will disclose it to anyone. We do, however, recommend that you read this Privacy Policy each time you use our Site(s) in case you missed our notice of changes to the Privacy Policy. We will not, however, materially change our policies and practices to make them less protective of Personal Information we have previously collected from you without your express consent.

#### **How Do I Opt-Out or Correct Information About Me**

You may always opt-out of receiving future e-mail messages and newsletters from the Shapels Brand, Northstar Learning and Entertainment, and EVN Marketing. We provide you with the opportunity to opt-out of receiving communications from us at the point where we request information about you. To do so, you can send us a message at [shapels@shapels.com](mailto:shapels@shapels.com).

#### **Your California Privacy Rights**

California Civil Code Section 1798.83 permits customers of Northstar Learning and Entertainment and EVN Marketing who are California residents to request certain information regarding its disclosure of their personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [shapels@shapels.com](mailto:shapels@shapels.com).

#### **Do Not Track Practices**

As of the date of this privacy policy listed above, we cannot honor web browser "do-not-track" signals because we use third party vendors who do not honor such signals. While we collect personally identifiable information from you as described earlier in this privacy policy, we do not collect personally identifiable information from you to monitor your online activities across third party websites or online services and over time (also known as behavioral advertising or interest-based advertising). We do not use or allow third parties to collect personally identifiable information from you on the Site(s) in order to monitor your online activities across third party websites or online services and over time (also known as behavioral advertising or interest-based advertising). For more information about behavioral advertising or interest-based advertising and for further information on how to opt out from such advertising (and what "opting-out" does and doesn't do), click <http://www.networkadvertising.org/choices/#completed>

**CONTACT US** - If you have any questions about this Privacy Policy, you may contact us as follows:

#### **BY MAIL:**

Online Privacy  
Attn: Customer Service  
Northstar Learning and Entertainment  
4 Ajellos Farm Road  
Seymour, CT 06483

#### **PHONE:**

(203) 906-8738

**Email:** [shapels@shapels.com](mailto:shapels@shapels.com)