

SPECIAL RULES FOR BRUSSELS + MUSCLES® PROGRAM

Last modified May 1, 2015

General Rules. The general statements in the Be Colorado® Privacy Policy apply to the Brussels+Muscles website as well as the special rules that follow with respect to personal information of children under the age of 13 participating in the Brussels+Muscles program.

Information Collection During Registration Process. In order for a child to participate in the Brussels+Muscles program, an eligible parent must register through the Brussels+Muscles website. The information collected for registration includes personal information of the parent and the participating child such as parent and child's full name, parent's mailing address and child's age. This information is collected directly from the parent. No information is collected from children under the age of 13 during the registration process. Brussels+Muscles sends the personal information provided by the parent to our service providers in order for the parent to receive the child's activity tracker, track the child's activity and participate in online games.

Ongoing Information Collection. Following the registration process, an eligible parent will have an account accessible from the Brussels+Muscles website. On this account, a parent will be able to track a child's activity on GeoPalz and the child's participation in online games on ZisBoomBah. Brussels+Muscles collects the information provided by our service providers in order to allow Brussels+Muscles and parents to monitor program participation. The information collected from GeoPalz, a service provider, and provided to Brussels+Muscles includes the parent's email address; child's gender; child's age; type of device (ibitz or legacy V2); currently accumulated points; the number of steps taken by the child per day and per lifetime; average steps per day; a list of the child's goals, including goal category, goal unique identifier, progress toward the goal, goal type, user supplied goal description and the unique identifier of the planet associated with the goal; Amazon points; Disney Penguin coins; registration date; last activity date; and retention time. Information is collected through the participant's custom application programming interface (API). The information collected from ZisBoomBah, a service provider, and provided to Brussels+Muscles includes a unique adventure identifier, a video embedded adventure url, adventure name, progress on the adventure, and the quests for the adventure, including: the unique quest identifier, quest name, quest sort indicator, points earned on quest completion, percentage of quest completion, total quest goals, and total quest goals completed. Information is collected through the participant's custom API.

Information Use and Disclosure. The personal information collected above is used for monitoring program participation. The information is securely maintained and is used only for Brussels+Muscles to monitor program participation and to allow a parent to monitor his/her child's participation in the program. The information collected on or through the Brussels+Muscles website may be shared with third-party service providers. These service providers will use the personal information only for the purposes of allowing Brussels+Muscles to monitor program participation and allowing a parent to monitor his/her child's participation in the program. To the extent required or permitted by law, Brussels+Muscles may also collect, use and disclose such information in connection with security-related

or law enforcement investigations or in the course of cooperating with authorities or complying with legal requirements. Information may also be used as permitted by law to protect our rights or property, our website, or its users and their safety. Other than our service providers listed below, we will not share your child's information with third parties.

Our Service Providers. Brussels+Muscles uses the following service providers:

- GeoPalz (GeoPalz, LLC) provides the activity trackers and provides online monitoring of activity.
- ZisBoomBah (Online Tools for Parents, LLC) provides online games and education.
- M7 (M7 Business Systems, LLC) provides printing and mailing services.
- Foraker Labs (Foraker Labs, LLC) provides website services and data integration.
- Amazon (Amazon Web Services, Inc.) provides website hosting services.

We require our service providers to maintain the confidentiality, security and integrity of the information and limit the use to the specific services the provider is performing for the Brussels+Muscles program. Additionally, ZisBoomBah and GeoPalz are compliant with the Children's Online Privacy and Protection Act (COPPA).

ZisBoomBah Privacy Policy: <http://blog.zisboombah.com/about-us/privacy/>

ZisBoomBah Terms of Use: <http://blog.zisboombah.com/zisboombah-terms-of-use-forbrusselsmuscles-program/>

GeoPalz Privacy Policy: <https://geopalz.com/privacy-policy>

GeoPalz Children's Privacy Policy: <https://geopalz.com/childrens-privacy-policy>

GeoPalz Terms of Use: <https://geopalz.com/terms/>

If you have any questions or concerns regarding the Brussels+Muscles Privacy Policy or any of Brussels+Muscles' service providers, please contact Be Colorado/CU Health Plan Administration at 1800 Grant Street, Suite 225, Denver, Colorado 80203; 303-860-4199; cuhealthplan@cu.edu.

Child's Participation and Parent's Rights. We encourage parents to regularly monitor and supervise their children's online activities. A child's participation in any of the Brussels+Muscles activities is not conditioned on the disclosure of more information than is reasonably necessary to participate in the activity. A parent has the option to agree to the collection and use of his/her child's information without consenting to the disclosure of information to third parties, understanding that the parent would not be able to view his/her child's progress in the Brussels+Muscles program. A parent can review the child's information, ask to have it deleted and/or refuse to allow any further collection or use of the child's information. To exercise these rights, parents should contact CU Health Plan Administration via the contact information listed above.

Policy Changes. We may change this policy from time to time. The revised policy will be posted on the Be Colorado and Brussels+Muscles websites.