

# Privacy Policy

## PROTECTING YOUR PRIVACY

Your privacy is important to us. Parago (the "Administrator"), the entity that operates and administers the Pepsi Rewards+Plus Program (the "Program"), utilizes all reasonable efforts to be responsible when gathering your personal information and to protect your privacy. Although this Privacy Policy (the "Policy") is not a contract and does not create any legal rights, it does serve as an expression of the Administrator's commitment to protecting private personal information. Please be advised that the practices described in this Privacy Policy apply only to information gathered through and in connection with the Program and on the Program's website and do not necessarily reflect our practices for other sites we may now or in the future operate.

This Policy should answer your questions about the sources and kinds of information we collect, how we use it, when it may be shared with others and how we safeguard its confidentiality and security. We also provide you with ways to correct the data you provide us and to limit our sharing of this data with third parties. This Policy is applicable to the Program and certain affiliated company websites. References to "we," "our" and "us" refer to the Administrator and its agents, successor and assigns.

## INFORMATION WE COLLECT AND HOW WE COLLECT IT

In order to facilitate your experience, and manage our business, we collect and maintain personal information about you. The Administrator collects customer information from many sources to understand and meet your needs. We collect personal information about you from:

- You, when you voluntarily provide us with information;
- Your browser, when you visit our websites and your browser interacts with us;
- Your transactions and interactions with Administrator affiliates, partners, sponsors and service providers;
- Other sources, in connection with uses and services at events.

The personal information we collect about you through these various sources may include, but is not limited to:

- Business name, customer number, contact name, address, telephone number,
- Email addresses;
- Your Customer/Account number, login name, password, password hint
- Transactional and online activity data pertaining to the Program;
- Information concerning your interests and/or your use of products and services;
- Personal information provided via survey, focus group or other marketing research efforts; and
- Personal information provided to customer service representatives to research and resolve issues or questions.

You may also be able to submit information about other people. For example, you might submit a person's name and email address to send an electronic greeting card or to make a gift of a reward, product, service, privilege, benefit or experience (each a "Reward") offered through the Program by the Administrator and its participating Program sponsors, affiliates, partners, and service and product providers (together, "Providers"). If you order a Reward online and want it sent directly to the recipient of your gift, you might submit the recipient's name and address. The types of personally identifiable information that may be collected about other people at these pages include: recipient's name, address, email address and telephone number.

Only persons who provide us with the requested personally identifiable information will be able to order products, programs and services or otherwise participate in the Program's activities and offerings, including redemption of Rewards.

## **Aggregate Information**

In addition to obtaining your personal information, when you use our websites or the websites of our Providers, we or they may collect tracking information such as your browser type, the type of operating system you use, the name of your Internet service provider and the pages visited on the site. We obtain this information to improve the functionality and user-friendliness of our site and to better tailor our site to our visitors' needs. We also use this information to verify that visitors meet the criteria required to process requests. None of this tracking information identifies you personally; we collect it for reporting onsite activity in the aggregate. For example, we may want to know how long the average user spends on our site or which pages or features get the most attention.

## **Cookies and Web Beacons**

To enhance your experience with our sites, many of our Web pages use "cookies." Cookies are text files we place in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at one of our sites. However, once you choose to furnish the site with personally identifiable information, this information may be linked to the data stored in the cookie.

We use cookies to understand site usage and to improve the content and offerings on our sites. For example, we may use cookies to personalize your experience at our Web pages (e.g., to recognize you by name when you return to our site), save your password in password-protected areas and enable you to use shopping carts on our sites. We also may use cookies to offer you products, programs or services.

"Web beacons" or clear .gifs are small pieces of code placed on a Web page to monitor the behavior and collect data about the visitors viewing a Web page. For example, Web beacons can be used to count the users who visit a Web page or to deliver a cookie to the browser of a visitor viewing that page. We may use Web beacons on this site from time to time for this and other purposes.

## **Network Traffic Logs**

In the course of ensuring network security and consistent service for all users, the Administrator employs software programs to do such things as monitor network traffic, identify unauthorized access or access to nonpublic information, detect computer viruses and other software that might damage Administrator computers or the network and monitor and tune the performance of the Administrator network. In the course of such monitoring, these programs may detect such information as email headers, addresses from network packets and other information. Information from these activities is used only for the purpose of maintaining the security and performance of Administrator's networks and computer systems.

We recognize the importance of protecting the privacy of children. For this reason, we do not collect or maintain information from children we know are under the age of 18 except as permitted by law. The program doesn't allow participation unless you state that you are 18 years or older. The Administrator also encourages parents to discuss the Internet with their children and monitor personal information that a child may provide via the Internet.

## HOW WILL THIS INFORMATION BE USED

The Administrator does not sell or disclose your personally identifiable information to third parties except to the extent required by law or otherwise in compliance with this Policy. Specifically, please note the following:

- - We may use the information you provide about yourself to fulfill your requests for our products, programs and services; to respond to your inquiries about our offerings and to offer you other products, advertisements, programs or services that we believe may be of interest to you.
- - We sometimes use this information to communicate with you, such as to notify you, to fulfill a request by you or to contact you about your Account with us.
- - We use the information that you provide about others to enable us to send them your gifts or cards. From time to time, we also may use this information to offer our products, programs or services to them.

To the extent required by law, we may disclose personally identifiable information to government authorities, or to third parties pursuant to a subpoena or other legal process, and we may also use or disclose your information as permitted by law to protect the rights or property of the Administrator, the Program, our customers, our websites and their users. We also may disclose such information in response to a law enforcement agency's request, or where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use or as otherwise required by law.

In addition to the above, we sometimes contract with other companies and individuals to perform functions on our behalf or otherwise in connection with the Program, such as hosting our websites, distributing promotions or sweepstakes, performing marketing surveys, focus groups or interviews or promoting other opportunities offered by the Program. These parties may have access to personal information, such as addresses, needed to perform their functions, but are generally restricted from using it for other purposes. We may also disclose this information to third parties, such as employers, who have arranged for discounts, purchased travel or other services on your behalf.

As we continue to develop our business, we might sell or buy assets. In such transactions, user information generally is one of the transferred business assets. Also, if either the Administrator itself or substantially all of the Administrator's assets were acquired, your personal information may be one of the transferred assets.

The Administrator also uses customer information to identify, develop and market products and services that we believe you will value. From time to time, you may receive offers from Administrator affiliates, including, without limitation, parent and subsidiary companies and companies under common control or ownership ("Affiliates") or from third-party companies with whom we have a business relationship. These third parties are also subject to confidentiality requirements with respect to your information.

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that personally identifiable information that is collected will never be disclosed in a manner that is inconsistent with this Privacy Policy.

We may also disclose personally identifiable information to companies which are not Affiliates of the Administrator ("Non-Affiliates") whose practices are not covered by this privacy notice (e.g., other marketers, magazine publishers, retailers, participatory databases and nonprofit organizations) that want to market products or services to you. If we share personally identifiable

information, we will provide you with an opportunity to opt out or block such uses. For instructions on how to opt out from such disclosures, see below.

## **Third-Party Collection and Use of Information**

We sometimes may offer content that is sponsored by or co-branded with identified third parties. By virtue of these relationships, the third parties may obtain personally identifiable information that visitors voluntarily submit to participate in the activity. We do not have ultimate control over these third parties' use of this information.

We may use a reputable third party to present or serve the advertisements that you may see at its Web pages. These third-party ad servers may use cookies, Web beacons, clear .gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness. The use of these technologies by these third-party ad servers is subject to their own privacy policies and is not covered by our Privacy Policy.

You may choose to restrict marketing communications and the sharing of your information with third parties as outlined below.

## **Managing Communication Preferences**

You can manage and modify your personal Account preferences, including your privacy choices, by clicking [Contact Information](#) on the Account Details Page on our Program website. You must log in using your password to access your information and to make any changes. In addition to this method, which applies to your Program preferences, other companies or offerings pertaining to the Program may require different steps to change your preferences for participation in their programs. Please review those other company or offering Web pages directly for any additional requirements.

## **Discussion Forum and Chat Room Use**

If you participate in a Program or Administrator website discussion forum or chat room, you should be aware that the information you provide there will, by the very nature of use of a forum or chat room, be made available to others, potentially inside and outside of the Administrator and its affiliates. Also, please recognize that the individual forums and chat rooms may have additional rules and conditions. Each participant's opinion set forth on a forum or chat room is his or her own and should not be considered as reflecting the opinion of the Administrator.

The information we collect in connection with our online forums and communities is used to provide an interactive experience. We use this information to facilitate participation in these online forums and communities and, from time to time, to offer you products, programs or services. If you choose to submit content for publication (e.g., questions for an online chat guest), we may publish your screen name and other information you have provided to us (e.g., transcript of the chat, including your question).

## **Security**

Information security is important at the Administrator. We maintain standard physical, electronic and procedural safeguards in an effort to protect personal information, and we regularly review our security standards and procedures to protect against unauthorized access to personal information. We cannot guarantee the security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us through electronic

means. We ask that you do your part by maintaining your Internet, Program and website passwords and access codes strictly confidential.

## **Links to Other Sites**

This Policy is applicable to the Administrator, the Program and the associated websites. Please note that we may provide additional links to affiliate, partner and third-party resources we think you will find useful. These links will lead you to sites that may operate under different privacy practices and policies not under the control of the Administrator. You are responsible for reviewing the privacy policies for such other websites. If you cannot find the privacy policy of any of these sites via a link on the site's homepage, you should contact the site directly for more information.

## **Access to Personal Information**

You may contact us by phone or send us an email requesting access to or correction of your personally identifiable information. For verification purposes please include your first name, last name, email address and the password you use for said service, if any. To contact us for this purpose, see "Contacting Us" below.

## **Contacting Us**

If you have any other questions, comments or concerns about our Policy, or if you wish to correct your personally identifiable information, please contact us at 1-855-238-7041, write to us at Parago - Pepsi Rewards+Plus Administrator, 700 State Hwy 121 Bypass, Ste 200, Lewisville, TX 75067, or use our link to the [Contact Us](#) form.

## **Privacy Policy Modifications**

The Administrator reserves the right to change this Policy at any time. The most current version of the Policy will be available on the Administrator's websites pertaining to the Program and will supersede all previous versions of the Policy. Participants are responsible for remaining knowledgeable as to any changes that the Administrator may make to the Policy by periodically checking such websites for updated versions of the Policy.

This Policy was last updated on September 2011.