



## 2du® Privacy Policy

**Overview:** The family of 2du web sites <sup>1</sup> (referred to as “2du” in this document) are designed to offer messaging services that allow businesses and consumers (customers) to communicate with each other using state-of-the-art technologies. These services are free for consumers. We have created a system where you (the consumer) have the user controls that allow you to select (opt-in) and/or filter the message senders, the frequency of contact, and the method of deliver (currently via web, SMS, email, IM, or voice). These controls protect you from being sent unwanted messages (spam). While there is the potential for this to happen once, you are given easy administration controls that let you stop messages from any business (advertiser) at any time. We also believe that there is great value in giving demographic information about you to businesses (advertisers) so they can tailor their information and specials to be relevant to your location, gender, lifestyle and interests. When this is done responsibly, we believe that both you (the consumer) and businesses (advertisers) will create maximum value for each other.

**Public vs. Private Info:** We divide information as follows:

**Private information:** The following information is considered private and will NOT be shared with any 2du member businesses or 3<sup>rd</sup> parties: Your Name, Street Address, Phone Number, E-mail Address. The only case where this information will be released is if you specifically approve the exposing of this data (For example: Are you sure you want to send your email address ?), or if a governmental agency, or an attorney, subpoenas your private information, or makes a formal request for discovery pursuant to any legal action, or pending legal action.

**Public Information:** The following demographic information will be shared with member businesses and 3<sup>rd</sup> parties to help identify what information and specials will be appropriate for you: Account Display Name, Age, Gender, City, Zip Code, Phone model and capabilities, Mobile phone service provider, member completed interest profiles, Company selection patterns, frequency of use, and other site behavior and usage pattern data. Whenever further information is requested (for example, opinion polls), we will always identify whether the data being collected is to be considered private or public.

**Why do we share information with others?** We do this to create value for BOTH you and the business owners in your community. We understand that this info sharing can be disconcerting to many people, but please consider the following situations: By sharing

gender information with businesses, only women will get Hair Salon specials, and only men will get Auto Parts specials. If you select in your interest profile that you are interested in electronics (or NOT interested), then the local electronics store can send specials to only people who are interested, while both saving money and not bothering people who have no interest in these products. So, even though a business gets your demographic and preferences information, we feel that you will find that this actually **acts as a valuable filter** that is helping you to only get relevant information.

**NOTE:** To a business (advertiser) they will be able to see age, gender, zip code, etc. under the headline of you being "**Member #62453**" or by your publicly visible "**<Display Name>**".

**Conformance:** We follow the Children's Online Privacy Protection Act<sup>2</sup>, the FCC's CAN-SPAM Act<sup>3</sup> regulations and the Mobile Marketing Association Consumer Best Practices Guidelines<sup>4</sup>. Individual mobile carriers also have consumer notification regulations which we adhere to.

**Cookies.** A cookie is a small data file that is sent to your computer when you first visit a website. As with most website cookies, our cookies include an identification number that is unique to the computer you are using. This identifier helps us better understand our user base and how they are using our site and services.

When you sign up for a 2du account, we set a cookie on your computer. We use cookies for a number of reasons, such as recognizing you when you visit the site, displaying the site according to your chosen user settings for language, and maintaining the security of your account. We may also use the cookies to collect aggregated information about the use of 2du to maintain, analyze and improve the service. If you set your browser so that it refuses cookies, you will not be able to use the 2du service.

**Log information.** When you use your 2du account, we collect certain information (the same information that most web sites log when they are accessed). This information, contained in the "header" of your request to access the 2du page, usually includes the browser type you used, your Internet Protocol address, and the date and time of day. In addition, we log the unique ID provided by our cookie and the URL of the last site you visited. As a basic matter, we need this information to help us provide our services to you. For example, we need to validate your identity in order to maintain the security of your task lists. We also need to know what Internet Protocol address your query came from so we can send the appropriate pages back to you.

The log information is also important for security, audit, quality improvement, and other internal business purposes.

**Data Storage.** The contents of your 2du account are stored and maintained on the shared host servers as outlined above. Because we keep back-up copies of data for the purposes of recovery from errors or system failure, residual copies of some data may remain on our systems for some time, even after you have deleted information or after the termination of your account. 2du employees do not access this information unless you specifically request them to do so (for example, if you are having technical difficulties accessing your account) or if required by law, to maintain our system, or to protect 2du or the public.

**Contact directly from 2du.** 2du may send you information related to your 2du account or 2du services. Because we believe such information is important, you will not be given the opportunity to opt-out of receiving them. We will limit these contact to only important account information such as a password change has occurred, or an important policy change. These notifications will be extremely rare.

**Editing or Deleting your Account.** You can edit or terminate your 2du account at any time in the "My Account" section of your account. If you terminate your account, we typically deactivate accounts within two business days of such requests. You should be aware, however, that residual copies of information may remain stored on our systems even after the deletion of information or the termination of your account.

## References

<sup>1</sup> = 2du.com, my2du.com and other domain names that link to these web sites.

<sup>2</sup> = Children's Online Privacy Protection Act ( <http://www.ftc.gov/ogc/coppa1.htm> )

<sup>3</sup> = FCC's CAN-SPAM Act<sup>3</sup> ( <http://www.fcc.gov/cgb/consumerfacts/canspam.html> )

<sup>4</sup> = Mobile Marketing Association Consumer Best Practices Guidelines  
( <http://www.mmaglobal.com/bestpractices.pdf> )

Please contact us if you have any questions, comments or concerns about this policy.

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