Last updated: March 18, 2025

Future Problem Solving Program International, Inc. (FPSPI) ("us", "we", or "our") operates fpspi.org, fpspimart.org, ic.futureproblemsolving.org, and fpsonline.org (collectively, the "Site"). This page informs you of our policies regarding the collection, use and disclosure of personal information we receive from users of the Site.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and our information practices, meaning how and why we collect, use, disclose, sell, share, store, and retain your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint or request.

We collect, use, and are responsible for certain personal information about you. When we offer goods and services to individuals in the European Economic Area (EEA), we may be subject to the EU General Data Protection Regulation (EU GDPR), which applies across the entire European Union. For California consumers, we may be subject to the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA).

## 1. Key Terms.

It would be helpful to start by explaining some key terms used in this policy:

Personal information Any information relating to an identified or identifiable

individual

Special category personal information Personal information revealing racial or ethnic origin, political

opinions, religious beliefs, philosophical beliefs, or trade union membership; genetic and biometric data; and data

concerning health, sex life or sexual orientation.

Sensitive Personal Information Personal information revealing a consumer's social security

number, driver's license and passport numbers, account numbers and credentials, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, biometric information, or citizenship and

immigration status

#### 2. Personal Information We Collect About You.

We may collect and use the following personal information, including sensitive personal information, that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

#### **Categories of Personal Information**

# Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)

Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, their name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information

Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account

Characteristics of protected classifications under California or federal law (age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)

Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)

Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)

Racial or ethnic origin, religious or philosophical beliefs, union membership, or citizenship or immigration status

Sensitive Personal Information

#### **Specific Types of Personal Information Collected**

Real name, postal address, Internet Protocol address, email address, social security number, driver's license number, passport number, and other similar identifiers

Name, social security number, address, telephone number, passport number, driver's license or state identification card number, employment, bank account number, credit card number, debit card number, medical information

N/A

Medical condition and sex

Products or services purchased

Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)

N/A

Personal information revealing a consumer's social security number, driver's license or passport numbers, and precise geolocation

If you do not provide personal information required to provide products and/or services to you, it may delay or prevent us from providing products and/or services to you and may affect your ability to use the Site.

## 3. How Your Personal Information is Collected.

We collect personal information from the following categories of sources:

- You, directly in person, by telephone, text, or email and/or via the Site
- Internet service providers

- Data analytics providers
- Operating systems and platforms
- Cookies on the Site

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Site, or transmitted to other users of the Site or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Site with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. The foregoing does not apply to competition-related submissions submitted in accordance with instructions on the Site or otherwise furnished to participants.

## 4. How and Why We Use Your Personal Information.

Under data protection laws, we can only use your personal information if we have a proper reason for doing so, for example:

- To comply with our legal and regulatory obligations
- For the performance of our contract with you or to take steps at your request before entering into a contract
- For our legitimate interests or those of a third party –or–
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products and/or services to you, including:	For our legitimate interests and to operate the Site for your use and benefit
•To fulfill or meet the reason you provided the information.	
•To provide, support, personalize, and develop our Site, products, and services.	
•To create, maintain, customize, and secure your account with us.	
•To process your requests, purchases, transactions, and payments and prevent transactional fraud.	
To prevent and detect fraud against you or FPSPI	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you

Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training, and quality control	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information
	To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g., in relation to our customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you
	To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract
	To comply with our legal and regulatory obligations
	For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns, filings and other purposes related to our status as a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations
	For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to:	For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers
• Existing and former customers	promote our ousiness to existing and former customers
• Third parties who have previously expressed an interest in our services	

• Third parties with whom we have had no previous dealings

For EEA Data Subjects: The above table does not apply to special category personal information, which we will only process with your explicit consent.

With respect to children under the age of 13, see our Privacy Policy for Children Under the Age of 13 below.

## 5. EEA Data Subjects: Promotional Communications.

We may use your personal information to send you updates (by email, text message, telephone, or post) about our products and/or services.

We have a legitimate interest in processing your personal information for promotional purposes (see above "How and why we use your personal information"). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organizations outside of FPSPI's affiliate group for marketing purposes.

You have the right to opt-out of receiving promotional communications at any time by contacting us at:

Email: mail@fpspi.org

Postal Address:

Future Problem Solving Program International, Inc.

Attn: IT Administrator 225 5th Ave, Ste 1 Indialantic, FL 32903

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

#### 6. Who We Share Your Personal Information With.

We routinely share personal information with:

- Our subsidiaries and affiliates
- Service providers we use to help deliver our products and/or services to you, such as payment service providers, warehouses, and delivery companies
- Other third parties we use to help us run our business, such as marketing agencies or website hosts

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g., in relation to ISO accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

#### 7. Personal Information We Sold or Shared.

We do not sell personal information.

In the preceding 12 months, we have shared the following categories of personal information:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, their name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information
- Characteristics of protected classifications under California or federal law
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)

## 8. Categories of Personal Information We Disclosed for a Business Purpose.

In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, their name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information

- Characteristics of protected classifications under California or federal law
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)
- Sensitive personal information

## 9. How Long Your Personal Information Will Be Kept.

We will keep your personal information while you have an account with us or while we are providing products and/or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf
- To show that we treated you fairly –or–
- To keep records required by law

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

## 10. Consumer Right to Know

Right to Know. You may request to know whether we process your personal information and to access such personal information.

In addition, if you are a California consumer, you may request that we disclose to you the following information covering the 12 months preceding your request: (i) the categories of personal information we collected about you and the categories of sources from which we collected such information; (ii) the business or commercial purpose for collecting or sharing personal information about you; (iii) the categories of personal information about you that we shared and the categories of third parties to whom we shared such information; and (iv) the categories of personal information about you that we otherwise disclosed, and the categories of third parties to whom we disclosed such personal information.

You may request to receive a copy of your personal information, including specific pieces of personal information, including, where applicable, to obtain a copy of your personal information in a portable, readily usable format.

Right to Delete. You may request that we delete your personal information, subject to certain exceptions. If you are a California consumer, this applies to personal information we collected from you.

Right to Correct. You may request to correct inaccuracies in your personal information.

Right to Opt-Out. You may request to opt-out of the sharing of your personal information to third parties, as defined by applicable law. This right may be exercised by submitting a request to our Privacy Center.

You may request that we do not share your personal information for cross-contextual behavioral advertising or targeted advertising by utilizing the "Cookie Settings" link on our websites that use tracking technologies for such purposes or by sending an opt-out preference signal supported by your device or browser. Your use of an opt-out preference signal will apply only to your device or browser and not to other personal information that is not linked to your device or browser.

Right Not to Receive Discriminatory Treatment. We will not unlawfully discriminate against you because you exercise any of your rights under U.S. consumer privacy laws.

## 11. EEA Data Subjects: Your Rights Under the EU GDPR.

Right to Be Informed	The right to know or be notified about the collection and use of your personal information
Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g., if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object:
	• At any time to your personal information being processed for direct marketing (including profiling)
	• In certain other situations to our continued processing of your personal information, e.g., processing carried out for our legitimate interests
Right Not to be Subject to Automated Individual Decision- Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the EU General Data Protection Regulation.

#### 12. How to Exercise Your Rights.

If you would like to exercise any of your rights as described in this Privacy Policy, or to appeal a decision we have made with respect to your exercise of such rights, please write to us at:

Email: mail@fpspi.org

Postal Address:

Future Problem Solving Program International, Inc.

Attn: IT Administrator 225 5th Ave, Ste 1 Indialantic, FL 32903

Please note that you may only make a CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period.

You will need to provide us with:

- o Enough information to identify you
- o Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill) –and–
- o A description of what right you want to exercise and the information to which your request relates
- We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.
- Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

## 13. EEA Data Subjects: Where Your Personal Information is Held.

Information may be held at our offices, third-party agencies, service providers, representatives and agents as described above (see above: "Who We Share Your Personal Information with").

Some of these third parties may be based outside the EEA. For more information, including on how we safeguard your personal information when this occurs, see below: "Transferring Your Personal Information Out of the EEA."

## 14. EEA Data Subjects: Transferring Your Personal Information Out of the EEA.

To deliver services to you, it is sometimes necessary for us to share your personal information outside the EEA, e.g.:

- With our offices outside the EEA
- With your and our service providers located outside the EEA
- If you are based outside the EEA –or–
- Where there is an international dimension to the services we are providing to you

These transfers are subject to special rules under European and UK data protection law.

Some non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission.

If you would like further information, please contact us (see "How To Contact Us" below).

## 16. EEA Data Subjects: How to File a GDPR Complaint.

We hope that we can resolve any query or concern you raise about our use of your information.

The GDPR also gives you right to lodge a complaint with a supervisory authority, in the EEA state where you work, normally live, or where any alleged infringement of data protection laws occurred.

## 17. Changes to This Privacy Notice.

We may change this privacy notice from time to time—when we do, we will inform you via the Site or other means of contact such as email.

#### 18. How to Contact Us

Please contact us if you have any questions about this privacy policy or the information we hold about you. Our contact details are shown below:

Email: mail@fpspi.org

Postal Address: Future Problem Solving Program International, Inc. Attn: IT Administrator 225 5th Ave, Ste 1 Indialantic, FL 32903

## Privacy Policy for Children Under The Age of 13

The U.S. Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") require us to inform parents and legal guardians (as used in this policy, "parents") about our practices for collecting, using, and disclosing personal information from children under the age of 13 ("children"). It also requires us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's personal information.

This policy notifies parents of:

- •The types of information we may collect from children.
- •How we use the information we collect.
- •Our practices for disclosing that information.
- •Our practices for notifying and obtaining parents' consent when we collect personal information from children, including how a parent may revoke consent.
- •All operators that collect or maintain information from children through the Site located at fpspi.org, fpspimart.org, ic.futureproblemsolving.org, fpsonline.org.

This policy only applies to children under the age of 13 and supplements our Privacy Policy above. Only our Privacy Policy applies to teens and adults.

Terms that are defined in the Privacy Policy have the same meanings as used in this Privacy Policy for Children Under the Age of 13.

#### **Information We Collect from Children**

Children can access many parts of the Site and its content and use many of its features without providing us with personal information. However, some content and features require us to collect certain information, including personal information, from them. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including children) when they visit or use the Site.

We only collect as much information about a child as is reasonably necessary for the child to participate in an activity, and we do not condition his or her participation on the disclosure of more personal information than is reasonably necessary.

Information We Collect Directly. A child must provide us with the following information to register with this Site: the child's first and last name, gender, grade, school and a parent's email address. We also require the child to create a member name and password. We may request additional information from your child, but this information is optional. We specify whether information is required or optional when we request it.

We enable registered users to communicate with others on or through this Site through the Site's chat feature and posting to public areas of the Site ("Social Features"). The nature of these features allows

children to disclose personal information about themselves. We do not monitor or review this content before it is posted, and we do not control the actions of third parties with whom your child shares his or her information. We encourage parents to educate their children about safe internet use and to monitor their children's use of Social Features.

Automatic Information Collection and Tracking. We use technology to automatically collect information from our users, including children, when they access and navigate through the Site and use certain of its features. The information we collect through these technologies may include:

One or more persistent identifiers that can be used to recognize a user over time and across different websites and online services.

- •Information that identifies a device's location (geolocation information).
- •We also may combine non-personal information we collect through these technologies with personal information about you or your child that we collect online.

For information about our automatic information collection practices, including how you can opt out of certain information collection, see our Privacy Policy https://www.fpspi.org/privacy-policy/

#### How We Use Your Child's Information

- •We use the personal information we collect from your child to:
- •register him or her with the Site;
- •communicate with him or her about activities or features of the Site that may be of interest;
- •respond to his or her requests and provide the services connected with the Site;
- •track his or her performance in the activities being administered by us, through the Site or otherwise;
- •investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies, or as otherwise required by law; and
- •for any other purposes disclosed at the time the information is collected or to which you consent.

We use the information we collect automatically through technology (see Automatic Information Collection and Tracking above) and other non-personal information we collect to improve the Site and to deliver a better and more personalized experience by enabling us to:

- •Estimate our audience size and usage patterns.
- •Store information about the child's preferences, allowing us to customize the content according to individual interests.
- •Speed up your searches.

We may use geolocation information we collect to track performance in the activities being administered by us, through the Site or otherwise.

Our Practices for Disclosing Children's Information

We do not share, sell, rent, or transfer children's personal information other than as described in this section.

We may disclose aggregated information about many of our users. In addition, we may disclose children's personal information:

- •To third parties we use to support the internal operations of the Site and who are bound by contractual or other obligations to use the information only for such purpose and to keep the information confidential.
- •If we are required to do so by law or legal process, such as to comply with any court order or subpoena or to respond to any government or regulatory request.
- •If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Future Problem Solving Program International, Inc., our customers or others, including to:

o protect the safety of a child;

o protect the safety and security of the Site; or to enable us to take precautions against liability.

•To law enforcement agencies or for an investigation related to public safety.

Social Features. The Site offers social features, including instant messaging, chat, email, and posting on message boards that enable children to communicate with others on our FPSOnline platform. We do not control the types of information your child can send or post through them. We encourage parents to educate their children about safety online and to carefully monitor their children's use of social features to ensure they do not disclose their personal information through them.

Accessing and Correcting Your Child's Personal Information

At any time, you may review the child's personal information maintained by us, require us to correct or delete the personal information, and/or refuse to permit us from further collecting or using the child's information.

You can review, change, or delete your child's personal information by:

- •Logging into your child's account and visiting his or her account profile page.
- •Sending us an email at mail@fpspi.org. To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections.