

# SPT XPRESS PRIVACY POLICY

Your privacy is very important to us. We want to make your experience on the Internet as enjoyable and rewarding as possible, and we want you to use the Internet's vast array of information, tools, and opportunities with complete confidence.

We have created this Privacy Policy to demonstrate our firm commitment to privacy and security. This Privacy Policy describes how our company collects information from all end users of our Internet services (the "Services")-those who access some of our Services but do not have accounts ("Visitors") as well as those who may purchase Products and/or pay a monthly service fee to subscribe to the Service ("Members")-what we do with the information we collect, and the choices Visitors and Members have concerning the collection and use of such information. We request that you read this Privacy Policy carefully.

## Personal Information Our Company Collects and How It Is Used

**Introduction.** Our company collects information in different ways from Visitors and Members who access the various parts of our Services and the network of Web sites accessible through our Service.

**Registration:** Members may be asked to provide certain personal information when they sign up for our Products or Services including name, address, telephone number, billing information (such as a credit card number), and the type of personal computer being used to access the Services. The personal information collected from Members during the registration process is used to manage each Member's account (such as for billing purposes). This information may be shared with third parties, as stated herein, or in special circumstances.

However, in instances where our company and a partner jointly promote our Services, we may provide the partner certain personal information, such as the name, address, and username of persons who subscribed to the Services as a result of the joint promotion for the purpose of offering you other products and services.

In this instance, personal information may not be used by the partner for any other purpose. We may also generate non-identifying and aggregate profiles from personal information Members provide during registration (such as the total number, but not the names, of Members). As explained in more detail below, we may use this aggregated and non-identifying information to sell advertisements that appear on the Services.

Also, with purchases, we supply our member's contact information, to our business partners, who then may contact the member by telephone after the member purchase. Sales proceeds are collected by the that business partner company. We also may supply other companies with contact information, for mail offers we believe would be of interest to our members, with or without compensation from those companies. At times we may send an advertisement for a third party product, where we collect the sales proceeds, and forward the purchaser's information to that third party.

**Our Company Partners and Sponsors:** Some products and services may be offered to Visitors and Members in conjunction with an affiliate, independent contractor seller or non-affiliated partner. To provide Visitors and Members some of these products and services, the partner may need to collect and maintain personal information.

**Online Shopping:** At some Web sites, you can purchase products and services or register to receive materials, such as a newsletter, catalog or new product and service updates. In many cases, you may be asked to provide contact information, such as

your name, address, email address, phone number, and credit/debit card information.

If you complete an order for someone else, such as an online gift order sent directly to a recipient, you may be asked to provide information about the recipient, such as the recipient's name, address, and phone number. Our company has no control over the third parties' use of any personal information you provide when placing such an order. Please exercise care when doing so.

If you order services or products directly from our company, we use the personal information you provide to process that order. We do share this information with outside parties that we do business with.

**Online Advertisements:** Our company may display our online advertisements. In this case, we share information about our Visitors and Members collected through the registration process as well as through online surveys and promotions with these advertisers.

Additionally, in some instances, we use this information to deliver tailored advertisements or joint ventures. For instance, an advertiser or joint venture company tells us the audience they want to reach and provides us an advertisement tailored to the audience. Based upon the information we have collected, we may then display or send the advertisement to the intended audience. Our company does share personal information about its Visitors or Members with these advertisers or joint venture companies.

**Responses to Email Inquiries:** When Visitors or Members send email inquiries to our company, the return email address is used to answer the email inquiry we receive.

**Voluntary Customer Surveys:** We may periodically conduct both business and individual customer surveys. We encourage our customers to participate in these surveys because they provide us with important information that helps us to improve

the types of products and services we offer and how we provide them to you.

We may take the information we receive from individuals responding to our Customer Surveys and combine (or aggregate) it with the responses of other customers we may have, to create broader, generic responses to the survey questions (such as gender, age, residence, hobbies, education, employment, industry sector, or other demographic information). We then use the aggregated information to improve the quality of our services to you, and to develop new services and products. This aggregated, non-personally identifying information may be shared with third parties.

**Special Cases:** It is our company's policy to use or share the personal information about Visitors or Members in ways described herein without additional notice or means to opt out or otherwise prohibit such unrelated uses.

Also, we may disclose personal information about Visitors or Members, or information regarding your use of the Services or Web sites accessible through our Services, for any reason if, in our sole discretion, we believe that it is reasonable to do so, including: credit agencies, collection agencies, merchant database agencies, law enforcement, or to satisfy laws, such as the Electronic Communications Privacy Act, the Child Online Privacy Act, regulations, or governmental or legal requests for such information; to disclose information that is necessary to identify, contact, or bring legal action against someone who may be violating our Acceptable Use Policy or Terms Of Service, or other user policies; to operate the Services properly; or to protect our company and our Members.

"Cookies" and How Our Company Uses Them. A "cookie" is a small data file that can be placed on your hard drive when you visit certain Web sites. Our company may use cookies to collect, store, and sometimes track information for purposes stated herein as well as for statistical purposes to improve the products

and services we provide and to manage our telecommunications networks.

Advertisers and partners may also use their own cookies. We do not control use of these cookies and expressly disclaim responsibility for information collected through them.

Our Company Commitment to Children's Privacy. Protecting children's privacy is especially important to us. It is our policy to comply with the Children's Online Privacy Protection Act of 1998 and all other applicable laws. Therefore we restrict our Web site to persons eighteen years or older.

**YOU MUST BE EIGHTEEN (18) YEARS OR OLDER TO ACCESS THIS WEB SITE. IF YOU ARE UNDER EIGHTEEN YEARS OF AGE, YOU ARE NOT PERMITTED TO ACCESS THIS WEB SITE FOR ANY REASON. DUE TO THE AGE RESTRICTIONS FOR USE OF THIS WEB SITE, NO INFORMATION OBTAINED BY THIS WEB SITE, FALLS WITHIN THE CHILD ONLINE PRIVACY ACT (COPA) AND IS NOT MONITORED AS DOING SO.**

**Public Forums:** Please remember that any information you may disclose in any Member Directory, or other public areas of our Web sites or the Internet, becomes public information. You should exercise caution when deciding to disclose personal information in these public areas.

**Our Company's Commitment to Data Security:** Services and Web sites we sponsor have security measures in place to protect the loss, misuse, and alteration of the information under our control. While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information.

**Where to Direct Questions About Our Privacy Policy:** If you have any questions about this Privacy Policy or the practices

described herein, you may contact us through the contact information provided on this Web site.

**Revisions to This Policy:** Our company reserves the right to revise, amend, or modify this policy, our Terms Of Service agreement, and our other policies and agreements at any time and in any manner, by updating this posting. Your use of this site after such changes are implemented constitutes your acknowledgement and acceptance of these changes. Please consult this privacy statement prior to every use for any changes.