



PLTW.org Privacy Policy

Introduction. This website, including the features, applications, emails, content, downloads, products or services of the website (collectively, the “Site”) has been developed as part of the charitable and educational activities of Project Lead The Way, Inc. (“PLTW” or “We”) to assist and support educational institutions in providing students with an innovative, highly effective science, technology engineering and math (“STEM”) curriculum and to promote STEM education. This Privacy Policy describes how we collect and use information through the Site. Please carefully read this policy before using and providing any information through the Site. Your use of the Site constitutes consent to this Privacy Policy. Please also read the “Terms of Service” which describe the rules regarding the use of the Site. This Privacy Policy is incorporated by reference into the Terms of Service.

**BY PROVIDING INFORMATION TO US, AND BY USING THIS WEBSITE,
YOU ARE CONSENTING TO THE COLLECTION AND PROCESSING OF
PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.**

SUMMARY PRIVACY NOTICE

- PLTW complies with local law when it collects and processes personal information.
- PLTW usually does not collect or process sensitive personal information, unless it is required by law.

- If PLTW is going to collect or process sensitive personal information for purposes not required by law, we will ask your specific personal consent.
- For the collection and processing of personal information and sensitive personal information of children, consent is obtained from at least one parent, a legal guardian, or, if permitted by local law, the school in which the child is enrolled.
- You have certain rights regarding the personal information and sensitive personal information that PLTW collects and processes. PLTW respects these rights:

- o To know what information is collected and processed, and why
- o To access your data
- o To ask for correction if the information we are processing is incomplete, incorrect or out-of-date
- o To ask us to delete information, such as information that is no longer relevant
- o To have a copy of the data to take to another service provider
- o To know what third parties we share data with.

- You also have the right to know the impact of these requests.
- PLTW has the policy of granting these requests when possible. However:

- o If certain data is deleted, or if consent to process data is denied or revoked, the data subject may no longer be able to participate in PLTW programs or buy PLTW products, because the ability to process that data is necessary to provide the programs, services, and products.
- o If the requested correction is factual, and PLTW does not agree that the correction is appropriate, PLTW may not be able to make the requested correction. However, PLTW may be able to add a notation that the correction was requested. For example, if a student requests that a grade be changed from a C to a B, PLTW cannot change the grade without authorization from the school; however, PLTW may be able to include a notation that the student requested that the change in grade be noted.
- o PLTW may not be able to delete certain information. For example, if PLTW is required to retain information by law, PLTW cannot honor a request to delete that information.

- PLTW has a dispute resolution process, which may be updated from time to time. Our Data Protection Officer can be reached at dpo@pltw.org. If the Data Protection Officer is not able to resolve your concerns, you can discuss those concerns with the regulators in your jurisdiction. The Data Protection Officer can help you find the contact information for that regulator.
- PLTW does transfer personal information across international borders. PLTW's main office is in the United States of America. Therefore, if you are in a country other than the United States, your information may be sent to the U.S., whose data protection laws may be less protective than the data protection laws in your country.
- PLTW's website does use cookies.

- We encourage you to read the full Privacy Policy, which follows this Summary. If you have any questions, please contact the Data Protection Officer at dpo@pltw.org.

PRIVACY POLICY AND NOTICE

- It is PLTW's policy to protect personal information collected and processed by PLTW in compliance with applicable laws. Because PLTW may operate in a number of different countries, some privacy protections may apply based on the country in which the data was collected or processed. PLTW strives to ensure that all personal information is protected and used only as necessary to accomplish the purposes for which the data is collected and to ensure that data subjects are provided the ability to control the use of their data to the greatest extent possible.

- o Personal data of individuals in the European Economic Area that is collected or processed for or by PLTW will be processed in compliance with the European Union's General Data Protection Regulation ("GDPR"). PLTW will also comply with other applicable data protection laws with regard to the processing of personal data and on the free movement of such data.

- o Personal data of individuals in Brazil that is collected or processed for or by PLTW will be processed in compliance with Brazil's General Data Protection Law ("GDPL"). PLTW will also comply with other applicable data protection laws with regard to the processing of personal data and on the free movement of such data.

- o Personal data of individuals in Australia that is collected or processed for or by PLTW will be processed in compliance with Australia's Federal Privacy Act. PLTW will also comply with other applicable data protection laws with regard to the processing of personal data and on the free movement of such data.

- This Privacy Policy also serves as the Privacy Notice for the European Economic Area, Brazil, and Australia. PLTW typically serves as the Data Controller and determines what data is collected and processed. At times, PLTW may act as a Data Processor.
- PLTW has designated a Data Protection Officer, who can be reached at dpo@pltw.org.
- The purposes and legal basis for the processing are described in this Policy.
- Personal information will be transferred to the United States for further processing.
- For individuals subject to European Union, Australian, and Brazilian law, the consent of at least one parent or legal guardian of individuals **under 18** will be obtained before collecting and processing personal data. Parental consent is not required to collect and use data:

- o To contact the parent or legal guardian

- o To use the data a single time, if the data is not stored

- o To use the data for the protection of the child/adolescent
- o As otherwise required or permitted by law.

- You have the right to ask us to:
 - o Confirm that we are processing your data;
 - o Access your data;
 - o Correct incomplete, inaccurate or out-of-date data;
 - o Anonymize, block or delete unnecessary/excessive or non-compliant data;
 - o Take a copy of the data to another service provider;
 - o Delete the data;
 - o Know the third parties we share the data with;
 - o Explain the possibility of denying consent, and what happens if you deny consent;
 - o Revoke consent.
- We encourage you to understand your rights regarding your data. Parents and legal guardians exercise these rights on behalf of their children.
 - o If you deny consent, revoke consent, or we delete data, you or your child may no longer be able to participate in PLTW programs, activities, opportunities, or order PLTW products.
 - o In some cases, we may not be able to grant a request. For example, we may not be able to delete (erase) data if we are required to maintain that data under law. However, we might be able to add a notation that erasure or rectification was requested.
- If there is a concern about privacy or security of data, please contact the Data Protection Officer at dpo@pltw.org. If the Data Protection Officer is not able to resolve your concern, a dispute resolution process is available upon request. If the Data Protection Officer is not able to resolve your concerns, you can discuss those concerns with the regulators in your jurisdiction. The Data Protection Officer can help you find the contact information for that regulator.

How Do We Collect Personal Information? Many areas of the Site can be used without collection of personally identifiable information. There are some areas that require an account to access or use the area. We collect personally identifiable information that you provide when you:

- Register on the Site
- Create an Account
- Make purchases
- Subscribe to a newsletter
- Respond to a survey
- Fill out a form
- Submit or post content
- Engage in other activities, services or features that We make available on the Site

that request your information

- If you sign up to use a special feature of the Site, you may be asked to expressly consent to special terms, for example, by affirmatively checking a box or clicking a button marked, “I agree.” This separate agreement will supplement or amend this Policy, but only with respect to the matters governed by such separate agreement.

What Information is Collected?

The information that is collected may include:

- Name
- Contact information, such as:
 - o Mailing address
 - o Phone number
 - o Email address
 - o School District
- Date of birth, or grade you are in school
- Student ID number
- IEP status/testing accommodations
- NCES code
- Other information that you provide to Us

We only collect sensitive personal information when we are required to by law, or when necessary for the purposes of the processing or with your consent. Sensitive personal information is personal information regarding:

- Racial or ethnic origin
- Religious belief
- Political opinion
- Trade union or religious, philosophical or political organization membership
- Information about health or sex life
- Information about genetic or biometric data

How Do We Use This Information?

We use personally identifiable information only if:

- The subject of the data (or the subject’s legal representative, such as a parent or, in some cases, the school) has consented to the use
- The use is necessary to perform an agreement that the subject of the data is a party to, or that the subject of the data has requested prior to entering into an agreement;
- To comply with a legal obligation;
- To protect vital interests of an individual;
- To carry out a task in the public interest that is an obligation of PLTW;
- The use is necessary for purposes of the legitimate interests of PLTW, and those

interests are not overridden by the interests or fundamental rights and freedoms of the subject of the data.

Examples of ways that we use personally identifiable information include:

- To improve customer service
 - o Your information helps us respond to Your customer service requests and support needs more efficiently.*
- To improve user experience
 - o We may use individual and aggregated information to understand how our services, resources and Site are used.*
- To improve our Site
 - o We may use feedback to improve PLTW products and services.*
- To process payments
 - o We use information provided when placing an order to fulfill that order.*
- To run a promotion, contest, survey or other Site feature
 - o To provide information about topics We think will be of interest.*
 - o To advise Site users of survey results, or if they won a contest.*
- To send periodic emails
 - o We may send email updates about orders, or to answer inquiries, questions, and/or other requests. If you decide to opt-in to our mailing list, We may send emails that include PLTW news, updates, and product or service information. You can unsubscribe from receiving future emails at any time; unsubscribe instructions are included at the bottom of each email.*
- For the purposes specified at the time of collection.
 - o There may be other purposes that are specified when the information is collected.*
- As otherwise permitted or required by law.

How Do We Share Your Personal Information?

We do not sell, trade, or rent Your personal identification information to others.

- You may contact solutioncenter@pltw.org to tell Us you do not want your information to be sold to third parties.

- However, we may still give your information to third parties that provide services to us.

We may share information about visitors to the Site:

- With our business partners, trusted affiliates and advertisers to help provide services that are described above and on the Site.
- With third party service providers that help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. Newsletters and surveys are only sent if You have agreed to receive them.
- With companies that provide services to us, such as website hosting services or credit card processing services.
- With companies that are disclosed to You at the time You provide the Information.
- As permitted or required by law; for example, to comply with a court order or subpoena, or to prevent or investigate a crime or fraud. We may share information if necessary to enforce this Privacy Policy or Terms of Use of the Site. We also reserve the right to report to appropriate law enforcement or government agencies activities that We, in good faith, believe to be harmful or unlawful, with or without providing notice to You.
- PLTW complies with the Family Educational Rights and Privacy Act (FERPA), which prohibits the release of education records without student permission, and other applicable online privacy laws.

Sensitive personal information is only used as permitted by law in the country in question. Some of these purposes are:

- With the specific consent of the subject of the data (or the subject's legal representative, such as a parent), for the specific purpose;
- To comply with a legal or regulatory obligation;
- If permitted by law, for research purposes;
- For the prosecution or defense of legal claims or other legal proceedings, as permitted by law;
- If necessary to protect the vital interests of a natural person;
- When processing is necessary for reasons of substantial public interest.

Is the Site Private?

Some of the Site is not private and can be viewed by others. You may be permitted to post content for viewing on the Site. We have no control over, and disclaim responsibility or liability for, how other users may respond to, use or misuse the content that you post for public viewing on this Site, or for any actions taken by other users related to content that You post on the Site. Please consider carefully the information that You choose to post for public viewing on the site.

How Can You Access or Correct Your Information

- You have the right to access your personal information stored with us to ensure that it is accurate, complete and current.

- Upon request, we will grant you reasonable access, except where the burden or expense of providing access would be disproportionate to the risks to your privacy or where the rights of other persons would be violated.
- We will take reasonable steps to correct, amend or delete information that you can independently demonstrate is inaccurate or incomplete. You can correct or amend your information by sending an email to us at solutioncenter@pltw.org or calling us at [877]-335-7589. You may use the same email address or phone number to ask us to delete information about you. However, we may not agree to delete information, if (a) we still need to information for legitimate purposes; or (b) we are required to retain the data for regulatory or legal purposes.
- You may withdraw your consent to the collection, use and transfer your personal information. However, please note that, by withdrawing your consent, it may be impossible for us to continue to provide you with certain services.
- You can log in to Your Account and correct or update information in Your User Profile.
- You can send an email to solutioncenter@pltw.org requesting that information be corrected

What Information is Automatically Collected

We may collect certain information automatically, including:

- The IP address of the computer You are using;
- The date and time You are connecting to the Site;
- Website analytic data;
- Technical information about Your computer, such as the operating system, the browser and the Internet service providers You are using, and other similar information.

Web browser cookies

Our Site uses “cookies” to enhance User experience.

- Cookies are small text files that are placed on Your hard drive. Cookies help identify a User's computer and may allow some tracking of information. For example, cookies can remember a User between visits, and can keep information in a shopping cart.
- A persistent cookie is set to store your User Name and Password, so you do not have to enter it more than once. Persistent cookies also enable the ability for the Site to track and target the interests of a user in order to enhance the experience of the user on the Site.
- We do not currently collect, and it is not our policy to permit third parties to collect “targeted” cookies (persistent identifiers tracking users across different sites and services) for purposes of advertising.
- You can set Your web browser to refuse cookies, or to alert You when cookies are being sent. However, if You refuse cookies, some parts of the Site may not function properly.

Google Analytics Notice

We use Google Analytics, which uses cookies to analyze website traffic. For instance, Google Analytics tells us how many people have visited our website, what pages they visit, and how long they visit each page. You can visit <https://policies.google.com/te...> to learn more about how Google uses the information collected.

California Do Not Track Notice

Many internet browsers have "Do Not Track" features which, when turned on, send a signal (the "DNT signal") to the websites a user visits that indicates the user does not want to be tracked. Because there is not yet a common understanding of how to interpret DNT signals, and there is no common definition of "tracking", We do not currently respond to DNT signals on the Site. We do not engage in targeted behavioral advertising.

Your California "Shine the Light" Privacy Rights

Upon your request, submitted to solutioncenter@pltw.org, We will advise you of any categories of personal information that We disclose to third parties, and (to the extent We know) whether those third parties use that information for their direct marketing purposes. If We provide Your personal information to a third party, We do not allow that third party to use that information for marketing their services, unless You have consented to that use.

How Do We Protect Your Information?

We use reasonable data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of Your personal information, username, password, transaction information and data stored on our Site. However, it is impossible to guarantee security of any website, or of data transmitted over the Internet. While We seek to protect information, We cannot guarantee the security of any personal information You provide through the Site. It is important that You are careful when You provide private information online, that You use a secure connection, and that You protect your username and password.

Third Party Websites

- This Site may provide hyperlinks, which are highlighted words or pictures within a document, that, when clicked, take you to another place within the document, to another document altogether, or may take you to a third-party website not controlled by PLTW.
- Any third-party websites may collect, use, and disclose information in a manner different than the Site. PLTW is not responsible for the collection, use, or disclosure of information collected through these websites and expressly disclaims any and all liability related to such collection, use, or disclosure.
- Chat Rooms, Journals and WebLogs, Message Boards, Classifieds, and Public Forums are areas that are only available to eligible and registered users.

- Whenever you voluntarily post public information to journals, weblogs, message boards, classifieds, or any other public forum, then that information can be accessed by the public and can in turn be used by those people to send you unsolicited communications.
- You should use discretion in providing information in these areas. PLTW is not responsible for the review, collection, use, or disclosure of information collected through such public forums and expressly disclaims any and all liability related to such collection, use, or disclosure.

PLTW does not share any information with third parties except as stated in this Privacy Policy, as required by law, as needed to protect the rights of others, or to enforce the terms of use for the Site.

Third Party Websites

Any information PLTW collects from its donors is used by PLTW for internal purposes only, such as program implementation, tax reporting, legal compliance, or budgeting, and is shared with board members, staff and third parties for these purposes only. Otherwise, donor information shall be kept strictly confidential by Project Lead The Way, its board members, staff and volunteers, unless permission is obtained from individuals or organizations to release such information. Project Lead The Way is committed to respecting the privacy of its donors.

Protecting Children's Privacy

As a service provider to educational institutions, PLTW is committed to protecting the privacy of children, including any children under the age of 13.

- We adhere to the Children's Online Privacy Protection Act, (COPPA), and do not knowingly register or otherwise collect personally identifiable information from any child under the age of 13 without the prior verifiable consent of the child's parent or guardian.
- Any student information collected by PLTW on or through the Site is collected solely for the benefit of such students and their school systems. Schools that we contract with obtain consent from the parent or guardian of the child, authorizing PLTW to collect and use the child's personally identifiable information for purposes of the PLTW program.
- Parents/guardians may receive, upon written request, a description of the types of personal information collected on the Site; an opportunity to review their child's personal information and/or have the information deleted; and may revoke permission for further use or online collection of a child's personal information.
- Subject to any legal and/or regulatory record keeping requirements, PLTW retains personal information collected from a child for only as long as is necessary to fulfill the purpose for which it was collected and deletes such personal information using reasonable measures to protect against its unauthorized access or use.
- PLTW uses the following method to confirm parental permission for children to use the Site: Program Participants agree to obtain verifiable consent from the

parents/guardians of all students to the collection and use of personal information provided through and on PLTW websites or related applications and software and use of school internet resources.

PLTW will use the same method to confirm parental permission as required by other laws, including the California Consumer Privacy Act.

Retention

PLTW retains personally identifiable information only as long as it is needed for permissible business purposes, as required by law, and in accordance with record retention policies. Upon expiration of the retention period, personally identifiable information is disposed of in a secure manner.

Changes to this privacy policy

We have the discretion to update this Privacy Policy at any time. When we update the Privacy Policy, we will revise the "updated" date at the top of this page. We encourage Users to frequently check this page for any changes to stay informed about how We collect and use Your information. You acknowledge and agree that it is Your responsibility to review this Privacy Policy periodically and become aware of modifications. By using this Site, You agree that the Privacy Policy applies to any current or past information you have shared with PLTW.

Access from Outside the United States; Acceptance of Policy

- If you are located outside of the United States, please note that any personal information collected through this Site may be transferred to the United States and other countries that might not provide an equivalent level of protection as the data protection laws in your home country.
- Your use of this Site or submission of any personal information constitute your express consent to the collection, use, disclosure, processing and storage of your personal information outside of your home country.
- We collect and use information as reasonably necessary to fulfill requests by Users, to operate Our business, and to comply with law. By using this Site, You signify Your acceptance of this Privacy Policy.
- If You do not agree to this Privacy Policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed Your acceptance of those changes.

Contact Us

If You have any questions about this Privacy Policy or Your interactions with this Site, please contact us at: solutioncenter@pltw.org

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