#### **Privacy Policy**

#### SCOPE OF THIS POLICY

This Privacy Policy (the "Policy") explains how KISS Institute for Practical Robotics ("KIPR", "we", "use" or "our") applies it privacy practices to how we collect, process, and/or use information that we receive via our websites, emails or communications we send, mobile applications, curriculum, or any other program or services we provide (collectively, the "Services"). This Policy describes the processing of information provided or collected on the sites and applications where this Policy is posted whether on our digital properties or on applications we make available on third-party sites or platforms. It also describes the processing of guest and user information provided to us or collected by us offline, such as in schools or other institutions which use our programs and Services. We follow this Policy in accordance with applicable law in the places where we operate. In some cases, we may provide additional data privacy notices specific to certain products, practices, or regions. Those terms are to be read in conjunction with this policy.

Please keep in mind that when you provide information to us on a third-party site or platform (for example, via our applications), the information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this Policy, and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our applications. Please also keep in mind that our sites and applications may contain links to other sites not owned or controlled by us and we are not responsible for the privacy practices of those sites. We encourage you to be aware when you leave our sites or applications and to read the privacy policies of other sites that may collect your personal information. For purposes of this Policy "personal information" means information that identifies (directly or indirectly) a particular individual, such as the individual's name, address, email address, and telephone number. Information that results from anonymous information that is directly or indirectly associated with personal information is also treated as personal information.

#### TYPES OF INFORMATION WE COLLECT

We collect two basic types of information, personal information (as defined in this policy) and anonymous information, meaning information that does not directly or indirectly identify, and cannot be reasonably used to identify, an individual user of the Services. We may use personal and anonymous information to create a third type of information, aggregate information, which means information about groups or categories of users, which does not identify and cannot reasonably be used to identify an individual user. In particular, we collect:

- Registration information you provide when you create an account, enter a promotion, or link your profile on a third-party site or platform with your registration account, such as your first name and surname, country of residence, gender, date of birth, email address, username, and password;
- Transaction information you provide when you request information, contact us, or purchase, return, request, or exchange a product or service from us, such as your postal address, telephone number, and payment information;
- Information you provide in public forums on our sites and applications (including message board, pages, blogs, chat rooms, profile pages and other forums that may not restrict audiences) such as your public posts;
- Information sent either one-to-one or within a limited group using our message, chat, post, or similar functionality, where we are permitted by applicable law to collect this information;
- Information we obtain from a third party, such as a site or platform provider, about use of our applications on third-party platforms or devices;
- Location information, including precise or approximate location information provided by a mobile or other device interacting with one of our sites, applications, or Services (including through beacon technologies), or associated with your IP address or other online or device identifier, where we are permitted by law to process this information;
- Activity information about your use, and the use by any person(s) you authorize through your account of our sites and applications, such as the content you view or post, how often you use our services, and your preferences; and
- Usage, viewing, technical, and device data when you visit our sites, use our applications on thirdparty sites or platforms, or open emails we send, or connect with our wireless Internet access services and other similar technologies, including your browser or device type, unique device identifier, and IP address.

#### HOW WE COLLECT YOUR INFORMATION

• We collect information you provide to us when you request or purchase products, services or information from us, register with us (including when you link your profile on a third-party site or platform with your registration account), participate in public forums other activities on our sites and applications, respond to guest surveys, enroll in a program provided by KIPR through your school or other entity, call our phone numbers, or otherwise interact with us using one or more devices. You may provide information in a variety of ways, including by typing or using voice commands.

- We collect information through a variety of technologies, such as cookies, Flash cookies, pixels, tags, software development kits, application program interfaces operated by us or on our behalf that may be displayed online (including those operated by third parties which permits us to interact directly with our guests and users) and Web beacons, including when you visit our sites and applications or use our applications on third-party sites or platforms using one or more devices, whether or not you are logged in or registered. Please see the below section titled "Online Tracking Technologies and Advertising" for further information, including Do Not Track and how to disable cookies and otherwise make choices with respect to such data collection.
- We collect information using analytics tools, including when you visit our sites and applications or use our applications on third-party sites or platforms.
- We acquire information from other trusted sources to update or supplement the information you provided or we collected automatically, such as when we validate postal address information using third party services through your enrollment in our Services via your school. Applicable law may require that you authorize the third party to share your information with us before we can acquire it.

#### ONLINE TRACKING TECHNOLOGIES AND ADVERTISING

We and certain service providers operating on our behalf collect information about your activity, or activity on devices associated with you, on our sites and applications using tracking technologies such as cookies, Flash cookies, pixels, tags, software development kits, application program interfaces, and Web beacons. Definitions for some of the tracking technologies listed, as well as information about your choices with respect to them, are available below. This tracking data may be used for many purposes including, for example, to:

- Provide useful features to simplify your experience when you return to our sites and applications (for example, remembering your shipping information for future purchases);
- Deliver relevant content and advertising based on your preferences, usage patterns and location;
- Monitor, evaluate, and optimize the use and operation of our sites and applications; and
- Analyze traffic on our sites and on the sites of third parties.

We may collect information whether or not you are logged in or registered, and may associate this tracking data with your registration account (if you have one), in which case we will treat it as personal information. Service providers that collect tracking data on our behalf may provide an opportunity for you to choose not to be tracked online.

Advertisers and third parties also may collect information about your activity on our sites and applications, on devices associated with you, and on third-party sites and applications using tracking technologies. Tracking data collected by these advertisers and third parties is used to decide which ads you see both on our sites and applications and on third-party sites and applications.

Some states provide residents or, in some cases, their authorized agents, with the right to opt out of the "selling" or "sharing" of their "personal information", or of "targeted advertising" based on their "personal information." To submit a request to opt out please email us at privacy@kipr.org with the title of such email "Do Not Sell or Share My Personal Information". Please note that your opt-out choice is specific to the digital property and to the device and browser you are using. If you access other digital properties of KIPR, you will need to make a separate election for each. Also, if you clear your cookies on your browser or use another browser or device, you may need to opt out again.

You may also choose to opt out of targeted advertising directly with many ad networks and partners, data exchanges, and marketing analytics and other digital advertising and marketing service providers. You may also be able to choose to control targeted advertising on other websites and platforms that you visit. In addition, you may choose to control targeted advertising you receive within applications by using the settings and controls on your devices (for example, by resetting your mobile device's advertising identifier and/or opting out of interest-based ads). We adhere to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising.

#### ONLINE TRACKING TECHNOLOGIES

Examples of online tracking technologies include:

- Cookies. Cookies are pieces of information that a website places on the hard drive of your computer when you visit the website. Cookies may involve the transmission of information from us to you and from you directly to us, to another party on our behalf, or to another party in accordance with its privacy policy. We may use cookies to bring together information we collect about you. You can choose to have your computer warn you each time a cookie is being placed on your device, or you can choose to block all cookies. You do this through your browser settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you won't have access to many features that make your guest experience more efficient, and some of our services will not function properly.
- Web beacons and marketing pixels. Web beacons and marketing pixels are small pieces of data that are embedded in images on the pages of sites. They may involve the transmission of information directly to us, to another party on our behalf, or to another party in accordance with its privacy policy. We may use web beacons or marketing pixels to bring together information we collect about you.

#### DO NOT TRACK

You or your authorized agent may choose to enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global Privacy Control ("GPC"). We will process the GPC signal as a request to opt out.

#### USE OF YOUR INFORMATION

Affiliates of KIPR may access your information where they perform services on behalf of the data controllers of KIPR (as data processors) and, unless prohibited under applicable law, for use on their own behalf (as data controllers) for the purposes described in this policy. Consistent with applicable law and choices and controls that may be available to you, we may use information collected from you, or from devices associated with you, to:

- Provide you with the experiences, products, and Services you request, view, engage with, or purchase;
- Communicate with you about your account or transactions with us and send you information or request feedback about features on our sites and applications or changes to our policies;
- Send you offers and promotions for our products and services or third-party products and services;
- Personalize content and experiences;
- Operate, understand, optimize, develop, or improve our sites, applications, products, Services and operations, including by using guest survey research and analytics tools; and
- Detect, investigate and prevent activities that may violate our policies, pose safety issues, or be fraudulent or illegal; and
- Notify you of product recalls or safety issues.

SHARING OF YOUR INFORMATION

We will not share your personal information with a third party outside of KIPR or its affiliated entities in limited circumstances, including:

- When you register for the Services via a school or other entity which is providing or facilitating our programming or Services, you are directing us to share your personal information directly with such school or other entity.
- When you direct us to share your personal information with another company to fulfill your request.
- When you direct us to share your personal information with third-party sites or platforms, such as social networking sites.
- Please note that once we share your personal information with another company in the above circumstances, the information received by the other company is controlled by that company and becomes subject to the other company's privacy practices.
- When companies perform services on our behalf, like marketing and advertising, and customer service; however, these companies are prohibited from using your personal information for purposes other than those requested by us or required by law; and
- When we share your personal information with third parties in connection with the sale of a business, to enforce our Terms of Use or rules, to ensure the safety and security of our users and third parties, to protect our rights and property and the rights and property of our users and third parties, to comply with legal process, or in other cases if we believe in good faith that disclosure is required by law.

# YOUR CONTROL OF YOUR INFORMATION

We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your information. In accordance with applicable law, your controls and choices may include:

- Correcting, updating, and deleting your registration and account;
- Choosing or changing your choices for subscriptions, newsletters, and alerts;
- Choosing whether to receive from us offers and promotions for our products and services, or products and services that we think may be of interest to you;
- Choosing to control targeted advertising you receive within applications by using the settings and choices made available to you through your device(s), for example, by re-setting your device's advertising identifier and/or opting out of interest based ads;

- Requesting removal of your personal information from a public forum on one of our sites or Services;
- Requesting access to the personal information we hold about you and that we amend or delete it.

You may exercise these controls and choices by contact us at privacy@kipr.org, following instructions provided in communications sent to you, or by using your device or other available settings (for example, by re-setting your device's advertising identifier and/or opting out of interest based ads). You can opt out of interest based ads by visiting the Digital Advertising Alliance (<u>https://optout.aboutads.info/?c=2&lang=EN</u>) or European Interactive Digital Advertising Alliance (<u>https://edaa.eu/</u>).

Please be aware that if you do not allow us to collect personal information from you, we may not be able to deliver certain experiences, products, and services to you, and some of our services may not be able to take account of your interests and preferences. If collection of personal information is mandatory, we will make that clear at the point of collection so that you can make an informed decision whether to participate. If you have questions about the specific personal information about you that we process or retain, and your rights regarding that personal information, please contact us at privacy@kipr.org.

# CHILDREN'S PRIVACY POLICY

We recognize the need to provide further privacy protections with respect to personal information we may collect from individuals who we have identified are not of legal age to consent to the collection and processing of their personal information, specifically those under the age of 13, on our sites and applications. When we intend to collect personal information from children, we take additional steps to protect children's privacy, including:

- Notifying parents or legal guardian about our information practices with regard to children, including the types of personal information we may collect from children, the uses to which we may put that information, and whether and with whom we may share that information;
- In accordance with applicable law, and our practices, obtaining consent from parents for the collection of personal information from their children, or for sending information about our products and services directly to their children;
- Limiting our collection of personal information from children to no more than is reasonably necessary to participate in an online activity; and
- Giving parents access or the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed or deleted.

For additional information about our practices in the United States regarding children's personal information, please read our Children's Privacy Policy below:

# 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 policy, "**parents**") about our practices for collecting, using, and disclosing personal information from children under the age of 13 ("**children**" or "**child**"). 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 or the services provided by KIPR.

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 other sections of this privacy policy have the same meanings as used in this Children Under the Age of 13 section.

#### 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 or 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 Website or the Services.

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**

To create an account, a child using the services must provide us with the following information to register with this website: the child's name, information related to the child's age, and a parent's email address so that we may obtain consent. No child under the age of 16 may have an account activated without parental consent. 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 and may include location, ethnicity and educational institution. We specify whether information is required or optional when we request it, and any user may opt out of optional information requests. We may also collect data and information from users, including children, through the use of

anonymized surveys related to a user's satisfaction with programs; all such surveys are optional and users may opt out of providing any information related to survey requests.

Our website and services contain links to certain third-party social platforms including Facebook, X (formerly known as Twitter), Discord, TikTok, YouTube and Instagram ("**Social Features**"). The nature of these third party sites and Social Features allows children to disclose personal information about themselves to the third parties who host such Social Features and platforms. 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. To opt out of ad tracking and analytics of such third parties and Social Features that may be linked on our site, please see "How to Opt Out" below.

#### 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 the Services and use certain of the Website's features. The information we collect through these technologies may include:

- Email Addresses
- IP Addresses

We also may combine non-personal information we collect through these technologies with personal information about you or your child that we collect online.

# How We Use Your Child's Information

We use the personal information we collect from your child to:

- register him or her with our site(s) or Services
- communicate with him or her about activities or features of our sites or Services that may be of interest;
- track his or her performance in games or other activities; and
- debug or address any technical issues related to the Services, or making any updates, improvements or additions to the site(s) or Services.

Pursuant to the other sections of this privacy policy, we use the information we collect automatically through technology and other non-personal information we collect to improve our sites or Services 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 child's searches.

We use geolocation information we collect for internal purposes to determine demographics, logistics, language and localization data to personalize a user's experience. All such geolocation information is anonymized.

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

If KIPR (or any of its affiliated entities) is involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of KIPR'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

Our sites and Services may include links which enable sharing of content through third party social media platforms and which may include (but is not facilitated or hosted directly by us) instant messaging, chat, email, and posting on message boards, and that enable children to communicate with others through such services. We do not control the types of information your child can send or post, nor do we control any social media or websites operated by third parties. 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 the account profile page.
- Sending us an email at privacy@kipr.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.

#### **Operators That Collect or Maintain Information from Children**

No other third-party operators may collect or maintain personal information from children through website or services.

# DATA SECURITY AND RETENTION

The security, integrity, and confidentiality of your information are extremely important to us. We have implemented technical, administrative, and physical security measures that are designed to protect guest information from unauthorized access, disclosure, use, and modification. We regularly review our security procedures to consider appropriate new technology and methods. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable. We will retain your personal information for the length of time needed to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

# INTERNATIONAL DATA TRANSFERS, PROCESSING, STORAGE

We operate globally and may transfer your personal information to individual companies affiliated with us or third parties in locations around the world for the purposes described in this privacy policy. Wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. These steps may include implementing standard contractual clauses where recognized by law, obtaining your consent, or other lawful means of transferring personal information.

# CHANGES AND UPDATES TO THIS PRIVACY POLICY

From time to time, we may change this privacy policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. Notice may be by email to you at the last email address you provided us, by posting notice of such changes on our sites and applications, or by other means, consistent with applicable law.

#### COMMENTS, QUESTIONS, CONTACT

If you have a comment or question about this privacy policy, please contact us at: privacy@kipr.org or 1818 W Lindsey St., Bldg D Ste 180, Norman, OK 73069.

#### US RESIDENTS' PRIVACY RIGHTS

If you are a US resident, you may have certain additional privacy rights as detailed below which provide additional information relevant to residents of certain states that have their own laws regarding data privacy. The below supplements our privacy policy.

#### CALIFORNIA PRIVACY RIGHTS

Effective January 1, 2023

This notice to California residents is provided under California law, specifically the California Consumer Privacy Act ("CCPA"). It explains your privacy rights, provides our "notice at collection," and provides certain mandated disclosures about our treatment of California residents' information, both online and offline. This privacy notice should be read in conjunction with the rest of our Privacy Policy, as the sections of our Privacy Policy are hereby incorporated by reference along with this privacy notice.

#### NOTICE OF COLLECTION OF PERSONAL INFORMATION

We may collect the following categories of personal information about users of our digital properties: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above.

We collect this information so that we can best serve you, including to fulfill your requests and to share offers that we think you may be interested in. A more detailed description of these purposes is in our Privacy Policy under "Use of Your Information."

Disclosures/Sharing/Selling

California residents also have the right to "opt out" of the "sale" or "sharing" of their "personal information" to or with "third parties" (as those terms are defined under law).

Based on the CCPA's broad definition of the term "sale," certain data collection on our sites and applications by third parties for purposes of social media tools may be a "sale" under the CCPA. To opt out, please email us at privacy@kipr.org to opt out (with the subject line "do not sell info"), including if you are an authorized agent for a California resident.

You may be directed to this page where you can learn more about your choices and how to opt out from interest based advertising more broadly and to opt out from certain social media and audience measurement tracking. To exercise these choices, please follow the instructions below.

• If you are an authorized agent making a CCPA request on behalf of a California consumer, please email us at privacy@kipr.org to submit the request.

#### SOCIAL MEDIA

Social media operators which we may link to our site(s) collect information about your online activity when you interact with our sites and applications.

#### How to Opt Out

To opt out of social media site ad tracking and analytics, you can use your browser controls to opt out, or go directly to our partners listed below to disable social media tracking and analytics on this device.

#### • Google/YouTube

To opt out of Google ad tracking and analytics, you can choose to block certain ads, or opt out or adjust ad personalization at <u>https://myadcenter.google.com/?sasb=true</u>

#### • Facebook

To opt out of Facebook ad tracking and analytics follow instructions here <u>https://www.facebook.com/help/568137493302217</u>

#### • X (formerly known as Twitter)

To opt out of Twitter ad tracking and analytics, follow instructions here <u>https://help.twitter.com/en/safety-and-security/privacy-controls-for-tailored-</u> <u>ads#:~:text=Using%20your%20Twitter%20settings%2C%20visit,Twitter%20in%20your%20cur</u> <u>rent%20browser</u>.

#### • Discord

To opt out of Discord ad tracking and analytics, follow instructions here https://support.discord.com/hc/en-us/articles/360004109911-Data-Privacy-Controls

#### • Instagram

To opt out of Instagram ad tracking and analytics, follow instructions here https://help.instagram.com/155833707900388

#### • YouTube

To opt out of YouTube ad tracking and analytics, follow instructions here <u>https://support.google.com/youtube/answer/9487666?hl=en</u>

#### "DO NOT SELL OR SHARE MY PERSONAL INFORMATION" RIGHTS

You, your parent or guardian, or your authorized agent can opt out of the "sale" or "sharing" of your personal information to third parties.

Certain data collection on our sites and applications for purposes of interest-based advertising and social media tools may be a "sale" or "sharing" under California privacy law. Instructions for how you can exercise these rights are set forth below in the "California Residents' Rights" section.

# **CALIFORNIA RESIDENTS' RIGHTS**

Right to Access

You have the right to request, up to two times each year, access to categories and specific pieces of personal information about you that we collect, use, disclose, sell, and share.

Right to Delete

You have the right to request that we delete personal information that we collect from you, subject to applicable legal exceptions.

Right to Correct

You have the right to request that we correct inaccurate personal information that we maintain about you, subject to applicable legal exceptions.

Right to Opt Out of Sale or Sharing of Personal Information

You have the right to "opt out" of the "sale" or "sharing" of your "personal information" to or with "third parties" (as those terms are defined by applicable law).

#### EXERCISING YOUR CALIFORNIA PRIVACY RIGHTS

Making Access, Deletion, and Correction Requests

To make an access, deletion, or correction request, please contact us at privacy@kipr.org. Before completing your request, we may need to verify your identity. We will send you a link to verify your email address and may request additional documentation or information solely for the purpose of verifying your identity.

Instructions for Authorized Agents Making Requests

You may also use an authorized agent to submit an access, deletion, or correction request on your behalf. Authorized agents may submit such requests to us via email at privacy@kipr.org. An authorized agent must have your signed permission to submit a request on your behalf or provide

proof that they have power of attorney in accordance with California probate law. Before completing requests from authorized agents, we may contact you directly to confirm you've given your permission and/or to verify your identity.

Making Requests to "Opt Out" of the "Sale" or "Sharing" of "Personal Information"

To submit a request to opt out of the sale or sharing of your personal information, email us with the email title "Do Not Sell or Share My Personal Information" or you may choose to enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global Privacy Control ("GPC"). We will process the GPC signal as a request to opt out. You may also use an authorized agent to submit a request to opt out on your behalf if you provide the authorized agent signed written permission to do so. Authorized agents may submit requests to opt out by emailing us at privacy@kipr.org. You have the right not to receive discriminatory treatment for the exercise of your privacy rights.

# CALIFORNIA MANDATORY DISCLOSURES

We also make the following disclosures for purposes of compliance with California privacy law:

- We collected the following categories of personal information in the last 12 months: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above.
- The sources of personal information from whom we collected are: directly from our users, third-party sites or platforms that you link with your registration account, analytics tools, social networks, advertising networks, and third-party services that update or supplement information we hold about you.
- The business or commercial purposes of collecting personal information are as summarized above and in our Privacy Policy under "Use of Your Information."
- We disclosed the following categories of personal information for a business purpose in the last 12 months: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above. We disclosed each category to third-party business partners and service providers, third-party sites or platforms such as social networking sites, and other third parties as described in the "Sharing Your Information" section of our Privacy Policy.

• We do not "sell" or "share" the personal information of known minors under 16 years of age, except as provided as described in this Privacy Policy.

Shine the Light Act

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by KIPR to third parties for the third parties' direct marketing purposes. Pursuant to California Civil Code Section 1798.83(c)(2), KIPR does not share users' personal information with others outside KIPR for those parties' direct marketing use unless a user elects that we do so.

Removal of Content

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted.

To make such a request, please send an email with a detailed description of the specific content or information to privacy@kipr.org. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

#### **CONTACT INFORMATION**

If you have a question about our privacy policies, please send an email to privacy@kipr.org or write us at 1818 W Lindsey St., Bldg D Ste 180, Norman, OK, 73069.

#### VIRGINIA RESIDENTS' RIGHTS

EFFECTIVE JANUARY 1, 2023

Virginia law provides Virginia residents with the rights listed below.

Right to Access You have the right to confirm whether we are processing your personal data and to access your personal data.

Right to Correct

You have the right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing.

Right to Delete You have the right to delete personal data provided by or obtained about you. Right to Portability You have the right to obtain a portable copy of the personal data that you provided to us.

Right to Opt Out

You have the right to opt out of targeted advertising (as defined under Virginia law). We do not sell data as defined under Virginia law.

#### EXERCISING YOUR VIRGINIA PRIVACY RIGHTS

Making Access, Deletion, and Correction Requests

To make an access, deletion, or correction request, please email us at privacy@kipr.org. Before completing your request, we may need to verify your identity. We will send you a link to verify your email address and may request additional documentation or information solely for the purpose of verifying your identity.

Making Requests to "Opt Out" of Targeted Advertising

To submit a request to opt out of targeted advertising, you may email us at privacy@kipr.org with an email titled "Do Not Sell or Share My Personal Information" or you may choose to enable online, where available, a universal tool that automatically communicates your opt-out preferences, such as the Global Privacy Control ("GPC"). We will process the GPC signal as a request to opt out.

To appeal our decision regarding a request related to these rights, you may email us at privacy@kipr.org.

#### VIRGINIA MANDATORY DISCLOSURES

We also make the following disclosures for purposes of compliance with Virginia privacy law:

- We process the following categories of personal data: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above.
- The purposes for processing personal data are described in our Privacy Policy under "Use of Your Information."

- We may disclose the following categories of personal data to third parties: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above. We share each category with third-party business partners and service providers, third-party sites or platforms such as social networking sites, and other third parties as described in the "Sharing Your Information" section of our privacy policy.
- We process the following categories of personal data for targeted advertising: identifiers/contact information, Internet or other electronic network activity information, and inferences drawn from the above. We share each category with advertising networks, data analytics providers, and social networks.

# EU AND UK RESIDENT RIGHTS

Notice to UK & EU Residents: If you are an EU or UK resident, you may have certain additional privacy rights. If you are at this page, then you are a customer/user/website visitor, who are EU Residents, to whom the General Data Protection Regulations apply. The General Data Protection Regulation ("GDPR") (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union and the European Economic Area. It also addresses the export of personal data outside the EU. The GDPR places limits on the gathering and use of personal data and establishes clear responsibilities for companies that collect it, as well as clear rights for people whose data is gathered.

This privacy notice should be read in conjunction with the rest of our Privacy Policy, as the sections of our Privacy Policy are hereby incorporated by reference along with this privacy notice.

In context of the services that we are providing:

- We process the following categories of personal data: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above.
- We have a lawful basis to process your personal information, the purposes for processing personal data are described in our Privacy Policy under "Use of Your Information." In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

- We may disclose the following categories of personal data to third parties: identifiers/contact information, demographic information (such as gender and age), payment card information associated with you, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above. We share each category with third-party business partners and service providers, third-party sites or platforms such as social networking sites, and other third parties as described in the "Sharing Your Information" section of our privacy policy.
- If you are under the age of 16, you are not permitted to use the websites and services or to disclose personal information without parent or guardian consent. If we learn we have collected or received personal information from a child under 16, we will delete that information and seek new information after such child's parent or guardian has consented. If you believe we might have any information from or about a child under 16, please contact us at privacy@kipr.org. You may refer to the section titled as "Children Privacy Policy", which details the treatment of the personal information of children.

How we use your personal data and your rights:

- When you visit, shop or register with KIPR online or use any KIPR online product, service or mobile application, your personal data is controlled by KIPR.
- Your personal data is primarily used to provide you with the KIPR products and services you request. It may also be used to comply with legal obligations we are subject to or to fulfill our legitimate interests, such as to personalize your experience, develop and improve our services or to detect illegal activities. With your prior consent, it may also be used to send you offers and promotions.
- You have a number of rights including the right to request access to, change, or remove your personal data, or to change your marketing preferences (including withdrawing your consent at any time) please see the other sections of this privacy policy to learn more about managing your marketing preferences or deleting your account. Where you have consented to a particular processing, you have a right to withdraw the consent at any time.
- Data Retention: We will retain certain personal information even after termination/ suspension of the use of Services for as long as we reasonably consider it necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period that is necessary for statutory obligations (such as tax, maintaining accounting records or other legal requirements). We will retain customer Data in accordance with your instructions, including any applicable terms of service and as required by applicable laws. Any other information, other than personal information may be retained for as long as necessary for the purpose as described in the Privacy Policy.

- You can request to access, update or rectify your personal information. You also have the right to object to direct marketing. You can reach out to our data protection officer as per the details below.
- Under the GDPR regulations, your personal information is processed based on legitimate interests, you have the right to object to the processing on grounds relating to your specific situation. We strive to use your information fairly, lawfully and transparently. Under GDPR you may also have the right to request to have your personal information deleted or restricted and ask for portability of your personal information.

# • Cross-Border Data Transfers. We have servers in the Oklahoma, Iowa, South Carolina, Virginia, and Oregon. Your data will be stored and processed in the servers accordingly.

We are an international company and thus, have servers situated in the above Oklahoma, Iowa, South Carolina, Virginia, and Oregon USA regions. In the event you are an EUbased company/ person, your data will be processed in the Oklahoma, Iowa, South Carolina, Virginia, and Oregon USA regions. Else, your data will be processed within Third Party Data Centres in the Oklahoma, Iowa, South Carolina, Virginia, and Oregon, United States of America.

We offer European Union Model Clauses, also known as Standard Contractual Clauses, to meet the adequacy and security requirements for our customers that operate in the European Union, and other international transfers of your Data. These clauses are contractual commitments between parties transferring personal data binding them to protect the privacy and security of the data and can be found at <a href="https://eurlex.europa.eu/eli/dec\_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=en#ntc12">https://eurlex.europa.eu/eli/dec\_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=en#ntc12</a> -L\_2021199EN.01003701-E0012.

- Our Data Protection Officer can be contacted by emailing: privacy@kipr.org
- You have a right to lodge a complaint with your local Data Protection Supervisory Authority or with the UK Information Commissioner's Office: https://ico.org.uk/for-thepublic.

For more information about KIPR's data collection and use practices please read all sections of this Privacy Policy.