

## Privacy Policy:

### ***POLICY LAST REVISED: April 28, 2008***

This Privacy Policy shall apply to all websites owned and/or operated by Los Angeles Academy of Figurative Art Inc. hereafter referred to as "LAAFA", including without limitation the website on which this Privacy Policy has been posted and LAAFA's parents, subsidiary and/or affiliate entities whether or not referred to directly as LAAFA or LAAFA INC. Your privacy and security are important to us. Because we gather certain types of information about LAAFA's users, we feel you should fully understand the terms and conditions surrounding the capture and use of that information. This privacy statement discloses what information we gather and how we use it and applies to your use of any of the LAAFA websites. Questions regarding this statement should be directed to [accounting@laafa.org](mailto:accounting@laafa.org) or by contacting us at the address or phone number stated in the last section of this policy. Note: LAAFA's websites are intended for a general audience and are not specifically directed to children. LAAFA will only collect information from children under the age of 13 as described in sections 7 and 8 herein. LAAFA may update this policy at any time in its sole discretion. LAAFA will attempt to notify you of any changes by contacting you through any email address you have provided, or by placing a notice on our site indicating the new revision date.

### **1. Capture and Use of Information.**

#### *Registration*

If you participate in interactive activities (event registration, message boards, membership program, etc.) on any LAAFA site, you may be asked to register for a free Username or ID and password and/or to provide certain personally identifying information including, but not limited to your name, address, phone number, email address and birth date, gender, ZIP code, occupation, industry, and personal interests, on event or class registration forms. Unique identifiers, such as IDs and passwords, are collected to verify your identity and for use as account numbers in our system. Your contact information may also be used for a variety of purposes including contacting you when necessary for customer service reasons. Financial information that is collected is used to bill you for products and services that you specifically request. Registration on any single LAAFA website will not necessarily permit your registration and access to all LAAFA websites and you may be required to register more than once for access to multiple LAAFA websites. However, because some or all of the LAAFA websites are interrelated, some or all of your personal information may be transferred or shared among these sites. LAAFA may also combine information about you that we have with information we obtain from business partners or other companies. LAAFA also collects information about your transactions with us and with some of our business partners, including information about your use of financial products and services that may be offered. LAAFA receives and records information on our server logs from your browser, including your IP address, LAAFA cookies information, and the page you request. LAAFA uses information for the following general purposes: to customize the advertising and content you see, fulfill your requests for products and services, improve our services, contact you, conduct research, and provide anonymous reporting for internal and external clients.

Your use of the LAAFA websites is conditioned on your provision of requested information in an accurate and truthful fashion. Failure to provide accurate and truthful information as requested will affect your ability to access the LAAFA websites. Registration information for cancelled or terminated accounts may be deleted from LAAFA's databases. Although LAAFA uses commercially reasonable efforts to safeguard your private registration information, transmissions made by means of the Internet cannot be guaranteed secure in all instances. LAAFA accepts no liability for disclosure of registration information caused by transmission errors or the acts or omissions of third parties.

#### *Cookies*

"Cookies" are small pieces of information that are stored by your browser on your computer's hard drive. Our cookies do not contain any personally identifying information; we use them for a variety of purposes including to provide features such as personalization, to saving your member ID and to keep track of your shopping cart. We may also use cookies to assist us in delivering content specific to your interests. Additionally, after you've entered your member ID and password during a session on our service, we save that information so you don't have to re-enter it repeatedly during that session. Most Web browsers automatically accept cookies, but you can usually change your browser to prevent that. Not accepting cookies may make certain features of LAAFA unavailable to you.

#### *IP Address*

We may use your IP address to identify you and your shopping cart, to administer our website and to assist in diagnosing problems with our server.

### **2. Additional Uses of Information**

All of the information we collect, both what you tell us and what we collect through the use of cookies, is used for a variety of reasons including to personalize your account, to customize our services and to allow our customer service representatives to contact you when necessary. LAAFA may use information collected from you to tell you about products or services that may be of interest to you. Except as otherwise expressly set forth in this privacy policy, it is LAAFA's policy not to distribute to third parties any personally identifying information about you without your consent (usually communicated through either an "opt-out" or "opt-in" notification or mechanism). Upon obtaining your consent, LAAFA may provide access to or otherwise disclose your personally identifying information to third parties.

However, certain personally identifying information is released by LAAFA only on an aggregated basis (meaning that the information from many LAAFA users is grouped together in a way that does not disclose the personal information of any particular user). Such information is disclosed by LAAFA without your consent. In other cases, LAAFA may, without your consent, also use contact information that you provide to send you information about our company, products, services and promotional material from some of our partners.

#### *2.a. for Users Accessing LAAFA within a Frame*

LAAFA has partnered with various web sites ("Framing Sites"), allowing users of those Framing Sites to register for events and to otherwise use the LAAFA services within a frame and without leaving the Framing Site. In some cases, LAAFA has agreed to provide to the Framing Site personal information collected from people who make use of the LAAFA services from the Framing Site (that is, within a frame and without leaving the Framing Site). In these cases, please be aware that the Framing Site operates independently from, and may have privacy and security policies wholly different from, LAAFA. If you wish to make use of the LAAFA services, but do not wish to have your information shared with third parties, please access our services directly, and not from a Framing Site.

#### *2.b. for Users Accessing LAAFA for Classes or Events with Event Directors*

In some cases, an event on LAAFA involves an Event Provider (EP). An EP is a third party that may coordinate, facilitate, or sponsor an event. In these cases, LAAFA has agreed to provide to the EP personal information collected from people who register for an event that has been entered by such EP. Each EP operates independently from, and may have privacy and security policies entirely different from, LAAFA. Prior to registering for an event sponsored by an EP, LAAFA encourages you to contact the EP and review the EP's privacy and security practices. LAAFA bears no responsibility for the activities of any EP to whom LAAFA may provide information.

#### *2.c. for Fulfillment Partners*

In some cases, a third party with whom we have contracted may need to coordinate, facilitate, or perform a service for us (e.g., fulfill orders or other similar activities). In these cases, LAAFA will provide personal information to the third party. Each such third party operates independently from, and may have privacy and security policies wholly different from, LAAFA. LAAFA bears no responsibility for the activities of any third party to whom LAAFA may provide fulfillment information.

#### *Legal Requirements*

Notwithstanding anything to the contrary, LAAFA may release your personal information to third parties: (a) in order to comply with a valid legal requirement such as in compliance with any law, regulation, search warrant subpoena or court order; or (b) in special cases, when we believe it is necessary to share information in order to investigate, prevent or take action regarding any illegal or unauthorized activities, suspected fraud, situations involving potential threats to the physical safety of any person or violations of our Terms of Use.

### **3. General Privacy Information.**

LAAFA makes various public forums (such as message boards, chat rooms or news groups) available to its users. When you disclose personal information in such public forums, that information can be collected and used by others in various ways, including by sending unsolicited messages. You are solely responsible for any postings you make on public forums on LAAFA, and for maintaining the secrecy of your passwords and/or any account information. Please be careful and responsible whenever you're online. Further, the LAAFA web site contains links to partners, advertisers and third party Internet sites and services that may collect data in connection with registrations, promotions, e-commerce, etc. LAAFA is also linked to by, and in some cases framed by, certain partner web sites. Each of the web sites (linked from LAAFA, or linking to LAAFA) have separate privacy and data collection practices, independent of LAAFA, and LAAFA has no responsibility or liability for these independent policies or actions and is not responsible for the privacy practices or the content of such Web sites. LAAFA also displays targeted advertisements based on personal information. Third party advertisers (including ad-serving companies) may assume that people who interact with, view, or click targeted ads meet the targeting criteria. However, LAAFA does not provide any personal information to the advertiser when you interact with or view a targeted advertisement. However, by interacting with or viewing an advertisement you are consenting to the possibility that the advertiser will make the assumption that you meet the targeting criteria used to display the advertisement. LAAFA does business with a multitude of vendors, partners, advertisers, and other service providers in different industries and categories of business. For more information regarding providers of products or services that you've requested please contact us via the link listed in the last section of this privacy agreement.

### **4. Security.**

LAAFA has established and maintains reasonable security procedures to protect the confidentiality, security and integrity of your personally identifiable information. We use a variety of industry-standard security measures to maintain the safety of your personal information. For example, credit card numbers are encrypted in LAAFA's secure database which is located behind a firewall. Personal information and such encrypted credit card numbers collected on LAAFA are stored in a secure operating environment that is not available to the public. All credit card and registration information supplied by users is transmitted via **Secure Socket Layer (SSL)** technology. LAAFA's technology department conducts frequent site-security audits. "Perfect security," however, does not exist on the Internet. Although your privacy is very important to us, due to the existing legal regulatory and security environment, we cannot fully ensure that your private communications and other personally identifiable information will not be disclosed to third parties. For example, LAAFA will disclose personal information about an individual user if we

believe in good faith that such disclosure is necessary to comply with an applicable law or valid legal process.

#### **5. Protecting Yourself.**

You can help to protect your information by safeguarding your LAAFA password, using caution and discretion when posting information on public areas of the LAAFA Web site, and by learning more about internet privacy from Web sites such as [www.ftc.gov/privacy/](http://www.ftc.gov/privacy/) and TRUSTe ([www.truste.com](http://www.truste.com)). In addition, it is important that you keep us updated with your most current contact information. To review and make changes to your profile, please visit the applicable LAAFA registration page.

#### **6. Changes To Our Policy.**

LAAFA reserves the right to modify or supplement this privacy policy at anytime. If we make any changes, we will update the LAAFA Websites and this privacy policy to include such change. Please regularly review this privacy policy to keep up to date with any changes that may affect your use of the LAAFA Websites. Your continue use of the LAAFA Websites once the revised privacy policy has been posted on the LAAFA Websites affirms your agreement to such changes.

#### **7. Parental Access.**

LAAFA is the operator its websites. Please send an email or letter to LAAFA at the email address provided below if you would like to do any of the following:

Access personally identifiable information that has been collected from you or your child;

Correct factual errors reflected by such information;

Request to have any information collected for you or your child deleted;

Request that we no longer collect or maintain such information from you or your child.

#### **8. Children's Privacy Policy.**

The following sets forth the website information gathering and dissemination practices relating to information collected from children under the age of thirteen (13). This policy only applies to the LAAFA Websites and does not apply to third party websites, or to companies and persons that are not controlled, affiliated with or managed directly by LAAFA.

LAAFA's Websites are intended for general use by a broad and mature audience. No individual under the age of thirteen (13) is permitted to provide any personal information (except such information as is necessary to determine age or parental consent, as described below) or use our message board or any other public forum without prior parental or legal guardian consent.

LAAFA does not knowingly solicit personal information from children under the age of thirteen (13) other than is necessary to determine that person's age. In order to determine a child's age, generally we limit our collection of information to what is known as non-personally identifiable information such as first name, screen name and age. Individuals identified as being thirteen (13) years of age or older are then permitted to use the LAAFA Websites. If an individual is identified as being under the age of thirteen, parental consent will be required to permit that child to register as a prerequisite to accessing LAAFA's non-public Websites. LAAFA will not contact children known to be under the age of thirteen (13) about any special offers or for marketing purposes without a parent or legal guardian's prior consent. For any child identified as being under the age of thirteen (13) that accesses any LAAFA Website, LAAFA may request additional personally identifiable information such as the child's email address and/or the parent's or guardian's email address in order to determine if such child has his/her parent's permission to access our Websites. LAAFA will use reasonable efforts to contact the parent or guardian of any child under the age of thirteen (13) to confirm their permission to the child's access to LAAFA's Websites. LAAFA may also collect and use a child's personal information for the sole purpose of responding to a single request or inquiry by that child. Information is collected actively, such as through registration forms, and passively, such as through cookies. All personally identifiable information collected by us from children under 13 is securely maintained and used only for the limited purposes set forth herein.

#### **9. Contact Us.**

If you have any questions, comment or concerns regarding our privacy policy and/or practices, please send an email to [contactus@laafa.org](mailto:contactus@laafa.org) or contact us at: Los Angeles Academy of Figurative Art, Attn: Administrative Director, 16926 Saticoy Street, Van Nuys, CA 91406. Phone: 1-818-708-9232. If addition, if at anytime, you no longer want us to send you any regular communications, which you have signed up to receive, you may "opt-out" of such future communications by changing your user registration profile on the LAAFA Websites. To unsubscribe from a newsletter you are already subscribed to and no longer wish to receive, simply click the "unsubscribe" link at the bottom of the newsletter