

## **FUTURE ENGINEERS PLATFORM PRIVACY POLICY**

**Updated and effective: 07/20/2019**

Future Engineers LLC (“Future Engineers”) owns and operates the web and mobile-based Future Engineers platform (the “Platform”, “us” or “we”) that hosts innovation challenges (“Challenge,” “Challenges”) for students. We are committed to protecting the privacy of your personal information, and have provided this policy to inform the educators, parents, students, and judges who use the Future Engineers Platform (“you,” “your”), of the types of information we collect, and the ways in which we will use, disclose and protect it. By accessing or using the Future Engineers Platform, you agree to the terms of this Privacy Policy.

### **INFORMATION YOU PROVIDE TO US**

**Educators:** When educators decide to use the Future Engineers Platform, you provide us with your username and password, first and last name, email address, phone number, school name and address, and a name for each class you have registered with the Platform. Optionally, educators may provide class grade. We use this information to create your account, set up your class(es), populate class portfolios, customize emails to students or parents directly from you in relation to the Challenge explaining deadlines and activities, and allow you to see the work your students are doing on the Platform.

We may also use your email address to send you updates about Challenges or student Challenge activity, send product updates, or send other information that may be of interest to you when you sign up to receive such additional information.

For each class you set up, a class code will display on your dashboard that you may use to grant your students access to the Platform. The code permits us to link specific students to your class.

Through your dashboard, you may create student accounts linked to a code by providing us with first and last name, user name, password, birthdate and grade level for each of your students. At your option, you may also provide student gender.

If you wish to use our Platform as an automated conveyance to send emails to parents or students who are 13 years or older in connection with a Challenge, you may also provide an email for each parent or student. The student’s information will be used as described in this Privacy Policy.

In the alternative, you may permit students to create their own accounts. In this case, you will use the code to grant your students access to the Platform. Upon entering the Platform, students will be asked to provide information as described in the Students section below.

If you would like your students under the age of 18 to be eligible to win challenge prizes, or to participate in additional personal challenges at home, we will also ask you to provide parent contact information so that we may obtain any required consent necessary by the time

required. If a parent email is not available or you do not wish to provide it, you may download the parent consent form from your teacher dashboard and mail-in or upload the signed parent form via your dashboard.

**Parents:** In order for students under the age of 18 to be eligible to be awarded prizes in any of the Future Engineers challenges, we require that their parents agree to the official challenge rules (“Official Rules”). We request that parents provide us with their first and last name, phone number, as well as verify or provide the first and last name of their child. We use this information to obtain parent consent and to notify parents in the event that their child is a potential winner in a challenge, at which point we may request additional documentation if required. We use the student first and last name to set up the account and may use it to populate a teacher’s dashboard, populate student or class portfolios, and to customize emails to the student’s parent or teacher about the Challenges.

Additionally, parents may verify or provide their child’s zip code and grade, which we use to determine grade-specific and location-specific eligibility and in the aggregate to better understand our user demographics.

Optionally, parents may verify or provide their child’s gender, which we use to determine eligibility of gender-specific challenges and in the aggregate to better understand our user demographics.

Parents may also choose to provide us with an email address for a child under the age of 13, which we would not otherwise collect directly from the child. We use this information to send deadline reminders, winners’ announcements, and to keep the child informed about new challenges that they could be eligible to enter. If a parent opts their child into the newsletter, we may also send product updates or other information.

**Students:** All students are asked to provide a user name, password, and birthdate. Students are asked to provide the following additional information:

**Students age 18+:** Students are asked to provide their first and last name, email address, phone number, zip code, and grade. We use this information to set up the account, permit the student to use the platform, obtain student consent, send updates about challenges, and populate student portfolios. Optionally, students may provide gender. We use gender to determine eligibility for gender-specific challenges and in the aggregate to better understand our user demographics. If the student is linked to a class code, their information may be used to populate class portfolios, and to customize emails to the student’s teacher. We may also use the email address to send a newsletter when the student has opted in to receive it, or to contact the student if they have been selected as a prospective winner, at which point we may request additional documentation if required.

**Students age 13-17:** Students are asked to provide their first and last name, email address, and grade. We use this information to set up the account, send updates about challenges, populate student portfolios, customize emails to the student's parent, and determine eligibility. Optionally, students may provide gender. We use gender to determine eligibility for gender-specific challenges and in the aggregate to better understand our user demographics. We may also use the email address to send a newsletter when the student has opted in to receive it.

- When the child is not connected to a class code, we ask them to provide us with a parent email address. We use the parent email address to request parent consent required to create an account for the child, to permit their child to submit eligible entries, or for prizes to be awarded.
- When the child has signed up for the Platform through their school, we rely on the Educators to have obtained consent permitting the child to use the Platform and submit an eligible entry. If a student is linked to a class code, their information may also be used to populate class portfolios and customize emails to the student's teacher. We may also ask the student to provide a parent email address to obtain parent consent required for prizes to be awarded or to grant full access to the platform.

**Students under the age of 13:** In compliance with the Children's Online Privacy Protection Act (COPPA), we only ask children under the age of 13 to provide us with the minimally required information in order to permit them to use the Platform. As noted in our Terms of Use, by permitting students under the age of 13 to use the Platform, Educators agree that they have obtained the necessary parent consents for the collection of any personal information from the child.

- When the child is not connected to a class code, we ask them to provide us with a parent email address. We use the parent email address to request parent consent required to create an account for the child, to permit their child to submit eligible entries, or for prizes to be awarded.
- When the child has signed up for the Platform through their school, as noted above, we rely on the Educators to have obtained verifiable parental consent for collection of personal information from the child before permitting the child to use the Platform and submit eligible entries. If participating through their school, students will provide their first and last name, grade, and optionally can provide gender. We use first and last name to populate the teacher's dashboard for class management, populate student or class portfolios, and customize emails to the student's parent or teacher solely about the Challenge progress. We use gender and grade to determine eligibility for grade-specific or gender-specific challenges and in the aggregate to better understand our user demographics. We may also ask the student to provide a parent email address to be used to obtain parent consent required for prizes to be awarded or to grant full access to the platform.

In addition, individuals may submit additional personal information such as a video that includes their likeness or an audio file that includes their voice when necessary as part of a Challenge submission. This information is used only to judge the Challenge entry in accordance with the Challenge rules, to display the entry as described below in the section, “Sharing Your Personal Information,” and otherwise stored in the individual’s account.

Whether a minor child has signed up through their home or school, we use parent email to obtain parent consent by the time required for a prize to be awarded. Students connected to a class may opt to return a signed parent form to their teacher, which the teacher may upload or mail-in to Future Engineers to provide parent consent by the time required. If a student has signed up for the platform through their school, parental consent may also be obtained to grant the student full access to the platform, including personal challenges. We may also use the parent’s email to contact the parent if their child has been selected as a prospective winner in order to request additional documentation if required

Upon receipt of a class code provided by an Educator, a student who has created an account outside of the classroom may link their account with the class so that they may use one account to participate on the Platform. Students may also link to multiple class codes.

All registered students will have the ability to edit any student information that was previously collected for their account, with the exception of birthdate. They may also request to change their parent’s information. Upon such request, the parent will be sent an email invitation to edit their parent information.

**Judges:** When judges volunteer to use the Future Engineers Platform, you provide us with your 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 race and gender. We use this information to create your account, generate your judge dashboard, select judges, assign entries, and otherwise communicate with judges to facilitate the review of entries and collection of scores.

We may also use your email address to send product updates. We may also send you other information that may be of interest to you when you sign up to receive such information.

### **INFORMATION WE COLLECT AUTOMATICALLY**

When you use the Future Engineers 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 Future Engineers, and to 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.

By using the Future Engineers Platform, you agree to our use of these tracking technologies.

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>. We are not responsible for the Google Analytics opt-out tools.

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

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 do not sell or rent information, and we do not share user information for advertising or marketing purposes. We collect and use personal information for the purposes described above and to:

- Create accounts and allow individuals to use the Platform
- Provide and deliver the Platform
- Review Challenges in accordance with the official rules for each Challenge, verify the eligibility of Challenge winners and send prizes to the winners
- Send confirmations and administrative messages related to your use of the Platform, including technical notices, updates, security alerts, and support messages
- Send you information about new Challenges, Challenge deadlines, and winner announcements.
- Send you information about new products and features, including our newsletter, when you have opted in to receive such information

- Manage our relationship with you, including to respond to your comments and questions, resolve problems and provide similar support
- Investigate a suspected violation of the Terms of Service, suspected fraud or other unlawful or unfair activity
- With your consent as permissible under applicable laws

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.

### **SHARING YOUR PERSONAL INFORMATION**

All Challenge submissions are posted in a publicly available gallery, however, we do not post entries that include personal information of any submitter 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 on your private student dashboard, to the educator associated with the account, and to others in your class.
- For accounts of students aged 13 and older, we may display personal information included in your submission on your private student dashboard and in the publicly available gallery, dependent on the specific Challenge Rules. While we may not require nor encourage the inclusion of personal information in a submission, we are not obligated to reject it or remove it for participants ages 13 and older, unless the Challenge Rules require such moderation.
- For all accounts:
  - 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 finalist selection process.
  - 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 on the Platform.
  - In the event of a reorganization, merger, sale, bankruptcy or other business change, in which case your information will remain subject to the terms of this Privacy Policy.

### **LINKS**

The Platform 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**

Future Engineers uses 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 Future Engineers is not responsible for the consequences of security incidents that are not reasonably foreseeable and not reasonably within its control.

## **FOR USE IN THE UNITED STATES**

Future Engineers is operated in the United States and is intended only to users who are residents of the United States. If you are located outside of the United States, please be aware that the information you provide to us is transmitted and processed in the United States, and will be protected subject to this Privacy Policy and applicable laws, which may not be as protective as the laws in your country. By using Future Engineers, you agree to this.

## **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@futureengineers.org](mailto:support@futureengineers.org).

If you are a parent of a child under the age of 13 who is using the Platform 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 revoke any consent you have provided for our collection of your child's personal information. To do so, please email us at [support@futureengineers.org](mailto:support@futureengineers.org). 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 accessing the Platform through a school account, we will work with you and your school to facilitate your request.

If you are a parent of a child using the Platform through a school account, you may also have rights to access, amend or correct information in the education record that may be stored on

the Platform. 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, Students, and Judges whom have email addresses associated with their account will receive email updates about our challenges. 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 Future Engineers. 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 similar deactivation and deletion as follows:

#### School Accounts:

- If a school requests deletion of its school account, we will comply with such requests within 45 days. 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 respond to deletion requests as follows.

- If a parent or individual user aged 18 or older requests deletion of their home account, we will comply with such requests within 45 days.

In the event an individual has been accessing the Platform from both home and school accounts, deleting one account will only delete that account and the other account shall remain active, including the applicable information associated with that account.

In all cases, we will 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@futureengineers.org](mailto:support@futureengineers.org).

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

We may change this Privacy Policy in the future. When we do, we will post a notice in the Platform and provide other notifications as required by law. If we make material changes to this Privacy Policy, we will notify the account holder or, in the case of children under 13 accessing



the Platform through a home account, the parent, via the email address we have in our records, and changes will become effective when accepted. Non-material changes will become effective when posted in the Platform. The “last updated” date at the top of this policy indicates when the Policy was last revised.

**CONTACT INFORMATION**

For additional information regarding this Privacy Policy or our privacy practices, please contact us at: 3900 W. Alameda Ave. Suite 1200, Burbank, CA 91505, [support@futureengineers.org](mailto:support@futureengineers.org)