



THUMBSTOPPER LLC GLOBAL PRIVACY POLICY

Link to: [Privacy Notice for Californians](#)

Effective Date & Last Updated: May 11, 2020

Thumbstopper LLC and its affiliates (referred to herein as “Thumbstopper”, “we”, “our”, or “us”) recognizes the importance of protecting the personal information we may collect from visitors, users and any other individual or entity (“Users”, “you”, or “your”). This Privacy Policy applies to data collection and privacy practices of Thumbstopper and when we collect personal information through your use of the website, www.thumbstopper.com, and other Thumbstopper-related sites, software and applications accessible on or by any top-level Thumbstopper domain owned by us or which we control (each, a “Site” and collectively the “Sites”), through social media pages that we control or access on behalf of our customers, and through email messages that we may send to you (collectively, the “Services”). Please note that this Privacy Policy excludes services that state that they are offered under a different privacy policy.

Our Privacy Policy explains: (1) what information we collect; (2) why we collect it; (3) how we use that information; (4) how we may share it; and (5) the choices we offer, including how to access and delete information. Specifically, our Privacy Policy covers the following topics:

- When This Privacy Policy Applies
- Website Terms of Use
- Our Services
- Information We Collect
- Information Collected Related to California Residents
- How We Use Information We Collect
- Sale of Personal Information
- Our Legal Basis for Collecting Personal Data
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Please familiarize yourself with our privacy practices and let us know if you have any questions. By using the Sites, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Sites.

If you have any questions or comments about this Privacy Policy, please submit a request to privacy@thumbstopper.com.

When this Privacy Policy Applies

Our Privacy Policy applies to all of the Services offered by Thumbstopper, including its affiliates, to Users. Our Privacy Policy is intended to describe our data collection practices globally and applies unless there is a specific country privacy policy which applies to you. However, because the data protection and privacy laws in some jurisdictions where our Services are located may restrict our data collection and processing practices, our practices may be more restrictive subject to local laws.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our Sites or Services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Website Terms of Use

By accessing or using the Sites in any manner, you also agree to be bound by ThumbStopper's [User Agreement](#). Please read the User Agreement carefully. If you do not accept all of the terms and conditions contained in or incorporated by reference into the User Agreement, please do not use the Sites.

Our Services

ThumbStopper offers a suite of social media, classified marketing and other software applications and services. ThumbStopper software and services enable manufacturers and retailers to curate, modify and share content and also sell inventory across social and classified online channels. ThumbStopper focuses on minimal user interaction to complete these tasks of managing multiple content and inventory sources via multiple third-party marketplaces.

Information We Collect

We collect information, including personal information, to provide better Services to all our Users. We use the term "Personal Information" to refer to any information that identifies or can be used to identify you. Common examples of Personal Information include: full name, email address, information about your device, and certain metadata.

You may choose to provide us with Personal Information about yourself, including your name, email, and phone number, when you complete forms on our website, such as when you request information about our services. You may also provide us with Personal Information in the following ways:



- **Account Information.** You may provide us with information in connection with the creation and management of your account for the Services, such as a name, email address, and a password to create a ThumbStopper account.
- **Billing Information.** If you have purchased a paid version of the Services, or if you make another financial transaction using our Services, we will collect information about the purchase or transaction.
- **Other Information.** You may choose to provide us with information when you contact our customer support or report a problem or have a question about our services. You may also provide us with other personal information as part of your account profile, including your usernames and links to social media accounts. The Sites offer interactive and social features that permit you to submit content and communicate with other users. You may provide personal data to us when you post information in these interactive and social features. Please note that your postings in these areas of the Sites may be publicly accessible or accessible to other users.
- **Content.** The content which you upload, download, or view on our Services may, but does not necessarily, contain Personal Information. When we refer to “Content” in this notice, we mean the Personal Information that we process at your direction. In legal terms, we act as data processors for the Personal Information included in the Content.
- **Website Interaction.** We collect certain information automatically, such as your operating system version, device identifier, browser type, and internet service provider. When you use our Site, we automatically collect and store this information in service logs. This includes: details of how you used our Site; Internet protocol address; and cookies that uniquely identify your browser. We may also collect and process information about your actual location. The information we collect automatically is statistical data and may or may not include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties.

If you provide us or our service providers with any Personal Information relating to other individuals, you represent that you have the authority to do so and acknowledge that it will be used in accordance with this Privacy Policy. If you believe that your Personal Information has been provided to us improperly, or to otherwise exercise your rights relating to your Personal Information, please contact us by using the information set out in the “How to Contact Us” section below.



Information Collected

During the last twelve (12) months, we have collected the following categories of personal information from consumers.

Category	Type of Identifiers We Collect	Collected
Identifiers.	A name, postal address, telephone number, unique personal identifier, online identifier, Internet Protocol address, personal email address, business email address, account ID and password.	YES
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, postal address, telephone number, employment, employment history, credit card number, debit card number, or any other financial information.	YES
Protected classification characteristics under California or federal law.	Age, sex (including gender, gender identity, gender expression).	YES
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement, meta data used for matching, reward codes and tags, security codes for password resets.	YES
Geolocation Data	Physical location.	YES
Professional or employment-related information.	Current or past job history.	YES
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We obtain the categories of Personal Information listed above from the following categories of sources

- Directly from Users or their agents. For example, when a User voluntarily provides information when requesting additional information or completion of downloaded forms.
- Indirectly from our customers or their agents. For example, through information we collect from our clients in the course of providing Services to them.
- Directly and indirectly from activity on our website (www.thumbstopper.com). For example, from website usage details that are collected automatically. In addition, like many companies, we use “cookies” which are small text files a website can use to recognize repeat users, facilitate the user’s ongoing access to and use of the site and to track usage behavior. Examples include information about Users’ browsers, IP addresses, general location as determined from the Users’ IP address and provided by Users’ browser, the site which Users come from and the links followed when leaving our website.
- From social media websites, such as Facebook, LinkedIn, Instagram and Twitter.
- From third parties that assist us in providing certain transactions and services, even though it appears that you may not have left our Site.



How We Use Information We Collect

We use your Personal Information in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

- To present, operate or improve the Site and Services, including analysis of Site activity;
- To inform you about Services and products available from Thumbstopper or Thumbstopper;
- To authorize access to our Sites and Services;
- To validate your identity or verify communications from you;
- To provide, maintain, administer or expand the Services, performing business analyses, or for other internal purposes to support, improve or enhance our business, the Services, and other products and services we offer;
- To communicate about, and administer your participation in, special programs, surveys, contests, online campaigns, online programs, sweepstakes, and other offers or promotions, and to deliver pertinent emails;
- To send you confirmations, updates, security alerts, and support and administrative messages and otherwise facilitate your use of, and our administration and operation of, the Services;
- For marketing purposes, including but not limited to, facilitating interest-based advertising, creating custom audiences to target online and mobile advertising, sending integrated marketing messages across channels and devices, personalizing email marketing that we send to you, sending you other promotional materials, and notifying you about special promotions, offers, events or opportunities that may be of interest to you;
- To improve our customer service, conduct customer satisfaction, market research, and quality assurance reviews;
- To respond to and support users regarding their use of the Sites and Services;
- To administer general recordkeeping;
- To verify your transactions, for purchase confirmation, billing, security and authentication (including security tokens for communication with installed Third-Party Apps);
- To comply with all applicable legal requirements;
- To investigate possible fraud or other violations of our [User Agreement](#) or this Privacy Policy and/or attempts to harm our visitors.
- For any other purpose that is disclosed to you at the point of collection of the personal information, for any purpose for which you provide your prior consent, or for any other lawful purpose.

Our service providers and we may use IP addresses to understand the locations from which our Users and visitors are accessing the Services. Except where prohibited by applicable law or regulation, we may combine information collected through one source with information obtained through other resources. We also may supplement the information we collect with information obtained from third parties. We will treat any information that we combine with your personal information as Personal Information pursuant to this Privacy Policy.

We may use your Personal Information in furtherance of our legitimate interest to provide you with the Services offered by Thumbstopper. We may also use your information to manage our contractual relationship with you or to comply with our legal obligations.

To the extent we rely on consent for the processing of your Personal Information, we will seek such consent at the time we collect your personal data. We may also use the Personal Information we obtain about you in other ways for which we provide specific notice at the time of collection.



Sale of Personal Information

In the preceding twelve (12) months, we have not sold any Personal Information.

Our Legal Basis for Collecting Personal Data

Whenever we collect Personal Data from you, we may do so on the following legal bases:

1. Your consent to such collection and use;
2. Out of necessity for the performance of an agreement between us and you, such as your agreement to use our Services or your request for Services;
3. Our legitimate business interest, including but not limited to the following circumstances where collecting or using Personal Information is necessary for:
 - Intra-organization transfers for administrative purposes;
 - Product development and enhancement, where the processing enables Thumbstopper to enhance, modify, personalize, or otherwise improve our Services and communications for the benefit of Users and our visitors, and to better understand how people interact with our Sites;
 - Fraud detection and prevention;
 - Enhancement of our cybersecurity, including improving the security of our network and information systems; and
 - General business operations and diligence;

Provided that, in each circumstance, we will weigh the necessity of our processing for the purpose against your privacy and confidentiality interests, including taking into account your reasonable expectations, the impact of processing, and any safeguards which are or could be put in place. In all circumstances, we will limit such processing for our legitimate business interest to what is necessary for its purposes.

Cookies and Similar Technologies

We and our partners use various technologies to collect and store information when you visit one of our Sites or Services, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with services from our partners, such as advertising services. Our third-party advertising and analytics partners include Google Analytics, Salesforce, and similar partners.

The technologies we use for this automatic data collection may include:

Cookies. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our services. For more information about our use of cookies, including details on how to opt-out of certain cookies, please see our [Cookie Policy](#).

Web Beacons. Pages of our services or our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count Users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).



Clickstream Data. Clickstream data is information collected by our computers when you request Web pages from the Sites. Clickstream data may include information such as the page served, the time spent viewing the page, source of the request, type of browser making the request, the preceding page viewed and similar information. Clickstream data permits us to analyze how visitors arrive at the Sites, what type of content is popular, what type of visitors in the aggregate are interested in particular kinds of content on the Sites.

Your Failure to Provide Personal Information

Your provision of Personal Information is required in order to use certain Services and programs. In some instances, if you fail to provide such Personal Information, you may not be able to access and use our Services, or parts of our Services.

Our Retention of Your Personal Information

We use and retain your Personal Information for as long as necessary to fulfill the purpose for which it is being processed, to carry out legitimate business interests, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation).

Sharing Personal Information

Thumbstopper may disclose your Personal Information to commercial providers for a business purpose, which include verifying your identity when making a payment or registering access to your account. When we disclose Personal Information for these reasons, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except for the purposes set forth in the contract.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for one or more business purposes:

- Identifiers;
- California Customer Records Personal Information categories;
- Protected classification characteristics under California or federal law;
- Commercial information;
- Internet or other network activity information;
- Inferences drawn from other personal information.



We disclose your Personal Information for a business purpose to the following categories of third parties:

- Our affiliates;
- Commercial providers;
- Service providers and other third parties we use to support our business, including without limitation those performing core services (such as billing, credit card processing, customer support services, customer relationship management, accounting, auditing, administering sweepstakes, surveys, advertising and marketing, analytics, email and mailing services, data storage, and security) related to the operation of our business and/or the Services, and making certain functionalities available to our users;
- Enterprise accounts, such as your retail business customers;
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with the services we provide to you.

We may disclose your Personal Information for legal reasons. Specifically, we will share Personal Information with companies, organizations or individuals outside of Thumbstopper if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Fulfill any purpose for which you provide it;
- Meet any applicable law, regulation, legal process or enforceable governmental request;
- Enforce applicable Terms of Use, including investigation of potential violations;
- Detect, prevent, or otherwise address fraud, security or technical issues;
- Protect against harm to the rights, property, assets or safety of Thumbstopper, our Users or the public, content found on the Services, or to protect the Services from unauthorized use or misuse, as required or permitted by law;
- Facilitate a business transfer, such as to a buyer or other successor in the event of merger, acquisition, consolidation, divestiture, change in control, dissolution or other sale or transfer of some or all of Thumbstopper' assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by Thumbstopper about its visitors and users will be among the assets to be transferred, and any such successor may use your information for the same purposes set forth in the Privacy Policy.
- For any other purpose disclosed when you provide the information; and,
- When we obtain your consent to do so.

We attempt to notify you about legal demands for your Personal Information when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

International Transfer

We are committed to complying with applicable laws, regulations and mandatory government standards regarding the protection of Personal Information. Countries where we process data may have laws which are different, and potentially not as protective, as the laws of your own country. If we transfer your Personal Information out of your jurisdiction, we will implement suitable safeguards and rely on legally-provided mechanisms to lawfully transfer data across borders to ensure that your Personal Information is protected.



Your Privacy Choices

You may have certain rights relating to your Personal Information, subject to local data protection law. Whenever you choose to visit our Site or use our Services, we aim to provide you with choices about how we use your Personal Information. Subject to applicable law, you may obtain a copy of Personal Information we maintain about you. In addition, if you believe that Personal Information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the “How to Contact Us” section below. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information.

Privacy Rights Specific to California Residents

Under the California Consumer Privacy Act, California residents have specific rights regarding their personal information. This section describes Californians’ rights and explains how California residents can exercise those rights.

Below we further outline specific rights which California residents may have under the California Consumer Privacy Act.

- **Right to Access Your Data.** You have the right to request that we disclose certain information to you about our collection, use and disclosure of your Personal Information over the past twelve (12) months. Any disclosures we provide will only cover the 12-month period preceding the receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.
- **Right to Data Portability.** You have the right to a “portable” copy of your Personal Information that you have submitted to us. Generally, this means you have a right to request that we move, copy or transmit your Personal Information stored on our servers or information technology environment to another service provider’s servers or information technology environment.
- **Right to Delete Your Data.** You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.
- **Right to Non-Discrimination for the Exercise of Your Privacy Rights.** You have the right not to receive discriminatory treatment by us for exercising your privacy rights conferred by the California Consumer Privacy Act.

Exercising Your Rights

If you are a California resident who chooses to exercise your rights, you can:

1. Submit a request via email to privacy@thumbstopper.com, or
2. Call 866-760-9418 (toll-free) to submit your request.

You may also designate an agent to exercise your privacy rights on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester’s valid government-issued identification, and the authorized agent’s valid government issued identification.



Our Response to Your Request

Upon receiving your request, we will confirm receipt of your request by sending you an email within 10 days of receipt. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. In some instances, such as a request to delete personal information, we may first separately confirm that you would like for us to in fact delete your personal information before acting on your request.

We will respond to your request within forty-five (45) days. If we require more time, we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

In some cases our ability to uphold these rights for you may depend upon our obligations to process Personal Information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, listed below, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Debug products to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*);
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
8. Comply with a legal obligation; or
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Privacy Rights Specific to European Union Residents

The European Union's General Data Protection Regulation ("GDPR"), and corresponding legislation in the United Kingdom and Switzerland, provide European, Switzerland and United Kingdom residents with certain rights in connection with Personal Information you have shared with us. If you are resident in the European Economic Area, you may have the following rights:



- **The right to be informed.** You are entitled to be informed of the use of your Personal Information. This Privacy Policy provides such information to you.
- **The right of access.** You have the right to request a copy of your Personal Information which we hold about you.
- **The right of correction.** You have the right to request correction or changes of your Personal Information if it is found to be inaccurate or out of date.
- **The right to withdraw consent.** You have the right to withdraw a previously given consent for processing your Personal Information for a specific purpose.
- **The right to be forgotten.** You have the right to request us, at any time, to delete your Personal Information from our servers and to erase your Personal Information when it is no longer necessary for us to retain such data. Note, however, that deletion of your Personal Information will likely impact your ability to use our services.
- **The right to object (opt-out).** You have the right to opt-out of certain uses of your Personal Information, such as direct marketing, at any time.
- **The right to data portability.** You have the right to a “portable” copy of your Personal Information that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your Personal Information stored on our servers or information technology environment to another service provider’s servers or information technology environment.
- **The right to refuse to be subjected to automated decision making, including profiling.** You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
- **The right to lodge a complaint with a supervisory authority.** You have the right to lodge complaints about our data processing activities by filing a complaint with us or with the relevant Supervisory Authority. A list of Supervisory Authorities is available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

You may exercise any of the rights described in this section by sending an email to privacy@thumbstopper.com. Please note that we may ask you to verify your identity and request before taking further action on your request. We may respond to your request by letter, email, telephone or any other suitable method.

Your Marketing Choices

You may have certain choices when it comes to how we use your data and we want to provide you with information to make the choices that are right for you.

- **Interest-Based Ads and Other Online Advertising.** Visit <http://www.networkadvertising.org> or <http://www.aboutads.info> to learn more about your options for opting out of interest-based advertising. For more information on various opt-out options, visit the “Interest-Based Advertising” section above. We do not guarantee that all of the third parties we work with will honor the elections you make using those options. Please also keep in mind that even if you opt-out of receiving ads tailored to your apparent interests, you will continue to see online ads, but the ads that you see therefore may be less relevant to your interests.
- **Mobile Devices.** Your mobile device may offer settings relating to cookies, pixel tags, Flash cookies, and other similar technologies. We encourage you to visit your device’s help menu to learn about your options to limit tracking when using your device.



- **Social Media Platforms and Networks.** We encourage you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about sharing information from those platforms and networks with us.
- **Email Marketing.** You can opt-out of receiving marketing emails from us by sending us an email stating your request to privacy@thumbstopper.com. If we or one of our service providers acting on our behalf have sent you a promotional email, you may use the “unsubscribe” link or send us a return email asking to be omitted from future email distributions. Please keep in mind that opting out of marketing emails may impact our ability to allow you access to certain offers, benefits and features. Please also note that even if you opt out of receiving certain marketing emails, that opt-out may not apply to other transactional or legal communications that you may continue to receive from us, such as customer service messages, messages about your account or transactions with us, notices about our policies and terms, and emails responding to your communications with us or requests for information that we receive from you.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service related notices.

Links to Other Websites

The Sites may contain links to webpages operated by parties other than Thumbstopper. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the User to take precautions to ensure that whatever links the User selects or software the User downloads (whether from this Site or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which the User will be subject to upon linking to the third party’s website. Thumbstopper strongly recommends that each User review the third party’s terms and policies.

If you have any questions about the privacy practices of other websites, you should contact the relevant parties controlling these websites for more information.

How We Protect Personal Information

Thumbstopper maintains administrative, technical and physical safeguards designed to protect the user's Personal Information and other information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. For example, we and/or our service providers use commercially reasonable security measures such as encryption, firewalls, and Secure Socket Layer software (SSL) or hypertext transfer protocol secure (HTTPS) to protect Personal Information.

Although we take reasonable steps designed to protect your Personal Information, please be advised that no security system or means of transmitting data over the Internet can be guaranteed to be entirely secure (including without limitation with respect to computer viruses, malicious software and hacker attacks). We cannot and do not guarantee or warrant the security of your Personal Information or any information you disclose or transmit to us. We are not responsible for the acts of those who gain unauthorized access, and we make no warranty, express, implied or otherwise, that we will prevent such access, and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted



by law. Where required under law, we will notify you of any such loss, misuse or alteration of Personal Information that may affect you so that you can take the appropriate actions.

For your own privacy protection, we urge you to keep all passwords confidential. We also recommend that you do not include sensitive information such as passwords, social security numbers or payment information, in any emails that you send to us. If you become aware of any breach of the terms of this Privacy Policy or of the security of the Services, please notify us by email at privacy@thumbstopper.com.

Children's Privacy

The Sites and Services are not designed or intended to be used by anyone under the age of 16. If you are under the age of 16 (or a minor in the jurisdiction in which you are accessing our Sites or Services), do not use the Services, or make purchases via the Services, use any interactive features of the Services, or post any Personal Information to our Sites or submit any Personal Information via the Services. We do not knowingly or intentionally gather Personal information about children who are under the age of 16. If a child has provided us with Personal Information, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 16 in the applicable jurisdiction, please contact us privacy@thumbstopper.com. If we learn that we have inadvertently collected the Personal Information of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible and cease the use of that information in accordance with applicable law.

Direct Marketing and "Do Not Track" Signals

Thumbstopper does not track its users over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may include controls to block and delete cookies, web beacons and similar technologies, to allow you to opt out of data collection through those technologies.

California residents are entitled to contact us to request information about whether we have disclosed Personal Information to third parties for the third parties' direct marketing purposes. Under the California "Shine the Light" law, California residents may opt-out of our disclosure of Personal Information to third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your Personal Information with third parties for marketing purposes. To make such a request you should send (a) an email to privacy@thumbstopper.com with the subject heading "California Privacy Rights," or (b) a letter addressed to Thumbstopper LLC, Attention: 3415 E. Frontage Road, Suite B, Tampa, Florida, U.S.A., 33607. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.



Privacy Policy Modifications

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services or programs, email notification or privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

How to Contact Us

If you have any questions, comments or concerns about this Privacy Policy, or if you would like to exercise the choices discussed above, please contact us:

Via e-mail: privacy@thumbstopper.com

By writing to us:

Thumbstopper LLC
Attn: Privacy Policy Inquiry
3415 E. Frontage Road
Suite B
Tampa, Florida 33607
U.S.A.