

## **PRIVACY POLICY**

Effective Date: June 14, 2014

To review material modifications and their effective dates scroll to the bottom of the page.

Editorial Gemas ("Gemas") owns and operates the gemas.discernir.com website business. All references to "we", "us", this "website" or this "site" shall be construed to mean Gemas. We understand that visitors to this website are concerned about the privacy of information. The following describes our privacy policy regarding information, including Personal Information (defined below), that we collect through this website. By using this website you are accepting the practices described in this Privacy Policy.

### **HOW WE MODIFY THIS PRIVACY POLICY**

We reserve the right to modify this Privacy Policy at any time, and without prior notice, by posting an amended Privacy Policy that is always accessible by clicking on the "Privacy Policy" link on this site's home page. Your continued use of this site indicates your acceptance of the amended Privacy Policy.

Regarding Personal Information (defined below), if any modifications are materially less restrictive on our use or disclosure of the Personal Information previously disclosed by you, we will obtain your consent before implementing such revisions with respect to such information.

### **THE TYPES OF INFORMATION WE COLLECT**

**Personal Information.** We collect information from you that is protected for purposes of privacy and data security ("Personal Information"). Personal Information that we collect may vary with each separate purpose for which you provide it, and it may include one or more of the following categories: name, physical address, an email address, phone number, credit card information including credit card number, expiration date, and billing address, and location data.

**Non-Personal Information.** We reserve the right to collect anonymous information such as your browser type, the URL of the previous website you visited, your computer's operating system and Internet protocol (IP) Address, Internet domain and host name, your Internet Service provider, your clickstream data, and the dates and times that you may access this site and specific pages ("Non-Personal Information"). Non-Personal Information is essentially anonymous when collected.

### **HOW AND WHEN WE COLLECT INFORMATION**

**Personal Information.** We collect Personal Information at the time you provide it to us.

**Your Communications With Us.** We collect Personal Information that we receive from you as you communicate with us.

**Passive and Analytical Information.** We reserve the right to monitor your use of this site. As you navigate through this site, Non-Personal Information may be passively collected (that is, gathered without your actively providing the information) using various analytics and reporting technologies, such as cookies and web beacons.

## HOW WE USE YOUR INFORMATION

We use your Personal Information for the performance of the services or transaction for which it was given, our private, internal reporting for this site, and security assessments for this site.

We may use your Personal Information to send you emails and/or pre-recorded phone messages.

We reserve the right to make full use of Non-Personal Information. For example, we may use Non-Personal Information to provide better service to site visitors, customize the site based on your preferences, compile and analyze statistics and trends about the use of this site, and otherwise administer and improve this site for your use.

## INFORMATION SHARING AND DISCLOSURE

**General Disclosure Policy.** Our general policy is that we will not share, sell, rent, or provide access to your Personal Information to others. The only exceptions to this general policy: (i) are described in the subsections below, and (ii) if you explicitly approve through our site. We reserve the right to disclose Non-Personal Information without restriction.

**Affiliated Entities.** We reserve the right to provide your Personal Information and Non-Personal Information to any affiliated entities we may have, including our subsidiaries. Affiliated entities are entities that we legally control (by voting rights) or that control us.

**Service Providers.** We reserve the right to provide access to your Personal Information and Non-Personal Information to our trusted service providers that assist us with the operation and maintenance of this site. For example, we may contract with third parties to process payments, host our servers, provide security, and provide production, fulfillment, optimization, analytics, and reporting services. Our service providers will be given access to your information only as is reasonably necessary to provide the services for which they are contracted.

**Successors.** If we sell or otherwise transfer part or all of our business or assets to another organization, such as in the course of an acquisition, merger, bankruptcy or liquidation, we may transfer your Personal Information and Non-Personal Information. In such an event, we will require the buyer or transferee to agree to our commitments provided in this Privacy Policy.

**Legal Process, Enforcement and Security Notice.** We reserve the right to disclose your Personal Information and Non-Personal Information if we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary (i) to satisfy any applicable law, regulation, legal process or enforceable governmental request (such as for example, to comply with a subpoena or court order), (ii) to detect, prevent, and address fraud or other illegal activity, and (iii) to investigate, respond to, or enforce violations of our rights or the security of this site. If we believe that the security of your Personal Information may have been compromised, we may notify you of the relevant facts as promptly as possible under the circumstances, and if you have provided us your email address, we may notify you by email. You consent to our use of your email address for this purpose.

**Marketing Affiliates, Partners and Resellers.** We reserve the right to disclose your Personal Information to any of our (i) marketing affiliates that referred you to our site for purposes of sales by us, and (ii) resellers that may re-sell our products or services to you. We may also disclose your Personal Information to any marketing partners that may participate in the offer or related fulfillment. Understand that you originated with these marketing affiliates and resellers, and that the information you may provide to them is subject to their privacy policies also.

**When We Act as a Marketing Affiliate, Partner or Reseller for Others.** We may act as a marketing affiliate, partner, or reseller for certain of our marketing partners for purposes of selling their

products or services to you, and we reserve the right to disclose your Personal Information to them for purposes of compensation, transaction processing, fulfillment, and support. These marketing partners may also email you regarding complimentary products or services, however, you have two ways to opt out of receiving these emails: (i) contact us (as provided below under the Contact Us heading) with a request to opt out, or (ii) wait until you receive an email from them and then unsubscribe.

**Your California Privacy Rights.** As described above, from time to time, we make your Personal Information available to third parties. If you do not want us to share your Personal Information with other companies or organizations, you may request opt-out of this information sharing by making a request at the following email address: [gemas@discernir.com](mailto:gemas@discernir.com). This notice is designed to comply with California's "Shine the Light" law, but the opt-out option is available to all of our users. If you are a California resident, you are entitled, but limited to the extent required by law, upon sending us a request by email to [gemas@discernir.com](mailto:gemas@discernir.com) to receive the following information: (i) the names and addresses of all of the third parties that received personal information from us for their direct marketing purposes during the preceding calendar year and, if the nature of that third parties' business cannot reasonably be determined from the third parties' name, examples of the products or services marketed, if known to us, sufficient to give you a reasonable indication of the nature of the third parties' business; and (ii) a list of the categories of information that correspond to the personal information disclosed by us to such third parties for the third parties' direct marketing purposes as set forth in the applicable law.

#### SPECIFIC INFORMATION ABOUT COOKIES AND WEB BEACONS

In order to provide better service for our site, we may use Cookies and Web Beacons to collect Non-Personal Information to store your preferences and information about what pages you visit and past activity at our site. We may also employ Web Beacons from third parties in order to help us compile aggregated statistics regarding the effectiveness of our promotional campaigns or other operations of our site.

"Cookies" are tiny pieces of information stored by your browser on your computer's hard drive. Cookies are also used to customize content based on your browser. Most browsers are initially set to accept cookies. If you want to disable cookies, there is a simple procedure in most browsers that allows you to turn off cookies. Please remember, however, that cookies may be required to allow you to use certain features of our site. We reserve the right to use third party web analytics services that use third party cookies (cookies passed by them, not by us) to collect Non-Personal Information about your use of this site. These web analytics services may also transfer this information to third parties where required to do so by law, or where such third parties process the information on the service's behalf.

Web Beacons - sometimes called single-pixel gifs or clear gifs - are used to assist in delivering cookies, and they allow us to count users who have visited pages of our site. We may include Web Beacons in promotional e-mail messages or our newsletters in order to determine whether messages have been opened and acted upon.

**Google Analytics.** We reserve the right to use Google Analytics, a web analytics service of Google, Inc. Google will receive the information generated by its cookie regarding your use of our website (including your IP address) and store the information on Google's servers located in the United States. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity, and providing other services relating to website activity and Internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

## DO NOT TRACK REQUESTS

Some Web browsers incorporate a "Do Not Track" feature that signals to websites that you visit that you do not want to have your online activity tracked. Each browser communicates "Do Not Track" signals to websites differently, making it unworkable to honor each and every request correctly. In order to alleviate any communication error between browsers and website, we do not respond to "Do Not Track" signals at this time. As the technology and communication between browser and website improves, we will reevaluate the ability to honor "Do Not Track" signals and may make changes to our policy.

## DATA SECURITY

We will implement reasonable and appropriate security procedures to protect data from unauthorized access by physical and electronic intrusion. Unfortunately, no data transmission over the Internet or method of data storage can be guaranteed 100% secure. Therefore, while we strive to protect your Personal Information by following generally accepted industry standards, we cannot ensure or warrant the absolute security of any information you transmit to us or archive at this site.

## ONWARD TRANSFER OUTSIDE YOUR COUNTRY OF RESIDENCE

Any Personal Information which we may collect on this site may be stored and processed in our servers located in the United States or in any other country in which we, or our affiliates, subsidiaries, or agents maintain facilities. By using this site, you consent to any such transfer of Personal Information outside your country of residence to any such location.

## UPDATING PERSONAL INFORMATION

Upon request, we will permit you to request or make changes or updates to your Personal Information for legitimate purposes. We request identification prior to approving such requests. We reserve the right to decline any requests that are unreasonably repetitive or systematic, require unreasonable time or effort of our technical or administrative personnel, or undermine the privacy rights of others. We reserve the right to permit you to access your Personal Information in any account you establish with this site for purposes of making your own changes or updates, and in such case, instructions for making such changes or updates will be provided where necessary.

## EMAIL MESSAGES; OPT-OUT

If you supply us with your e-mail address you may receive periodic messages from us with information specific to the site and required for the normal functioning of the site as well as for new products or services or upcoming events or offers from us. If you prefer not to receive these periodic email messages, you may opt-out by following the instructions in the email. Some of these emails from us may contain promotional offers on behalf of third party marketing partners which we select; however, in these instances, we do NOT share your Personal Information with the third party marketing partner for purposes of the mailing; we do the mailing for them. However, if you do click on any of the links to their websites or accept any of these promotional offers, your click-through information and any information that you provide in the process of registration or purchase will be transferred to these sites. We have no responsibility or liability for the policies and practices of these sites. You should be careful to review any privacy policies posted on any of these sites before providing information to them.

## LINKS TO OTHER SITES

This site may contain links to other websites with whom we have a business relationship. These links may include online advertisements that we deem to be appropriate. If you do click on any of the links to their websites or accept any of their promotional offers, your click-through information and any information that you provide in the process of registration or purchase will be transferred to these sites. We have no responsibility or liability for the policies and practices of these sites; however, we have entered into agreements with these websites which provide that unless you specifically agree otherwise, they will use and share your Personal Information only for the purpose of providing or fulfilling your request for products or services. You should be careful to review any privacy policies posted on any of these sites before providing information to them.

#### CHILDREN'S ONLINE POLICY

We are committed to preserving online privacy for all of its website visitors, including children. This site is a general audience site. Consistent with the Children's Online Privacy Protection Act (COPPA), we will not knowingly collect any information from, or sell to, children under the age of 13. If you are a parent or guardian who has discovered that your child under the age of 13 has submitted his or her personally identifiable information without your permission or consent, we will remove the information from our active list, at your request. To request the removal of your child's information, please contact our site as provided below under "Contact Us", and be sure to include in your message the same login information that your child submitted.

#### CONTACT US

If you have any questions regarding this Privacy Policy, please contact the owner and operator of this website business at:

Editorial Gemas  
Email: [gemas@discernir.com](mailto:gemas@discernir.com)

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Material Modifications Since June 14, 2014: none.