

PRIVACY DISCLOSURES

IMPORTANT INFORMATION ABOUT YOUR PRIVACY

Protecting your privacy is important to Scoocher ("Scoocher") is referred to in this notice as "we", "us" and "our"). We understand that you expect your personal information to be confidential and secure. This notice will help you understand what information we collect about you, how we use it and how we protect it. In addition, this notice describes your right to prevent information from being shared with any affiliates or non-affiliates (under certain circumstances).

INFORMATION WE COLLECT

In connection with providing services to you, we collect nonpublic and personal information ("nonpublic personal information"). Nonpublic personal information is information that is not available from a public source. We obtain nonpublic personal information about you from the following sources: Information we receive from you on account forms; Information concerning your transactions with us, our affiliates or others; and Information we receive from third parties.

INFORMATION WE DISCLOSE AND WHO WE SHARE IT WITH

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. Customer service agents, and other trusted third parties provide services to us. We share information with these service providers in order to complete the transactions that you request. All service providers are bound by contract to maintain the confidentiality of your personal information. We do not sell or rent your personal information to third parties for marketing purposes.

FORMER CUSTOMERS

If you close your account(s) with us or you become an inactive customer, we will continue to adhere to the privacy practices described in this notice.

OUR SECURITY PROCEDURES

We restrict access to nonpublic personal information about you to our employees, agents and subcontractors who need this information to provide products or services to you. We maintain very advanced physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

YOUR CHOICES REGARDING INFORMATION SHARING

We are permitted under law to (and in some cases must) disclose nonpublic personal information to "nonaffiliated third parties" in certain circumstances. For example, we may disclose nonpublic personal information to process your transaction at your

request, to control fraud and identity theft, to make certain information a matter of public record and to government entities in response to such things as subpoenas. Other than these disclosures, which are permitted by law, we do not disclose and may not disclose without your consent.

NOTE REGARDING CHILDREN UNDER 18

Our website is a general audience site, and we do not knowingly collect personal information from children under the age of 13.

VISITING OUR WEBSITE FROM OUTSIDE OF THE UNITED STATES

This Privacy Policy is intended to cover collection of information on or via our website from residents of the United States. If you are visiting our website from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. Please be assured that we seek to take reasonable steps to ensure that your privacy is protected. By using our services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy.

STATE LAW

You may have privacy rights under applicable state law in addition to those outlined in this privacy policy.

CHANGES IN THIS POLICY

Scoocher may change this privacy policy at any time typically relating to improvements in technology or changes in law. We will promptly post any policy changes to this page and notify our participants directly with notice of any material changes.