

## **PRIVACY STATEMENT**

Welcome to the BumbleBee Kids Video Streaming and App Service (“BumbleBee Kids” and/or “BumbleBee Kids Service”). The BumbleBee Kids Video Streaming and App Service is owned or licensed and operated and distributed by Rhetor, Ilc. (dba BumbleBee Kids).

The multimedia content provided for your child through our subscription service is available via a number of internet connected and smart devices including but not limited to Apps, smartphones, TVs, streaming devices, computers and tablets.

The following [PRIVACY STATEMENT](#) details and explains our methods and practices, including choices that are available to you, the user, regarding the use, collection, and disclosure of certain information, including your personal information, by Rhetor, Ilc...

### **HOW TO CONTACT US**

If you have questions about your account or how to contact Customer Service for assistance, please visit our online help center at [BumbleBeeKids.com/help](https://BumbleBeeKids.com/help) .

Your Rhetor, Ilc. service provider and data controller may depend on your country of membership, and will be listed in your membership or payment confirmation email. For questions specifically about this Privacy Statement, or our use of your personal information, cookies or similar technologies, please contact us by email at [CustomerService@BumbleBeeKids.com](mailto:CustomerService@BumbleBeeKids.com)

The data controller of your personal information is Rhetor, Ilc., which also provides this service to you. Please note that if you contact us for assistance, for your protection and ours we may need to confirm your identity before fulfilling your request.

### **HOW WE COLLECT INFORMATION**

We receive and store information about you such as:

- Information you provide to us when subscribing or enrolling for a free trial: This information may include any or all of the following: your name, email address, address, postal code, payment method, telephone number, and age and gender of your child or children. This information is collected in a number of ways, including when you enter it while using our service, interact with our employees or agents, or participate in surveys or marketing promotions;
- information, when you choose to provide feedback or reviews, video and app preferences, account settings, set preferences on the “My Account” page ([bumblebeekids.com/MyAccount](https://bumblebeekids.com/MyAccount)) , or otherwise provide information to us through our service or elsewhere.
- Information we collect automatically: We collect information about you and your use of our service, your interactions with us and our with our advertising, as well as information regarding your computer, TV, smartphone or other device used to access our service (such as gaming systems, smart TVs, tablets etc.). This information includes: your activity on our streaming and interactive app platforms, such as title selections, and viewing and search histories; details of your interactions with our Customer Service, such as the date, time and reasons for contacting us, transcripts of any chat conversations, and if you call us, your phone number and call recordings;
- device IDs or other unique identifiers, device and software characteristics (such as type and configuration), connection information, statistics on page views, referral

URLs, IP address (which may tell us your general location), browser and standard web server log information;

- information collected via the use of web beacons, cookies, and other technologies, including ad data (such as information on the availability and delivery of ads, the site URL, as well as the date and time).
- Information from other sources: We may from time to time supplement the information described above with information we obtain from other sources, including information from 3rd party data providers. Such supplemental information could include demographic data, interest based data, and Internet browsing behavior.

#### **PLEASE NOTE:**

IF YOU ARE UNDER THE AGE OF 18, YOU MUST HAVE A PARENT OR GUARDIAN OPEN A BUMBLEBEE KIDS VIDEO STREAMING AND APP SERVICE ACCOUNT AND/OR SUBSCRIBE. If you are at least 18 years of age, and you are the parent or legal guardian of one or more children seeking to subscribe to the BumbleBee Kids, you may register an account for your own children, or for children for whom you are a legal guardian.

IF YOU ARE BELOW THE AGE OF 18, YOU MUST HAVE YOUR PARENT OR GUARDIAN COMPLETE ALL BUMBLEBEE KIDS ACCOUNT OPENING AND SUBSCRIPTION PROCESSES FOR YOU. YOU MAY NOT SUBSCRIBE OR PROVIDE ANY PERSONAL INFORMATION. **WE DO NOT PERMIT PERSONAL OR SUBSCRIPTION INFORMATION TO BE COLLECTED FROM ANY CHILD UNDER 13 YEARS OF AGE.**

#### **HOW WE USE INFORMATION**

We use the collected information to provide, analyze, administer, enhance and personalize our services and advertising, to process your subscription, your orders and your payments, and to communicate with you on these and other related topics.

For example, we use this information to:

- Help us quickly and efficiently respond to your inquiries and requests.
- Provide you with customized viewing recommendations and personalized experiences on our services.
- Better understand our subscription / user base, improve our service, and optimize content selection, recommendation algorithms and delivery.
- Determine your general or specific geographic location and determine your Internet service provider,
- Detect, prevent and investigate potentially prohibited or illegal activities, including fraud, and enforcing our terms.
- communicate with you regarding our services (for example by email, push notifications text messaging, and online messaging channels), so that we can send you news about BumbleBee Kids and our services, including details about new features and content available through us including extending special offers, or sending promotional announcements and surveys
- Help you with technical or operational requests such as password reset requests or app installation assistance.

Please see the "**YOUR COMMUNICATIONS CHOICES**" section of this Privacy Statement to learn how to set or change your communication preferences.

## **WAYS IN WHICH WE DISCLOSE YOUR INFORMATION**

We disclose your information for certain purposes and to third parties, as described below:

- To Rhetor, llc. business partners and independent contractors: We share your information with select companies and independent contractors for the purposes of data processing and storage; for designing, improving and maintaining our offered services; for content development; and for the purposes described above in the **“HOW WE USE INFORMATION”** section of this **PRIVACY STATEMENT**
- To Service Providers: We use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with the provision of services to you. For example, we engage Service Providers to provide marketing, advertising, communications, infrastructure and IT services, to personalize and optimize our service, to process credit card transactions or other payment methods, to provide customer service, to collect debts, to analyze and enhance data (including data about users' interactions with our service), and to process and administer consumer surveys. In the course of providing such services, these Service Providers may have access to your personal or other information. We do not authorize them to use or disclose your personal information except in connection with providing their services.
- For Promotional offers: We may offer joint promotions or programs that, will require us to share your information with third parties in order for you to participate. In fulfilling these types of promotions, we may share your name and other information in connection with fulfilling the incentive. Be advised that these third parties are responsible for their own privacy practices.
- For the protection of Rhetor, llc. and others: Rhetor, llc. and its Service Providers may disclose and otherwise use your personal and other information where we or they reasonably believe such disclosure is needed to (a) satisfy any applicable law, regulation, legal process, or governmental request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues, or (d) protect against harm to the rights, property or safety of Rhetor, llc., its users or the public, as required or permitted by law.
- Business or asset transfers: In connection with any future reorganization, restructuring, merger or sale, or other transfer of assets or business interests, we will transfer information, including personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy Statement.

Whenever in the course of sharing information we transfer personal information to countries outside of the European Economic Area and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Privacy Statement and as permitted by the applicable laws on data protection.

## **WAYS IN WHICH YOU MAY DISCLOSE YOUR OWN PERSONAL INFORMATION WHILE USING OUR SERVICE**

While using our service you may choose to disclose your personal information in the following ways:

- While using the BumbleBee Kids Service you may have opportunities to post reviews or other information publicly, and third parties could use the information you disclose;

- Certain portions of our service may contain tools which give you the option to share information by email, text message and social or other sharing applications, using the clients and applications on your device;
- Social plugins (including those offered by Facebook, Twitter, Instagram, Pinterest, and Google) allow you to share information on their platforms. Social plugins and social applications are operated by the social network themselves, and are subject to their own terms of use and privacy policies.

### **ACCESS TO YOUR ACCOUNT AND PROFILES**

In order to provide you with ease of access to your account and to help administer the BumbleBee Kids Service, we use technology that enables us to recognize you as the account holder and provide you with direct access to your account without requiring you to retype any password or other user identification when you revisit the BumbleBee Kids Service on your computer or laptop. You can choose not to take advantage of this feature on your computer by unchecking the box "Remember me on this device" when you log in to the website.

### **SECURITY OF YOUR DEVICES AND REMOVING YOUR ACCOUNT INFORMATION FROM DEVICES**

To remove access to your BumbleBee Kids account from your devices: (a) visit "Your Account", choose "Sign out of all devices," and follow the instructions to deactivate your devices (note, deactivation may not occur immediately) or (b) delete your BumbleBee Kids settings from your device if your device offers this feature (not all do). Where possible, users of public or shared devices should log out at the completion of each visit. If you sell or return a computer, tablet, phone or other device, you should log out and deactivate the device before doing so. If you do not maintain the security of your password or device, or fail to log out or deactivate your device, subsequent users may be able to access your account, including personal information contained in your account

### **SHARING LOGIN AND / OR PASSWORD INFORMATION**

If you share or otherwise allow others to have access to your account, they will be able to see your information (including in some cases personal information) such as your viewing history, ratings, reviews and account information (including your email address or other information in Your Account).

### **YOUR COMMUNICATIONS CHOICES**

If you no longer want to receive certain communications from us via email, simply click the "unsubscribe" link in an email. PLEASE NOTE THAT YOU CANNOT UNSUBSCRIBE FROM CERTAIN EMAIL CORRESPONDENCE FROM US, SUCH AS MESSAGES RELATING TO YOUR ACCOUNT TRANSACTIONS.

### **YOUR INFORMATION AND RIGHTS**

You can request access to your personal information, or correct or update out-of-date or inaccurate personal information we hold about you.

You can most easily do this by visiting the "Your Account" portion of our website, where you have the ability to access and update a broad range of information about your account, including your contact information, your BumbleBee Kids payment information, and various related information about your account (such as the content you have viewed and rated, and your reviews). You must be signed in to access "Your Account." You may also request that we delete personal information that we hold about you.

To make requests, or if you have any other question regarding our privacy practices, please contact us at [CustomerService@BumbleBeeKids.com](mailto:CustomerService@BumbleBeeKids.com). Please also see the Your Choices section of this Privacy Statement for additional choices regarding your information.

We may reject requests that are unreasonable or not required by law, including those that would be extremely impractical, could require disproportionate technical effort, or could expose us to operational risks such as free trial fraud. We may retain information as required or permitted by applicable laws and regulations, including to honor your choices, for our billing or records purposes and to fulfill the purposes described in this Privacy Statement.

## **SECURITY**

We use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized access, use and modification. Unfortunately, no measures can be guaranteed to provide 100% security. Accordingly, we cannot guarantee the security of your information.

## **OTHER WEBSITES, PLATFORMS AND APPLICATIONS**

The BumbleBee Kids Video Streaming and App Service may be provided through and/or utilize features (such as voice controls) operated by third party platforms, or contain links to sites operated by third parties whose policies regarding the handling of information may differ from ours. For example, you may be able to access the BumbleBee Kids Service through platforms such as gaming systems, smart TVs, mobile devices, set top boxes and a number of other Internet connected devices. These websites and platforms have separate and independent privacy or data policies, privacy statements, notices and terms of use, which we recommend you read carefully. In addition, you may encounter third party applications that interact with the BumbleBee Kids Service.

## **YOU MUST BE 18 YEARS OF AGE OR OLDER TO SUBSCRIBE**

You must be 18 years of age or older to subscribe to the BumbleBee Kids Video Streaming and App Service. In certain jurisdictions, the age of majority may be older than 18, in which case, you must satisfy that age requirement in order to subscribe. While individuals under the age of 18 may utilize the service, they may do so only with the involvement, supervision, and approval of a parent or legal guardian.

## **CHANGES TO THIS PRIVACY STATEMENT**

We will update this Privacy Statement from time to time in response to changing legal, regulatory or operational requirements. We will provide notice of any such changes (including when they will take effect) in accordance with law. Your continued use of the BumbleBee Kids Video Streaming and App Service after any such updates take effect will constitute acceptance of those changes. If you do not accept any updates to this Privacy

Statement, you may cancel your use of the BumbleBee Kids Service. To see when this Privacy Statement was last updated, please see the "Last Updated" section below.

## **COOKIES AND INTERNET ADVERTISING**

We and our Service Providers use cookies and other technologies for various purposes. For example, we use cookies and other technologies to make it easy to access our services by remembering you when you return, to provide and analyze our services, to learn more about our users and their likely interests, and to deliver and tailor marketing or advertising. We want you to be informed about our use of these technologies, so this notice explains the types of technologies we use, what they do and your choices regarding their use.

1. **What are cookies?** Cookies are small data files that are commonly stored on your device when you browse and use websites and online services. They are widely used to make websites work, or to work more efficiently, as well as to provide reporting information and assist with service or advertising personalization.□ Cookies are not the only technology that enables this functionality; we may also use other, similar types of technologies. See below for more information and examples.□

2. **Why are cookies used?** We and our Service Providers may use the following types of cookies:

- **Essential cookies:** These cookies are strictly necessary to provide our website or online service. For example, we or our Service Providers may use these cookies to authenticate and identify our members when they use our websites and applications so we can provide our service to them. They also help us to enforce our Terms of Use, prevent fraud and maintain the security of our service.
- **Performance and functionality cookies:** These cookies are not essential, but help us to personalize and enhance your online experience with BumbleBee Kids. For example, they help us to remember your preferences and prevent you from needing to re-enter information you previously provided (for example, during member sign up). We also use these cookies to collect information (such as popular pages, conversion rates, viewing patterns, click-through and other information) about our visitors' use of the BumbleBee Kids Service so that we can enhance and personalize our website and service and conduct market research. Deletion of these types of cookies will result in limited or sub-optimal functionality of the BumbleBee Kids Service.
- **Advertising cookies:** These cookies use information about your visit to this and other websites, such as the pages you visit, your use of our service or your response to ads and emails, to deliver ads that are more relevant to you. These types of ads are called "Interest-Based Advertising." Many of the advertising cookies associated with our service belong to our Service Providers.

3. **Do Not Track.** At this time, we do not respond to Web browser "do not track" signals.□

4. **How Does Rhetor, llc. use Web Beacons and other Technologies?** Web beacons (also known as clear gifs or pixel tags) often work in conjunction with cookies. We and our Service Providers may use them for similar purposes as cookies, such as to understand and enhance the use of our service, improve site performance, monitor visitor

traffic and actions on our site, and understand interactions with our marketing (including email and online ads on third party sites). Because web beacons often work in conjunction with cookies, in many cases, declining cookies will impair the effectiveness of web beacons.□ We use other technologies that are similar to cookies. Like cookies, some of these technologies may store small amounts of data on your device. We may use these and various other technologies for similar purposes as cookies, such as to enforce our terms, prevent fraud, and analyze the use of our service. There are a number of ways to exercise choice regarding these technologies. For example, many popular browsers provide the ability to clear browser storage, commonly in the settings or preferences area; see your browser's help function or support area to learn more. Other technologies, such as Silverlight storage, may be cleared from within the application.□

To see the prior version of this document, please go to [BumbleBeeKids.com/legal](https://BumbleBeeKids.com/legal)