

Provider Pals Privacy Policy

Updated: June 1, 2007

Note to Kids

Provider Pals encourages you to get permission from your parents before sending any personally identifiable information about yourself (such as your name or your e-mail address) over the Internet, to us or to anyone else.

Note to Parents

PLEASE READ. This section of the privacy policy explains our information collection and use practices online for children under the age of thirteen, including what we do with information that we collect and with whom we share that information. We ask that you take the time to review our policy so that you can know exactly how we collect and use information from kids, and so that you will know how you can review or request that we delete your child's information. If you ever have any questions or concerns about this policy, please contact us.

Provider Pals Kids' Privacy Policy Section

Provider Pals is dedicated to protecting your privacy and handling any personal information we obtain from you with care and respect. This Kids' Privacy Policy is designed to answer your questions regarding our privacy policies and principles with respect to kids under the age of 13.

Building on our general Privacy Policy, we recognize the need to provide additional privacy protections when kids visit the sites on which this Kids' Privacy Policy is posted. We explain those additional protections here in this Kids' Privacy Policy. For your convenience, this Kids' Privacy Policy uses terms that are defined in our General Privacy Policy.

The Children's Online Privacy Protection Act ("COPPA") requires that we inform parents and legal guardians about how we collect, use, and share personal information from children under 13 years of age; and that we obtain the consent of parents and guardians in order for children under 13 years of age to use certain features of our Web sites. Below, we explain how we do that for these "kids." Also, when we use the term "parent" below, we mean to include legal guardians.

- 1. What types of personal information do we collect about kids?**
- 2. How do we use and share the personally identifiable information that we have collected about kids?**
- 3. How do we notify and obtain consent from parents for the collection of information from their kids?**
- 4. How can parents access, change or delete personally identifiable information about their kids?**
- 5. How will we notify parents if our Kids' Privacy Policy changes?**
- 6. Who do members and guests contact with questions or comments about our Kids' Privacy Policy?**

- 1. What types of personal information do we collect about kids?**

The only information we collect about kids during our registration process is a kid's first name, city and state of residence, kid's birth date, parent's e-mail address, self-defined user name and password. We encourage all kids who register to choose a user name that does not contain personally identifiable information, such as a nickname and to not use objectionable words or phrases in their username. We collect birth dates to validate the ages of our members and guests, including kids. We do not collect any other personally identifiable information from kids during our registration process. By law, we cannot require any more personal information from a kid than is necessary for participation in an online activity.

We may collect personal information from parents in order to allow kids to participate in certain features located on our Web sites and within subscription-based portions of our Web sites. These features may include instant message chatting, sending e-mail, posting on message boards, and other similar activities. In the course of a kid's participation in these features, a kid may also provide us additional information about himself or herself, such as the contents of his or her chat or message board postings. If a parent allows us to collect personal information about their kid, we may link certain information collected through technology (see the "Information Collected Through Technology" in No. 2 below) to that personal information.

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2. How do we use and share the personally identifiable information that we have collected about kids?

If a kid registers for a sweepstakes or contest, we use the parent's e-mail address to notify the parent of the kid's registration request (as described in detail below in No. 3). We may get a kid's e-mail address from the parent in order to send the kid a newsletter. In addition, personal information about a kid may be collected and used to enable a kid's participation in certain interactive features such as instant message chatting, sending e-mail, posting on message boards and other similar activities. By the very nature of activities such as instant message chatting, posting on message boards and other similar activities there may be inadvertent disclosure of a kid's personal information to third parties, even though all such activities are monitored on our Web sites. In Provider World, only the English language will be used for communication so that occurrences of unintentional sharing of personal information are limited. Other languages and characters are not allowed. Failure to comply, or the attempt to circumvent our language filters by using foreign languages or characters may result in an account being deactivated and/or permanently banned from the site. In addition, we may share a kid's personal information with third parties when reasonably necessary to: protect the security and integrity of our sites; to take precautions against liability; to respond to judicial process; or to the extent permitted under provisions of law, to provide information to police, and other law enforcement agencies or for an investigation related to public safety.

Information Collected Through Technology

We get information through technology to make our sites more interesting and useful to you and for other purposes related to our business. For instance, when you come to one of our sites, we collect your IP address. An IP address is used to show the way you enter the Internet, and is usually controlled by your ISP (Internet Service Provider), your school, library or other such place. All by itself, your IP

address is not personally identifiable. We may use IP addresses to get information about how often our members and guests visit the different parts of our sites, and we may combine IP addresses with personally identifiable information.

Our Web sites collect information through a variety of technical methods, including cookies and Web beacons. Cookies are pieces of information that a Web site sends to your computer while you are on the Web site. Web beacons are small pieces of data contained in images on the pages of Web sites. Cookies, Web beacons and other technical methods may involve the transmission of information either directly to us or to another party that helps collect information for us.

We may use the information we get through these technical methods for tracking and to improve our members' and guests' experience on our Web sites. For example, when you return to one of our Web sites after logging in, cookies provide information to the site so that the site will remember who you are. These technical methods may let us collect and use information in a form that is personally identifiable.

Companies That Help Us Serve You Better

Sometimes Provider Pals hires companies to help give out products or services, like a shipping company that delivers a package or a company that helps send out prizes for a sweepstakes. That means we have to share your information. Sometimes, Provider Pals also works with other companies who help either get your information or talk with you, such as a company that helps to provide customer service. Unless we permit it somewhere else in this policy, these companies are only allowed to do this for the reasons in this paragraph, or as required by law, and we require strict confidentiality and security from those we contract with.

Provider Pals does allow approved ads to be placed on our Web sites. Please keep in mind that if you click on an ad on one of our Web sites and link to a third party's Web site, then our Privacy Policy will not apply to your personally identifiable information collected on that other's Web site and you must read the privacy policy posted on that site to see how your personally identifiable information will be handled. Please ask your parent's permission to go to one of these other sites, and remember never give out your personal information without your parent's permission!

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3. How do we notify and obtain consent from parents for the collection of information from their kids?

Before allowing a kid to use a feature of our Web sites that might result in the public disclosure of the kid's information to third parties on the Internet, such as posting on open message boards, we require a high level of verification to confirm that the parent has given permission for the kid's participation in such features. For example, we send an e-mail to the kid's parent requesting the parent's affirmative consent to the kid's participation, we may require a parent to provide us credit card information, speak to a trained telephone operator, or return by postal mail or fax a signed consent form.

If a kid wins a sweepstakes or contest, we notify the parent at the parent's e-mail address provided to us during the registration process and request that the parent provide their postal address for purposes of

delivering the prize. We may publish a winner's first name, first initial of last name, city and state of residence on our Web sites.

On limited occasions, there may be a special offer for a trial play period. When a kid uses their trial pass, we will collect no identifiable information from them. These passes are only good for a very limited amount of time and will be deactivated upon expiration.

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4. How can parents access, change or delete personally identifiable information about their kids?

At any time, parents can refuse to permit us to collect further personal information from their kid and can request that any personal information we have collected be deleted from our records. We use two methods to allow parents to access, change or delete the personally identifiable information that we have collected from their kid.

A parent can view his or her kid's personal information by logging on to the kid's account at the Member Services center located at <http://www.providerpals.com/pals/user/action/UpdateProfile.action>. The parent will need to have their kid's user name and password. There are also instructions at the Member Services center explaining how to recover a password if the kid has forgotten it.

To change or delete personal information that we have collected from his or her kid, a parent can contact our Member Services center by sending an e-mail to memberservices@providerpals.com. Please include the kid's user name, the parent's e-mail address, and your specific request in the e-mail so that we can better assist you.

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5. How will we notify parents if our Kids' Privacy Policy changes?

We may amend our Kids' Privacy Policy at any time. To keep parents updated, we will provide parents notice by e-mail of any material changes in the way we intend to collect, use and/or share kids' personal information. Please note that, at all times, parents should update their personal information to provide us current e-mail addresses. We will apply material changes in our Kids' Privacy Policy only in conformance with applicable law, including any applicable provisions of COPPA that require parental consent.

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6. Who do members and guests contact with questions or comments about our Kids' Privacy Policy?

If you need further assistance, please send an e-mail with your questions or comments to memberservices@providerpals.com or write us at:

Member Services
Provider Pals
5957 Champion Road
Libby, MT 59923

You may also telephone us at (406) 293-8822. (If you are not 18 years of age or older, you must have your parent or guardian's permission to call this number.)

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Provider Pals General Privacy Policy

At Provider Pals, we are dedicated to protecting your privacy. Any personal information we obtain from you will be treated with care and respect. Our Privacy Policy has been designed to answer questions you may have about our privacy policies and our principles.

- 1. What information does this Privacy Policy cover?**
- 2. What types of personally identifiable information do we collect about our members and guests?**
- 3. How is your personally identifiable information used and shared?**
- 4. What choices do you have about the collection, use, and sharing of your personally identifiable information?**
- 5. What kinds of security measures do we take to safeguard your personally identifiable information?**
- 6. How can you update your contact information and opt out choices?**
- 7. How can you ask questions or send us comments about this Privacy Policy?**
- 8. How will you know if we amend this Privacy Policy?**
- 9. What additional privacy protections do we provide for children under the age of 13 who visit our sites?**

1. What information does this Privacy Policy cover?

This Privacy Policy applies only to personally identifiable information collected on the Web sites where this Privacy Policy is posted and does not apply to any other information collected by Provider Pals through any other means.

When this Privacy Policy uses the term "personally identifiable information," we mean information that identifies a particular individual, such as the individual's name, postal address, e-mail address, and telephone number. When other information, such as a purchase of goods or service, is directly associated with personally identifiable information, this other information also is treated as personally identifiable information for purposes of this Privacy Policy. The terms of this Privacy Policy are subject to all applicable laws.

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2. What types of personally identifiable information do we collect about our members and guests?

We collect several types of personally identifiable information about our members and guests.

[Information You Provide to Us](#)

Much of the personally identifiable information we receive comes directly from members and guests who are interested in obtaining various products and services from us. Typically, this information includes the member's or guest's complete name, postal address, e-mail address of parent and/or child, birthdate, and telephone number. We may also collect other types of information such as gender, age and personal interests, which we may associate with personally identifiable information. This information may be used for record keeping, order fulfillment, marketing and subscription renewal notification or as a means of ensuring that our online experiences are designed for the appropriate audience. If you purchase products or services from us, we will note, for example, credit card information, the type of services or products ordered or purchased and the date of the order or purchase. You may also provide us photographs or other video materials, which may contain personal information. We may collect personal information when you register on, log on, or visit our Web sites, including when you participate in activities on our Web sites, such as sweepstakes, contests, games and promotional offers, and when you provide information to our Member Services representatives. Finally, our Web sites may offer message board, chat and other public forums. In Provider World, only the English language will be used for communication so that occurrences of unintentional sharing of personal information are limited. Other languages and characters are not allowed. Failure to comply, or the attempt to circumvent our language filters by using foreign languages or characters may result in an account being deactivated and/or permanently banned from the site. If you provide personal information when you use these forums, that personal information may be publicly posted. Our rules for use of these public forums are described in the "Public Forums and Communication" and "House Rules" sections of the Terms of Use for this Web site.

Since use of some of our Web sites, including Provider World, require that you create a unique identifier such as a password, you should know that failure to create or enter this required information will result in your inability to access portions or all of these Web sites.

Information Collected Through Technology

We collect information through technology to make our sites more interesting and useful to you and for various purposes related to our business. For instance, when you come to one of our sites, we collect your IP address. An IP address is associated with the access point through which you enter the Internet, and is typically controlled by your ISP (Internet Service Provider), your company, or your university or school. Standing alone, your IP address is not personally identifiable. We may use IP addresses to collect information regarding the frequency with which our members and guests visit various parts of our sites, and we may combine IP addresses with personally identifiable information.

Our Web sites collect information through a variety of technical methods, including cookies and Web beacons. Cookies are pieces of information that a Web site sends to your computer while you are viewing the Web site. Web beacons are small pieces of data that are embedded in images on the pages of Web sites. Cookies, Web beacons and other technical methods may involve the transmission of information either directly to us or to another party authorized by us to collect information on our behalf.

We may use the information collected through these technical methods for tracking and to enhance our members' and guests' experience on our Web sites. For example, when you return to one of our Web sites after logging in, cookies provide information to the site so that the site will remember who you

are. We also may use technical methods for a number of purposes in HTML e-mails that we send our members and guests, including to determine whether our members and guests have opened those e-mails and/or clicked on links in those e-mails, to customize the display of banner advertisements and other messages after a member or guest has closed the e-mail, and to determine whether a member or guest has made an inquiry or purchase in response to a particular e-mail. These technical methods may enable us to collect and use information in a form that is personally identifiable.

Provider Pals does allow approved advertisements to be placed on our Web sites. Please keep in mind that if you click on an advertisement on one of our Web sites and link to a third party's Web site, then our Privacy Policy will not apply to your personally identifiable information collected on that third party's Web site and you must read the privacy policy posted on that site to see how your personally identifiable information will be handled.

Information That We Collect from Others

We may supplement personally identifiable information that we have collected directly from our members and guests with other information that we obtain from third parties. In addition, we may obtain information about individuals who are not yet users of our Web sites, members or guests of Provider Pals or Provider World. When we associate information that we obtain from third parties with personally identifiable information that we have collected under this Privacy Policy, we will treat the acquired information like the information that we collected ourselves and, except as permitted by this Privacy Policy, the information will not be shared with third parties.

On limited occasions, there may be a special offer for a trial play period. During this trial period, we will collect no identifiable information from the user. These passes are only good for a very limited amount of time and will be deactivated upon expiration.

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3. How is your personally identifiable information used and shared?

As described in detail below, Provider Pals may use your personally identifiable information in many ways, including sending you promotional materials. (By "promotional materials," we mean communications that directly promote the use of Web sites, and/or the purchase of products or services.) As outlined below in No. 4, you may "opt-out" of certain uses of your personal information.

General Provisions for Sharing and Use by Provider Pals

Personally identifiable information collected under this Privacy Policy is used by Provider Pals for many purposes. For example, Provider Pals may use your personal information to send you promotional materials about goods and services (including special offers and promotions) offered by Provider Pals. These promotional materials may be sent to you by postal mail, e-mail or other means. You may opt out of receiving these communications as provided in No. 4 below.

Provider Pals may also use your personally identifiable information for many purposes other than sending you promotional materials. (We refer to all of these types of uses of your personally identifiable information that do not involve the sending of promotional materials as "Operational

Uses.") For example, we may use your information to complete transactions requested by you (such as your purchase of a product or service offered on our Web sites), or to send you administrative communications either about your account with us or about features of our Web sites, including any future changes to this Privacy Policy. Because these uses of your personally identifiable information do not involve sending you promotional materials, your opt-outs under No. 4 below will not apply to any of these Operational Uses.

Finally, Provider Pals may take your personally identifiable information and make it non-personally identifiable, either by combining it with information about other individuals (aggregating your information with information about other individuals), or by removing characteristics (such as your name) that make the information personally identifiable to you (de-personalizing your information). Given the nature of this information, there are no restrictions under this Privacy Policy upon the right of Provider Pals to aggregate or de-personalize your personal information, and Provider Pals may use and/or share with third parties the resulting non-personally identifiable information in any way.

Companies That Facilitate Communications and Transactions with You

Sometimes Provider Pals hires companies to help provide products or services, like a shipping company that delivers a package or a company that helps fulfill prizes for a sweepstakes. In those instances, there is a need to share your information with these companies. Sometimes, Provider Pals also works with other companies who help either gather your information or communicate with you, such as a company that helps to provide customer service. Your opt-out choices under No. 4 below will not apply to sharing by Provider Pals of your personally identifiable information with any of these companies. Nonetheless, except as separately permitted by other provisions of this Privacy Policy, these companies are allowed to gather, receive and use your information only for the purposes described in this paragraph or as required by law.

Disclosures Required By Law and Disclosures to Help Protect the Security and Safety of Our Web Sites, Provider Pals and Others

Regardless of any opt-out choices that you make under No. 4, Provider Pals will disclose personally identifiable information when it believes, in good faith, that such disclosures (a) are required by law, including, for example, to comply with a court order or subpoena, or (b) will help to: enforce our Terms of Use; enforce contests, sweepstakes, promotions and/or game rules; protect your safety or security, including the safety and security of property that belongs to you; and/or protect the safety and security of our Web sites, Provider Pals and/or third parties, including the safety and security of property that belongs to Provider Pals or third parties.

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4. What choices do you have about the collection, use, and sharing of your personally identifiable information?

With regard to personally identifiable information that you have provided under this Privacy Policy, there are two opt-out choices available to you. These opt-out choices are the means by which you give us, or decline to give us, your consent to use your personally identifiable information for the purposes covered by these opt-out choices. Please be assured, however, that if any one of these opt-out choices is

not presented to you on a Web site, personal information collected from you on that site will not be used for the purposes covered by that opt-out choice. There are several methods by which you can exercise your opt-out choices: (a) during the registration process on our Web sites; (b) after registration, by logging on our Web sites, clicking on our Privacy Policy links, going to a site's Member Services center, and following the opt-out directions; and (c) as described below in No. 6. Each of these opt-out choices is subject to the exceptions described further below.

Your two opt-out choices are:

Opt-Out Choice #1 -- You may choose to opt-out of receiving promotional materials from Provider Pals. This opt-out choice is found on each of our Web sites. For your convenience, when you make a choice regarding this "Provider Pals" opt-out at any one of our Web sites, we will treat that choice as replacing any other choices regarding that opt-out that you may previously have made. Thus, if you want to make a change in your "Provider Pals" opt-out choice, you can make that change by visiting the Member Services center at any one of our Web sites. As described in the following paragraph, you provide this consent when you complete a registration page on, or visit the Member Services center of, the Web site of Provider Pals and choose not to opt-out of receiving promotional materials.

Opt-Out Choice #2 -- You may choose to opt-out of receiving from Provider Pals such items as newsletters, Web site update notifications, notices of contests, sweepstakes and other such communications that are of interest and benefit to our members and guests. This opt-out choice is found on each of our Web sites. For your convenience, when you make a choice regarding this "Provider Pals" opt-out at any one of our Web sites, we will treat that choice as replacing any other choices regarding that opt-out that you may previously have made. Thus, if you want to make a change in your "Provider Pals" opt-out choice, you can make that change by visiting the Member Services center at any one of our Web sites. As described in the following paragraph, you provide this consent when you complete a registration page on, or visit the Member Services center of, the Web site of Provider Pals and choose not to opt-out of receiving such materials as noted above.

Please keep in mind that any opt-out choices you make will not apply in situations where you either have made, simultaneously make or later make a specific request for information from Provider Pals.

Finally, if you do not exercise your opt-out choices upon registration or initial login at our Web sites, it may take up to ninety (90) days for your opt-out choices to be fully effective. Please keep in mind that, if you have not consistently used the same postal and e-mail addresses on our Web sites, or if you have used a general change of address process (such as the change of address process offered by the U.S. Postal Service) after providing address information on our Web sites, systems maintained by Provider Pals may have varying contact information for you. Accordingly, it may not always be possible to match your new opt-out choices with the personal information that you previously have provided.

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5. What kinds of security measures do we take to safeguard your personally identifiable information?

The security and confidentiality of your information is extremely important to us. We have implemented technical, administrative and physical security measures to protect member and guest

information from unauthorized access and improper use. From time to time, we review our security procedures in order to consider appropriate new technology and methods. Please be aware though, that despite our best efforts, no security measures are perfect or impenetrable.

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6. How can you update your contact information and opt out choices?

You can access and update the contact information you gave us during registration (that is, your postal address, e-mail address, or any other information that would directly enable us to contact you), or modify your opt-out choices, by going to our Member Services center. Simply click on this link <http://www.providerpals.com/pals/user/action/UpdateProfile.action>, or go to the Member Services center on our Web sites, and then log in with your member name and password. In some cases, you may need to visit the Member Services center on a particular Web site to change your preferences associated with that Web site. There are instructions on the start page of the link above to help you recover your password if you have forgotten it. If you need to recover your password, you can also contact us via e-mail at memberservices@providerpals.com. Please include information in the e-mail that will help us identify your account so we can assist you with your request. We may also provide you an opportunity to update your contact information and/or modify your opt-out choices by sending you an e-mail or other communication that invites your response. Finally, you may unsubscribe from certain e-mail communications by clicking on unsubscribe links in those e-mails.

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7. How can you ask questions or send us comments about this Privacy Policy?

If you have questions or wish to send us comments about this Privacy Policy, please send an e-mail with your questions or comments to memberservices@providerpals.com or write us:

Member Services
Provider Pals
5957 Champion Road
Libby, MT 59923

Please be assured that any personal information that you provide in communications to the above e-mail and postal mail addresses will not be used to send you promotional materials, etc. unless you so request.

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8. How will you know if we amend this Privacy Policy?

We may amend this Privacy Policy at any time. If we amend this Privacy Policy to permit material changes in the way we collect, use and/or share your personally identifiable information, we will notify you of such amendment by sending you an e-mail at the last e-mail address that you provided us and/or by prominently posting notice of such amendment on the Web sites covered by this Privacy Policy. Any such amendment to this Privacy Policy will be effective thirty (30) calendar days following either our dispatch of an e-mail notice to you or our posting of notice of the changes on the Web sites covered by this Privacy Policy. Please note that, at all times, you are responsible for updating your personal information to provide us your current e-mail address. In the event that the last e-mail address that you

have provided us is not valid, or for any other reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the amendment described in the notice. In any event, an amendment to this Privacy Policy may permit material changes in the way we use and share personally identifiable information that you provided us prior to our notification to you of such amendment. If you do not wish to allow such material changes, you must so notify us (in the manner we specify) prior to the effective date of the amendment. If you provide us this notice, we may choose to deactivate your account. Please be advised, however, that regardless of whether you provide such notice to us, any such amendment to this Privacy Policy will apply to any personal information that you provide us on or after the effective date of such amendment.

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9. What additional privacy protections do we provide for children under the age of 13 who visit our sites?

We recognize the need to provide additional privacy protections for children who visit our sites. To read about our protections for children who are under the age of 13, please [click here](#).

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