SPARX TECHNOLOGY INC.

PRIVACY POLICY

Sparx Technology Inc. created this privacy policy statement ('Privacy Policy') for the use of Sparx Technology ("Sparx Technology" or "we" or "us" or "our") to demonstrate our commitment to protecting the privacy of our users and to explain our privacy policies and procedures. This Privacy Policy governs the privacy practices and procedures of Sparx Technology Inc. with respect to the data it collects via the Sparx Technology web sites that post this Privacy Policy and all sub-domains, wireless application protocol versions and other mobile versions thereof (collectively, the "Web Sites"). Neither this Privacy Policy nor Sparx Technology Inc.'s Terms and Conditions apply to data collected by any other means, including any offline means. By visiting our Web Sites or accessing the Sparx Technology application, you are consenting to the practices and procedures described in this Privacy Policy. Please take a moment to review the sections below. This Privacy Policy is incorporated into, and part of, the Terms and Conditions, which govern your use of Sparx Technology.

POLICY CHANGES

We suggest that you review this Privacy Policy and the Terms and Conditions periodically as we may modify them from time to time as our services evolve. Your continued use of Sparx Technology after the posting of a revised Privacy Policy signifies your acceptance of the revised terms. Under certain circumstances (e.g., with respect to material changes), we may also elect to notify you of changes or updates to our Privacy Policy by additional means, such as posting a notice on the front page of the affected sites or sending you an e-mail.

WHAT INFORMATION DOES SPARX TECHNOLOGY COLLECT?

Sparx Technology collects two types of information from users of Sparx Technology: (1) non-personal information collected, for example, as you interact with our services, that cannot be used to specifically identify or contact an

individual ("Non-Personal Information"); and (2) personal information that can be used to specifically identify or contact an individual ("Personal Information").

NON-PERSONAL INFORMATION

When you use Sparx Technology, our web server and or applications, automatically recognizes and collects certain Non-Personal Information about your visit, such as your Internet Protocol (IP) Address and domain name.

Sparx Technology also collects clickstream data, which includes a trail of electronic information left at each Web Site you visit, Game you play or Application that you use. These data tell us, for example, the type of computer or device and browsing software you are using and the address of the web site, if applicable, from which you linked to Sparx Technology. We may use this clickstream data to determine how much time visitors spend on each page of our sites or applications, how visitors navigate throughout those sites and application, and how we may tailor our services to better meet the needs of visitors. Collection or use of clickstream data will be anonymous, aggregated, and will not intentionally contain any Personal Information.

Sparx Technology also uses cookies, which are small pieces of data stored by your web browser that contain data regarding your settings and preferences or other data about your visits to our Web Sites or Games. We use this information to, for example, recognize you and your computer or device when you return to Sparx Technology, provide you with access to account information you may have entered on Sparx Technology, compile statistics about traffic to Sparx Technology, and for other purposes consistent with this Privacy Policy. We do not use cookies to retrieve personal information about you from your computer.

Sparx Technology may also use Web beacon technology to help track usage and viewing of the Sparx Technology Web Sites and certain Sparx Technology applications and communications (such as emails), and usage of and access to Sparx Technology services. Web beacons, also sometimes called single pixel gifs or action tags, allow Sparx Technology to track page and message viewing counts and patterns, which we use to focus and tailor future content development and otherwise measure and improve the performance of our services.

Any or all of the above-described activities may be performed on our behalf by third party service providers of Sparx Technology.

PERSONAL INFORMATION

When you use Sparx Technology, you may be asked to provide or otherwise choose to provide Personal Information, which may include, but is not limited to your name and e-mail address. We may also request information about your likes, demographic information, your social networking preferences, and other interests you have. We collect or request Personal Information for many reasons and on different occasions during your visits to our sites and application. For example, you may provide certain Personal Information when you sign up for Sparx Technology.

You may be able to send information about our services to your friends and family members by clicking on a "Send-to-a-Friend" or similar button within the application, or in an e-mail that we have sent you. In doing so, you may provide to us the name and e-mail address of your friend or family member. We will treat this information in accordance with this Privacy Policy and applicable law.

The above are only examples of the types of Personal Information we may collect. The actual types of Personal Information collected depend on the specific product or service you request, the types of transactions you conduct within the application and the other various activities in which you participate.

LOCATION INFORMATION

If you use location-enabled products or devices to access Sparx Technology, you may be sending us location information, including information about the real-time geographic location of your device. You may also choose to note your location in your profile or otherwise voluntarily send us information about your location.

INFORMATION OBTAINED FROM THIRD PARTIES

We may supplement the information collected from you with information that is received or otherwise obtained from third parties. For example, this information may be received or obtained from our partners in sponsored content sections or

our affiliates with whom you have previously done business. Such supplemental information could include, for example, user contact information (like name, e-mail address and telephone number), user preferences (like the types of products you buy or request information about) and user demographic information (like zip code, age or income level).

We receive information about consumers from third parties to enable targeted advertising on the website(s) and application(s) that we support. The collection and use of that data is governed by the privacy policy and legal terms of the data collector and the website using the data; it is not governed by Sparx Technology.

HOW DOES SPARX TECHNOLOGY USE MY INFORMATION?

We will use information we collect from and about you to provide services to you, process and respond to your requests, help you connect with other users of our application, develop new features and offerings, improve our service offerings and protect our rights and property as well as that of third parties. We may also use your information to maintain our internal record keeping, to show you a history of your activity, to provide you with statistics about your use of Sparx Technology or to enhance your user experience. We may analyze user behavior as a measure of interest in, and use of our services, e-mails and other messaging campaigns both on an individual basis and in the aggregate. We may match information collected from you through different means or at different times, including both Personal Information and Non-Personal Information, and use such information along with supplemental information obtained from other sources.

In addition, we may use your information to send you notices (in the form of e-mails, text messages, SMS communications, notifications, mailings, and the like) as part of the services or our other offerings, or to inform you about products, services, companies and events that we think might interest you. You may opt out of receiving certain notices from us by following the instructions in the Opt Out section below.

OPT OUT

You may "opt out" or unsubscribe from our communications and non-transactional related emails by following the unsubscribe instructions in any email you receive from us. You may also update your opt-out preferences by contacting Sparx Technology.

Please understand that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us.

Please note that your choice to change your information or opt out may affect Sparx Technology's ability to provide you with the requested Sparx Technology products or services.

WHAT INFORMATION DOES SPARX SHARE WITH OTHERS?

Sparx Technology may share your information (including both Personal Information and Non-Personal Information) with third parties in certain circumstances, including the following:

Public Forums: When you contribute to a public area or feature of Sparx Technology, such as a chat room, bulletin board, list serve, blog, wiki or other communication or community tool or area, the information that you submit or post will be made available to the general public. For this reason, we recommend that you do not submit any sensitive information, including your full name, home address, phone number, other information that would enable other users to locate you, or financial information on these areas. Instead, make up a username that does not disclose your personal identity. In addition to any information you choose to post using public areas or features available on our Web Sites, we may display statistics and other information about your participation to other users or the general public.

Third-Party Offers: We may provide you with an opportunity to receive offers from other entities that have services, products and offers that we think might be of interest to you. Unless you elect not to receive such offers by following the instructions in the Opt Out section above, we may from time to time provide your Personal Information, to these entities so that they may send you these offers.

Service Providers: We may use third-party partners to help operate and deliver our products and services, and may share your information with our service providers and other third parties that provide products or services for our business (such as web site or database hosting companies, address list hosting companies, e-mail service providers, analytics companies, distribution companies, and fulfillment companies).

Non-Personal Information: We may disclose Non-Personal Information regarding our users and user behavior as a measure of interest in, and use of, our products and services and e-mails to third parties, including, for example, aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual user.

Legal Disclosures: We may disclose user information to government authorities, and to other third parties when compelled to do so by government authorities, at our discretion, or otherwise as required or permitted by law, including but not limited to in response to court orders and subpoenas. We also may disclose user information when we have reason to believe that someone is causing injury to or interference with our rights or property, other users of Sparx Technology, or anyone else that could be harmed by such activities.

Business Transfer: In the event that Sparx Technology, or substantially all of its assets, is acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, Personal Information may be one of the transferred assets.

THIRD-PARTY AD SERVERS

We may use third-party advertising companies to serve ads when you visit Sparx Technology. If so, a list of these ad serving companies will be made available upon request. These companies may use information (generally not including your name, address, e-mail address or telephone number) about your visits to this and other web sites in order to provide advertisements about goods and services of interest to you. These advertisements may appear on Sparx Technology or on

other Sparx Technology web sites. These companies may employ cookies and clear GIFs to cause relevant ads to be displayed to you. Any information that these third parties collect via cookies and clear GIFs is generally not personally identifiable (unless, for example, you provide personally identifiable information to them through an ad or e-mail message). We encourage you to read these businesses' privacy policies if you should have any concerns about how they will care for your Non-Personal Information or Personal Information. If you would like more information about this practice and to know your choices about NOT having this information used by these companies, see the Network Advertising Initiative's consumer Web site at http://www.networkadvertising.org/consumer/.

WIRELESS ADDRESSES

If the e-mail address you provide to us is a wireless e-mail address, you agree to receive messages at such address from Sparx Technology (unless and until you have elected not to receive such messages by following the instructions in the Opt Out section above). You understand that your wireless carrier's standard rates apply to these messages, and that you may change your mind at any time by following the instructions in the Opt Out section above. You represent that you are the owner or authorized user of the wireless device on which messages will be received, and that you are authorized to approve the applicable charges.

HOW DOES SPARX AIM TO PROTECT MY INFORMATION?

While Sparx Technology endeavors to protect the security and integrity of the information provided to us, due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the Internet or while stored on our system or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers.

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your e-mail address, we may notify you by e-mail. Unless you provide us with

another method to notify you in this situation, you consent to our use of e-mail as a means of such notification

LINKS TO OTHER WEB SITES

Sparx Technology may contain or provide links, banners, widgets or advertisements that lead to other Web sites. When you click on these types of third-party content, the privacy policies of the Web sites to which you are linked will govern the collection and use of your information. Sparx Technology does not have access to or control over any technologies or practices that may be used on linked to sites, and we are not responsible for the privacy practices of them. We encourage you to read the privacy statements of each and every Web site visited after leaving Sparx Technology to learn about how your information is treated.

YOUR CALIFORNIA PRIVACY RIGHTS

California law permits our customers who are California residents to request certain information about our disclosure of personal information to third parties for these third parties' direct marketing purposes. To make such a request, please contact Sparx Technology online at www.sparxtechnology.com or write to us at Sparx Technology Inc.,1500 West Georgia Street, Suite 1300, Vancouver, B.C. Canada, V6G 2Z6, Attn: Sparx Technology Privacy.

CONSENT TO PROCESSING

By providing Personal Information through the Sparx Technology application or related Web Sites or Games, you consent to the collection, maintenance, processing and transfer of such information in and to the United States and other countries and territories, pursuant to the laws of the United States, which may provide lesser privacy protections than the laws of other countries.

CONTACT US

Sparx Technology welcomes your questions and comments about privacy. Please feel free to contact us for any reason including a request to be added to or taken off a marketing list or to prevent sharing your Personal Information with third parties, by contacting Sparx Technology at info@sparxtechnology.com