

# Website Privacy Policy

Last Modified: July 15, 2020

## **Introduction**

iEDAPTS LLC ("**Company**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website <http://iedapts.com> (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party including our affiliates and subsidiaries; or
- Any third party including our affiliates and subsidiaries, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

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

The 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 section, "**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 section 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 this Website.

This section only applies to children under the age of 13 and supplements the other provisions of this privacy policy. Only the other provisions of this privacy policy apply to teens and adults.

Terms that are defined in the general 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 Website and its content and use many of its features without providing us with personal information. However, some content and features are available only to registered users. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including children) when they visit or use the Website.

If we allow children to create an account or otherwise engage with us over time, we will obtain parental consent prior to the collection of their personal information. In order to obtain this consent, we sometimes ask your child to provide a parent's email address so that we may directly notify you of our privacy practices and obtain your consent. When we do this, we delete the email address they provided if a parent does not timely respond to the request for consent.

We may allow children to enter contests, sweepstakes, or other promotions, or receive a one-time communication from us. When we do that, we will collect the child's first name, email address, and sometimes their state of residence, as well as a parent's email address to provide you with notice that your child has entered the promotion and an opportunity for you to opt your child out. We will use the collected information for the purpose of that promotion or communication, and then delete the information from our records once it is no longer required. We do not send text messages or other non-email messages (like chat) to children.

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 You or Your Child Actively Provides**

You or your child must provide us with the following information to register with and download content from this Website: the child's first name, last name, email address, date of birth, parent's phone number, parent's name, parent's email address, and parent's mailing address. Parents will be responsible for providing financial information, including credit or debit card information, and bank account and routing numbers for the payment of fees associated with the use of the Website, including but not limited to the download fee. In addition, we collect talent information, such as photographs, video and audio submissions from children and their parents. We also require you to create a username and password for you and/or your child. We may request additional information from you or your

child, but this information is optional. We specify whether information is required or optional when we request it.

We enable users to communicate with others on or through this Website through chat, email, and posting to public areas of the site ("**Social Features**"). The nature of these features allows users 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 you or 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 Website 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 such as an IP address and cookies, which are small text files that help store user preferences and activity. This information is collected for the purposes of supporting our internal operations, such as to provide children with access to features and activities on the Website, to customize content and improve our Services. We do not allow online behavioral advertising, sometimes called personalized advertising or tailored advertising to children or teens under 16.

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 the "Automatic Information Collection and Tracking" and "Choices About How We Use and Disclose Your Information" sections of our general Privacy Policy.

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

We collect and use the personal information about you and your child for the following purposes, including to:

- Provide, maintain and improve the Site, as well as to develop new content and features.
- Register him or her with the Site.
- Send notifications related to your account.
- Send newsletters, postcards, or messages you or your child request.
- Communicate with him or her about activities or features of the Site that may be of interest.
- Track his or her performance in games or other activities.
- Enable you or your child to participate in interactive features of the Site.
- Enable you or your child to participate in sweepstakes, contests, or promotions.
- Respond to customer service requests.
- Process and fulfill orders and transactions.
- To provide you with information, products, or services that you request from us.

- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- Protect the rights and property of iEDAPTS LLC and others, and comply with our legal obligations, including to detect, investigate, and prevent fraud and other illegal activities, and to enforce our agreements.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

The information we collect automatically may include both personal information and non-personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including 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 his or her individual interests.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data (the order form/registration form, etc.). You may also be able to adjust your user preferences in your account profile. For more information, see [Choices About How We Use and Disclose Your Information](#).

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

### **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 and information that does not identify any individual. In addition, we may disclose children's personal information:

- To our subsidiaries and affiliates.

- To third parties we use to support the internal operations of our Website 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 iEDAPTS LLC, our customers or others, including to:
  - protect the safety of a child;
  - protect the safety and security of the Website and Services provided; or
  - enable us to take precautions against liability.
- To law enforcement agencies or for an investigation related to public safety.

In addition, if iEDAPTS LLC is involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of iEDAPTS LLC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding or event, we may transfer the personal information we have collected or maintain to the buyer or other successor.

### **Social Features**

The Website may offer social features, including chat, email, and posting on message boards that enable children communicate with others on or through the Website. 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 [info@iedapts.com](mailto:info@iedapts.com). 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.

### **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, and financial information such as bank account and routing numbers or credit and debit card information any other identifier by which you may be contacted online or offline ("**personal information**"); and

- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners. Personal information collected on other sites and services is subject to the privacy policy and practices of the third party providing such website or service and not this Privacy Policy.

### **Information You Provide to Us**

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website 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.

### **Information We Collect Through Automatic Data Collection Technologies**

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

As mentioned above, the information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see [Choices About How We Use and Disclose Your Information](#).
- **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

### **Disclosure of Your Information**

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 affiliates.
- 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 iEDAPTS LLC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by iEDAPTS LLC about our Website users is among the assets transferred.
- To third parties to market their products or services to you if you have consented and/or have not opted out of these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them. For more information, see [Choices About How We Use and Disclose Your Information](#).
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- 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 other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of iEDAPTS LLC, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by checking the relevant box located on the form on which we collect your data (the order form, registration form, etc.). You can also always opt-out by logging into the Website and adjusting your user preferences in your account profile, checking or unchecking the relevant boxes, or by sending us an email with your request to [info@iedapts.com](mailto:info@iedapts.com).

- **Promotional Offers from the Company.** If you do not wish to have your email address or other contact information used by the Company to promote our own or third parties' products or services, you can opt-out by checking the relevant box located on the form on which we collect your data (the order form, registration form, etc.) or at any other time by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to [info@iedapts.com](mailto:info@iedapts.com). If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by sending us an email at [info@iedapts.com](mailto:info@iedapts.com).

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) for more information.

### **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at [info@iedapts.com](mailto:info@iedapts.com) to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users.

Proper access and use of information provided on the Website, including User Contributions, is governed by our [Terms of Use](#).

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) for more information.

### **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, visit <https://oag.ca.gov/privacy/ccpa>.

## **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your account and/or through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

## **Contact Information**

If you have any questions or comments about this privacy policy and our privacy practices, you may email us at [info@iedapts.com](mailto:info@iedapts.com) with the subject line "Privacy Rights," or write to us at:

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