

## PRIVACY POLICY

Last updated: May 19, 2020

Future Problem Solving Program International, Inc. (FPSPI) (“us”, “we”, or “our”) operates fpspi.org, fpspimart.org, icfpspi.org, fpsonline.org (the “Site”). This page informs you of our policies regarding the collection, use and disclosure of Personal Data (defined below) we receive from users of the Site.

This Privacy Policy does not apply to FPSPI’s wholly-owned subsidiary, Center for Creative Learning LLC, or FPSPI’s Affiliate Programs.

### **Information Collection and Use**

Personally identifiable information may include your name, postal address, email address, telephone number or any other identifier by which you may be contacted (“Personal Data”).

We may use Personal Data for the following purposes:

- to provide you with our newsletters, provided you have given your consent,
- to provide you with the information, services, or products that you request from us,
- to process donations or sponsorships,
- to provide you with information, and other materials, relating to the content of events organized by FPSPI,
- to carry out our obligations to you, and enforce our rights arising from any contracts entered into between you and us,
- in any other ways we may describe when you provide the information.

You also may provide information to be published or displayed (hereinafter, “posted”) on public areas of the Site, or transmitted to other users of the Site or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Site with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. The foregoing does not apply to competition-related submissions submitted in accordance with instructions on the Site or otherwise furnished to participants.

### **Log Data**

Like many site operators, we collect information that your browser sends whenever you visit our Site (“Log Data”).

This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this.

### **Cookies**

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

### **Disclosure**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this Privacy Policy:

- to our subsidiaries and Affiliate Programs,
- to contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them,
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about our Site users is among the assets transferred,
- for any other purpose disclosed by us when you provide the information, or
- with your consent.

### **We may also disclose your personal information:**

- to comply with any court order, law or legal process, including to respond to any government or regulatory request,
- to enforce or apply our terms of use and other agreements, including for billing and collection purposes, or
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of FPSPI, our customers or others.

### **Collection of Information From Children**

With respect to children under the age of 13, see our Privacy Policy for Children Under the Age of 13 below.

In accordance with certain state laws, minors under the age of 18 may remove or request and obtain removal of content and information that they post on the Site.

If you wish to remove or request and obtain removal of content and information for persons under the age of 18, please contact us at [mail@fpspi.org](mailto:mail@fpspi.org).

### **Your California Privacy Rights**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, see our Privacy Notice for California residents below.

### **Security**

We are deeply concerned about protecting your privacy and safety. We respect and follow online privacy guidelines from the Children's Online Privacy Protection Act of 1998 ("COPPA"), the Better Business Bureau, and the U.S. Federal Trade Commission.

Please note that sending data over the internet is never completely secure. Although we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee the security of the data you transmit to us, and you do so at your own risk.

### **Data Protection Rights of EU Residents**

We would like to make sure residents of the European Union are fully aware of all of their data protection rights. Every user that is a resident of the European Union is entitled to the following:

The right to access – You have the right to request copies of your Personal Data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete information you believe is incomplete.

The right to erasure – You have the right to request that we erase your Personal Data, under certain conditions.

The right to restrict processing – You have the right to request that we restrict the processing of your Personal Data, under certain conditions.

The right to object to processing – You have the right to object to our processing of your Personal Data, under certain conditions.

The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at [mail@fpspi.org](mailto:mail@fpspi.org).

### **Changes To This Privacy Policy**

This Privacy Policy is effective as of May 19, 2020 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our Site.

### Contact Us

If you have any questions about this Privacy Policy, please contact us at [mail@fpspi.org](mailto:mail@fpspi.org).

### Privacy Notice for California Residents

This Privacy Notice for California Residents supplements the information contained in Future Problem Solving Program International, Inc.'s Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

Capitalized terms not defined herein have the same meaning ascribed to them in FPSPI's Privacy Policy.

### Information We Collect

Our Site collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.

In particular, our Site has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank	YES

C. Protected classification characteristics under California or federal law.	<p>account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.</p> <p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	YES
D. Commercial information.	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	YES
E. Biometric information.	<p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p>	NO
F. Internet or other similar network activity.	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	YES
G. Geolocation data.	<p>Physical location or movements.</p>	NO
H. Sensory data.	<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>	NO
I. Professional or employment-related information.	<p>Current or past job history or performance evaluations.</p>	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	<p>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>	NO
K. Inferences drawn from other personal information.	<p>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	NO

Our Site obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Site.

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information.
- To provide, support, personalize, and develop our Site, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Sharing Personal Information**

We may disclose your personal information to a third party for a purpose related to our charitable purposes under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended. When we disclose personal information for such a purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We may share your personal information with service providers.

### **Disclosures of Personal Information for a Purpose Related to Our Charitable Purposes**

In the preceding twelve (12) months, Company has not disclosed personal information for a purpose related to our charitable purposes.

### **Sales of Personal Information**

In the preceding twelve (12) months, Company has not sold personal information.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

## Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

## Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely

render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by emailing us at [mail@fspfi.org](mailto:mail@fspfi.org).

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12- month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale opt-out rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#).

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a

request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Personal Information Sales Opt-Out and Opt-In Rights**

We do not sell the personal information of our consumers. Nevertheless, if you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the “right to opt-out”). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the “right to opt-in”) from either the consumer who is at least 13 but not yet 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us via email to [mail@fpsi.org](mailto:mail@fpsi.org).

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by sending an email to [mail@fpsi.org](mailto:mail@fpsi.org).

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Site and update the notice’s effective date. Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which Future Problem Solving Program International, Inc. collects and uses your information described here and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (321) 768-0074

Email: [mail@fspspi.org](mailto:mail@fspspi.org)

Postal Address:

Future Problem Solving Program International, Inc.

Attn: IT Administrator

2015 Grant Place

Melbourne, Florida 32901

## **Privacy Policy for Children Under The Age of 13**

### **CHILDREN UNDER THE AGE OF 13**

The U.S. Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") require us to inform parents and legal guardians (as used in this policy, "parents") about our practices for collecting, using, and disclosing personal information from children under the age of 13 ("children"). It also requires us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's personal information.

This policy notifies parents of:

- The types of information we may collect from children.
- How we use the information we collect.
- Our practices for disclosing that information.
- Our practices for notifying and obtaining parents' consent when we collect personal information from children, including how a parent may revoke consent.
- All operators that collect or maintain information from children through the Site located at [fspspi.org](http://fspspi.org), [fspimart.org](http://fspimart.org), [icfspspi.org](http://icfspspi.org), [fpsonline.org](http://fpsonline.org).

This policy only applies to children under the age of 13 and supplements our Privacy Policy above. Only our Privacy Policy applies to teens and adults.

Terms that are defined in the Privacy Policy have the same meanings as used in this Privacy Policy for Children Under the Age of 13.

### **Information We Collect from Children**

Children can access many parts of the Site and its content and use many of its features without providing us with personal information. However, some content and features require us to collect certain information, including personal information, from them. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including children) when they visit or use the Site.

We only collect as much information about a child as is reasonably necessary for the child to participate in an activity, and we do not condition his or her participation on the disclosure of more personal information than is reasonably necessary.

**Information We Collect Directly.** A child must provide us with the following information to register with this Site: the child's first and last name, gender, grade, school and a parent's email address. We also require the child to create a member name and password. We may request additional information from your child, but this information is optional. We specify whether information is required or optional when we request it.

We enable registered users to communicate with others on or through this Site through the Site's chat feature and posting to public areas of the Site ("Social Features"). The nature of these features allows children to disclose personal information about themselves. We do not monitor or review this content before it is posted, and we do not control the actions of third parties with whom your child shares his or her information. We encourage parents to educate their children about safe internet use and to monitor their children's use of Social Features.

**Automatic Information Collection and Tracking.** We use technology to automatically collect information from our users, including children, when they access and navigate through the Site and use certain of its features. The information we collect through these technologies may include:

One or more persistent identifiers that can be used to recognize a user over time and across different websites and online services.

- Information that identifies a device's location (geolocation information).
- We also may combine non-personal information we collect through these technologies with personal information about you or your child that we collect online.

For information about our automatic information collection practices, including how you can opt out of certain information collection, see our Privacy Policy <https://www.fpspi.org/privacy-policy/>

### **How We Use Your Child's Information**

- We use the personal information we collect from your child to:
- register him or her with the Site;
- communicate with him or her about activities or features of the Site that may be of interest; and
- track his or her performance in the activities being administered by us, through the Site or otherwise.

We use the information we collect automatically through technology (see Automatic Information Collection and Tracking) and other non-personal information we collect to improve the Site and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about the child’s preferences, allowing us to customize the content according to individual interests.
- Speed up your searches.

We may use geolocation information we collect to track performance in the activities being administered by us, through the Site or otherwise.

### **Our Practices for Disclosing Children’s Information**

We do not share, sell, rent, or transfer children’s personal information other than as described in this section.

We may disclose aggregated information about many of our users. In addition, we may disclose children’s personal information:

- To third parties we use to support the internal operations of the Site and who are bound by contractual or other obligations to use the information only for such purpose and to keep the information confidential.
- If we are required to do so by law or legal process, such as to comply with any court order or subpoena or to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Future Problem Solving Program International, Inc., our customers or others, including to:
  - o protect the safety of a child;
  - o protect the safety and security of the Site; or
  - o enable us to take precautions against liability.
- To law enforcement agencies or for an investigation related to public safety.

**Social Features.** The Site offers social features, including instant messaging, chat, email, and posting on message boards that enable children to communicate with others on our Site. We do not control the types of information your child can send or post through them. We encourage parents to educate their children about safety online and to carefully monitor their children’s use of social features to ensure they do not disclose their personal information through them.

### **Accessing and Correcting Your Child’s Personal Information**

At any time, you may review the child’s personal information maintained by us, require us to correct or delete the personal information, and/or refuse to permit us from further collecting or using the child’s information.

You can review, change, or delete your child’s personal information by:

- Logging into your child’s account and visiting his or her account profile page.

- Sending us an email at [mail@fpspi.org](mailto:mail@fpspi.org). To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections.