

PRIVACY POLICY

WHAT DOES THIS PRIVACY POLICY COVER?

TURNAND is an independent, non-political, non-profit organization which owns and operates **WWW.TURNAND.COM** (the "Site" or "we"). We have created this Privacy Policy to describe the personal information we collect when you visit our Site and how we use that information. This Privacy Policy applies to **TURNAND**.

WHAT INFORMATION DO WE COLLECT?

A. Personal Information

Personal information is any information that allows our Site to identify an individual consumer, such as, name, phone number, residential address or email address. Certain information is only personal information when it is linked to other information, such as your name. For example, your birth date and gender are only personal information when associated with you. To become a member of our Site or to access certain services offered by us, you may be required to provide personal information, such as your name, home and email addresses, birth date and gender. Similar information may also be required to participate in other online activities, special events, contests, sweepstakes or Interactive Areas. "Interactive Areas" include, when offered, comment sections on articles, message boards, chat rooms, reader photo upload, reader ratings and reviews, saving articles or other content on our sites, reader-created content, SMS text messaging and mobile alerts.

B. Posting Reviews or Comments and Use of Interactive Areas

We collect information when you submit it for posting on our Site. Any communication you submit or that may be posted to any public areas of our Site, such as a comment on an article or a review, is a public communication and may be viewed by the general public. You hereby acknowledge that you have no expectation of confidentiality in the content you submit to such services over our Site, whether or not it includes any personal information. If you display your personal information in any communication submitted to such services or features, other

individuals may collect and use your personal information. The Site is not responsible for nor can we guarantee the protection of, any personal information you disclose in a communication submitted to such services or features for posting or contained in an email or other communication submitted to us for such posting, and thus, you acknowledge that if you disclose personal information in any such material, you do so at your own risk.

C. Non-Personal Information

We may collect non-personal information about our members and visitors, such as Internet server and browser identification etc. We gather this information through the use of cookies and similar devices as discussed below. We may contract with third parties to collect this analytics information on our behalf. The analytics companies include Adobe, Chartbeat, Flurry and Google. For more information about these companies and their privacy policies, please visit these websites and check their privacy policy.

HOW IS THE INFORMATION WE COLLECT USED?

A. Use of Personal Information

We collect personal information for several important purposes, such as, to protect the security of our visitors and the Site, improve the on-site experience, distribute our newsletters, allow participation in Interactive Areas, etc. We may also survey visitors about various topics, including local events and experiences, media consumption preferences and how we can improve our Site and services. Response to our surveys is entirely voluntary. The Site or our operational providers may enhance or merge the information we collect with other data collected from other sources, such as demographic data including age and gender, to enhance our marketing activities.

We may offer a feature that will allow the visitor to email a link to another person to inform them about an article or feature on the Sites. We do not retain telephone numbers or email addresses collected for these purposes after sending the SMS text message or email. Additionally, we may have offer features allowing users to share such links in social media platforms, such as, Facebook, Twitter, LinkedIn, Instagram etc.

We may produce or promote any special events for promotional purposes. Personal information collected by our Site in conjunction with such activities may also be used for the marketing of additional products, services, and events by the Site and/or their promotional partners. Please see the rules of each individual event and any applicable privacy policies for information on the choices you can exercise with respect to the use of your personal information. To the extent there is a conflict between this privacy policy and the rules or policies applicable to a special event, the rules and policies associated with the special event shall govern.

B. Use of Non-Personal Information Including Cookies

The Site uses cookies and other tracking devices. A cookie is a small data file that contains a unique identification number that a website places on your hard drive when you visit a website. The cookie is able to store information such as data about your computer, the type of browser you use and how many times your computer visits a certain site. The cookies we use on the Site do not contain any personal information. Cookies enable us to track how often visitors are visiting our Site and specific pages, the number of entries in specific events, the estimated audience size for sponsors and advertisers and user preferences. You can refuse to use cookies by turning them off in your browser. Please contact your browser software manufacturer for questions on how to disable your cookies. You do not need to have cookies turned on to use most of the content on our Site. However, you may find that some areas on the Site will be slower, or may not function at all, and you may not be able to participate in certain activities, such as commenting, contests or sweepstakes, if the cookies are disabled.

Our Site may also use clear GIFs [Graphics Interchange Formats]. A clear GIF is a tiny line of code, only 1 by 1 pixel in size that is programmed to collect certain information about a visit to a particular website. We use clear GIFs to gather non-personal, aggregate information on visits to our Site, track usage of website links and email delivery, and assist with registration and log-on features, including in chat rooms and email. We do not disclose personal information that may be linked to our clear GIF collection practices to third parties. The Sites are not responsible for the use of clear GIFs by other website operators.

You should review other website operators' privacy policies to determine the type and extent of tracking devices used at other websites you visit.

C. Use and Collection of Information by Operational Providers

For your convenience, we may provide the opportunity to purchase certain goods, merchandise and services through this website (including, without limitation, on-line personals services, print and digital magazine subscriptions, and special event tickets). Organisations other than Turnand or its affiliates may process these transactions. We call these organisations that conduct our e-commerce operations, order and/or contract services "operational providers." They are third parties that perform services on our behalf. If you choose to use these optional services, our operational providers will request your personal information to fulfil your order or request. The voluntary submission of your personal information to these operational providers, including your order or request, will be governed by the specific provider's terms of usage and privacy policies. To facilitate an order or request, we may share your personal information with the provider. The operational provider may also share your personal information with us. We may store this information in our membership database. In most instances, we request that our operational providers adhere to the provisions in Turnand' Privacy Policy and that such providers only share visitors' personal information with Turnand, only if necessary to complete a visitor's request or order. We also request that these providers only use the personal information for the purpose of conducting the sale or fulfilling the requested service or order. However, you must read an operational provider's privacy policy to determine the extent of use and disclosure of your personal information collected online. Turnand, its parents, affiliates and subsidiaries are not responsible for the collection, use and disclosure practices of operational providers, nor is Turnand responsible or liable for the products or services provided by operational providers.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

A. Sharing of Information with Partners

We may collect and provide aggregate information about our visitors to our sponsors, promotional partners and affiliates, such as how many persons visited a particular page or activity, the average age of our visitors on the site or page, etc; but this information does not include personal information about any individual visitor. We may also obtain geographic information, but this aggregate information will not reveal any personal information about a

specific visitor. We may also obtain other demographic information from third parties to improve our products and services, for marketing purposes or to display more relevant advertising. However, we do not combine this data with any personal information.

B. Other Information Sharing

Other than as disclosed in this Privacy Policy, we only share or disclose your personal information with companies other than Turnand and its affiliates when it is required by law, regulation, legal process or enforceable governmental request; when we believe disclosure would enhance or improve operation of the Site or certain website services and/or when we believe disclosure is necessary to protect the safety of our visitors.

The Site may in the future share personal information with its partners, and/or affiliates to conduct joint activities.

When you send us an email, we will reasonably safeguard your email address and other personal contact information. However, we may disclose the content of your email to other persons in accordance with our Terms of Use Agreement.

WHAT CHOICES DO I HAVE ABOUT HOW MY PERSONAL INFORMATION IS USED?

You reserve the right to not provide us with any personal information. If personal information you provide our Site changes or if you no longer wish to receive a service or marketing communications from us or if you wish to inquire about the information we hold about you, please contact us using the contact information below and we will correct, update or remove your details or process your request to be removed from future communications. Additionally, you can opt out of any email communications you receive from us using the dedicated link to unsubscribe from such service found at the bottom of each email we send.

WHAT ABOUT LINKS TO THIRD PARTY WEBSITES?

The Site may contain links, sometimes in the form of advertisements or links to other sites, such as information about other services, to other sites, including sites operated by other entities. These advertisers and sites that have links on our Site may collect personal information directly from you and/or use their own tracking technologies. When you visit an advertiser's or

sponsor's website, we may frame the site with our Site's logos; however, you will be subject to the privacy policy and terms of use agreement of that website operator. Turnand is not liable for the privacy policies or contents of our advertisers, sponsors or other sites to which we provide hyperlinks or access. Please visit the sites of these businesses to review their privacy policies.

IS MY PERSONAL INFORMATION PROTECTED?

When you submit personal information on our Site, such information is protected both online and offline. Only employees and supervisors with specific authorization have access to databases containing visitors' personal information. The databases are protected in a secure facility. Credit card information is transmitted via encrypted technology. Please be advised that, although we take reasonable technological precautions to protect your data, no data transmission over the Internet can be guaranteed to be 100% secure. Therefore, our Site cannot warrant that your information will be absolutely secure. Any transmission of data through our Site is at your own risk.

WHAT ABOUT CHANGES TO THIS PRIVACY POLICY?

We may periodically modify, alter or otherwise update this Privacy Policy. We may also change or update our Privacy Policy if we add new services or features. We will notify you of any material changes to this Privacy Policy by posting the revised policy with the date it was revised on this page. We encourage you to review our Privacy Policy on a regular basis to stay informed about how we are protecting the personal information we collect. Your continued use of our Site constitutes your agreement to this Privacy Policy and any updates.

How Can You Ask Questions or Raise Concerns?

Please do not hesitate to contact us if you have any questions about this Privacy Policy.

Contact us at:

E-mail: info@turnand.com