

## NATIONAL STEM CHALLENGE

### PRIVACY POLICY

Effective: September 12, 2023

EXPLR PBC INC (“EXPLR”) and Future Engineers LLC (“Future Engineers”) (collectively “us” or “we”) offer the National STEM Challenge (“Challenge”) to students via a web and mobile-based platform (“Platform”). EXPLR is the sponsor of the Challenge and Future Engineers is the administrator of the Challenge. This Privacy Policy explains the types of information we collect, and the ways in which we will use, disclose and protect it when you participate in our Challenge. By participating in our Challenge, you agree to the terms of this Privacy Policy.

Our Challenge is designed to get students excited about science, technology, engineering, and technology. As a Challenge directed to students, we take our responsibility to protect the privacy of students very seriously. Our Challenge is designed to comply with the Children’s Online Privacy Protection Act (“COPPA”) and the Family Educational Rights and Privacy Act (“FERPA”).

#### **INFORMATION WE COLLECT**

**Information Provided to Us.** We collect the content and information you and other users provide to us when signing up for and participating in the Challenge. If you sign up for the Challenge with Google, we may collect information about users from Google. Depending on how you interact with the Challenge and what information you and other users choose to provide about you, we may collect the following personal information.

- **Educators.** We collect information that educators provide about themselves when they sign up for and participate with the Challenge, including the educator’s first and last name, email address, phone number, school name and address, and name and class grade for each class they register with the Challenge. Educators must also either provide a username and password or log in using Google credentials. If you make a purchase through our site, we may also collect payment information.
- **Parents/Guardians.** We collect information that educators and/or students provide about the parents/guardians of students, which enables us to contact the parent/guardian to provide certain notices, obtain parent/guardian consent, and collect or verify information about students. During the consent process, we may request additional information from the parent/guardian. Parent/guardian information may include first and last name, zip code, telephone number, and email address. If you make a purchase through our site, we may also collect your address and payment information.
- **Students.** We collect information provided by educators, parents/guardians, and students about students. The type of information collected and source from which the information is collected is determined by a student’s age and whether they register for the Challenge using a school account or home account. Student information may include first and last name, birthdate, username and password associated with the Challenge registration, email address, telephone number, zip code, school, and grade. Optionally, students may provide their race and gender. We collect content that students provide in their Challenge submissions, which may include photos of the student, video recordings of the student, or an audio file that includes the student’s voice. We may also request additional documentation required to verify a student’s eligibility and award prizes.
- **Judges.** We collect information that judges provide about themselves when they sign up to judge a Challenge, including username, password, email address, phone number, first and last name, address, company/organization/school, job title, industry served, and judging preferences. Optionally, judges may provide their race and gender.

We may ask all individuals that participate in a Challenge, for feedback on your experience.

**Information We Collect Automatically.** When you engage with the Challenge Platform, our servers automatically record information sent from your browser. This may include information such as your computer’s Internet Protocol (“IP”) address, pages of the Platform that you visit, the time spent on those pages, browser, operating system, access times and dates. We use this information to monitor, analyze use of and administer our Platform, including to make improvements and better tailor it to your needs. To collect this information, we use certain technologies including:

- **Cookies.** A cookie is a small data file sent from a website or application and stored on your computer or device. Cookies allow us to recognize your browser when you return to our website, and to remember your login information. Cookies also allow us to authenticate you as a user, serve certain features, to better understand how you interact with the Platform, to improve your, for session control and to monitor and analyze aggregated usage. Most browsers allow visitors to a website to control cookies, including to detect some cookies, to stop accepting cookies or to prompt you before accepting a cookie. Please note that if you choose to erase or block your cookies, certain parts of the Platform may not function correctly. To learn more about browser cookies, including how to manage or delete them, look in the Tools, Help or similar section of your web browser, or visit [allaboutcookies.org](http://allaboutcookies.org).
- **Pixel Tags.** A pixel tag (also known as a “clear GIF” or “web beacon”) is a tiny image – typically just one-pixel – that can be placed on a Web page or in an email to you, to tell us when you have displayed that page or opened that email.
- **Google Analytics.** We use Google Analytics to assist us in collecting and understanding the information we collect automatically. For more information on Google Analytics, see the Google Analytics Terms of Use and the Google Privacy Policy. To opt out, visit <https://tools.google.com/dlpage/gaoptout>.

### **HOW WE USE YOUR INFORMATION**

We collect and use personal information for the following purposes:

- To create accounts for the Challenge;
- To provide and deliver the Platform, including to personalize certain aspects of the website and online platform that are relevant to you;
- To review entries in accordance with the Official Rules for each Challenge, including categorizing entries and assigning judges.
- To contact prospective winners, including a parent if the winner is under the age of 18 and a teacher if the winner is participating in the Challenge using a school account, to collect required documentation, verify eligibility, and award prizes;
- To send and personalize confirmations and administrative messages related to your use of the website and online platform, including technical notices, updates, security alerts, and support messages;
- To customize digital certificates and digital portfolios made available on a user’s dashboard.
- To send you information about new Challenges, Challenge deadlines, and winner announcements;
- To evaluate your responses to surveys and your feedback on the Challenge.
- To provide virtual events;
- To process purchases and payments;
- To send you information about new products and features, including our newsletter, when you have opted in to receive such information;
- To manage our relationship with you, including to respond to your comments and questions, resolve problems and provide similar support; and
- To investigate a suspected violation of the Terms of Service, suspected fraud or other unlawful or unfair activity.

Consistent with our obligations under the Family Educational Rights and Privacy Act (FERPA) as outlined in our Terms of Use, we will use “personally identifiable information” from “education records,” as those terms are defined in FERPA, as directed by the school or district for their educational purposes.

We may also use and retain aggregated, de-identified information to develop and improve our educational products, to demonstrate the efficacy of our products, including in the marketing of our products, and for customized and adaptive learning.

### **HOW WE SHARE YOUR INFORMATION**

We do not sell or rent your information, and we do not share user information for advertising or marketing purposes.

Your Challenge submission may be posted in a publicly available gallery. If a submission includes information that could identify you (“personally identifiable information”), we obtain consent from you (if over the age of 18), or from your parent/guardian (if under the age of 18) before posting the submission publicly. We do not post entries that include personally identifiable information of an individual that is under 13 years of age.

We may disclose your personal information to the following recipients or categories of recipients:

- For accounts associated with a classroom, we may display personal information included in your challenge submission to the educator associated with the account, and/or to other students associated with the same classroom.

- Our service providers who help to facilitate our delivery of the Platform and who provide certain features on our behalf, such as customer service, database management, email management, maintenance services, analytics and improvement of the Platform.
- Selected judges or Challenge administration consultants who may assist with an internally conducted entry review process.
- During virtual events, if you are 18 years or older, your username and other information that you choose to share, such as video, audio or chat conversations, may be shared with other participants.
- Any authorized law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your safety or the safety of others participating in a Challenge.
- In the event of a reorganization, merger, sale, bankruptcy, or other business change of EXPLOR or Future Engineers, your information will remain subject to the terms of this Privacy Policy.

### **CHILDREN'S PRIVACY**

This Challenge complies with the Children's Online Privacy Protection Act ("COPPA"), the Family Educational Rights and Privacy Act ("FERPA"), and relevant state laws concerning the privacy of students.

We do not collect, use or disclose personal information from a child until we have obtained the required consent. Two types of accounts may be created to participate in a Challenge: (1) a personal or home account, and (2) a school account. Children under the age of 13 may only create a home account to participate in the Challenge after the parent/guardian has provided consent. School systems that use our Challenge as an educational tool may create a school account for a student and provide the requisite consent for us to collect personal information of the child.

We collect only as much information as is necessary to provide the service. The child's parent/guardian may access, delete or withdraw consent for the continued processing of the child's information at any time, as described in "HOW YOU CAN ACCESS AND MODIFY YOUR INFORMATION." Please contact us at [support@nationalstemchallenge.com](mailto:support@nationalstemchallenge.com) if you believe we have inadvertently collected information from a child under 13 without parent/guardian consent and we will delete that information as soon as possible.

### **THIRD- PARTY LINKS**

The website contains links to websites belonging to third parties that may offer additional resources, activities, or information that may be useful when participating in Challenges. If you click on a third-party link, you will be directed to that third party's website. The fact that we link to a website is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data, or solicit personal information from you. Those sites have their own privacy policies, and we encourage you to read them.

### **SECURITY**

We use commercially reasonable information security safeguards to protect its databases and servers against risks of loss, unauthorized access, destruction, misuse, modification, or inadvertent or improper disclosure of data. We store data in cloud-based environments that use firewalls and other industry-standard protections in an effort to prevent access from outside intruders. We also encrypt the data in transit, require unique account credentials and limit data access. Not all security risks are reasonably foreseeable, however, and we are not responsible for the consequences of security incidents that are not reasonably foreseeable and not reasonably within its control.

### **HOW YOU CAN ACCESS AND MODIFY YOUR INFORMATION**

If you would like to review, correct, update or request that we delete personally identifiable information you or your students have provided to us, you may do so by emailing us at [support@nationalstemchallenge.com](mailto:support@nationalstemchallenge.com).

We require parental/guardian consent to establish a home account for a Challenge for a child under the age of 13. If you are a parent/guardian of a child under the age of 13 who is participating in a Challenge through a home account, you may request to review your child's personal information, ask us to delete any personal information your child has provided, ask that we no longer collect personal information from your child and/or revoke any consent you have provided for our collection of your child's personal information. To do so, please email us at [support@nationalstemchallenge.com](mailto:support@nationalstemchallenge.com). Before responding to your request, we may require certain information in order to verify your identity and your relationship to the child. If your child under

the age of 13 is participating in a Challenge through a school account, we will work with you and your school to facilitate your request.

If you are a parent/guardian of a student under the age of 18 participating in a Challenge through a school account, you may also have rights to access, amend or correct information in the education record that may be stored in connection with the Challenge. Please contact your school with any such requests. We will work with them to provide them with the information they need to respond to your request.

### **OPT OUT**

Educators, Parents/Guardians, Students, and Judges, and other virtual event participants who have email addresses associated with their account will receive periodic emails from us. You may update your email preferences or opt out of receiving emails from us by clicking on the “unsubscribe” link found at the bottom of each email, or you may contact us at the address listed in the CONTACT US section below. If you have opted out of receiving emails from us, we may still send essential communications, such as legal notices or password change information to you as needed.

### **DATA RETENTION**

We retain your information as long as you retain an active account with us. After a certain period of inactivity, we will deactivate your account and delete your personal information in accordance with our data retention policy. In addition, you may request deactivation and deletion as follows:

#### School Accounts:

- We will honor a school’s request to delete a student’s school account, provided however, that a student may retain a copy of their account information in a personal home account with the prior permission of the student or their parent or legal guardian in the event that the student is under the age of 18.

#### Home Accounts:

- We will honor a parent’s/guardian’s or individual user’s aged 18 or older requests to delete their home account.

We may retain de-identified data, including de-identified entries displayed on the Challenge galleries for the purposes described above.

### **FOR CALIFORNIA RESIDENTS**

We do not disclose any personal information to third parties for their own marketing purposes. For additional information about our privacy practices, or to review and request to have deleted any personal information you have shared with us, please send a request to [support@nationalstemchallenge.com](mailto:support@nationalstemchallenge.com).

With respect to “do not track signals,” we currently do not respond to do-not-track signals. Third parties may collect information about an individual consumer’s online activities over time and across different Internet websites or online services when the consumer interacts with our website. If an industry standard is established and accepted, we may reassess how to respond to do-not-track signals at that time.

### **UPDATES TO THIS PRIVACY POLICY**

We may change this Privacy Policy in the future. When we do, we will post a notice on the Platform and provide other notifications as required by law. By continuing to participate or engage with a Challenge after an updated Privacy Policy is posted, you are deemed to have consented to the updated policy. If we make material changes to this Privacy Policy, we will provide 30 days prior notice to the account holder or, in the case of children under 13 participating in a Challenge through a home account, the parent/guardian, via the email address we have in our records. If the material changes impact information we have previously collected from you, we will request your consent to such changes. The “last updated” date at the top of this policy indicates when the Privacy Policy was last revised.

### **CONTACT INFORMATION**

For additional information regarding this Privacy Policy or our privacy practices, please contact Future Engineers at: 177 E. Colorado Blvd Suite 200, Pasadena, CA 91105, [support@nationalstemchallenge.com](mailto:support@nationalstemchallenge.com).