

## PRIVACY POLICY

This Policy was last updated on November 14, 2020.

**PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AND WHAT CHOICES AND RIGHTS YOU HAVE IN THIS REGARD. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY, YOU SHOULD NOT ACCESS OR USE THE WEBSITE.**

### INTRODUCTION

RocketJudge is a product of Populy Voting Systems, LLC (referred to as “we,” “us,” and “our”). We are committed to protecting the privacy and security of the personal information we receive or collect from you. We also believe in transparency and are committed to informing you about how we treat your personal information.

**When does this Policy apply?** We have created this website Privacy Policy (the “Policy”), together with our [Terms of Service](#), and any documents referenced therein, to inform you about the privacy practices that we apply to personal information and to inform you about your rights and choices in this regard. By visiting this website or using our platform, you accept this entire Privacy Policy. This Privacy Policy only governs the website and platform and does not govern off-line data collection.

### HOW DO WE COLLECT AND PROCESS YOUR INFORMATION?

**When we are a Data Controller.** We collect, receive and process the following personal information from you for the purposes set forth below and in the “*Other Processing Activities*” section of this Policy. If you are a user in in the European Union (the “EU”) or European Economic Area (“EEA”), for purposes of the EU General Data Protection Regulation, 2016/679 (the “GDPR”), we act as a data controller with respect to this information. We collect this information from you via the Website, and we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources.

Category	Types of Data and Purpose
Contact Information	<p>When you visit our Website or request our services, we collect or receive your name, address, telephone number, email address, and other contact details. This may occur, for example, during the sign-up process or if you sign up for a mailing list. If you seek services from us in the course of a contractual or customer relationships between you, and/or your organization, and us, we also collect business contact information in order to provide the services you have requested.</p> <p>We process Contact Information to provide our services to you, to communicate with you, to keep records of our communications with you, to honor and enforce our contracts, to operate the Website, to ensure the privacy and security of our Website and services, to maintain our databases and back-ups, and to manage our relationships with you.</p> <p>The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Website and business, the proper management of our relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>

<p>User Account Information</p>	<p>In order to access and use certain features of our Website, you must first complete a registration. When you create an account, you create a username and password, and we associate this with your Contact Information. This information is necessary to enable us to provide you the account you have requested and to maintain the account and your profile.</p> <p>We process Account Information to provide our services to you, to communicate with you, to keep records of our communications with you, to honor and enforce our contracts, to operate the Website, to ensure the privacy and security of our Website and services, to maintain our databases and back-ups, and to manage our relationships with you.</p> <p>The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Website and business, the proper management of our relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
<p>Cookies and Similar Technologies</p>	<p>Like most websites, we use cookies and/or web beacons to enhance your experience, to gather general visitor information, to track visits to our Website, to provide you with a more personal and interactive experience, to improve our marketing efforts, and for usage analytics purposes (e.g., page response times, download errors, length of visit, webpages visited, etc.).</p> <p>Please see the “<i>Cookies and Similar Technologies</i>” section of this Policy for more information. If you choose to disable cookies and similar technologies, some areas and features of the Website may not work properly.</p> <p>We process Cookies and Similar Technologies to analyze use of the Website and our services, to operate the Website, to serve you the content and functionality you request, to ensure the privacy and security of our Website and services, to enhance your experience, to track visits to the Website, and to provide you with a more personal and interactive experience on the Website.</p> <p>We rely on your express opt-in consent for the use of analytic or marketing cookies and similar technologies. The legal basis for processing of strictly necessary cookies is our legitimate interests in the proper administration of our Website and business.</p>
<p>Traffic and Location Data</p>	<p>When you visit our Website, we automatically collect information from your browser or your mobile device, which includes the date and time of your visit, your Internet Protocol (IP) address or unique device identifier, your browser type, domain server, type of computer, data about which pages you visit, and your interaction with advertising and analytics services on the Website. Location information may include your Internet Protocol (IP) address or unique device identifier.</p> <p>We process Traffic and Location data to analyze use of the Website and our services, to operate the Website, to serve you the content and functionality you request, to ensure the privacy and security of our Website and services, to enhance your experience, to track visits to the Website, and to provide you with a more personal and interactive experience on the Website.</p>

	<p>The legal basis for this processing is our legitimate interests in the proper administration of our Website and business.</p>
<p>Your Communications and Feedback</p>	<p>If you contact us, in addition to your Contact Information, we will collect the information in your message and any other information needed to respond to your inquiry or to answer your question. When you communicate with us, we may retain your communications in order to process and respond to them, as well as to improve our services. We may use your email address to communicate with you about our Services or send you periodic emails if you decide to opt-in to any of our mailing lists.</p> <p>If you receive email communications from us, we may use certain tools to capture data related to if/when you open our message, click on any links or banners it contains. Other information collected through this email tracking feature includes: your email address, the date and time of your “click” on the email, a message number, the name of the list from which the message was sent, a tracking URL number, and a destination page. We use this information to enhance our marketing efforts. We do not sell or distribute this information to third parties.</p> <p>We process Your Communications and Feedback to provide our services to you, to communicate with you, to keep records of our communications with you, to honor and enforce our contracts, to operate the Website, to ensure the privacy and security of our Website and services, to maintain our databases and back-ups, to improve our customer service, and to manage our relationships with you.</p> <p>The legal basis for this processing is consent or, where applicable, our legitimate interests in the proper administration of our Website and business, the proper management of our relationships, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>
<p>Financial and Payment Information</p>	<p>If you choose to purchase services from us, we may collect, via our payment processor, your billing address; card number, security code, and expiration date; bank account number and routing information; and other data necessary to process payments. By submitting your payment card information, you expressly consent to the sharing of your information with third-party payment processors and other third-party services (including but not limited to vendors who provide fraud detection services to us and other third parties). We do not store your payment information.</p> <p>We process Financial and Payment Information to fulfill and bill orders, to process payments, and to manage the data associated with those purposes.</p> <p>The legal basis for this processing is consent or, where applicable, the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p>

**When we are a Data Processor or Service Provider.** If you are using our platform as a judge or a competitor, we act as a service provider or data processor (if you are in the EU or the EEA, for purposes of the GDPR) of our customers who operate the event. In this scenario, we process personal data in accordance with our contracts and the instructions from our customers. If you have additional questions about the event organizer’s policies, you should contact the event coordinator.

Category	Types of Data
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Judge and Competitor Information	<p>Our customers may, for example, configure our service to ask judges and competitors to provide their names, email addresses, and telephone numbers during the sign-up process. This information may also be collected prior to an event and provided to the event organizer(s) or collected via volunteers during in-person registration.</p> <p>As another example, the information collected for science fair registration may include name, age, grade level, home address, school name, school address, teacher name, teacher email, and information about their science fair project.</p> <p>We also receive your responses to questions created by the customer for its competition. Depending on their needs, our customers may configure our services to collect information regarding your racial or ethnic origin, gender, citizenship status, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health information, financial information, or data concerning your sex life or sexual orientation.</p>
Educational Customers	<p>If our customer is an “educational agency or institution” as defined in the Federal Education Rights and Privacy Act (“<b>FERPA</b>”) and notifies us about this, we will not use or disclose any personally identifiable information from education records (as defined under FERPA) for purposes other than performance of our services and the contract with the customer, unless specifically authorized by the customer and permitted by FERPA.</p> <p>If you are a parent or legal guardian of a student user and have questions about how and why personal information is collected, the legal basis for processing, or access requests, you should refer to the school’s privacy policies and direct all inquiries to school.</p>
Video Interviews	<p>If an event elects to use the video conference functionality of our platform, we will process video and audio of the competitor, and the interview may include a discussion of the submitted project and other questions posed by the event sponsor.</p>

**Is entry of personal information required?** You may choose not to provide us with any Personal Information, and you may still access and use much of the Website. However, if you do not provide any personal information, you will not be able to access any portions of the Website that require your Personal Information. Our customers may require certain personal information from you.

**Other Processing Activities.** In addition to the processing activities described above, but only where permitted by applicable law, we may process personal information:

- When necessary for the establishment, exercise, or defense of legal claims, whether in court, administrative, or other proceedings. (The legal basis for such processing is our legitimate interest in the protection and assertion of our legal rights, your legal rights, and the legal rights of others.);
- When necessary for obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice (The legal basis for this processing is our legitimate interest in the proper protection of our business.);
- When required by applicable law;
- To create, use, retain, or disclose de-identified or aggregated data;
- To administer a contest, promotion, survey or other site feature (We may periodically run a contest, sweepstakes, or survey relating to our website. When we run a contest or sweepstakes relating to our website, it will be accompanied by a set of rules. The rules for each contest/sweepstakes will specify how the information gathered from you for entry will be used and disclosed.); and

- For other purposes that are consistent with, related to and/or ancillary to the purposes and uses described in this Policy for which your personal information was provided to us.

We may process your personal information in connection with any of the purposes and uses set out in this Policy on one or more of the following legal grounds:

- Because it is necessary to perform the services you have requested or to comply with your instructions or other contractual obligations between you and us;
- To comply with our legal obligations as well as to keep records of our compliance processes;
- Because our legitimate interests, or those of a third-party recipient of your personal information, make the processing necessary, provided those interests are not overridden by your interests or fundamental rights and freedoms;
- Because you have chosen to publish or display your personal information on a public area of the Websites, such as a comment area;
- Because it is necessary to protect your vital interests;
- Because it is necessary in the public interest; or
- Because you have expressly given us your consent to process your personal information in a particular manner.

We do not use personal information for making any automated decisions affecting or creating profiles other than as described herein.

**How do we disclose or share your information?** When we are acting as a data controller, we may share your information in the following contexts. If we are acting as a data processor or service provider, disclosures in the following contexts will be limited in accordance with the agreement with our customer.

Category	Context
Event Organizers and Participants	Depending on how the customer sets up an event, information may be shared with the event organizer and other event participants, including other competitors and judges. The event organizer may also have us share information with other competitions to which participants advance. Our customers may use information to communicate with you.
Acquisitions and Similar Transactions	We may disclose your personal information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our company assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website users is among the assets transferred. For example, if another company acquires us, we will share your personal information with that company.
Disclosures with Consent	When we are acting as a data controller, we may ask if you would like us to share your personal information with other unaffiliated third parties who are not described elsewhere in this Policy. We will only disclose your personal information in this context with your consent. Customers may also direct us to share personal information with others.
Legal Obligations and Rights	We may disclose your personal information in response to subpoenas, warrants, court orders or other legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our legal rights; to defend against a legal claim; and to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property or a violation of our <a href="#">Terms of Service</a> or other contracts.
Service Providers	We may share your personal information with our service providers that need access to your information to provide operational or other support services. Among

	other things, service providers may help us to administer the Website, support our provision of services requested by you, provide technical support; send marketing, promotions and communications to you about our services; provide payment processing; and assist with other legitimate purposes permitted by law.
De-identified or Aggregated Data	We may disclose aggregated information about our users, and information that does not identify any specific individual, such as groupings of demographic data or customer preferences.

## **Cookies and Similar Technologies**

### First and Third-Party Cookies

A “cookie” is a small file created by a web server that can be stored on your device (if you allow) for use either during a particular browsing session (a “session” cookie) or a future browsing session (a “persistent” or “permanent” cookie). “Session” cookies are temporarily stored on your hard drive and only last until they expire at the end of your browsing session. “Persistent” or “permanent” cookies remain stored on your hard drive until they expire or are deleted by you. Local stored objects (or “flash” cookies) are used to collect and store information about your preferences and navigation to, from, and on a website. First-party cookies are set by the website you’re visiting, and they can only be read by that site. Third-party cookies are set by a party other than that website.

### Other Similar Technologies

In addition to cookies, there are other automatic data collection technologies, such as Internet tags, web beacons (clear gifs, pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.) that can be used to collect data as users navigate through and interact with a website:

- **Web beacons**: These are tiny graphics (sometimes called “clear GIFs” or “web pixels”) with unique identifiers that are used to understand browsing activity. In contrast to cookies, which are stored on a user’s computer hard drive, web beacons are rendered invisible on web pages when you open a page.
- **Social Widgets**: These are buttons or icons provided by third-party social media platforms that allow you to interact with social media services when you view a webpage or mobile app screen. These social widgets may collect browsing data, which may be received by the third party that provided the widget and are controlled by third parties.
- **UTM Codes**: These are strings that can appear in a URL (the “Uniform Resource Locator,” which is typically the http or https address entered to go to a webpage) when you move from one web page or website to another. The string can represent information about browsing, such as which advertisement, page, or publisher sent the user to the receiving website.

### What Cookies and Similar Technologies Are in Use and Why Do We Use Them?

**Intercom.** We use Intercom to facilitate the message functionality on the Website. To learn more about Intercom, you can review their privacy policy at <https://www.intercom.com/legal/privacy> and their cookies policy at <https://www.intercom.com/legal/cookie-policy>.

<b>Cookie</b>	<b>Description</b>	<b>Type</b>	<b>Duration</b>
intercom-id-	Allows visitors to see any conversations they've had on Intercom websites.	Functional	9 months
intercom-session-	Allows users to access their conversations and have data communicated on logged out pages for 1 week.	Functional	1 week

**New Relic.** We also use New Relic to measure and monitor the performance of applications and infrastructure on portions of the Website. New Relic collects information such as the time it takes for users' browsers to load webpages on the Website, where users come from, and what browsers they use. New Relic briefly collects and leverages the IP address from you as part of the data collection process. The IP address is used as a lookup value that maps to additional details, allowing us to diagnose performance issues. IP address lookup values include: countryCode, regionCode, city, asn, asnOrganization, asnLatitude, and asnLongitude. The mapping process for the IP address lookup value can range from minutes up to 24 hours to process. Once the mapping process is complete, New Relic no longer retains the IP address. New Relic sets cookies by default. If you elect to use a cookie consent manager to prevent cookies from being stored, the New Relic Browser agent will continue to capture performance details. For more information regarding the cookies created by New Relic, please see <https://docs.newrelic.com/docs/browser/new-relic-browser/page-load-timing-resources/new-relic-cookies-used-browser>. New Relic's privacy policy is available at <https://newrelic.com/termsandconditions/privacy>.

**Google Marketing.** We use Google's marketing technologies on the public portions of the Website only, including DoubleClick, to track user activity on the Website and to serve personalized advertisements. Your browser is assigned a pseudonymous ID used to track the ads that have been served to your browser and to identify those on which you've clicked. The cookies enable Google and its partners to select and display ads based on your browsing behavior. For more information on how Google uses this information, you can visit <https://policies.google.com/technologies/ads>, <https://support.google.com/displayvideo/answer/7621162>, and <https://support.google.com/google-ads/answer/7548399?hl=en>. To block certain ads served by Google, please visit <https://support.google.com/ads/answer/2662922>. Google's Privacy Policy is available at: <https://www.google.com/policies/privacy>. Google's technologies use the following cookies:

Cookie	Description	Type	Duration
IDE	This cookie is used by Google DoubleClick and stores information about how end users use the Website and any other advertisement before visiting the Website. This is used to present users with ads that are relevant to them according to the user profile.	Marketing	2 years
1P_JAR	This cookie carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the website.	Marketing	1 month
NID	This cookie contains a unique ID Google uses to remember your preferences and other information, such as your preferred language, how many search results you wish to have shown per page, and whether or not you wish to have Google's SafeSearch filter turned on.	Marketing	6 months
_test_cookie	This cookie is set by DoubleClick (which is owned by Google) to determine if the website visitor's browser supports cookies.	Marketing	Persistent

**Google Tag Manager.** We use Google Tag Manager, which allows marketed website tags to be managed using an interface. The tool itself (which implements the tags) does not use cookies and does not register identifiable data. The tool causes other tags to be activated which may, for their part, register personal data under certain circumstances. Google Tag Manager does not access this information. Google Tag Manager is subject to the Google Privacy Policy located at <https://www.google.com/intl/en/policies/privacy>.

**Google Analytics.** We use Google Analytics to collect and process statistical data about the number of people using the Website and to better understand how they find and use the Website. The data collected includes data related to your device/browser, your IP address, and on-site activities to measure and report statistics about user interactions on the Website. The information stored in the cookie is reduced to a random identifier. Any data collected is used in accordance with this Policy and Google’s privacy policy. You may learn more about Google Analytics by visiting <https://www.google.com/policies/privacy/partners/> and <https://support.google.com/analytics/answer/6004245>. You can learn more about Google’s restrictions on data use by visiting the Google Privacy Policy at: <https://www.google.com/policies/privacy>. To opt-out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout> and install the opt-out browser add-on feature. For more details, visit the “Google Analytics opt-out browser add-on” page (located at <https://support.google.com/analytics/answer/181881?hl=en>). Google Analytics relies on the following cookies:

Cookie	Description	Type	Duration
_ga	Used to distinguish users	Analytics	2 years
_gat_UA-*	Used to throttle request rate	Analytics	1 minute
_gid	Used to distinguish users	Analytics	1 day

**Other.** We also use the following first-party cookies:

Cookie	Description	Type	Duration
XSRF-TOKEN	Used to prevent cross-site request forgery	Necessary	1 day
laravel_session	Used to identify a session instance for the user	Necessary	2 hours

#### Other Third-Party Technologies

Some third parties may use automated data collection technologies to collect information about you when you browse the Internet. The information they collect about your online browsing activities over time and across different websites and other online services may be associated with your personal information and used to provide you with targeted content. We do not control these third parties’ technologies or how they may be used. If you have any questions about targeted content, you should contact the responsible party directly or consult their privacy policies.

#### Choices About Cookies

Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being sent by website tracking technologies and advertising. You may adjust your browser settings to opt out of accepting a “persistent” cookie and to only accept “session” cookies, but you will need to log in each time you want to enjoy the full functionality of the Site.

Please be aware that, if you decline the use of cookies, you may not have access to the full benefits of the Site. In addition, adjusting the cookie settings on the Site may not fully delete all of the cookies that have already been created. To delete them, visit your web browser settings after you have changed your cookie settings on the Site. Additional information is provided below about how to disable cookies or manage the cookie settings for some of the leading web browsers:

**Google Chrome:** <https://support.google.com/chrome/answer/95647?hl=en>



- Firefox:** <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Internet Explorer:** <http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>
- Safari:** <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac> and <https://support.apple.com/en-us/HT201265>

To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website at: <https://www.macromedia.com/support/documentation/en/flashplayer/help/help09.html>.

For more information on how to modify your browser settings to block or filter cookies, visit <http://www.aboutcookies.org/> or <http://www.cookiecentral.com/faq/>. You may learn more about internet advertising practices and related consumer resources at <http://www.aboutads.info/consumers/>, <http://www.networkadvertising.org/choices>, and <http://youonlinechoices.eu/>.

## HOW LONG DO WE STORE AND PROCESS YOUR INFORMATION?

We will retain and use your personal information for as long as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements. When applicable, we store your personal data in accordance with the instructions from our data controller clients.

We take reasonable steps to delete the personal information we collect when (1) we have a legal obligation to do so, (2) we no longer have a purpose for retaining the information, and (3) if you ask us to delete your information, unless we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. We may also decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or business objectives.

To the extent permitted by law, we may retain and use anonymous and aggregated information for performance reporting, benchmarking, and analytic purposes and for product and service improvement. When we delete personal information, it will be removed from our active servers and databases; but, it may remain in our archives when it is not practical or possible to delete it.

## HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have put in place reasonable and appropriate security measures to protect the personal information that you share with us from being accidentally lost, used, altered, disclosed, or accessed in an unauthorized manner, altered or disclosed. We use a secure server. We do not store or save your financial information. From time to time, we review our security procedures to consider appropriate new technology and methods.

While our security measures seek to protect your personal information in our possession, no security system is perfect, and no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee or warrant the security of any information you transmit to or from our Site, and you do so at your own risk. We cannot promise that your personal information will remain absolutely secure in all circumstances.

The safety and security of your personal information also depends on you. Where you use a password for access to restricted parts of the Website, you are responsible for keeping the password confidential.

If a security breach compromises your data, we will notify you and any applicable regulator when we are required to do so by applicable law and in accordance with our agreements with our data controller customers.

## YOUR RIGHTS AND CHOICES REGARDING PERSONAL INFORMATION

Please use the Contact Us details at the end of this Policy to exercise your rights and choices under this Policy. If you are exercising a right that is the responsibility of our data controller customers, we will direct you to contact the appropriate data controller who is responsible for responding to your request.

**Communication Preferences.** If you no longer wish to receive communications from us via email, you may opt-out by clicking the “unsubscribe” link at the bottom of our emails or by contacting us at the “Contact Us” details provided at the end of this Policy and providing your full name, mailing address, phone number and email address so that we may identify you in the opt-out process. Once we receive your instruction, we will promptly take action.

**Cookies.** You may choose to not allow cookies via the cookies consent banner or you may set your browser to refuse all or some browser cookies or to alert you when cookies are being set. For more information on how to modify your browser settings to block or filter cookies, visit <http://www.aboutcookies.org/> or <http://www.cookiecentral.com/faq/>. You may learn more about internet advertising practices and related consumer resources at <http://www.aboutads.info/consumers/>, <http://www.networkadvertising.org/choices>, and <http://youronlinechoices.eu/>.

**Online Tracking Signals.** We do not currently recognize browser settings or signals of tracking preferences, which may include “Do Not Track” instructions. “Do Not Track” is a web browser setting that seeks to disable the tracking of individual users’ browsing activities. We adhere to the standards set out in this Policy and do not currently respond to “Do Not Track” signals.

**Accuracy and Updating Your Personal Information.** Our goal is to keep your personal information accurate, current, and complete. If any of the personal information you have provided to us changes, please update it in your user/account profile, or let us know via the “Contact Us” details at the end of this Policy. For instance, if your email address changes, you may wish to let us know so that we can communicate with you. If you become aware of inaccurate personal information about you, you may want to update your information. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

**Complaints.** If you believe that your rights relating to your personal information have been violated, you may lodge a complaint with us by contacting us via the “Contact Us” details at the end of this Policy.

**Educational Requests.** If a student or his or her parent would like to request to access, review, refuse further collection of or delete a student’s personal information, they must contact the school subscriber with the request. School subscribers may direct requests to access, delete or restrict further collection or use of a student’s personal information to [security@rocketjudge.com](mailto:security@rocketjudge.com). Customers can also access and delete their content via their account.

**California Residents.** Under California Civil Code Section 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us once a calendar year information about the information we shared, if any, with other businesses for direct marketing uses. At present, we do not share your personal information with third parties for those third parties’ direct marketing purposes. Please be aware that not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing, if any,

will be included in our response. As part of the California Online Privacy Protection Act, all users of our site may make any changes to their information at any time by contacting us at [security@rocketjudge.com](mailto:security@rocketjudge.com).

**Nevada Residents.** You may submit a verified request to us at the “Contact Us” details provided at the end of this Policy to request that we not make any sale (as defined under Nevada law) of any covered information (as defined under Nevada law) that we have collected or will collect about you. Please provide your name and contact information in your request. We will respond to your request in accordance with Nevada law.

### EU/EEA Residents

If you are located in the EU or EEA, you have the following rights under the GDPR. All requests should be sent to the address noted in the “Contact Us” section of this Policy, and we will fulfill requests to the extent required by applicable law. Where we act as a processor, we may direct you to our data controller customer. If you have additional questions about the event organizer’s policies, you should contact the event coordinator.

**Right of Access.** To the extent required by law, you have the right to receive confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information: the purposes of the processing; the categories of personal data concerned; and the recipients or categories of recipient to whom the personal data have been or will be disclosed. We will provide a copy of your personal information in compliance with applicable law.

**Right of Rectification.** Our goal is to keep your personal information accurate, current, and complete. Please contact us if you believe your information is not accurate or if it changes.

**Right to Erasure.** In some cases, you have a legal right to request that we delete your personal information when (1) it is no longer necessary for the purposes for which it was collected, (2) consent has been withdrawn in certain instances, (3) you have objected to the processing in certain instances, (4) the personal information has been unlawfully processed, (5) the personal data have to be erased for compliance with a legal obligation; and (6) the personal data were collected in relation to the offer of information society services. However, the right is not absolute. When we delete personal information, it will be removed from our active servers and databases as well as the Website; but, it may remain in our archives when it is not practical or possible to delete it. We may also retain your personal information as needed to comply with our legal obligations, resolve disputes, or enforce any agreements.

**Right to Restrict Processing.** You have the right to restrict when (1) the accuracy of the personal data is contested, for a period enabling the controller to verify the accuracy of the personal data; (2) the processing is unlawful and you oppose erasure and request a restriction instead; (3) we no longer need the personal data, but you need us to keep it for the establishment, exercise, or defense of legal claims; or (4) you have objected to us processing the personal information, pending resolution of the objection.

**Right to Object.** In certain circumstances, you have the right to object to the processing of your personal information where the processing is necessary for performance of a task carried out in the public interest, for our legitimate interests, or for the legitimate interests of others. You also have the right to object where personal data are processed for direct marketing purposes or for scientific or historical research purposes or statistical purposes.

**Right to Withdraw Consent.** If you have provided your consent to the collection, processing, and transfer of your personal information, you may have the right to fully or partially withdraw your consent. Once we have received notice that you have withdrawn your consent, in whole or in part, we will no longer

process your information for the purpose(s) to which you originally consented and have since withdrawn unless there are compelling legitimate grounds for further processing that override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. Withdrawal of consent to receive marketing communications will not affect the processing of personal information for the provision of our services.

Right to Complain. If you believe we have not processed your personal information in accordance with applicable provisions of the GDPR, we encourage you to contact us at [security@rocketjudge.com](mailto:security@rocketjudge.com). You also have the right to make a GDPR complaint to the relevant Supervisory Authority or seek a remedy through the courts. A list of Supervisory Authorities is available at: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en). If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law.

## INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

We are located and established in the United States and, therefore, your personal information may be transferred to, stored, or processed in the United States. While the data protection, privacy and other laws of the United States might not be as comprehensive as those in your country, we take necessary and appropriate steps to protect the privacy and security of your personal information. By using the Website or requesting services from us, you understand and consent to the collection, storage, processing, and transfer of your information to our facilities in the United States and those third parties with whom we share it as described in this Policy.

When storing, hosting, or otherwise processing your information (including personal data), we may send such data outside of the European Union (EU) and the European Economic Area (EEA). When we transfer information to the United States or other countries, we do so for the purposes set forth in this Privacy Policy and in accordance with applicable law. We rely on recognized legal bases to lawfully conduct cross-border/international transfers of personal information outside of the EU and EEA, such as your express informed consent to do so (as noted above), when transfer is necessary for us to deliver services pursuant to an agreement between us and you, for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person, or when the transfer is subject to safeguards that assure the protection of your personal information, such as the European Commission's approved standard contractual clauses.

## CHILDREN'S ONLINE PRIVACY PROTECTION ACT

The Children's Online Privacy Protection Act ("COPPA"), as well as other data privacy regulations, restrict the collection, use, or disclosure of personal information from and about children on the internet. While COPPA applies to information collected online from children under 13, it does not apply to information collected from adults that may pertain to children. For more information about COPPA, please visit the Federal Trade Commission's website at: <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>.

**General Website.** Our Website is not directed at children under 13, nor is information knowingly collected directly from children under the age of 13. No one under the age of 13 may access, browse, or use the Website or provide any information to or on the Website. If you are under 13, please do not use or provide any information on the Website. If we learn that we have collected or received personal information from a child under the age of 13 via the Website without a parent's or legal guardian's consent, we will take steps to stop collecting that information and delete it. If you believe we might have any information from or about a child under the age of 13 via the Website, please contact us using the contact information provided below.

**RocketJudge Platform.** Although our Website is not directed to children under 13, the events sponsored by our customers and hosted on our platform may be directed to children under 13. When an event sponsor is using our services with children under 13, the following apply:

- **Event Registration and Submissions.** For event participants under the age of 13, only a parent, legal guardian, or school official may register an account and submit information. Children under the age of 13 may not register for or enter information into the RocketJudge platform. Depending on how the event sponsor has set up the competition, we may collect the following for the sponsor from the child’s parent, guardian, or school: the child’s name, age, grade level, home address, email addresses, telephone number, school name, school address, teacher name, teacher email, and information about their science fair project.
- **Video Interviews.** If an event sponsor elects to use the video conference functionality of our platform, we will collect information from children under 13 when directed to do so by the customer because judges will interview competitors as part of the event. Parental consent will typically be obtained by a consent form, a discussion with trained personnel at the beginning of the video conference, or, if the sponsor is an educational institution, the sponsor may consent on behalf of the parent or legal guardian. Video interviews will include video and audio of the competitor, and the interview may include a discussion of the submitted project and other questions posed by the event sponsor and judges.
- **Uses and Disclosures of Data.** We only use information about participants who are under 13 to provide the RocketJudge platform. We do not use their information for any other commercial purpose. Participants who are under 13 cannot make information available to the general public via our platform, and we will only share the information with the event sponsor, judges, and staff. However, the event sponsor may publish the results of a competition.
- **Third-Party Operators.** We use Amazon Chime for video meetings with event participants. Amazon will collect participants’ email address, login time, and IP address. Amazon’s contact information is: Amazon Web Services, Inc., 410 Terry Avenue North, Seattle, WA 98109-5210, ATTN: AWS Legal, (206) 266-4064, [abuse@amazonaws.com](mailto:abuse@amazonaws.com). AWS Services, Google Firebase, and Sentry.io also support the video meeting functionality, but they do not collect any information from participants.
- **Parental Rights.** We do not require disclosure of more information than is reasonably necessary to participate in the event. In addition, parents may review personal information about their child on the RocketJudge platform, direct us to delete it, and refuse to allow further collection or use of the information. Parents may also restrict certain disclosures of personal information (however, parents cannot for example, restrict disclosures to events which are required as part of our services). To exercise these rights, please contact us using the “Contact Us” details provided at the end of this Policy.

## LINKS TO OTHER WEB PAGES AND YOUR PRIVACY

This Policy only applies to the Website, and it does not apply to any third-party websites or applications.

The Website may contain links to, or media and other content from, third-party websites. These links are to external websites and third parties with that have their own privacy policies. Because of the dynamic media capabilities of the Website, it may not be clear to you which links are to the Website and which are to external, third party websites. If you click on an embedded third-party link, you will be redirected away from the Website to the external third-party website. You can check the URL to confirm that you have left this Website.

We cannot and do not (i) guarantee the adequacy of the privacy and security practices employed by or the content and media provided by any third parties or their websites, (ii) control third parties' independent collection or use of your personal information, or (iii) endorse any third party information, products, services or websites that may be reached through embedded links on this Website.

Any personal information provided by you or automatically collected from you by a third party will be governed by that party's privacy policy and terms of use. If you are unsure whether a website is controlled, affiliated, or managed by us, you should review the privacy policy and practices applicable to each linked website.

## UPDATES AND CHANGES TO OUR PRIVACY POLICY

We reserve the right, at any time and without notice, to add to, change, update or modify this Privacy Policy to reflect any changes to the way in which we treat your personal information or in response to changes in law. Should this Policy change, we will post all changes we make to this Policy on this page. If we make material changes to how we treat your personal information, we will also notify you through a notice on the home page of the Website for a reasonable period of time. Any such changes, updates or modifications shall be effective immediately upon posting on the Website. The date on which this policy was last modified is identified at the top of this Policy.

You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Policy prior to using the Website, and from time to time, so that you are aware of any changes. Your continued use of the Website after the "Last Updated" date will constitute your acceptance of and agreement to such changes and to our collection and sharing of your information according to the terms of the then-current Policy. If you do not agree with this Policy and our practices, you should not use the Website.

## CONTACTING US

For more information, or if you have any questions or concerns regarding this Privacy Policy, wish to exercise your rights, or wish to lodge a complaint with us, you may contact us using the information below, and we will do our best to assist you:

**In writing:** RocketJudge by Populy Voting Systems LLC, 534 W 112 St, PO Box 250821, New York, NY 10025

**By phone:** +1-855-343-8683

**By email:** [security@rocketjudge.com](mailto:security@rocketjudge.com)