

## Internet Concessionaire Customer Privacy Policy

1. All Internet Concessionaires must use some form of encryption mechanism (example, Secure Sockets Layer (SSL) or Pretty Good Privacy (PGP) encryption, etc.) to protect Exchange online customers' sensitive information when shopping at an Internet Concessionaire's Internet site(s). Sensitive information such as credit card information must be encrypted before it is sent over the Internet. AAFES information must be stored on secured computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. The terms AAFES and Exchange online are used interchangeably in this policy statement.
  - a. Internet Concessionaires must have written procedures in place for notifying AAFES within 8 hours, and all Exchange online customers within 24 hours, on any security incident that might adversely affect the Exchange online customer, measured from when the Internet Concessionaire becomes aware of the incident. Security incidents include but are not limited to the following:
    - i. Web servers/site compromise
    - ii. Stolen credit card information
    - iii. Identity fraud
  - b. Internet Concessionaires are responsible for safeguarding Exchange online customers' information and may be held liable if the best common security practice was not adhered to and negligence can be proven.
2. Internet Concessionaires are prohibited from asking Exchange online customers for their Social Security Numbers, and are prohibited from asking Exchange online customers for personal information not necessary to complete the transaction.
3. Internet Concessionaires must obtain written consent for the collection, use, and sharing of a child's (ages 12 and under) personal information online, from the child's parent.
4. Internet Concessionaires are allowed to utilize Cookies in support of the functionality of their site and provide quality service. Information allowed to be collected and analyzed include the Internet protocol (IP) address used to connect the Exchange online customer's computer to the Internet; login; e-mail address; password; computer and connection information such as browser type and version, operating system, and platform; purchase history; the full Uniform Resource Locators (URL) click stream to, through, and from the Exchange web site, including date and time; cookie number; products viewed or searched for; Exchange online customer preference; shopping history; and Exchange online customer phone number. Internet Concessionaires must not use Cookies or other means to track or monitor the Exchange online customer beyond their session with the Internet concessionaire.
5. Internet Concessionaires must not sell, rent or lease its customer lists that include Exchange online customers, to third parties without the written consent of AAFES. Exchange online customer data must only be shared with other trusted partners to perform statistical analysis that will provide benefits to all parties involved. Internet Concessionaires are prohibited from using Exchange online customers' information except to provide quality service and are required to maintain the confidentiality of such information.
6. Internet Concessionaires must not add Exchange online customers to their mailing list without the Exchange online customer's consent, but must use an "opt in" system for Exchange online customer consent for mailing lists and sharing of such information with others. Exchange online customers must be given the option to request to have their information removed from the Internet Concessionaire's mailing list and to modify, correct or update their information on the Internet Concessionaire's database.
7. Internet Concessionaires may disclose Exchange online customers' personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:
  - a. Conform to the edicts of the law or comply with legal process served on AAFES or the site.
  - b. Protect and defend the rights or property of AAFES, or an AAFES Web site.
  - c. Act under exigent circumstances to protect the personal safety of users of AAFES, its web sites, or the public.
8. Internet Concessionaire's security and privacy practice will be reviewed on a quarterly basis and information regarding specific Internet Concessionaire's connections will be updated as necessary. Internet Concessionaires not conforming to this policy and the Privacy Act of 1974 will have their link removed from the AAFES web site.
9. This policy will remain in effect after the business relationship between AAFES and the Internet Concessionaire is ended to ensure that Exchange online data will continue to be safeguarded.
10. Questions or concerns regarding this specific policy, or AAFES general computer security policies should be directed to the contracting officer.

Visit EchoMetrix At: [www.echometrix.com](http://www.echometrix.com) and [www.SentryParentalControls.com](http://www.SentryParentalControls.com)

This e-mail is confidential and may be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation.

---

**From:** Mccoy, Matthew R. [mailto:[mccoyma@aafes.com](mailto:mccoyma@aafes.com)]  
**Sent:** Wednesday, October 14, 2009 10:09 AM  
**To:** Kevin Sullivan; Jeffrey Supinsky  
**Cc:** Burton, Chris W.; Trussell II, James E.  
**Subject:** FTC Complaint  
**Importance:** High

I was forwarded the attached complaint submitted to the FTC by EPIC. It is very unfortunate that you did not inform me of this issue. Our customer's privacy and security is very important to us, and we trust our Mall Partners to maintain the security of our customers.

I have removed your site, and it will stay offline until this matter with EPIC and the FTC is resolved.

**Matthew McCoy**  
Manager, Exchange Online Mail  
AAFES Direct Marketing  
214.312.2880  
[mccoyma@aafes.com](mailto:mccoyma@aafes.com)

10/27/2009

**Schreurs, Teresa L.**

---

**From:** Mccoy, Matthew R.  
**Sent:** Thursday, October 15, 2009 12:25 PM  
**To:** Jeffrey Supinsky; Kevin Sullivan  
**Cc:** Burton, Chris W.; Trussell II, James E.; Jeffrey Greene  
**Subject:** RE: FTC Complaint

Thank you Jeffrey.

My afternoon is booked, but what about tomorrow morning at 9:00 am CT?

**Matthew McCoy**  
Manager, Exchange Online Mail  
AAFES Direct Marketing  
214.312.2880  
[mccoyma@aafes.com](mailto:mccoyma@aafes.com)

---

**From:** Jeffrey Supinsky [mailto:[jsupinsky@echometrix.com](mailto:jsupinsky@echometrix.com)]  
**Sent:** Thursday, October 15, 2009 12:00 PM  
**To:** Mccoy, Matthew R.; Kevin Sullivan  
**Cc:** Burton, Chris W.; Trussell II, James E.; Jeffrey Greene  
**Subject:** RE: FTC Complaint

Matt,

I apologize I found two typos in the last email I sent.

I have attached our Policy and the procedures we follow to insure compliance with all the rules and regulations that are currently in place and even some that are no longer in effect.

Additionally, during the installation process we fully disclose all of Family Safe's procedures and clearly display an opt-out button for all anonymous aggregate data sharing in our (EULA) End User License Agreement. You can click on this link to access this page. <http://www.sentryparentalcontrols.com/Support/Policies/EULA.aspx>

Jeffrey Greene our CEO and I would like to set up a call with you following your review of our policies. Please let me know if we can schedule a time to speak.

Jeffrey

**From:** Jeffrey Supinsky  
**Sent:** Thursday, October 15, 2009 12:44 PM  
**To:** 'Mccoy, Matthew R.'; Kevin Sullivan  
**Cc:** Burton, Chris W.; Trussell II, James E.; Jeffrey Greene  
**Subject:** RE: FTC Complaint

Matt,

I have attached our Policy and the procedures we follow to insure compliance will all the rule and regulations that are currently in place and even some that are no longer in effect.

10/27/2009

Additionally, during the installation process we fully disclose all of Family Safe's procedures and clearly display an opt-out button for all aggregate data sharing in our (EULA) End User License Agreement. You can click on this link to access this page. <http://www.sentryparentalcontrols.com/Support/Policies/EULA.aspx>

Jeffrey Greene our CEO and I would like to set up a call with you following your review of policies. Please let me know if we can schedule a time to speak.

Jeffrey

**From:** Mccoy, Matthew R. [mailto:mccoyma@aafes.com]  
**Sent:** Thursday, October 15, 2009 10:39 AM  
**To:** Jeffrey Supinsky; Kevin Sullivan  
**Cc:** Burton, Chris W.; Trussell II, James E.; Jeffrey Greene  
**Subject:** RE: FTC Complaint

Please send me a detailed description of how collected customer information is handled. If this information is used for marketing services, please explain how specific customers are protected.

Thank you,

**Matthew McCoy**  
Manager, Exchange Online Mail  
AAFES Direct Marketing  
214.312.2880  
[mccoyma@aafes.com](mailto:mccoyma@aafes.com)

---

**From:** Jeffrey Supinsky [mailto:jsupinsky@echometrix.com]  
**Sent:** Thursday, October 15, 2009 9:06 AM  
**To:** Mccoy, Matthew R.; Kevin Sullivan  
**Cc:** Burton, Chris W.; Trussell II, James E.; Jeffrey Greene  
**Subject:** RE: FTC Complaint

Matt,

I do want to correct one statement I made to you yesterday, I would like to correct my statement that Randy Zelin one of Board of Directors was former Assistant District Attorney not former Assistant US Attorney.

Again there is no matter with the FTC to resolve.

Please give me a call to discuss.

Regards,

Jeffrey Supinsky

Direct (516) 547-0872  
Office (516) 802-0223 x455

**Supervise your internet active children without looking over their shoulder.**

10/27/2009

**Schreurs, Teresa L.**

---

**From:** Mccoy, Matthew R.  
**Sent:** Tuesday, October 27, 2009 8:56 AM  
**To:** Jeffrey Supinsky  
**Cc:** Kevin Sullivan  
**Subject:** Exchange Online Mall

Good Morning Jeffrey,

Thank you for the additional information you provided me on your services. The collection of AAFES customer information (personal or otherwise) for any other purpose than to provide quality customer service is prohibited in the AAFES Internet Retail Agreement Internet Concessionaire Customer Privacy Policy (point 5). Giving our customers the ability to opt out does not address this issue. It is prohibited in any case. Because of this, we must remove Sentry Parental Controls from the Exchange Online Mall.

Thank you,

**Matthew McCoy**  
Manager, Exchange Online Mall  
AAFES Direct Marketing  
214.312.2880  
[mccoyma@aafes.com](mailto:mccoyma@aafes.com)

10/27/2009