

# Privacy Policy

**Last Updated July 1<sup>st</sup> 2016**

This Privacy Policy (“Privacy Policy”) explains how Kardiem Inc. (“Kardiem,” “us,” “our,” and “we”) uses your information and applies to all who use our Web site, mobile applications, electronic services, social networking sites, or any individual, business partner-specific, merchant-specific, city-specific, or other area-specific Web sites we offer that link to or reference this Privacy Policy (collectively, the “Site”) and when you receive electronic communications from us.

Please read this Privacy Policy carefully and review it periodically for the latest information about our privacy practices. By using the Site, you agree to the terms of this Privacy Policy. If you do not agree with the practices described in this Privacy Policy, please do not provide us with your personal information or interact with the Site.

We will routinely update this Privacy Policy to clarify our practices and to reflect new or different privacy practices, such as when we add new services, functionality or features to the Site. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of notice on the Site prior to the change becoming effective. You can determine when this Privacy Policy was last revised by referring to the date it was “Last Updated” above. You can review the last version of this Privacy Policy at [www.Kardiem.com/pages/privacy-policy](http://www.Kardiem.com/pages/privacy-policy)

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## 1. Types of Information We Collect

We will collect information, including [Personal Information](#) and [Non-Identifying Information](#), when you interact with us and the Site, for example when you:

- Access or use the Site;
- Register, subscribe, or create an account with Kardiem;
- Open or respond to our e-mails;
- Provide information to enroll or participate in programs provided on behalf of, or together with, [Business Partners](#);
- Visit any page online that displays our ads or content;
- Follow either publicly or privately people, businesses or other entities;
- Add gift cards to your wish list;
- Purchase Gift Cards, products or services on or through the Site;
- Give gift cards to other people, businesses, entities;
- Connect or link to any Site via social networking sites; • Post comments to [Online Communities](#); and
- Provide information to our [Vendors](#).

This Privacy Policy does not apply to the collection of information in any way other than as listed above.

## 2. Your Choices

We think that you benefit from a more personalized experience when we know more about you and what you like. However, you can limit the information you provide to Kardiem, and you can limit the communications that Kardiem sends to you.

You can manage your email and notice preferences by logging into your account through the Kardiem mobile application, entering the “Settings” section.

You may manage how your browser handles [Cookies](#) by adjusting its privacy and security settings. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. You can opt-out of being targeted by certain [Third-Party Ad-Servers](#) online using the [National Advertising Initiative’s Opt-Out Tool](#), or on TRUSTe’s [site](#).

You may manage how your mobile device and mobile browser share certain [Device Data](#) with Kardiem, as well as how your mobile browser handles [Cookies](#) by adjusting the privacy and security settings on

your mobile device. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

You may also manage the sharing of certain Personal Information with us when you connect with us through social networking platforms or applications. Please refer to the privacy policy and settings of the social networking website or application to determine how you may adjust our permissions and manage the interactivity between Kardiem and your social networking account or your mobile device.

### 3. How Kardiem Uses Information

We (or our Vendors on our behalf), use information collected as described in this Privacy Policy to:

- Operate, maintain and improve the Site and our services;
- Provide you with personalized ads and offers for products and services from us and participating Business Partners;
- Facilitate and fulfill orders placed on the Site – for example, for Kardiem Gift Cards and other goods and services, including tracking redemption;
- Evaluate your eligibility for certain types of gift cards, products or services that may be of interest to you, and analyze advertising effectiveness;
- Answer your questions and respond to your requests;
- Perform analytics and conduct customer research;
- Communicate and provide additional information that may be of interest to you about Kardiem and our Business Partners, sometimes by combining your information with information from Other Sources;
- Send you reminders, technical notices, updates, security alerts, support and administrative messages, service bulletins, marketing messages, and requested information, including on behalf of Business Partners;
- Administer rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored by us or our Business Partners;
- Manage our everyday business needs, such as administration of the Site, forum management, fulfillment, analytics, fraud prevention, and enforcement of our corporate reporting obligations and Terms of Use, or to comply with the law;
- Allow you to apply for a job, post a video or sign up for special offers from merchants, Business Partners, or third parties through the Site, and to
- Enhance other information we have about you directly or from Other Sources to help us better understand you and determine your interests.

We also may use information collected as described in this Privacy Policy with your consent or as otherwise required or permitted by law.

## 4. When and Why Kardiem Discloses Information

We (or our Vendors on our behalf) may share your Personal Information as required or permitted by law:

- With any Kardiem Affiliate who may only use the Personal Information for the purposes described in this Privacy Policy;
- With our Vendors to provide services for us and who are required to protect the Personal Information:
  - To report or collect on debts owed to us or our Business Partners;
- With relevant Business Partners;
- With whom we jointly offer products and services;
- To facilitate a direct relationship with you, including in connection with any program we administer on behalf of the Business Partner;
- To enable electronic communications with you as part of purchase, a sponsored reward, offer, contest, program, or other activity in which you have elected to participate;
- To the extent you have purchased or redeemed a Kardiem voucher, goods or services offered by a Business Partner or participated in an offer, rewards, contest or other activity or program sponsored or offered through Kardiem on behalf of that Business Partner;
- With a purchaser of Kardiem or any of the Kardiem Affiliates (or their assets);
- To comply with legal orders and government requests, or as needed to support auditing, compliance, and corporate governance functions;
- To combat fraud or criminal activity, and to protect our rights or those of our Affiliates, users, and Business Partners, or as part of legal proceedings affecting Kardiem;
- In response to a subpoena, or similar legal process, including to law enforcement agencies, regulators, and courts in the United States and other countries where we operate; or
- With your consent.

We encourage Business Partners to adopt and post privacy policies. However, their use of Personal Information obtained through Kardiem is governed by their privacy policies and is not subject to our control.

We may also disclose Non-Identifiable Information:

- For the same reasons we might share Personal Information;
- With Business Partners for their own analysis and research;
- To facilitate targeted content and ads; or
- With Third-Party Ad-Servers to place our ads and/or ads of our merchants or Business Partners on the Site and on third-party sites, and to analyze the effectiveness of those ads.

We do not share Personal Information with Third-Party Ad-Servers; however, Third-Party Ad-Servers may automatically collect Non-Identifying Information about your visit to the Site and other websites, your device address, your Internet Service Provider and the browser you use to visit the Site. They do this by

using Cookies, clear gifs and other technologies. Information collected may be used, among other things, to deliver advertising targeted to your interests and to better understand the usage and visits to the Site and the other websites tracked by these third parties. This Privacy Policy does not cover the collection methods or use of the information collected by Third-Party Ad-Servers, and Kardiem is not responsible for Cookies or clear gifs in third party ads. We encourage you to review the privacy policies or policies of these third party advertising companies to learn more about their use of Cookies and other technologies. If you would like more information about this practice and to know your choices about not having this information used by third party advertisers, please visit <http://www.networkadvertising.org>.

## 5. How Kardiem Collects Information

You provide us with your Personal Information when you register, subscribe, create an account, purchase or redeem Kardiem gift cards, or otherwise when you provide us with your Personal Information during your interaction with the Site. We also collect Personal Information when you contact us online for customer service and other support using self-help tools, such as email, text, or by posting to an Online Community.

We also receive Personal Information and other online and offline information from Other Sources. Kardiem will use such information in accordance with applicable laws. Such information, when combined with Personal Information collected as provided in this Privacy Policy, will also be handled in accordance with this Privacy Policy. We also use cookies, tags, web beacons, local shared objects, files, tools and programs to keep records, store your preferences, improve our advertising, and collect Non-Identifying Information, including Device Data and your interaction with the Site and our Business Partners' web sites.

We use Cookies that contain serial numbers that allow us to connect your Site activity with other information we store about you in your profile or as related to your interactions with the Site. We use session cookies on a temporary basis, such as to manage your view of pages on the Site. We use persistent cookies for a number of purposes, such as retrieving certain information you have previously provided (for example, your user id if you asked to be remembered), and storing your preferences (for example, the cities for which you want to be shown Kardiem vouchers). Information from Cookies also tells us about the website you were visiting before you came to the Site and the website you visit after you leave the Site.

When you access these pages or open email messages, we use Pixel Tags and Web Beacons to generate a notice of that action to us, or our Vendors. These tools allow us to measure response to our communications and improve the Site's pages and promotions.

Device Data may be collected when your device interacts with the Site and Kardiem, even if you are not logged into the Site using your device. If you have questions about the security and privacy settings of

your mobile device, please refer to instructions from your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

## 6. Security of Personal Information

Kardiem has implemented an information security program that contains administrative, technical and physical controls that are designed to reasonably safeguard Personal Information. For example, we use industry-standard encryption technology to secure Financial Account Information.

## 7. Accessing and Correcting Personal Information

You can access, update and delete your, Financial Account Information, and the other information you provided to us in your profile by logging into your account and accessing the “My Account” section of the Site or sending us an email at My Privacy. Keeping your Personal Information current helps ensure that we, our Affiliates and Business Partners offer you the offers that are most relevant to you.

If you want to close your Kardiem account or have other questions or requests, please contact us. While we are ready to assist you in managing your subscriptions, closing your account, and removing your active profile, we cannot always delete records of past interactions and transactions. For example, we are required to retain records relating to previous purchases on the Site for financial reporting and compliance reasons.

We will retain your Personal Information for as long as your account is active or as needed to provide you services and to maintain a record of your transactions for financial reporting purposes. If you wish to cancel your account or request that we no longer use your Personal Information to provide you services contact us at Support. We will retain and use your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## 8. Social Networks

### Social Community Areas

The Site may be accessible through or contain connections to areas where you may be able to publicly post information, communicate with others such as discussion boards or blogs, review products and merchants, and submit media content. Prior to posting in these areas, please read our Terms of Use carefully. All the information you post may be accessible to anyone with Internet access, and any Personal Information you include in your posting may be read, collected, and used by others. For example, if you post your email address along with a public restaurant review, you may receive unsolicited messages from other parties. You should avoid publicly posting Personal Information or identifying information about third parties.

## Connecting through Social Networks

Kardiem offers social networking users the opportunity to interact with friends and to share on social networks. If you are logged into both Kardiem and a social network, when you use the Site's social networking connection functions, we will link your social network account with your Kardiem account if the email addresses match. If the email addresses do not match, we ask you if you want to link them and you must validate that you control the accounts. If you are already logged into Kardiem but not logged into your social network site, when you use the Site's social network connection functions, you will be prompted to enter your social network web site credentials or to sign up for the social network.

If you are not currently registered as a Kardiem user and you use the Site's social network connection functions, you will first be asked to enter your social network credentials and then be given the option to register and join Kardiem. Please refer to the privacy settings in your social network account to manage the data that is shared through your account.

By proceeding through any of the above steps, you grant Kardiem permission to access all of the elements of your social network profile information that you have made available to be shared and to use it in accordance with the social network's terms of use and this Privacy Policy.

## 9. Privacy Practices of Third Parties

This Privacy Policy only addresses the use and disclosure of information by Kardiem through your interaction with the Site. Other websites that may be accessible through links from the Site may have their own privacy policy and personal information collection, use, and disclosure practices. Our [Business Partners](#) may also have their own privacy policy. We encourage you to familiarize yourself with the privacy policy provided by these other parties prior to providing them with information or taking advantage of a sponsored offer or promotion.

## 10. EU/EEA Safe Harbor; Notice to Residents of Countries Outside the United States of America

If you live outside Canada or the United States (including in the EEA/CH), and you use the Site or provide us with [Personal Information](#) directly via the Site, your information will be handled in accordance with this Privacy Policy. By using the Site or giving us your [Personal Information](#), you are directly transferring your [Personal Information](#) and [Non-Identifiable Information](#) to us in Canada. Canada may not have the same level of data protection as your jurisdiction. However, you agree and consent to our collection, transfer, and processing of your [Personal Information](#) and [Non-Identifiable Information](#) in accordance with this Privacy Policy. You are solely responsible for compliance with any data protection or privacy obligations in your jurisdiction when you use the Site or provide us with [Personal Information](#). Regardless of where we transfer your information, we still protect your information in the manner described in this Privacy Policy.

## 11. Children's Privacy

Kardiem does not intend that any portion of the Site will be accessed or used by children under the age of thirteen, and such use is prohibited. The Site is designed and intended for adults. By using Kardiem, you represent that you are at least eighteen years old and understand that you must be at least eighteen years old in order to create an account and purchase the goods or services advertised through the Site. We will promptly delete information associated with any account be obtain actual knowledge is associated with a registered user who is not at least eighteen years old.

## 12. Contact Us; California Privacy Rights and Other Countries

Please contact us if you have any questions or comments about our privacy practices or this Privacy Policy. You can reach us online at [privacy@Kardiem.com](mailto:privacy@Kardiem.com). You can reach us via postal mail at the following address:

**Kardiem Inc.**

Attention: Privacy Office

78 Orkney Place

London ON, Canada N5X 3S1

If you reside in Canada, you may have the right to be provided with access to Personal Information that we have collected about you and written information about our policies and practices with respect to the transfer of your personal information to Vendors outside Canada. E-mail us at [privacy@Kardiem.com](mailto:privacy@Kardiem.com) with questions.

Pursuant to Section 1798.83 of the California Civil Code, residents of California can obtain certain information about the types of personal information that companies with whom they have an established business relationship have shared with third parties for direct marketing purposes during the preceding calendar year. In particular, the law provides that companies must inform consumers about the categories of personal information that have been shared with third parties, the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. To request a copy of the information disclosure provided by Kardiem pursuant to Section 1798.83 of the California Civil Code, please contact us via the email or address stated above. Please allow 30 days for a response.

## 14. Glossary of Terms

**Affiliate** means a company owned and/or controlled by Kardiem, Inc.

**Business Partners** means, collectively, third parties with whom we conduct business, such as merchants, co-marketers, distributors, and resellers.

**Chargeback** means, a request that a buyer customer files directly with his or her card company or card issuing financial institution to invalidate a processed payment.

**Claim** means a challenge to a payment that you or a buyer customer files directly with Kardiem.

**Cookie** means a small amount of information that a web server sends to your browser that stores information about your account, your preferences, and your use of the Site. Some cookies are temporary, whereas others may be configured to last longer. “Session cookies” are temporary cookies used for various reasons, such as to manage page views. Your browser usually erases session cookies once you exit your browser. “Persistent cookies” are more permanent cookies that are stored on your computers or mobile devices even beyond when you exit your browser.

**Device Data** means information concerning a device you use to access, use, or interact with the Site, such as operating system type or mobile device model, browser type, domain, and other system settings, the language your system uses and the country and time zone of your device, geo-location, unique device identifier or other device identifier, mobile phone carrier identification, and device software platform and firmware information.

**Non-Identifying Information** means information that alone cannot identify you, including data from Cookies, Pixel Tags and Web Beacons, and Device Data. Non-Identifying Information may be derived from Personal Information.

**Online Communities** means, collectively, our social networking pages or accounts, forums, bulletin boards, discussion groups, chat rooms or other methods of communication that may be offered on or linked through the Site.

**Other Sources** means sources of information that legally provide Kardiem with your information, and which are outside the scope of this Privacy Policy at the time of collection.

**Personal Information** means information about you that specifically identifies you or, when combined with other information we have, can be used to identify you. This includes the following types of information:

**Contact Information:** your name, postal addresses, email addresses, social networking website user account names, telephone numbers, or other addresses at which you are able to receive communications.

**Relationship Information:** information you provide that enables us to determine lifestyle, interests, and activities, including location information related to your state/province, city, or neighborhood; areas of interest, the types of deals that interest you, information collected through your interactions with social networks, demographic information (e.g., birth date, age, gender); information about persons for whom you have purchased Kardiem vouchers as gifts or who have bought Kardiem vouchers as gifts for you; and information about friends who refer you or whom you have referred;

**Transaction Information:** information you provide when you interact with us and the Site, such as the Kardiem vouchers you are interested in, purchase and redeem; email and other communications; and how you interact with Business Partners and our Vendors; and

**Financial Information:** information collected from you as needed to process payments for Kardiem vouchers or other products or services that you buy, or as provided by you to administer your participation in optional services and programs, such as your payment card number, expiration date, and card verification number.

**Pixel Tags and Web Beacons** means tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed specific actions.

**Reversal** means Stripe reverses the settlement of funds from a processed card transaction that you received.

**Third-Party Ad-Servers** means Vendors and other third parties that provide the technology to place ads on websites and track ad performance.

**Vendors** means, collectively, third parties that perform business operations on behalf of Kardiem, such as transaction processing, billing, mailing, communications services (e-mail, direct mail, etc.), marketing, data processing and analytics, servicing, collections, or ad management.