PRIVACY POLICY

Effective Date: September 25, 2014

The National Shelley China Club (NSCC) values your privacy and desires to ensure your experience with NSCC and our website (Site) and all our present or future products, mobile applications, software, blogs, forums, channels and sharing services (collectively the "Services") are as satisfying and safe as possible. We have established this privacy policy to explain and describe what personal information NSCC collects on our Site and/or Services, how NSCC uses it, and your options regarding such information.

Your continued use of our Site and/or Services or any other content, products or other services covered by this Policy constitutes your acceptance and agreement to this Policy, the NSCC's Terms of Use, and any updates to either of them. By accepting this Privacy Policy, you expressly consent to the information handling practices described in this Policy. This Privacy Policy is a part of and incorporated into NSCC's Terms of Use associated with its Site and/or Services.

Contacting Us

If you have questions about this policy, please feel free to contact us at:

National Shelley China Club privacy@shelleychinaclub.com

1. Information We Collect

This Policy describes our collection, use, and sharing of "Personal Information" which is defined as information that directly identifies an individual, such as first and last name, mailing address, email address, billing information, demographics, passwords or other online contact information, or telephone number.

We collect Personal Information, as well as non-personally identifiable information, on the NSCC Site and/or Services in two ways. First, we collect information you provide to us in optional, voluntary submissions, such as in registration forms, user profiles, requests for service, and software and mobile applications downloads. Second, some Personal Information may be collected automatically as described below in "Passive Data Collection."

You are under no obligation to provide, and can decline to provide, any requested information at any time. However, if you decline to provide personal information that is reasonably necessary to participate in certain activities, you may not be able to participate in those activities on the Site and/or Services.

Passive Data Collection

If you visit our website to browse, read, or download information:

- Your web browser automatically sends us (and we may retain) information such as the:
 - Internet domain through which you access the Internet (e.g., yourServiceProvider.com);

- Internet Protocol address of the computer you are using;
- type of browser software and operating system you are using;
- o date and time you access our site; and
- o the Internet address of the site from which you linked directly to our site.
- We will use this information as aggregate data to help us maintain this site, e.g., to determine
 the number of visitors to different sections of our site, to ensure the site is working properly,
 and to help us make our site more accessible and useful. We will not use this information to
 identify individuals, except for site security or law enforcement purposes.

In addition, we may receive passively-collected information through a variety of other methods including but not limited to:

Cookies

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device. Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. You can find more information about cookies at: www.allaboutcookies.org. NSCC does not require that you accept cookies, and you may restrict use of cookies at any time by adjusting your browser's privacy settings; however, some functionality on our Site and/or Services may be disabled if you decline to accept cookies.

Analytics Tools

We use "Google Analytics" to collect information about use of this site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. We use the information we get from Google Analytics only to improve this site. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information.

Google Analytics employs cookies to define user sessions, which allows for the collection of data about how visitors are using the websites. Google Analytics uses only first-party cookies for data analysis. This means that the cookies are linked to a specific website domain, and Google Analytics will only use that cookie data for statistical analysis related to your browsing behavior on that specific website. According to Google, the data collected cannot be altered or retrieved by services from other domains.

Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, Google's ability to use and share information collected by Google Analytics about your visits is restricted by the <u>Google Analytics Terms of Use</u> and the <u>Google Privacy Policy</u>. If you choose, you can opt out by turning off cookies in the preferences settings in your web browser. In addition, you may opt out of Google Analytics by visiting the <u>Google Analytics opt-out page</u>. For more information on Google Analytics, please visit <u>Google Analytics</u>.

2. How We Use Information

We collect and use Personal Information in accordance with this Policy and only for the purposes stated in this Policy and/or at the time we request such Personal Information from our users, or for such purposes to which a user may otherwise consent. We do not use or share Personal Information in a way that is incompatible with the purposes for which such Personal Information was requested and authorized for use by us.

If you choose to provide Personal Information about yourself, NSCC will use or disclose this information only to communicate directly with you or as may be necessary to accomplish the purpose for which the information was supplied. NSCC will not sell, rent or otherwise disclose that information to third parties unless such disclosure is necessary for the purposes set forth in this Policy, by law, or a policy or notice contained or associated with a specific Site(s) and/or Service(s).

Generally, we use Personal Information to establish and enhance our relationship with users through three main categories: (1) Communication; (2) Optimization; and (3) Sharing Features. Below, we provide some specific examples of how we use the Personal Information and other information we collect.

Communication and Responding to Requests

We use your information, including Personal Information to provide you with support, process transactions, respond to requests, send newsletters and updates, send special offers, seek your opinions and feedback, and connect users to the NSCC Site and/or Services.

Optimization

We use user information, including Personal Information, behavioral metrics, and other non-personally identifiable information to operate, provide, improve, and maintain our Site and Services, to develop new products and services, to prevent abuse and fraud, to personalize and display other content for you, and for other administrative and internal business purposes.

Sharing Features

We use your information, including Personal Information and any other information you submit directly or through passive means to provide you with various ways to connect and share content (e.g., web content, user generated videos, text, drawings, and screen and lecture captures, and quizzing features, media, tools, services and other products) with third parties. For example, we may provide you with the opportunity to email a link to certain content to another person. To use this feature, we may require you to provide certain Personal Information including your email address and the email address of each person to whom you send the link.

We also may allow you to share links to content with users of various third party services (e.g., social networking, search and sharing services). When sharing links using one of these third party services, if you are not already logged in to the third party service, you will need to supply login credentials for it. If you are not a registered user of the third party service, you will need to sign up for it. You are supplying the registration information or login credentials for the third party service directly to that third party, and not to us. By using any of these third party services to share links to content, you permit us to access, use and disclose any information relating to your account on each such third party service (such

as your user name and profile information) that is available to us through the third party service, including through its application programming interface (API) pursuant to this Policy.

3. When We Disclose Personal Information

We do not share Personal Information with third parties except in the limited circumstances described in this Policy.

Service Providers

We may provide Personal Information to third parties for their use in performing internal business functions (e.g., payment processing, customer service, maintenance, security, data analysis, email transmission, beta testing, or data hosting) on our behalf. Additionally, some third party service providers may collect information, including Personal Information, on our behalf. Whenever possible, we require such third-parties to only collect and use Personal Information in accordance with this Policy, to maintain the confidentiality, security, and integrity of such Personal Information, and for no purpose other than providing us with our requested services.

Interactive Features

If you use a forum, blog, channel, bulletin board, chat room, user commenting features, or other interactive sharing or social features that may be offered through our Site and/or Services, you should be aware that any Personal Information you submit, display, or publish there is considered publicly available and can be read, collected, used, and disclosed by other users of those features, by us, and other third parties without restriction, except to the extent limited access features are available, if any.

Legal Requirements

We may disclose Personal Information if we have a good-faith belief that doing so is required by a subpoena, warrant, or other judicial or administrative order or otherwise required by law. Additionally, we may disclose Personal Information where we, in good faith, deem it appropriate or necessary to prevent violation of our Terms of Use, or our other agreements; take precautions against liability; protect our rights, property, or safety, or those of any individual or the general public; maintain and protect the security and integrity of our Site and/or Services or infrastructure; protect ourselves and our Site and/or Services from fraudulent, abusive, or unlawful uses; investigate and defend ourselves against third party claims or allegations; or assist government regulatory agencies.

4. Your Choices

Submitting Personal Information

If you do not want to submit Personal Information that is necessary to provide or use our Site and/or Services or to fulfill your request, you will not be able to access and/or participate in the Site and/or certain NSCC Services. For example, you will not be able to register for a member account with us or access and/or use certain NSCC product features or online services such as NSCC Update. In addition, your refusal to submit Personal Information may limit our ability to respond to your support inquiry in a timely fashion.

Cookies

As noted above, NSCC does not require that you accept cookies, and you may restrict use of cookies at any time by adjusting your browser's privacy settings; however, some functionality on our Site and/or Services may be disabled if you decline to accept cookies.

5. Access to Personal Information

We provide individuals with reasonable access to Personal Information that they provided to us and the reasonable ability to review and correct it or ask for deletion unless we have to keep that information for legitimate business or legal purposes. We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup servers.) To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access to your data. If you have questions regarding such information, please contact us via email at the address identified in the "Contacting Us" section.

6. Children Under 13

NSCC does not knowingly collect information from children under the age of 13 and does not target its website to children under these ages. We encourage parents and guardians to take an active role in their children's online and mobile activities and interests.

7. Links to non-NSCC websites

The NSCC site and/or services may provide links to third-party applications, products, services, or websites for your convenience and information. If you access those links, you will leave the NSCC Site. We do not control those third party sites or their privacy practices, which may differ from NSCC's practices. We do not endorse or make any representations about third-party sites. The personal data you choose to provide to or that is collected by these third parties is not covered by this Policy. We encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your personal information.

We may also provide social media features that enable you to share information with your social networks and to interact with NSCC on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites with which you interact to make sure you understand the information that may be collected, used, and shared by those sites.

8. Security

We take reasonable measures, including the implementation and maintenance of physical, electronic, and managerial procedures, in an effort to assure the security, integrity, and accuracy of all Personal Information that we collect. Our efforts include procedures designed to avoid unauthorized access, alteration, misuse or disclosure of Personal Information. If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the NSCC Site and/or Services covered by this Policy and providing Personal Information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues.

9. Data Retention

We retain Personal Information for no longer than is deemed useful to carry out our Club's purposes, or as we believe may be legally required.

10. Changes and Updates to This Policy

In our sole discretion, we may update this Policy from time to time. If we do, we will post the revised Policy and update the "effective date" at the top of the Policy. If we make material changes to how we use Personal Information, we will post the updated Policy on the affected Site and/or Service, and prominently post a notice of the change on the Site's home page. We encourage you to review this Policy periodically to stay informed about our collection, use and disclosure of Personal Information. Your continued use of our Sites and/or Services or any other content, products or other services covered by this Policy constitutes your agreement to this Policy and any updates.

11. International Users

NSCC Site and/or Services is hosted in the United States. If you utilize our Site and/or Services from the European Union or Switzerland, or any other region with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your personal data outside of those jurisdictions to the United States. The United States does not have the same data protection laws as the European Union, Switzerland and other regions. By providing Personal Information under this Policy, you consent to the use of your Personal Information in accordance with this Policy and the transfer of your Personal Information to the United States.

12. No Error Free Performance

NSCC does not guarantee error-free performance under this Privacy Policy. NSCC will use reasonable efforts to comply with this Privacy Policy and will take prompt corrective action when NSCC learns of any failure to comply with our Privacy Policy. NSCC shall not be liable for any incidental, consequential or punitive damages relating to this Privacy Policy. This Privacy Policy shall be governed by the laws of the State of Missouri and the United States, to the extent applicable.