PRIVACY POLICY

Effective Date: October 11, 2012.

Overview

You should read this entire Privacy Policy, but here are some high points detailed below:

- We ask you for, and use technology to detect, information about you. Some of this information is shared with others.
- You consent to our practices detailed below. If you want to change your consent, terminate your account and stop using the Site(s).
- This Site is directed to parents and teachers of preschoolers, and our parent, teacher and product sections of the Site are particularly for adults and not for children. Accordingly, we may restrict certain activities to registered parents and teachers.
- Click <u>here</u> for an index of topics covered below. You may click on any topic to go to the details.

To view and print our entire Privacy Policy, click $\underline{\text{here}}$. To view and print our entire Privacy Policy, click $\underline{\text{here}}$. To view and print our entire Terms of Use, click $\underline{\text{here}}$. To receive copies of both documents by email, click $\underline{\text{here}}$.

Introduction

Welcome! You have arrived at a site that is owned and/or operated by Houghton Mifflin Harcourt Publishing Company (collectively, "HMH," "we," "our" or "us"). This "Privacy Policy" governs your use of our Curious George site available at www.curiousgeorge.com (including, without limitation, both mobile and online versions of our site), and also applies to your use of features, widgets, applications, content or downloads that we make available through the Curious George site and post this Privacy Policy (collectively, the "Site(s)") regardless of how you access or use them, whether via personal computers, mobile devices or otherwise but does not apply to data we receive from third parties unless we combine such data with Personal Information (defined below) that we have ourselves collected under this Privacy Policy. Our statements under this Privacy Policy only cover information collected at the Site(s) directly by us, and not by third parties that may interact with our Site(s).

This Privacy Policy does not apply to our data collection activities offline or otherwise outside of our Site(s) (unless otherwise stated below). To the extent we provide you notice on our Site(s) of different or additional privacy policies or practices (e.g., at the point of our collection), those additional terms shall govern such data collection and use. Due to the diverse nature of our businesses, companies within the Houghton Mifflin family of companies may have different privacy policies. In such cases, the privacy policy of the particular company will be posted, and will supersede the terms of this Privacy Policy in the event of a conflict.

In addition, please review the Site(s)' **Terms of Use**, which governs your use of the Site(s). By using our Site(s), you consent to our Privacy Policy and Terms of Use and our collection, use and sharing of your information and data, and other activities, as described below.

Linkable Table of Contents

It is important that you read and understand the entire Privacy Policy before using the Site(s). This table of contents highlights key issues and points and you can click on the headings or the "More" buttons to be taken to the full explanation.

1. What Information Do the Site(s) Collect?

(a)Information You Provide to Us

You may give us Personal Information and Demographic Information, such as when you register or contact us. **More**

(b) Information We Collect As You Access and Use the Site(s)

Tracking Technologies collect Usage Information based on your Device Identifier. More

2. How Do We Use the Information Collected?

We use your Personal Information, Demographic Information and Usage Information for a variety of purposes. <u>More</u>

3. How and When Do We Disclose Information to Third Parties?

We may provide your information to third parties under various circumstances. **More** These may include:

(a) When You Request Information From or Provide Information to Third Parties

If you request information from third parties, request that we send information to third parties or interact with third party sites, content, ads or tools (including Facebook and other third party share functionality) we may share your information with such parties and/or they may collect your information directly. **More**

(b) Third Parties Providing Services on Our Behalf

Our vendors may collect your information or we may share it with them. **More**

(c) Administrative and Legal Reasons

There are a variety of administrative and legal reasons for which we may share your information. **More**

(d) Affiliates and Business Transfer

We may share your information with our Affiliates or in the event of a sale, merger or similar transaction. **More**

(e) Sweepstakes, Contests and Promotions

Promotions entrants may be required to consent to certain information sharing. More

4. <u>Do Third Party Applications Appear on the Site(s)?</u>

We are not responsible for your interaction with third party applications. **More**

5. How Do I Change My Information and Communications Preferences?

You may change certain account information and preferences. **More**

6. What About Transfer of Information to the United States?

Data may be transferred to the United States. **More**

7. What Should Parents Know About Children?

This Site is for parents and teachers to use with and in connection with their preschoolers and as such is a general audience site. We do not intend to collect Personal Information from children, and make efforts to prevent such collection. If you think we have, let us know. **More**

8. What About Security?

No data security is absolute, but we take reasonable technical, physical and administrative steps to secure data appropriately. **More**

9. What About Changes to the Privacy Policy?

We may change this Privacy Policy as explained here.

10. Who Can I Contact?

You can contact us for more information about the manner in which we collect, use, disclose and otherwise manage your Personal Information. **More**

The Full Detailed Privacy Policy

1. What Information Do the Site(s) Collect?

(a) Information You Provide to Us

Personal Information and Demographic Information. On the Site(s), we may ask you to provide us with certain categories of information such as: (1) personally identifiable information, which is information that identifies you personally, such as your first and last name, email address, username and password ("**Personal Information**"); and (2) demographic information, such as your zip code ("**Demographic Information**"). We may collect this information through various forms and in various places on the Site(s), including account registration forms, contact us forms, or when you otherwise interact with the Site(s). If we combine Demographic Information with the Personal Information we collect directly from you on the Site(s), we will treat the combined data as Personal Information under this Privacy Policy.

(b) Information We Collect or Store As You Access and Use the Site(s)

In addition to any Personal Information or other information that you choose to submit to us via our Site(s), we and our third-party service providers may use a variety of technologies that automatically (or passively) store or collect certain information whenever you visit or interact with the Site(s) ("Usage Information"). This Usage Information may be stored or accessed using a variety of technologies that may be downloaded to your personal computer, laptop, tablet or mobile phone (a "Device") whenever you visit or interact with our Site(s). Usage Information may be nonidentifying or may be associated with you. Whenever we associate Usage Information with your Personal Information, we will treat it as Personal Information.

This Usage Information may include:

- your IP address or other unique identifier ("**Device Identifier**"). A Device Identifier is a number that is automatically assigned to your Device used to access the Site(s), and our computers identify your Device by its Device Identifier;
- your Device functionality (including browser, operating system, hardware, mobile network information);
- the URL that referred you to our Site(s);
- the areas within our Site(s) that you visit and your activities there, including remembering you and your preferences;
- your Device location;
- your Device characteristics; and
- certain other Device data, including the time of day, among other information.

We may use various developed methods and technologies to store or collect Usage Information ("**Tracking Technologies**"). Tracking Technologies may set, change, alter or modify settings or configurations on your Device. A few of the Tracking Technologies, include, without limitation, the following (and subsequent technology and methods later developed):

Cookies. A cookie is a data file placed on a Device when it is used to visit the Site(s). A Flash cookie (or locally shared object) is a data file placed on a Device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your Device. HTML5 cookies can be programmed through HTML5 local storage. Unlike Flash cookies, HTML5 cookies do not require a plug-in. Regular cookies may generally be disabled or removed by tools that are available as part of most commercial browsers, and in some but not all instances can be blocked in the future by selecting certain settings. Each browser you use will need to be set separately and different browsers offer different functionality and options in this regard. Also, these tools may not be effective with regard to Flash cookies or HTML5 cookies. For information on disabling Flash cookies go to Adobe's web site www.adobe.com. Please be aware that if you disable or remove cookies, Flash cookies, or HTML5 cookies on your Device, some parts of our Site(s) may not function properly, and that when you revisit our Site(s) your ability to limit cookies is subject to your browser settings and limitations.

Web Beacons. Small graphic images or other web programming code called web beacons (also known as "1x1 GIFs" or "clear GIFs") may be included in our Site(s)' pages and messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a page or email can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Site(s), to monitor how users navigate the Site(s), to count how many emails that were sent were actually opened or to count how many particular articles or links were actually viewed.

Embedded Scripts. An embedded script is programming code that is designed to collect information about your interactions with the Site(s), such as the links you click on. The code is temporarily downloaded onto your Device from our web server or a third party service provider, is active only while you are connected to the Site(s), and is deactivated or deleted thereafter.

ETag, or entity tag. A feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner ETags are a form of Device Identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash, and/or HTML5 cookies.

We may use Tracking Technologies for a variety of purposes, including:

Strictly Necessary. We may use cookies or other Tracking Technologies that we consider are strictly necessary to allow you to use and access our Site(s), including cookies required to prevent fraudulent activity, improve security or allow you to make use of shoppingcart functionality.

PerformanceRelated. We may use cookies or other Tracking Technologies that are useful in order to assess the performance of the Site(s), including as part of our analytic practices or otherwise to improve the content, products or services offered through the Site(s).

FunctionalityRelated. We may use cookies or other Tracking Technologies that are required to offer you enhanced functionality when accessing the Site(s), including identifying you when you signin to our Site(s) or keeping track of our specified preferences, including in terms of the presentation of content on our Site(s).

TargetingRelated. We may use Tracking Technologies to deliver content relevant to your interests on our Site(s) based on how you interact with our content. This includes using Tracking Technologies to understand the usefulness to you of the content that have been delivered to you.

There may be other Tracking Technologies now and later devised and used by us in connection with the Site(s). Further, third parties may use Tracking Technologies with our Site(s). We may not control those Tracking Technologies and we are not responsible for them. However, you consent to potentially encountering third party Tracking Technologies in connection with use of our Site(s) and accept that our statements under this Privacy Policy do not apply to the Tracking Technologies or practices of such third parties.

2. How Do We Use the Information Collected?

We may use your Personal Information, Demographic Information or Usage Information that is subject to this Privacy Policy: (1) to provide you with information or services or process transactions that you have requested or agreed to receive including to send you emails and electronic newsletters, or to provide you with special offers or promotional materials on behalf of us or third parties; (2) to enable you to participate in a variety of the Site(s)' features; (3) to process your registration with the Site(s), including verifying your information is active and valid; (4) to improve the Site(s) or our services, to customize your experience on the Site(s), or to serve you specific content that is relevant to you; (5) to contact you with regard to your use of the Site(s) and, in our discretion, changes to the Site(s) and/or Site(s)' policies; (6) for internal business purposes such as troubleshooting, data analysis, testing, research and service improvement; and (7) for purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy.

Please note that information submitted to the Site(s) via a "contact us" or other similar function may not receive a response; we will not use that information so provided to contact you for marketing purposes unrelated to your inquiry unless you agree otherwise.

3. How and When Do We Disclose Information to Third Parties?

We will not share non-Personal Information, such as aggregated user statistics, with third parties. We will not share your Device Identifiers along with data related to you and your activities with third parties. We will not share your Personal Information with third parties for those third parties' marketing purposes unless you consent to such sharing at the time you provide your Personal Information. However, we may share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information and as described below or otherwise in this Privacy Policy.

(a) When You Request Information From or Provide Information to Third Parties. You may be presented with an option on our Site(s) to receive certain information and/or marketing offers directly from third parties or to have us send certain information to third parties or give them access to it. If you choose to do so, your Personal Information and other information may be disclosed to such third parties and

all information you disclose will be subject to the third party privacy policies and practices of such third parties. In addition, third parties may store, collect or otherwise have access to your information when you interact with their Tracking Technologies, tools, content or apps on our Site(s) or link to them from our Site(s). This may include using third party tools such as Facebook, Twitter, Pinterest, Google+, or other third party posting or content sharing tools. We are not responsible for the privacy policies and practices of such third parties and, therefore, you should review such third party privacy policies and practices of such third parties prior to requesting information from or otherwise interacting with them.

- (b) Third Parties Providing Services on Our Behalf. We may use third party vendors to perform certain services on behalf of us or the Site(s), such as hosting the Site(s), designing and/or operating the Site(s)' features, tracking the Site(s)' activities and analytics, and enabling us to send you special offers or perform other administrative services. This may include content provided or operated by, in whole or in part, third parties, but we require them not to use your Personal Information for their own purposes without your express consent. We may provide these vendors with access to user information, including Device Identifiers and Personal Information, to carry out the services they are performing for you or for us. If you request that we share information with third parties such authorization also applies to our third party service providers. Third party analytics service providers may set and access their own Tracking Technologies on your Device and they may otherwise collect or have access to information about you, potentially including Personal Information, about you. We are not responsible for those third party technologies or activities arising out of them. However, some may offer you certain choices regarding their practices, and information we have been informed of regarding such choices is available here [LINK TO SECTION AFTER END OF PP].
- (c) Administrative and Legal Reasons. We may access, use, preserve, transfer and disclose your information (including Device Identifiers and Personal Information), including disclosure to third parties: (i) to satisfy any applicable law, regulation, subpoenas, governmental requests or legal process if in our good faith opinion such is required or permitted by law; (ii) to protect and/or defend the Site(s)' **Terms of Use** or other policies applicable to the Site(s), including investigation of potential violations thereof; (iii) to protect the safety, rights, property or security of the Site(s) or any third party; and/or (iv) to detect, prevent or otherwise address fraud, security or technical issues. Further, we may use IP address or other Device Identifiers, to identify users, and may do so in cooperation with third parties such as copyright owners, internet service providers, wireless service providers and/or law enforcement agencies, including disclosing such information to third parties, all in our discretion, subject to applicable law. Such disclosures may be carried out without notice to you.
- (d) Affiliates and Business Transfer. We may share your information, including your Device Identifiers and Personal Information, Demographic Information and Usage Information with our parent, subsidiaries and affiliates ("Affiliates"). We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Site(s) or applicable database; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change, including, during the course of any due diligence process.
- **(e) Sweepstakes, Contests and Promotions**. We may offer sweepstakes, contests, and other promotions (any, a "**Promotion**") through the Site(s) that may require registration. By participating in a Promotion, you are agreeing to official rules that govern that Promotion, which may contain specific requirements of you, including, allowing the sponsor of the Promotion to use your name, voice and/or likeness in advertising or marketing associated with the Promotion. If you choose to enter a Promotion, Personal Information may be disclosed to third parties or the public in connection with the administration of such Promotion, including, in connection with winner selection, prize fulfillment, and as required by law or permitted by the Promotion's official rules, such as on a winners list.

4. Do Third Party Applications Appear on the Site(s)?

Third party applications may be available via the Site(s). The owners of these applications ("**Third Party Owners**") may collect Personal Information and other data from you and may have their own policies and practices. We are not responsible for how Third Party Owners or their applications collect or use your

information. These Third Party Owners may have their own terms of service, privacy policies or other policies and ask you to agree to the same. We are not responsible for these third party privacy policies or the practices of Third Party Owners. Be sure to review any available policies before submitting any personally identifiable information to a third party application or otherwise interacting with it and exercise caution in connection with these applications.

5. How Do I Change My Information and Communications Preferences?

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of registration. The Site(s) may allow you to review, correct or update Personal Information you have provided through the Site(s)' registration forms or otherwise, and you may provide registration updates and changes, and otherwise request access to your information, by contacting us at **TradeCustomerService@hmhpub.com**. If so, we will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. Please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons. When you edit your Personal Information or change your preferences on the Site(s), information that you remove may persist internally for Houghton Mifflin Harcourt's administrative purposes. You may cancel or modify our email marketing communications you receive from us by following the instructions contained within our promotional emails or in some cases by logging into your account and changing your communication preferences. This will not affect subsequent subscriptions and if your opt-out is limited to certain types of emails the opt-out will be so limited. Please note that we reserve the right to send you certain communications relating to your account or use of our Site(s), such as administrative and service announcements and these transactional account messages may be unaffected if you choose to opt-out from receiving our marketing communications. If you have any questions about the Privacy Policy or practices described in it, you should contact us by email at: TradeCustomerService@hmhpub.com.

6. What About Transfer of Information to the United States?

Our Site(s) are operated in the United States and intended for users located in the United States and Canada. If you are located outside of the United States, please be aware that information we collect, including Personal Information, will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your Personal Information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the Site(s) or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information, including Personal Information, in the United States as set forth in this Privacy Policy.

7. What Should Parents Know About Children?

The Site(s) is intended for a general audience, in particular the parents and teachers of preschoolers. Except for contact us features, data from which we use only to respond to requests, we nonetheless undertake to limit collection of Personal Information from adults. We do not knowingly collect any personal information from children younger than the age of thirteen (13) as required by U.S. law. We will delete any personal information collected that we later determine to be from a user younger than the age of thirteen (13). If you are a parent or guardian of a child under the age of thirteen (13) and believe he or she has disclosed personal information to us, please contact us at **TradeCustomerService@hmhpub.com**. Keep in mind that we may link third party sites or include third party social media plug in on parent, teacher and product pages of the Site, which are intended for adults and not children, and these third parties may not undertake efforts to limit the collection of Personal Information based on age.

8. What About Security?

We incorporate commercially reasonable technical, physical and administrative safeguards to help protect and secure your Personal Information in our custody or control. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure the security of any information you transmit to us, and you use our Site(s) and provide us with your information at your own risk.

9. What About Changes to the Privacy Policy?

We reserve the right to change this Privacy Policy at any time without notice to you. Any changes will be effective immediately upon the posting of the revised Privacy Policy. We will not use your Personal Information, however, in a manner materially different than promised at the time it was collected without your consent. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

10. Who Can I Contact?

If you have questions, comments or complaints regarding our Privacy Policy or the manner in which we or our service providers treat your Personal Information, contact our [Insert Privacy Officer or individual responsible for compliance with privacy issues] at: <u>TradeCustomerService@hmhpub.com</u>.

//End Privacy Policy//

The following third parties that collect information from you on our Site(s) have given us notice that you may obtain information on their policies and practices, and in some instances opt-out of certain of their activities, as follows:

Party	Service	For More Information	Use of Tracking Technologies	Privacy Choices
Adobe	Online Marketing	http://www.adobe.com/	Yes	See information
	Services, On Demand	privacy/hosted-		links in prior
	Services and/or other	services.html		column
	Adobe-hosted services	http://www.adobe.com/		
		privacy/other-		
		policies.html		
Google	Google Analytics for	http://	Yes	See information
	Display Advertisers,	support.google.com/		links in prior
	Ads Preferences	analytics/bin/answer.py?		column
	Manager, and Google	hl=en&topic=2611283&a		
	Analytics Opt-out	nswer=2700409		
	Browser Add-on	http://www.google.com/		
		settings/ads/onweb/?		
		hl=en&sig=ACi0TCg8V		
		N3Fad5 pDOsAS8a4		
		https://tools.google.com/		
		dlpage/gaoptout/		

NOTE: We are not responsible for third party policies or practices. We try to keep this information current, but it is provided as a courtesy and may not be current or accurate. Please contact the applicable third parties regarding their privacy and data security policies and practices.

^{*}The link in Section 3(b) should go to: