

## **Drobots Privacy Policy**

See also: [Legal Notices](#)

### **Last Review and Update: August 1, 2019**

*Drobots Company ("Drobots")* takes your privacy seriously. As a nonprofit and a mission-driven youth-serving organization, we are compelled to understand who we are serving, how our programs are performing, and make improvements so that we can achieve our goals of making *Drobots* accessible to any youth who wants to be part of the fun, exciting and life-changing experience. Thus, we need to collect certain pieces of data from you to ensure we are meeting our goals and responsibilities as a youth-serving nonprofit organization.

This *Drobots* Privacy Policy describes how *Drobots* ("*Drobots*," "our," "we," "us,") collects and processes personal data that users ("user," "your," or "you") provide to us at any of our websites where this Policy is posted (the "Sites"). This Privacy Policy also applies to personal data which *Drobots* obtains by other means, as described below.

### **Treatment of Data for Minor Youth**

We are a 501(c) (3) non-profit organization and are exempt from compliance with the United States Children's Online Privacy Protection Act (COPPA). Nevertheless, we choose to protect the privacy of children under the age of 13, residing outside of the European Union, within the spirit of COPPA, and those residing in the European Union as provided by the European Union General Data Protection Regulation (GDPR).

Youth under the age of 13 are not permitted to create accounts or provide personal data on our Sites. If we learn that we have personal data obtained directly from a child under 13 we will delete that data as soon as possible.

### **1. Agreement to the Policy**

By accessing or using any of our Sites, you agree to be bound by all of the Site's terms and conditions including this Privacy Policy. If you do not agree to any of the terms and conditions outlined in this policy, please do not access or use any of our Sites in order to avoid inadvertent data collection. In the event you believe data was collected without your consent please see article 13 for instructions on how to contact us.

### **2. What personal data does *Drobots* Collect:**

*Drobots* may collect the following personal data categories for the uses explained in section 4: Name, mailing address, email address, phone number, date of birth, gender, race, ethnicity, employer, your affiliations with *Drobots* Strategic Alliances, *Drobots* Alumni status, *Drobots* program history, secondary or emergency contacts, credit card information, passport information, and your Internet Protocol ("IP") address. For youth participants, we also collect data on free or reduced lunch eligibility, grade in school, graduation data, school name, and school identification number. (*Drobots* does not collect race or ethnicity data from residents of the European Union.)

### **3. How does *Drobots* collect the data:**

We collect data when you provide it to us directly or indirectly through a third party and by "cookies" (as described in section 8, below). You may provide certain data to us when you: (a) register for any *Drobots* program or event; (b) subscribe to our newsletter; (c) send e-mail messages, submit forms, or transmit other information by telephone or letter; (d) order products; (e) submit your credit card or other payment information; (f) access certain forms or request information on our Sites; (g) visit other points on the Sites that state that such information is being collected; (h) attend a *Drobots* event or a *Drobots* Affiliate/Operational Partner activity; (i) apply for a grant through a

third party vendor; (j) register for housing for a *Drobots* event or for the *Drobots* Championship through a third party vendor; (k) complete a paper consent and release form; and/or (l) make a donation to *Drobots*.

When you engage in certain activities on any of our Sites, we may ask you to provide data by filling out and submitting an online form. Depending upon the activity, some of the data may be mandatory and some may be voluntary. If you do not provide the mandatory data with respect to a particular activity, you may not be able to engage in that activity.

#### **4. How does *Drobots* use the data:**

By entering personal data into *Drobots* Sites or providing it to *Drobots* (directly or indirectly through third parties), you agree to allow *Drobots* to collect and use the data for the following purposes:

*a. To register you as a *Drobots* program participant or volunteer.*

*b. To manage events:* We and our local *Drobots* representatives (*Drobots* Affiliate and Operational Partners, Regional Directors, and organizations who implement *Drobots* programs locally) use personal data to identify your region for program participation, event registration, badging, volunteer management and general event management.

*c. To comply with the *Drobots* Youth Protection Policy:* *Drobots* contracts with certified background screening agencies to conduct background screening on volunteers and staff. To conduct background screening, these agencies use your personal data and secure all data collected according to the process outlined on their privacy policy. *Drobots* may receive the last 4 digits of your social security number (if provided), name, and screening status and uses this data only to determine eligibility to volunteer in any role at *Drobots* and may keep this data in a secured file.

*d. To communicate with you as a participant in *Drobots* programs:* *Drobots* uses personal data to communicate with you about *Drobots* program information and related opportunities.

*e. To process transactions:* *Drobots* uses personal data to engage in interactions with you including to communicate with you about your registration status, payment of team registration, processing of sponsorship information, newsletter subscriptions, event information and to process orders, registration fees or donations.

*f. To provide support or other services:* *Drobots* uses personal data to provide you with support or other services that you have requested. We may use your data to respond directly to your requests for information including registering for newsletters, registering a *Drobots* team, registering for trainings or webinars and other specific requests. We may pass your data along to the appropriate local *Drobots* representative in your geographic area to respond to your request.

*g. To improve our programs, products and services:* *Drobots* uses data to evaluate and improve our programs, understand who we are serving, assess program impact, report aggregate/de-identified data, monitor growth, improve the delivery of *Drobots* programs, improve our marketing and promotional efforts, improve our product and service-offerings, customize and improve our Sites' content, layout, and services, diagnose problems with our servers, software, and administer our Sites, often with the assistance of our vendors. *Drobots* sometimes uses third parties to help implement, manage and evaluate programs and efforts, and may share personal data with those third parties only for the purposes outlined in this policy.

*h. To improve quality and facilitate use of our Sites.* *Drobots* may use your personal data, including the information gathered as a result of site navigation and electronic protocols and cookies, to help create and personalize website content, improve website quality, track marketing campaign responsiveness, evaluate page response rates, conduct usability testing, and facilitate your use of our Sites (for example, to facilitate navigation and the login process, enhance security, and preserve order information between sessions).

*i. To solicit donations for *Drobots* or local *Drobots* organizations.*

j. To assist with travel to *Drobots* events: *Drobots* may provide assistance with travel arrangements to events, including to *Drobots* Championship. Personal data including your name, gender, date of birth and passport number may be required to process visas and manage your travel arrangements to events.

## **5. How long does *Drobots* retain data:**

*Drobots* will retain your data for as long as needed or permitted to fulfill the purposes and uses described in this Policy. When we no longer need your data, and there is no need to keep it to comply with our legal obligations or protect our legal rights, we will either delete it from our systems or depersonalize it so we can't identify you. If you wish to understand how to request your personal data be deleted, please refer to article 13 for more information.

## **6. How does *Drobots* share data:**

*Drobots* does not rent or sell data to others. We share personal data through secure data processes with local *Drobots* representatives (*Drobots* Affiliate/Operational Partners, Regional Directors, and organizations who implement *Drobots* programs locally), employers (when permission is given), vendors, service providers, and other third parties (collectively, "Service Providers") who are acting on our behalf to help operate our Sites, handle communications, implement, manage or evaluate *Drobots* programs and events, or complete transactions you request.

Except as otherwise provided in this Privacy Policy, *Drobots* will keep your personal data private and will not share it with third parties, unless such disclosure is necessary to: (a) comply with the law or legal process served on us; (b) provide you the products, services and/or information that you may have requested; (c) protect our rights or property; (d) enforce our rights; (e) protect the interests of users of the Site or any other person; (f) operate or conduct maintenance and repair of our equipment; (g) detect, prevent and/or otherwise address fraud, security or technical issues, as authorized by law; and/or (h) otherwise comply with applicable laws.

## **7. How does *Drobots* protect information:**

*Drobots* uses technical and organizational measures to protect data including, but not limited to: conducting third-party security audits, firewalls, maintaining security patches on external systems, a log auditing system to identify breaches, and ensuring that all web connections are over HTTPS. Access to personal data is available through your user identification and password selected by you. This password is encrypted. We recommend that you do not divulge your password to anyone and no one at *Drobots* or who represents *Drobots* will ever ask for your password. In addition, your personal data resides on a secure server to which only select *Drobots* personnel and Service Providers have secure access.

## **8. Cookies:**

When you use any of our Sites, we may store cookies on your computer in order to facilitate and customize the experience. A cookie is a small data text file, which a website stores on your computer's hard drive (if your Web browser permits) that can later be retrieved to identify you to us. Our cookies store randomly assigned user identification numbers, the country where you are located, and your log-in name to welcome you back to a Site. Our cookies: (a) make your use of our Sites easier; (b) make our Sites run more smoothly; (c) track authenticated users visiting our Sites; and (d) help us to maintain secure Sites. You are always free to decline our cookies if your browser permits, but some parts of our Sites may not work properly in that case. You can at any time use your browser setting to delete cookies from your system. We may use an outside company to display information on our Sites. As part of their service, they will place a separate cookie on your computer. Except as provided herein, we will not provide any third-party with any of your personal data about your transactions with or through *Drobots*. We and third parties we hire will collect and use data about you, such as your IP address, browser type, the server your computer is logged onto, the area code and zip code associated with your server, and whether you responded to particular information.

## **9. Privacy Policies of Third-Party Sites:**

We may maintain links to other websites on our Sites. Links to alliances and sponsoring organizations are examples of these links. This Privacy Policy only applies to *Drobots*. Other sites accessible through our Site have their own privacy policies and data collection use and disclosure practices. Please consult each site's privacy policy.

## **10. Your Use of Our Training Materials, Forums, Blogs, and various Social Media:**

*Drobots* may offer online training materials. The training materials may contain original and copyright-protected works of *Drobots* and others. Our Sites also contain forums where training materials are posted and where users may submit their own comments, opinions, and images ("Submissions").

By making a Submission to or through one of our Sites, training materials, related forums, blogs, or *Drobots* World Tube, you grant *Drobots* an unrestricted, irrevocable, worldwide, royalty-free license to use, reproduce, display, blog, publicly perform, transmit and distribute such Submission (except to the extent it contains personal data), alone or as part of other works, in any form, media, or technology whether now known or hereafter developed.

You warrant and represent that you shall not transmit, post or upload any Submission that is, in whole or in part, libelous, scandalous, inflammatory, discriminatory, defamatory, false, threatening, vulgar, obscene, pornographic, profane, abusive, harassing, invasive of another's privacy, hateful or bashing, aimed at gender, race, color, sexual orientation, national origin, religious views or disability, or otherwise unlawful, or that violates or infringes on the privacy, publicity, intellectual property, proprietary, or contractual rights of any person or entity. By posting pictures of others, you warrant and represent that you have those persons' (or if the person is under the age of majority, the person's parent or guardian's) consent.

You agree to defend, indemnify, and hold harmless *Drobots*, its directors, officers, employees, agents, and sponsors from and against any claims, actions or demands, including, without limitation, reasonable legal and accounting fees arising out of, or resulting from, your use of our Sites or any of the services made available on or through our Sites, and/or your breach of this Privacy Policy.

*Drobots* does not warrant or represent the truthfulness, accuracy or reliability of any content, information or material contained in any Submission. Your reliance on any Submission shall be at your own risk.

Users of our training materials, Sites and related forums agree at all times to abide by legal protections and a professional honor system. Users agree that in downloading, using or referring to the contents of any document included in the training materials, Sites or related forums (whether in writing or verbally), they will give full attribution to the author.

## **11. How you can rectify incorrect information:**

You have the ability to access and edit the personal data you provide to us. Data may be changed by logging into your *Drobots* user's account, or by requesting a change in writing. Requests in writing should be sent to [privacy@drobotscompany.com](mailto:privacy@drobotscompany.com).

Please include your name, address, email address, and/or phone number when you contact us regarding an update or correction to data. We reserve the right to confirm your identity before updating or correcting personal data. We encourage you to promptly update your personal data if it ever changes.

## **12. How you can object to certain uses of your data:**

We may, from time to time, use your name or email to send you information regarding our programs, services and related opportunities as outlined in section 4.

If you do not wish to receive email from *Drobots* you may “opt-out” of receiving these communications by exercising your right to “opt out” by using the unsubscribe feature in the email or sending us an email at [privacy@drobotscompany.com](mailto:privacy@drobotscompany.com).

You also have choices with respect to cookies, as described in Section 8. By modifying your browser preferences, you generally have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies, some parts of our Sites may not work properly.

### **13. How you can exercise your right to be forgotten:**

You may request that your personal data at *Drobots* be deleted, by emailing [privacy@drobotscompany.com](mailto:privacy@drobotscompany.com). You will need to provide your name, email address and/or phone number at the time of your request. We reserve the right to confirm your identity before taking any action to delete your data. *Drobots* will assess each request to be forgotten on a case by case basis to determine the extent to which data can be deleted. In some cases we will remove personal data from your record but may retain de-identified information using processes such as pseudonymization. In some cases, such as when data has been collected as part of the Consent and Release forms or youth protection screening, personal data cannot be deleted.

### **14. How you can exercise your right to data portability:**

You have the right to receive a copy of the personal data you have provided to *Drobots* in a machine readable format by emailing [privacy@drobotscompany.com](mailto:privacy@drobotscompany.com).

### **15. Transfer of data to other countries:**

Because we are a global organization, *Drobots* may share your personal data with *Drobots* representatives (*Drobots* Affiliate/Operational Partners, Regional Directors, and organizations who implement *Drobots* programs locally) in other countries in order to carry out the activities specified in this policy. By submitting your personal data to *Drobots*, through *Drobots* Sites, or in connection with your interactions with *Drobots* offline, you consent to such transfers and to the processing of this information in any country where *Drobots* operates.

### **16. Special Notification for California Residents:**

Users who reside in California and have provided their personally identifiable information to us may request information about our disclosures of certain categories of personal identifiable information to third parties for their direct marketing purposes. Such requests must be submitted to us at [privacy@drobotscompany.com](mailto:privacy@drobotscompany.com). Within thirty days of receiving such a request, we will provide a list of the categories of personal identifiable information disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.

### **17. *Drobots* Donor Privacy Policy:**

This section applies to all donor-related information received by *Drobots*, both online and offline, from any donor. *Drobots* collects and stores donor information including name, address, email address, phone number, and donation amounts. Unless authorized by the donor or mandated by law, *Drobots* will not sell, share or trade our donors' personal data with any other entity, nor send mailings to our donors on behalf of other organizations. The only exception would be if the donor notified us that the donor's employer will match the donation and the donor requests that we reach out to obtain the matching gift, in which case we may disclose the donor's contact information (name, postal address, email address and telephone number) and donation information (donation amount and supported projects) to the employer. We are not responsible for the privacy practices of donors' employers. For more information regarding the handling of information by an employer, please refer to the employer's privacy policies.

To the extent donations are processed through a third-party service provider, our donors' information will only be used for purposes necessary to process the donation.

#### **18. Changes to this Privacy Policy:**

We reserve the right to change this Privacy Policy at any time. Such changes, modifications, additions, or deletions shall be effective immediately upon notice thereof, which may be given by means including, but not limited to, posting the revised Privacy Policy at any of our Sites. You acknowledge and agree that it is your responsibility to review the Site you are using and this Policy periodically, and to be aware of any modifications. Your continued use of a Site after any such modifications will constitute your; (a) acknowledgment of any modified Policy; and (b) agreement to abide and be bound by any modified Policy. To the extent that any modifications to this Policy materially alters how *Drobots* will use information collected under prior version of the Policy, *Drobots* will provide you notice by email using your email on file, and where required by law, will obtain your consent.

#### **19. How to contact us and how to lodge a complaint:**

*Drobots* has a Data Governance Team who represents *Drobots* and will lead investigative action, complaint handling and data breach notification. If you have any questions about this Privacy Policy, the practices of any of our Sites, or your dealings with any of our Sites, contact us via email [privacy@drobotscompany.com](mailto:privacy@drobotscompany.com) or by sending a letter to:

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