

# Privacy Policy

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## Contents

1. [INTRODUCTION](#)
2. [INFORMATION WE COLLECT](#)
3. [THIRD PARTY ADVERTISING/ANALYTICS SERVICE PROVIDERS](#)
4. [HOW WE MAY USE AND DISCLOSE YOUR INFORMATION](#)
5. [USER CHOICE AND ACCESS](#)
6. [OPTING-OUT OF USE OF CERTAIN INFORMATION THAT MAY BE COLLECTED BY TRACKING TECHNOLOGIES](#)
7. [DATA COLLECTION FROM CHILDREN](#)
8. [SECURITY](#)
9. [DATA RETENTION](#)
10. [YOUR CALIFORNIA PRIVACY RIGHTS](#)
11. YOUR NEVADA PRIVACY RIGHTS
12. [INDIVIDUALS WITHIN THE EUROPEAN UNION](#)
13. [THIRD PARTY WEBSITES](#)

14. [CHANGES TO OUR PRIVACY POLICY](#)
15. [CONTACT US](#)

## **1. INTRODUCTION**

Printers Row Publishing Group division of Readerlink Distribution Services, LLC (“Readerlink”) and its divisions, subsidiaries and affiliates (individually and/or collectively referred to as “PRPG”, “we”, “us” or “our”) wants you to be familiar with how we collect, use and disclose information about you (“Information”). This is the Privacy Policy for all websites (the “Website”) that link to this Privacy Policy and any other content, applications, features, functionality, information and services offered by us through the Website. Any capitalized terms that are not defined in this Privacy Policy shall have the meaning given in the [Terms of Use Agreement](#).

## **2. INFORMATION WE COLLECT**

We collect Information about you in the following ways:

## When you provide Information to us

We collect Information that you provide to us, which may include the following types of Information:

- Registration Information: Information you submit to register on our Website, including, information you provide to create your User Account, which may include your name, email address, country, zip code, mailing address, date of birth, etc.
- Fee-Based Services Information: If you engage in any Fee-Based Services or other transaction offered on or in connection with our Website, we may require certain Information, for example, your full name, physical address, telephone number(s), applicable payment data (e.g., credit card number, expiration date, etc.), and address.
- Information Collected Through Features and Functions of Services Provided on our Website: We may provide you with access to certain features and functionality, such as interactive and community features, message and comment functionality, posting and other functionality. To participate in these features and functionalities, you may be asked to provide certain Information about yourself and provide

additional consent in order to personalize and/or permit your use these features and functions, such as when you share information about your use of our Services with other Users.

- Communications Information: We may present you with the opportunity to sign up to receive newsletters, email correspondence and/or other communications from us in order for us to provide up-to-date information about our Services, and to publicize and promote certain content, products and services offered by us, our business partners and/or other third parties. When there is a separate sign-up for communications, we may ask for your contact information such as name and email address, and, sometimes, demographic and profile information. We will ask you to confirm your consent to any such uses at the time you sign up for these services or communications.
- Technical, Operational and Customer Support Information and Feedback: When you contact us for technical, operational or other support, or otherwise provide any comments or feedback to us, you may be required to provide certain Information relevant to your applicable issue or in order to contact you with respect to resolving the issue.

- Information Related to Promotions, Contests and Sweepstakes: To participate in certain Promotions, including contests, sweepstakes and surveys, there may be a separate registration or sign up process, which may require the submission of Information (e.g., your full name, email address, mailing address, telephone number, demographic and/or profile information, etc.).
- **If you log into our Website using account information from a “Third Party Service” (e.g., Facebook, etc.), connect a Third Party Service to our Service or enable functionality from Third Party Services as part of your use of our Services.**

We may receive information from the applicable provider of the Third Party Service that you have consented be shared. Such information may include, for example, your first and last name, gender, your physical location and that of your Devices, your date of birth, certain profile information, your public ID on or associated with the Third Party Service, profile page URL and e-mail address. We will, as reasonably practicable (e.g., by implementing a compatible disclosure feature offered by the Third Party Service, etc.), disclose what information we collect from the Third Party Services when you connect the Services to the Third

Party Service. In addition, we may receive information from the provider of that Third Party Service about you or your use of the website within that Third Party Service. Even if you delete your account on a Third Party Service, we will retain any Information provided by that Third Party Service. Similarly, if you delete or deactivate your account on our Website, any Information that we have shared with Third Party Services (in accordance with this Privacy Policy) may be retained by those Third Party Services.

- **By using certain automatic data collection technologies when you visit, access and/or interact with our Website, we may automatically collect certain Information about you, your equipment, browsing actions, and other information.**
- Log Files: When you use our Website, our servers automatically collect certain Information including Information that your browser and/or Device sends whenever you visit a website and/or use the applicable Device. Such Information may include your IP address, browser type and settings, and other usage data.
- Information about Your Device: We may also collect Information about the Device through which you access and use our website, including what type of Device it is, unique

Device identifiers, and other data provided by your applicable Third Party Service provider and/or Device manufacturer. You should read the policies of such third parties in order to learn more about what Information your Device makes available.

- Other Non-Personal Information: Other Non-Personal Information related to your use of the Services, including usage, traffic data and other communication data and resources that you access when you interact with the Services.

The Information we collect automatically helps us to improve our Services and to deliver a better and more personalized user experience by enabling us, among other things, to store information about your preferences, to customize our website according to your individual interests, speed up your searches, and recognize you when you return to our website.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies): A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting

on your browser. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Services.

- Flash Cookies: Certain features of the Services may use local stored objects (or Flash cookies) to collect and store Information about your preferences and navigation to, from and on the Services. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons: Pages of the Services may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit PRPG, for example, to count users who have visited those pages and/or for other related statistics (e.g., recording the popularity of certain content and verifying system and server integrity, etc.).
- Local Storage: Local storage is an industry standard method we may use to store and retrieve Information on a User's computer and/or Device (e.g., caching, HTML5, etc.) in a web browser. Your web browser may offer settings for you to



control local storage options. Please see Section 6 below for more details.

We may associate the information obtained through these technologies with other information we may collect about you so that we can, among other things, better customize your experience using the Services and/or the advertisements and promotions you see. Please see Section 6 below for more information on how to opt-out of the collection and use of Information collected via certain automatic collection technologies.

- **Information from Other Sources.** We may collect information from other sources, such as publicly available information from commercially available sources and information from our affiliates or business partners.

### **3. THIRD PARTY ADVERTISING/ANALYTICS SERVICE PROVIDERS**

We may also use a variety of third party advertising networks, data exchanges, traffic measurement service providers, marketing

analytics service providers and other third parties (collectively, “Third Party Advertising/Analytics Service Providers”) to, for example, serve advertisements on our website, facilitate targeting of advertisements and measure and analyze advertising effectiveness and traffic on the Services. PRPG does not control these Third Party Advertising/Analytics Service Providers, and/or their use of tracking technologies, which is instead governed by the privacy policies of any such Third Party Advertising Service Provider. Please see Section 7 below for more information on how to opt-out of the collection and use of Information collected via certain automatic collection technologies.

## **4. HOW WE MAY USE AND DISCLOSE YOUR INFORMATION**

We use the Information we collect to provide our Website and all its features to you, including to (a) measure and improve the Services, (b) improve your experience with both online and off-line services by delivering content that you will find relevant and interesting, including advertising and marketing messages, (c) allow you to comment on content; and (d) provide you with

customer support and to respond to inquiries. Additionally, we may also use the Information we collect about you as follows:

- **To allow service providers, contractors and other third parties to assist us in providing and managing our website:** We may make your Information available to certain third party service providers, such as contractors, agents or sponsors, who help us manage or provide our website.
- **To provide co-branded services and features:** We may offer co-branded services or features, such promotions, together with a third party ("Co-Branded Services"). These Co-Branded Services may be hosted on the Services or on the third party's service. By virtue of these relationships, we may share the Information you submit in connection with the Co-Branded Service with the third party. The third party's use of your Information will be governed by the third party's privacy policy.
- **To deliver relevant advertisements:** We and our service providers may use the Information we collect from and about you to deliver relevant advertisements to you when you use the Services or another service.

- **To contact you:** We may periodically send promotional materials or notifications related to the Services and/or your User Account.
- **To share with our affiliates:** We may share your Information with our affiliates for the purposes described in this Privacy Policy.
- **To share with business partners:** We may share your Information with business partners to permit them to send you marketing communications consistent with your choices and preferences.
- **To disclose certain Information in User Content intended for disclosure:** We may provide you and other Users with an opportunity to participate in viewing communities and other message, comment and communication features on our Website, including in connection with Third Party Services, and may provide you with the opportunity to submit, post, publish and otherwise make available User Content to other Users of the Services or to the public. Certain Personal Information associated with the User Content, for example, your name or photograph, may be intended for disclosure. We will disclose any such

Personal Information in connection with the display of, and other services relating to, such User Content. You acknowledge that once submitted, posted, published and/or otherwise made available, User Content may be distributed outside the Services by Users with access to such User Content and information, and that the Services do not control who views or distributes same. You may not be able to “undo” or “delete” any User Content. Accordingly, you should not submit, post, publish or otherwise make available any User Content you wish to remain private or confidential or which may contain any sensitive information. Please see the [Terms of Use Agreement](#) for more information regarding User Content and the terms and conditions associated therewith.

- **To protect the rights of PRPG and others:** We may disclose your Information where necessary in order to: (i) protect, enforce, or defend the legal rights, privacy, safety, or property of Readerlink and our affiliates and their respective employees, agents and contractors (including enforcement of our agreements and our [Terms of Use Agreement](#)); (ii) protect the safety, privacy, and security of Users of our Website or members of the public; (iii) protect against fraud

or for risk management purposes; (iv) comply with the law or legal process; and/or (v) respond to requests from public and government authorities.

- **To complete a merger or sale of assets:** If PRPG sells all or part of its business or makes a sale or transfer of its assets or is otherwise involved in a merger or transfer of all or a material part of its business, we may transfer your Information to the party or parties involved in the transaction as part of that transaction.
- **For other purposes for which you provide your consent.** We may use your information for other purposes which are disclosed to you at the time your information is collected or for purposes which can be inferred from or are obvious, given the circumstances of collection. For example, if you give us your Personal Information when entering a contest we will use that information to facilitate your participation in that contest.

## **5. USER CHOICE AND ACCESS**

We strive to provide you with as many choices as possible to access, review, correct, update, suppress, or otherwise limit our use of the Information you have previously provided directly to us, including:

- **User Account Settings:** If you have registered for a User Account, you may have the ability to access and use certain features and functionality that provide you with the ability to set certain privacy, permission and User Account options on our Website that, among other things, (a) allow you to control the visibility of your User profile and User Content with the public and/or other Users of the Services, (b) limit the provision of certain Information to us, (c) limit our ability to take certain actions that may disclose your Information, and/or (d) update and revise certain Information you have previously provided. Please be aware that that if you limit the collection of certain Information, you may not be able to use all of the features and functionality of our Website.
- **Email:** You may also contact us by email at [privacy@readerlink.com](mailto:privacy@readerlink.com). In your request, please include your email address, name, address, and telephone number

and specify clearly what information you would like to access, change, update, or suppress.

Additionally, you may opt-out of:

- **Receiving electronic communications (Email) from us:** If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out of receiving these marketing-related emails by (a) changing or editing your preferences of your User Account using the User Account settings (as described above), (b) contacting us via email in accordance with the procedure set forth above, and/or (c) using the opt-out mechanism (“Unsubscribe from this list” link) that appears at the bottom of such emails. Please note that there are certain service notification emails that you may not opt-out of, such as emails regarding your transactions with us.
- **Our sharing of your Personal Information with third parties for their marketing purposes:** You may request that we do not share your Personal Information on a going-forward basis with third parties for their direct marketing purposes by contacting us via email in accordance with the procedure set forth above.



We will try to comply with your request(s) as soon as reasonably practicable.

## **6. OPTING-OUT OF USE OF CERTAIN INFORMATION THAT MAY BE COLLECTED BY TRACKING TECHNOLOGIES**

- **Tracking Technologies Set by Third Party Advertising/Analytics Service Providers and Similar Third Parties:** For more information about Third Party Advertising/Analytics Service Providers and similar entities that use tracking technologies, see <http://www.aboutads.info/consumers>, and to opt-out of such Third Party Advertising/Analytics Service Providers advertising practices, go to <http://www.aboutads.info/choices/>.

For example, we use Google Analytics to help us analyse how visitors use our website. The information generated by the cookie, including your IP address, is transmitted to Google. This information is then used to evaluate visitors' use of the Website

and to compile statistical reports on Website activity for us. We do not use the statistical analytics tool to track visitors to our Website. If you do not want any information to be collected and used by Google Analytics, you can install an **opt-out** in your web browser.

- **Tracking Technologies That We Use and Set on the Services:** Most browsers are initially set to accept cookies (other than Flash cookies) and allow local storage, but you should be able to change your settings to notify you when a cookie is being set or updated, local storage is being used, and/or to block cookies and/or the use of local storage altogether. Please consult the “Help” section of your browser for more information.

Most web browsers automatically accept cookies, but you can change your browser’s settings to disable all or certain cookies if you wish. For more information on how to manage browser cookies, see <http://www.allaboutcookies.org>. Click on the links below to learn how to manage cookies on these browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)

- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)
- **Flash Cookies:** Users can manage the use of Flash technologies, with the Flash management tools available at Adobe's website, see <http://www.adobe.com/privacy/flash-player.html>.
- **Do-Not-Track Signals:** There is not currently an industry standard regarding how we should respond to these signals. Therefore, with respect to "do not track signals", we currently do not take action in response to these signals, but, if a standard is established and accepted, we may reassess how to respond to these signals.

Please note that by blocking any or all cookies you may not have access to certain features, content and/or other personalization available through the Services.

## 7. DATA COLLECTION FROM CHILDREN

Our Services are not directed to persons under 16 years of age. If you become aware that your child has provided us with personal information without your consent, please email us at [privacy@readerlink.com](mailto:privacy@readerlink.com). We do not knowingly collect Personal Information from children under 16, and if we become aware that a child under 16 has provided us with Personal Information, we will take steps to remove such information and terminate the child's account (if any).

## **8. SECURITY**

While no data transmission over the Internet is 100% secure from intrusion, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your Information. However, regardless of our efforts, it is possible that third parties may unlawfully intercept or access transmissions or private communications over an unsecured transmission. We also limit access to the Services by our own employees, contractors, service providers and those individuals who are authorized for the proper handling of such information. We require that our third party contractors and service providers follow similar standards of

security and confidentiality. However, regardless of our efforts, no one can guarantee the complete safety of your Information.

## **9. DATA RETENTION**

We will retain your Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law. Please be aware that even after you cancel your User Account, copies of certain Information from your User Account may remain viewable under certain circumstances. Because of the nature of caching technology, your User Account may not be instantly inaccessible to others. We may also retain backup information related to your User Account on our servers for some time after cancellation for fraud detection or to comply with applicable law or our internal security policies. Further, it is not always possible to completely remove or delete all of your Information due to technical constraints, contractual, financial or legal requirements.

## **10. YOUR CALIFORNIA PRIVACY RIGHTS**

Pursuant to applicable California law, including the CCPA, Readerlink makes the following disclosures regarding the personal information it collects:

| Category of Personal Information   | Category of Source from Which Data is Collected | Purpose of Collection  | Category of Third Parties to Whom Data is Disclosed |
|--|---|--|---|
| Name, phone number, date of birth, e-mail address, zip code, country, mailing address, demographic information, profile information, and credit card information | Directly from user                              | To operate, manage, and make the Service available to our users; billing, identification and authentication; to contact users about their use of the Service; to provide co-branded services and features; to provide advertising. | Service Providers                                   |
| Automatically collected information such as IP address, browser information; device information; usage data  | Cookies and other tracking technologies         | To improve the content and functionality of the Service and Site; to conduct analytics   | N/A   |

Readerlink has not sold consumers’ personal information in the twelve (12) months preceding the Effective Date of this Policy.

If you are a California resident, pursuant to the CCPA, you have the right to request:

- the categories of personal information Readerlink has collected about you;
- the categories of sources from which your personal information is collected;
- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom Readerlink shares your personal information;
- the specific pieces of personal information Readerlink has collected about you;
- the categories of personal information that Readerlink has sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt out of having your personal information disclosed or sold to third parties.

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please contact us at [privacy@readerlink.com](mailto:privacy@readerlink.com) or call us at 1-800-549-5389. To verify

your identity when you submit a request, Readerlink will match the identifying information you provide us to the personal information we have about you. If necessary, we may ask you to provide additional information for verification or ask for your oral confirmation regarding your request.

However, Readerlink will not be required to comply with your request to delete your personal information if it is necessary for Readerlink to maintain your personal information in order to:

- complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of Readerlink's ongoing business relationship with you, or otherwise perform a contract between you and Readerlink;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- debug to identify and repair errors that impair existing intended functionality;
- exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;



- comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when Readerlink's deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with Readerlink;
- comply with a legal obligation; or
- otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Readerlink will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, without limitation, by:

- denying goods or services to you;

- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

The Policy is available to consumers with disabilities. To access this Policy in an alternative downloadable format, please click [HERE].

Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of Personal Information to third parties for the third parties' direct marketing purposes, if any.

To make such a request, send an email with the subject heading "California Privacy Rights" to [privacy@readerlink.com](mailto:privacy@readerlink.com) or write to us at:

Printers Row Publishing Group

9717 Pacific Heights Blvd

San Diego, CA 92121

In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

## **11. YOUR NEVADA PRIVACY RIGHTS**

We do not currently sell your covered information as those terms are defined under applicable Nevada law. However, you may still submit an opt-out request and we will honor that request as required by Nevada law if we were to ever engage in such a sale in the future. If you are a Nevada resident and would like to opt-out of future sales of your covered information, please contact us [privacy@readerlink.com](mailto:privacy@readerlink.com). Your request must include your full name, street address, city, state, zip code, and an e-mail address so that we can contact you if needed regarding this request. You may also be required to take reasonable steps as we determine

from time to time in order to verify your identity and/or the authenticity of the request. We will respond to your request within 60 days either confirming that your request has been processed or indicating that we need an additional 30 days to complete the request.

## **12. INDIVIDUALS WITHIN THE EUROPEAN UNION**

### **Controllers of Personal Data**

Printers Row Publishing Group division of

9717 Pacific Heights Blvd

San Diego, CA 92121

is the data controller of the personal data processed through the Website.

### **Legal Bases for Processing Personal Data**

If you are an individual located in the European Union (EU), we collect and process personal data about you where we have a

legal basis for doing so under applicable EU laws. This means we collect and process your data only when:

- It is necessary for a legitimate interest (which is not overridden by your individual privacy interests), such as preventing fraud, improving our website, and increasing the security of the website and network infrastructure;
- You have consented to this collection and processing for a specific purpose;
- It is necessary to fulfil our contractual obligations; or
- It is necessary to comply with a legal obligation.

Where we rely on your consent to process your personal data, you have the right to withdraw or decline consent at any time. Some examples of where we rely on your consent to process your personal data include sending you our newsletter and marketing emails. If you wish to withdraw your consent, please contact us at [privacy@readerlink.com](mailto:privacy@readerlink.com).

Some examples of our legitimate interests for processing personal data include:

- Website and network security;
- Customer support;

- Fraud prevention;
- Marketing to current customers; or
- Improving our website.

Where we rely on our legitimate interests to process your personal data, you may have the right to object. More information on exercising this right can be found in the Individual Rights section below.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us at [privacy@readerlink.com](mailto:privacy@readerlink.com).

## **Individual Rights**

You have certain rights under EU data protection law with respect to your personal data, including the right to request access to, correct, and delete your personal data. You may also have the right to receive a copy of your personal data in a commonly used and machine-readable format and to transmit such data to another controller. You also may object to processing of your personal data, or ask that we restrict the processing of your personal data in certain instances.

To request deletion of, access to, or to make changes to your personal data, or to otherwise any of the rights in this section, please contact us at [privacy@readerlink.com](mailto:privacy@readerlink.com). Please note that not all requests can be honored.

## **Transfers, Storage, and Processing**

Our website is operated from and hosted on servers located in the United States. If you access and use our website from a location outside of the United States, any personal data you provide to us or that is otherwise collected may be transferred to and processed in the United States or any other jurisdiction in our sole discretion. Users of our website should be aware that the laws that apply to the use and protection of personal data in the United States or other countries or jurisdictions to which we transfer, or in which we process, personal data may differ from those of your country of residence. Users who access or use our website from jurisdictions outside of the United States do so at their own choice and risk and are solely responsible for compliance with local law. While we take steps to safeguard your personal data, the United States has NOT been deemed by the European Commission to ensure an adequate level of protection for personal data. Accordingly, the level of protection provided in the United

States or other non-EU countries and jurisdictions from which you may access our website may not be as stringent as that under EU data protection standards or the data protection laws of some other countries, possibly including your home jurisdiction.

By signing up for our e-mail lists through our Website, you consent to allow your personal data to be transferred across borders to the United States or to other countries or jurisdictions in which PRPG or its third-party associates may process personal data.

### **Data Protection Authority Assistance**

If you are a resident of the EU and your inquiry with us has not been satisfactorily addressed, or if you believe we are processing your personal data not in accordance with the law or this Privacy Policy, you may file a complaint with the supervisory authority in your country of residence.

## **13. THIRD PARTY WEBSITES**

Our website may be linked to other websites and platforms operated by other companies, including Third Party Services. Our



website may also feature advertisements from other third parties. PRPG is not responsible for the privacy practices of such other websites, platforms, or other services operated by third parties that are linked to or integrated with our website or for the privacy practices of Third Party Online Advertising Services. Once you leave our website via such a link to access a third party application or click on an advertisement, you should check the applicable privacy policy of the third party to determine, among other things, how they will handle any personally identifiable or other information that they may collect from you.

## **14. CHANGES TO OUR PRIVACY POLICY**

We may modify this Privacy Policy from time to time to reflect industry initiatives, changes in the law or technology, or changes in our practices regarding information collection and use. Please look at the Effective Date at the top of this Privacy Policy to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Services. If we make material changes to this Privacy Policy that expand our rights to use the Personal

Information we have already collected from you, we will notify you and provide you with a choice about our future use of such Personal Information.

## **15. CONTACT US**

If you have questions about this Privacy Policy, please contact us at:

Email: [\\_privacy@readerlink.com](mailto:privacy@readerlink.com)

Mail:

Printers Row Publishing Group

9717 Pacific Heights Blvd

San Diego, CA 92121

This Privacy Policy was last modified on the date indicated above and is effective immediately.

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