FamilyID®

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Privacy Policy

FAMILYID, INC.

PRIVACY POLICY

Your privacy is extremely important to us. This Privacy Policy addresses information collected by FamilyID, Inc. ("FamilyID", "we" or "us"), and we are committed to respecting your privacy and the confidentiality of your personal data and content. To better protect you, we provide this Privacy Policy to assist you in understanding how we use and safeguard the information you provide in using our online platform (the "Platform"). In this Privacy Policy, our "Product" means the Platform and services, including those provided through our Platform; "Personal Data" means any information that we possess relating to an identified or identifiable user of the Platform, and "Program Provider" means a third party offering a program for which you are submitting information via the Platform. This Privacy Policy is incorporated into, a part of, and governed by our Terms of Service. By using the FamilyID service, you are accepting the terms of this Privacy Policy. If you do not agree to this Privacy Policy, you may not use the FamilyID service.

1. WHAT INFORMATION DO WE COLLECT?

In order to provide you with use of the Platform, we may gather and process some or all of the following information:

- Content: information that is collected from or stored by you on the Platform, other than Account Sign-up Information, Customer Service Communications or Log Information.
- Account Sign-Up Information: information provided when you sign up for an account to use the Platform, including, your email address and password.
- Customer Service Communications: information that is reported to us about the operation of the Platform.
- Log Information: When you use the Platform, our servers automatically record basic information that your application sends in order to access our services. These server logs may include information such as your message, Internet Protocol address, other addressing information, the date and time of your request and an authentication token used to validate the identity of you and your computer.

2. HOW DO WE USE THIS INFORMATION AND FOR WHAT PURPOSE?

Our primary purpose in collecting information is to provide you with an efficient user experience. Below we describe how we use certain information. We may use this information to: provide the services and any customer support you request; resolve disputes, collect fees, and troubleshoot problems; enforce our contractual agreements; customize, measure, and improve the Platform; inform you about service updates; compare information for accuracy, and verify your identity; provide other services for you as described when we collect the information. In the future, we may give you the option of using your profile and registration data to enable FamilyID to provide you with information on relevant products, services and/or other offers.

• Account Sign-up Information

We ask for Account Sign-up Information in order to verify your identity and to enable your use of the Platform.

We respect the privacy of personal e-mail accounts and we will store your e-mail addresses just as securely as other Personal Data. We will not send you unwanted e-mail messages or junk mail, and your details will not be passed to third parties for their marketing purposes without your explicit permission. However, we will use e-mail to send you messages about Platform-related issues. We may also use e-mail to keep you up to date with news about FamilyID.

If you do not want to be kept informed in this way by e-mail, please unsubscribe at the bottom of the email message or contact us at info@familyid.com

• Content

We reserve the right to pre-screen, review, flag, filter, refuse or remove any or all of Content from the Platform.

• Customer Service Communications

Information which is voluntarily submitted in feedback is used for the purposes of reviewing this feedback and improving the Platform. We reserve the right to utilize anonymous information for marketing purposes, for instance by displaying selected comments on the Platform or in other communications. Further, we may from time to time ask you to provide information on your experiences which will be used to measure and improve quality. You are at no time under any obligation to provide any of such data. We will never use any personally identifiable (feedback) information without your explicit permission thereto.

• Log Information

We will use this routing information to provide you with access to the Platform and for statistical information.

• Children's Privacy

We are committed to protecting the privacy needs of children. Accordingly, we do not knowingly collect or solicit personal information from anyone under the age of 13 or allow such persons to register. No one under age 13 may provide any personal information to the Platform.

• Student Information

Individual student data will be managed by FamilyID in accordance with the Family Educational Rights and Privacy Act of 1974 (including its implementing regulations, "FERPA") that govern the confidentiality of, and access to, students' educational records. FamilyID is committed to abide by state and federal laws protecting student data.

FamilyID - Simple online registration for programs, clubs, schools and camps

• Requirements of Program Providers.

Program Providers may have specific guidelines and limitations regarding completion and submission of registration forms and use of the information provided. FamilyID does not monitor or verify compliance with these requirements or a Program Provider's use of your information, and you are responsible for all information submitted to a Program Provider.

3. TO WHOM DO WE TRANSFER YOUR PERSONAL INFORMATION?

Except as provided below, we will not sell, rent, trade or otherwise transfer any Registration Information or Content to any third party without your explicit permission, unless we are obliged to do so under applicable laws or by order of the competent authorities.

We may share your information with our affiliates and other service providers (for example, email notification and/or payment processing services as applicable to your registration) which are providing services relating to your use of the Platform. Registration Information that you provide to us may be sent to those providers in order to deliver their services; similarly, personal information that you provide to those providers may be sent to us in order to operate the Platform. FamilyID enables you to submit your personal information to register for programs and activities, among other potential uses. When you elect to submit your personal information to a third party Program Provider or other service, organization, company or individual via the Platform, whether to register for a program or for any other purpose, FamilyID is not responsible for how your data is used by that third party. It is solely your responsibility to understand how and with whom that party intends to use and share your personal data. This may include the transfer of your data to other software platforms, sharing of information in the form of reports, or other methods and forms of data sharing and use.

As we continue to develop our business, we might buy or sell subsidiaries or business units. In such transactions as well as in the event all or substantially all of our assets are acquired by a third party, personal information of our users will generally be one of the transferred business assets. We reserve the right to include your personal information, collected as an asset, in any such transfer to a third party. The use of any personal information by a third party transferee shall continue to be subject to applicable law. In the event of any such transfer, notice will be posted and you may elect to discontinue your use of the Platform and/or request removal of your personal data.

We reserve the right to access, use, preserve or disclose any information we have access to if we have a good faith belief that such access, use, preservation or disclosure is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce our contractual agreements, including investigation of potential violations, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of us, our users or the public as required or permitted by law.

4. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We take appropriate organizational and technical measures to protect the information provided to us or collected by us, and we also have protocols in place in the event we identify a security breach. Further, student data housed on the Platform is protected by us and accessible to users in a manner that is consistent with FERPA. You should be aware that internet communications are not always secure. Although we do take what we consider appropriate steps to protect your data, protection of information available over the internet is subject to attack from third parties, and accordingly we cannot guarantee that third parties cannot illegally gain access to Content.

5. HOW LONG IS YOUR PERSONAL DATA KEPT BY US?

We will retain your information for as long as is necessary to: (1) provide the use of the Platform; (2) invoice charges and to maintain records until invoices cannot be lawfully challenged and legal proceedings may no longer be pursued; (3) communicate with you regarding other services that we offer; (4) comply with applicable legislation, regulatory requests and relevant orders from competent courts; (5) enforce our contractual agreements; or (6) fulfill any of the other purposes detailed in this Privacy Policy.

You may request removal of your information at any time. FamilyID will delete your information from the Platform within 15 days from the date of your request. Deletion of your data from the Platform will prevent you from accessing your program registration history and details regarding what data you have shared with others through the Platform. The data will be removed from back-ups at the end of the duration of the FamilyID back-up cycle, which is a minimum of 30 days and but is subject to change without notice. Please note that the Program Providers, service providers, individuals, and/or organizations that have received your information will have their own data retention practices and may be subject to regulations that require them to maintain data for a specified period of time. You must contact those entities directly regarding their use and removal of your information.

6. WHAT ARE COOKIES AND HOW DO WE USE THEM?

A cookie is a piece of data stored on the user's hard drive containing information about the user. Usage of a cookie will in no way linked to any personally identifiable information while using the Platform. Once the user closes their browser, the cookie simply terminates. For instance, by setting a cookie on our product, the user would not have to log in a password more than once, thereby saving time while on the Platform. If a user rejects the cookie, they may still use the Platform. The only drawback to this is that the user will be limited. Cookies can also enable us to track to enhance the experience using products. and for analytic purposes to help us understand the use of the Platform.

Some of our business partners may use cookies. However, we have no access to or control over these cookies.

7. HOW FAR DOES OUR RESPONSIBILITY EXTEND?

This Privacy Policy applies to services that are owned and operated by us. We do not exercise control over other users, including Program Providers to whom you submit your information, or third party systems that may use the Platform. They may place their own or other files on their systems, collect data or solicit personal information from you. We accept no responsibility or liability for these other Platforms, Program Providers, or services.

8. CAN THIS PRIVACY POLICY BE MODIFIED?

We reserve the right to modify the provisions of this Privacy Policy from time to time. By using the Platform you consent to this Policy at the time of such use. We recommend that you check this Privacy Policy periodically for any changes. FamilyID will provide notice on the platform prior to any material changes to this Policy.

9. WHAT RIGHTS DO YOU HAVE AND HOW CAN YOU CONTACT US?

If you would like to exercise your right to view, correct, complete or remove your Personal Data, please contact us at <u>info@familyid.com</u>. Upon verification of your identity, we will attempt to quickly fulfill your request, provided we will not act contrary to applicable legislation by fulfilling your request.



See FamilyID in action.

We'd love to give you a guided tour and show you how FamilyID can save you tons of time and money.