

PRIVACY POLICY

Privacy Policy – Zintellect

Last Updated: March 2023

Oak Ridge Associated Universities (ORAU) provides innovative scientific and technical solutions to advance national priorities in science, education, security and health. Through specialized teams of experts, unique laboratory capabilities and access to a consortium of more than 100 major Ph.D.-granting institutions, ORAU works with federal, state, local and commercial customers to advance national priorities and serve the public interest. ORAU manages the Oak Ridge Institute for Science and Education (ORISE) for the U.S. Department of Energy (DOE).

This Privacy Policy governs how ORAU collects, uses and discloses Personal Information (as defined below) from and about users of this Website and the other services of ORISE and ORAU related to the internships, experiential learning opportunities, science education events, science competitions, professional development activities, academic fellowships and scholarships funded by government and private sector organizations, and jobs that are listed on Zintellect, (collectively with the Website, the “Services”). We advise you to read the Privacy Policy in its entirety, including the jurisdiction-specific provisions in the appendix to this Privacy Policy which will apply to users in certain jurisdictions.

ORAU adheres to the following principles to protect your privacy:

- We do not rent or sell your personally identifiable information to third parties for marketing purposes.
- We do not share your contact information with another User without your consent.
- Any personally identifiable information that you provide will be secured with industry standard protocols and technology.

As used herein, the term "Personal Information" means any information:

- that identifies or can be used to identify you or your household;
- that relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you or your household;
- that can be used to authenticate you or provide access to an account;
- that relates to you and that might be sensitive (such as personal medical or health information, account number, account value).

Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Terms & Conditions (“Terms”).

Please note this Privacy Policy does not replace or revise any other privacy policy or statement that may be applicable to Personal Information collected or used by ORAU through other relationships with ORAU.

You willingly provide us certain personal information, which we collect in order to allow you to benefit from the Website and other Services that we provide. If you have any hesitation about providing such information to us and/or having such information displayed on the Website or otherwise used in any manner permitted in this Privacy Policy and the Terms, you should not continue to use the Website.

We invite you to review the answers to the following questions and concerns regarding this Privacy Policy:

- [What Personal Information is collected through the Website?](#)
- [Which entity controls my Personal Information?](#)
- [What happens if I include Personal Information within my Submitted Materials to the Website?](#)
- [What are cookies, and how are they used to collect Personal Information?](#)
- [Does ORAU collect non-personally identifiable information, and what does ORAU do with it?](#)
- [How will my Personal Information be used?](#)
- [How will my Personal Information be shared?](#)
- [Where will my Personal Information be stored?](#)
- [What about other websites?](#)
- [Is the Personal Information collected about me secure?](#)
- [What happens when ORAU changes this Privacy Policy?](#)
- [How long does ORAU keep my Personal Information?](#)
- [Who can I contact about accessing, deleting or amending my Personal Information?](#)
- [Contact Us](#)
- [Appendix](#)

Question: [What Personal Information is collected through the Website?](#)

ORAU collects and may use certain Personal Information about you in order to operate and provide you with access to the Website and provide the Services.

- 1) Required Information for Account Creation and Registration.

Answer:

If you decide to use the Website, you will be required to provide the following information in order to create an account: name, email address, username, and password. Without this information, you will not be able to create an account or use the Website to apply for opportunities as a participant or select candidates as a mentor.

- 2) Use of the Services. By using the Services, you agree that we may collect other Personal Information about you, including but not limited to,

the following:

- a) Personal Information that you may voluntarily provide if you complete your application on the Website (including, without limitation, your email addresses, your telephone numbers, other contact details, educational background, racial or ethnic origin, and other relevant experiences and other biographical information) or if you submit material through the Website. Certain applications, opportunities, and services may also request your social security number, financial information, immigration status and Citizenship Verification documents. As part of your Account Creation and Registration, please do not include in your Submitted Materials or elsewhere on the Website any sensitive information about you or any other person (including but not limited to social security numbers or other government issued identification numbers, information about your or any other individual's religious, confessional or similar beliefs, physical, physiological or mental health or sexual life, sexual orientation, genetic code, addictions, political affiliation or political party membership, trade union membership or information about criminal offenses or any other categories of personal information defined as sensitive under applicable data protection laws);
 - b) Information about your usage of the Website (e.g., the pages you request and visit, the opportunities for which you apply, and your interaction with the Website);
 - c) Information obtained in the course of maintaining or supporting the Website; and information about your internet use, such as your IP address, the URLs of sites from which you arrive or leave the Website, your type of browser, your operating system, your internet service provider (ISP) and, if you access the Website via your mobile device, we may also collect information about your mobile provider and type of mobile device.
- 3) Minors. The Services are not directed at children under the age of 13; however, children are eligible to use the Services. Minors (under the age of 18 or the age of majority in your country if this is higher) are required to obtain parental/guardian permission to create an account and submit Personal Information. For more information, parents and guardians are directed to the appendix relating to children's privacy.

Question: [Which entity controls my Personal Information?](#)

Answer: Your Personal Information will be controlled by ORAU, but for ORISE applicants, please see the appendix relating to the Privacy Act.

Question: [What happens if I include Personal Information within my Submitted Materials to the Website?](#)

Answer: If you submit any Personal Information to the Website, your user name and any other Personal Information contained in your Submitted Material will be

visible and available to authorized ORAU Personnel who administer or maintain the Website and Services and the programs and Services associated with the Website ("Authorized ORAU Personnel"), to others who are authorized to use the Website including program mentors and sponsoring agency staff ("Authorized Users"), and to others who need the information to facilitate the provision of Services ("Information Recipients"). ORAU is not responsible for the Personal Information you choose to submit to this Website and, by providing such Personal Information, you are agreeing that it may be freely copied and used (or reused) by ORAU and others. As such, you should not include any Personal Information in your Submitted Materials (other than your user name which will appear automatically) that you do not want to be used in this manner. Please be aware that in providing information to ORAU for the purposes of using this Website and Services, you are expressly and voluntarily accepting the terms and conditions of this Privacy Policy and Terms. The supplying of all such information by you to ORAU and the Website, including all information deemed "sensitive" by applicable law, is entirely voluntary on your part. You have the right to withdraw your consent at any time, in accordance with the terms of this Privacy Policy and the Terms, but please note your withdrawal of consent will not be retroactive. If you decline to provide Personal Information, you will be unable to apply for opportunities through the Website or access information on the Website and may lose the ability to continue in any programs coordinated through the Website.

Question:

[What are cookies, and how are they used to collect Personal Information?](#)

A cookie is a piece of data stored on your hard drive containing information about you. We may use unique identifiers such as cookies and similar technologies to collect from you: browser, device information and browsing information such as time spent on the Website, pages visited, language preferences, and other traffic data. These cookies may contain or reflect segment or other interest-based data in a de-identified form including interests across other sites. We may also collect from you various attributes associated with your device (such as IP address, installed fonts, language and browser settings, and time zone) in order to create a device fingerprint or identifier so that we can recognize your device.

Answer:

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the features of the Website if cookies are disabled.

We occasionally use third party companies to set cookies on our websites and gather cookie information on our behalf. In some cases, We will also use another company to operate web servers for our sites. We use the cookie information gathered by these companies in the same manner as stated above. Third parties are prohibited from using these cookies for their own purposes or sharing the information gathered in connection with the cookies with others.

Question: [Does ORAU collect non-personally identifiable information, and what does ORAU do with it?](#)

Answer: In addition to Content, which is addressed in the Terms, ORAU collects certain non-personally identifiable information in connection with your use of the Website. For example, ORAU may collect click stream data, data on how you navigate the Website, and anonymous demographic information. Some of these types of information are also described above. We may use non-personally identifiable information for website administration, analytics, market research, advertising and promotions or any other legitimate business use. We may share such information with various affiliated and unaffiliated entities for such purposes and in any other manner and for any other purpose that ORAU in its sole discretion, deems appropriate.

Question: [How will my Personal Information be used?](#)

Any Personal Information that you submit will be available to Authorized ORAU Personnel and to other Authorized Users, Information Recipients, and Other ORAU Employees and may be used by any of them for any purpose not specifically prohibited by the Terms, including the facilitation and administration of the internships, experiential learning opportunities, science education events, science competitions, professional development activities, academic fellowships and scholarships, and jobs listed on the Website.

If you update any of your information, we may keep a copy of the information which you originally provided to us in our archives for uses documented herein.

In addition to other uses described herein, ORAU will use your Personal Information with your consent and/or when we have a legal obligation or for legitimate business purposes, including:

Answer:

1. Providing Services, including providing the functionality of the Website and fulfilling your requests.
2. To process applications for the opportunities listed on the Website and provide you with related assistance.
3. To send administrative information to you, such as changes to our Terms and policies.
4. To permit you to participate in voluntary polls and surveys.
5. To manage our relationship with you including responding to questions, comments, concerns, or requests.
6. To comply with a legal obligation.
7. To enable communications with you, including providing you with invitations and/or information about:
 - a) ORAU and ORAU-sponsored and/or third party-sponsored social and/or business-related events, programs, activities and opportunities;
 - b) ORISE programs and services;

- c) Other opportunities.
- 8. To offer you ORAU and ORISE services or products, including those that may be made available on or through this Website.
- 9. To aggregate, deidentify and/or anonymize Personal Information. We may aggregate, deidentify and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.
- 10. To accomplish our other business purposes.
- 11. For data analysis, such as to improve the efficiency of the Services.
- 12. For audits, to verify our internal processes function as intended and are compliant with legal, regulatory or contractual requirements.
- 13. For fraud and security monitoring purposes, such as to detect and prevent cyberattacks or attempts to commit identity theft.
- 14. For enhancing, improving or modifying our current products and Services.
- 15. For identifying usage trends, such as understanding which parts of the Services are of most interest to users.
- 16. For determining the effectiveness of our promotional campaigns, so we can adapt our campaigns to the needs and interests of our users.
- 17. For operating and expanding our business activities, such as understanding which parts of the Services are of most interest to our users so we can focus our energies on meeting our users' interests.

We may also use your information in other ways, if you consent to those uses.

Question:

[How will my Personal Information be shared?](#)

We use and disclose your Personal Information with your consent and/or when we have a legal obligation or legitimate interest to do so:

Answer:

- 1. To comply with applicable law and regulations. This can include laws outside your country of residence.
- 2. To cooperate with public and government authorities. To respond to a request or to provide information we believe is important. These can include authorities outside your country of residence.
- 3. To cooperate with law enforcement. For example, when we respond to law enforcement requests and orders or provide information we believe is important.
- 4. For other legal reasons.
- 5. To monitor compliance with and enforce our Terms.
- 6. To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- 7. To protect against fraud, crime, illegal activity, anti-money laundering, anti-terrorism, or for risk management purposes.
- 8. In connection with a sale or business transaction. We have a legitimate interest in disclosing or transferring your Personal

Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

9. With service providers, vendors, and consultants that perform services on our behalf.
10. With the relevant opportunity sponsors to facilitate the application process and enable the selection and onboarding process.

If ORAU appoints third parties to host, maintain, manage, or to provide other services in relation to the Website or the Services, then your Personal Information may be disclosed, accessed, and used by these third parties to the extent necessary to fulfill their hosting, maintenance, managerial, administrative, and/or other functions.

Question: [Where will my Personal Information be stored?](#)

The Site is controlled and operated by ORAU from Tennessee in the United States and is not intended to subject us to the laws or jurisdiction of any state, country, or territory other than those of the United States. Information about you may be stored and processed in any country where we have facilities or in which we engage service providers, and, by using the Site, you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your Personal Information.

Question: [What about other websites?](#)

The Website may contain links to other websites. Please note that ORAU is not responsible for the privacy or information security practices of other websites. You should carefully review the applicable privacy and information security policies and statements for any other websites to which you click through via the Website. This Privacy Policy applies solely to your Personal Information collected by this Website.

Question: [Is the Personal Information collected about me secure?](#)

We seek to use reasonable physical, electronic, and procedural measures to safeguard Personal Information within our organization against loss, theft, and unauthorized use, disclosure, or modification. Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while We strive to protect your information, We cannot guarantee its security.

You are responsible for maintaining the secrecy of your password and other Website registration information, and for controlling access to your email communications at all times. If you have reason to believe your interaction with us is no longer secure, please immediately notify us at zintellect@orau.org.

Question: [What happens when ORAU changes this Privacy Policy?](#)

Answer: From time to time, We may revise this Privacy Policy. Updates may be made for any number of reasons, including to reflect industry initiatives, changes in the law, and changes to the scope of the Services, among other reasons. You can tell when We last updated the Privacy Policy by checking the "Last Updated" legend at the beginning of the Privacy Policy. Any changes will become effective when we post the revised Privacy Policy on the Website.

Question: [How long does ORAU keep my Personal Information?](#)

Answer: We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

1. The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Website);
2. Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
3. Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Answer: If you no longer wish to participate in the Services, you may contact zintellect@orau.org to request your profile, account registration information, and other related data on this Website be deemed inactive. Even if your data is deemed inactive, ORAU may retain your data in accordance with applicable law.

ORAU will use reasonable efforts to notify you by email before deleting your profile, account registration information, and other related data. If your account information is deleted, other data and Information you have included on the Website may still remain on the Website and be visible to other Authorized Users.

Question: [Who can I contact about accessing, deleting or amending my Personal Information?](#)

In certain jurisdictions, you may have certain rights with respect to the Personal Information which ORAU holds about you, including the right to access or correct (and sometimes, object to or delete) the information.

1. **Your California Privacy Rights**

If you are a California resident, you have the right to request and receive certain information about disclosure of your Personal Information to third parties for their direct marketing purposes. Because it is our policy not to share your Personal Information with third parties for third-party direct marketing purposes without your consent, we are exempt from the requirement to respond to such requests. If you have any questions related to our policy, please contact us at zintellect@orau.org.

For information regarding how to exercise your rights as a consumer under the California Consumer Privacy Act, please see “Supplemental provisions for California residents” in the Appendix to this Privacy Policy.

2. **General Inquiries**

Answer:

If you are not a California resident and/or the above provisions otherwise do not apply, please review the procedures in this section. If you would like to request to review, correct, update, suppress, restrict, delete or deactivate Personal Information that you have provided to us, object to the processing of Personal Information, or if you would like to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), please contact zintellect@orau.org. We will respond to your request consistent with applicable law.

For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change, deletion, or deactivation.

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt out by following the instructions contained within each such email or through the email preferences in your account profile. We will try to comply with your request as

soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails from us, we may still send you administrative messages, from which you cannot opt out.

For information regarding how to exercise your rights as a consumer under the European Economic Area, please see “Supplemental Provisions Regarding the EEA” in the Appendix to this Privacy Policy.

3. **Do Not Track**

Some browsers have a do not track feature that lets you tell websites you do not want to have your online activities tracked. At this time, we do not respond to browser do not track signals.

Question: [How do you contact us?](#)

Answer: If you have any other questions concerning this Privacy Policy, you may submit them to zintellect@orau.org. If you wish to submit a request to have your Personal Information deleted or deactivated see the Appendix below.

APPENDIX

SUPPLEMENTAL PROVISION REGARDING THE EEA

If you are in the European Economic Area (“EEA”), you have certain additional rights and protections under the law regarding the processing of your personal data.

Subject to certain limitations and exceptions, you have the following legal rights:

1. A right to obtain information: You have the right to request information about how we process your personal data.
2. A right of access: You have the right to request access to, or a copy of, the personal data we process about you.
3. A right of rectification: You have the right to request that we correct or supplement inaccurate or incomplete personal data we process about you.
4. A right of erasure: You have the right to request that we delete personal data about you.
5. A right to restriction of processing: You have the right to request we restrict processing of your personal data, so that we can store such data but not further process it.

6. A right to data portability: You have the right to request we provide the personal data which you provided to us in a structured, commonly used and machine-readable format, and you have the right to transmit such data to another controller without hindrance from ORAU.
7. A right to object to processing: You have the right to request we stop processing personal data about you (for example, when your personal data is processed for direct marketing purposes, you have the right to object to the processing of such data at any time by writing to zintellect@orau.org).
8. A right to revoke your consent: When our processing is based on your consent, you have the right to revoke such consent at any time by contacting us at zintellect@orau.org.
9. The right to file a complaint: You have the right to file a complaint regarding our data protection practices with a supervisory authority. Contact details for your supervisory authority are available at http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.html.

To exercise these rights, please email us at zintellect@orau.org.

SUPPLEMENTAL PROVISION APPLICABLE TO USERS REGISTERING FROM THE UAE

Your use of the Website signifies you agree to waive your material privacy rights under the laws of the UAE. You also agree not to hold ORAU liable for any publicity, any publication of news, or comments pertaining to the secrets of your or any other person's private or family lives on the Website. Your use of the Website signifies your consent allowing ORAU to disclose any information you may consider a secret to anybody at any time. You agree not to hold ORAU liable for any disclosure of such information, that you may think to be a secret, to anyone. Please do not use the Website if you disagree with any part of this Privacy Policy.

SUPPLEMENTAL PROVISIONS FOR CALIFORNIA RESIDENTS

1. Requests. California residents have certain rights with respect to Personal Information under the California Consumer Privacy Act (“CCPA”). For purposes of this subsection, the terms “consumer,” “categories of personal information,” “business purpose,” “third party,” and “sell” have the meanings ascribed to them respectively in the CCPA. Terms defined under the CCPA may differ in meaning from the common usage of the same terms used elsewhere in this Privacy Policy.

- A. You have the right to request, up to two times every 12 months, ORAU disclose to you the following: (i) the categories of Personal Information ORAU has collected about you; (ii) the categories of sources from which ORAU has collected Personal Information about you; (iii) the business or commercial purpose for collecting or selling your Personal Information; (iv) the categories of Personal Information ORAU has sold about you in the last 12 months and the categories of Third Parties to whom the Personal Information was sold, by category or categories of Personal Information for each Third Party to whom the Personal Information was sold; (v) the categories of Personal Information ORAU has disclosed about you for our business purposes in the last 12 months and the categories of Third Parties to whom the Personal Information was disclosed, by category or categories of Personal Information for each Third Party to whom the Personal Information was disclosed; and (vi) the specific pieces of Personal Information ORAU has collected about you.
- B. You have the right to request a portable copy of your Personal Information.

In response to verified requests pursuant to A or B above, we will confirm receipt of the request within 10 business days of receipt of the request, and disclose and deliver the required information to you free of charge within 45 days of receiving a verifiable consumer request. We may extend this time period once by an additional 45 days when reasonably necessary. We will provide notice of the extension within the first 45-day period.

- C. You have the right to request ORAU delete or anonymize Personal Information collected from you, subject to certain exceptions allowed under applicable law and ORAU's contractual obligations.

In response to verified requests pursuant to C above, we will confirm receipt of the request within 10 business days of receipt of the request. Following verification of your request, we may require you to separately confirm you want your Personal Information to be deleted.

- D. You have the right to opt out of the sale of your Personal Information to Third Parties. CCPA defines sale very broadly, covering both monetary and other consideration.

ORAU does not sell personal information for money. However, we may share some types of personal information.

- E. ORAU will not discriminate against you because you elect to exercise these rights, but ORAU may be unable to offer the Services if you choose to do so as a result of contractual obligations.
2. Submission of Requests. You may exercise these rights by submitting a request to have your Personal Information deleted. Requests should be emailed to us at zintellect@ORAU.org. If you wish to submit any type of CCPA request through an authorized agent, please follow the process in Section 4 below.
 3. Requests from Households. ORAU cannot take action in response to a request to know or request to delete as it pertains to household specific pieces of personal information unless all of the following conditions are satisfied:
 - a) All consumers of the household must jointly request access or deletion through the processes outlined in this Statement;
 - b) We are able to individually verify (i) all members of the household (see Section 5 below); and (ii) that all individuals making the request are still members of the household.
 4. CCPA Authorized Agent. CCPA permits consumers to designate authorized agents to submit requests on their behalf. Under CCPA, an “authorized agent” is a natural person or a business entity registered with the Secretary of State to conduct business in California that a consumer has authorized to act on their behalf subject to the requirements. If you would like to designate an authorized agent to submit a request to know or a request to delete Personal Information on your behalf, please email us at zintellect@ORAU.org. Please be advised of the following additional information that will be required:
 - a) We require a written power of attorney, executed by you, confirming the authority of the authorized agent with respect to your CCPA request(s). After you initiate a request with us by phone at the number above, we will provide you with a form of power of attorney.
 - b) Prior to responding to any request made on your behalf by an authorized agent, we may require you to provide written confirmation directly to us that you have provided the authorized agent permission to submit such request(s) on your behalf.

c) Once verified (see below), your authorized agent may request changes to your account by email.

5. Verification. Whether you submit a request directly on your own behalf, or through an authorized agent, we will take reasonable steps to verify your identity prior to responding to your requests under CCPA. Upon receiving a request pursuant to 3 or 4 above, we will confirm receipt within 10 days and provide you with information about how we will verify and process the request. In order to verify your request, we will require you to provide your social security number, tax ID number or passport number and issuing country, in addition to your first and last name, email address and mailing address.

SUPPLEMENTAL PROVISION FOR ORISE OPPORTUNITIES:

Pursuant to 5 U.S.C. § 552a(e)(3), this Privacy Policy serves to inform you of the following concerning the collection of the information on this Website that relates to the Department of Energy's System of Record 82, Grant and Contract Records for Research Projects, Science Education, and Related Activities.

A. Authority:

Collection of the information solicited by this Website is authorized for the Department of Energy. ORAU manages this system on behalf of the Department of Energy subject to the Energy Policy Act of 2005 amendment of Chapter 19 of the Atomic Energy Act of 1954, section 243, "Scholarship and Fellowship Program," Title 42, United States Code, Section 7101 *et. seq.* and 50 U.S.C. 2401 *et. seq.* Collection of this information is voluntary.

B. Purpose:

The primary purpose for soliciting this information is to store, retrieve, and update information on individuals who apply for fellowships, scholarships, internships and other research, education, or training opportunities including those that are available through the Oak Ridge Institute for Science and Education (ORISE) for the Department of Energy.

C. Routine Uses:

The information solicited on this form may be made available as a "routine use" to other government agencies and contractors to assist the Department of Energy in making determinations about the application submitted for

opportunities available through ORISE. A complete list of the routine uses can be found in the system of records notice associated with this Website. The Department's system of records notices can be found on the Department's website at <https://www.federalregister.gov/documents/2009/01/09/E8-31316/privacy-act-of-1974-publication-of-compilation-of-privacy-act-systems-of-records>

D. Consequences Of Failure To Provide Information:

Providing this information is not legally required. However, if the individual chooses not to provide information, or requests personal information be deleted or deactivated, they will not be able to apply for opportunities or continue in appointments available through ORISE.

SUPPLEMENTAL PROVISION RELATING TO CHILDREN'S PRIVACY:

Although the Services are not directed or targeted to children under the age of 13, children are eligible for some opportunities available through the Website and the Services. As such and in compliance with the Children's Online Privacy Protection Act, we are providing additional information for parents and guardians regarding the collection of their child's Personal Information.

Information we collect

Once you give permission for your child to create an account, their account and Personal Information will generally be treated like any other user with respect to the Personal Information that we collect and which is specifically detailed in other sections of this Privacy Policy. For example, we collect:

Personal Information you and your child create or provide to us

As part of the account creation process, we may ask for Personal Information like first and last name, email address, and birthdate. We also collect the Personal Information you or your child provide, such as your online contact details, which are necessary for us to contact you. We also collect the Personal Information your child creates or uploads when using their account, such as information submitted to apply for a specific opportunity.

Information we get from your child's use of the Services

We automatically collect and store certain information about the Website and how your child uses it. This information includes:

Your child's browsers & devices

We collect information about the browsers, and devices your child uses to access the Services, including unique identifiers, browser type and settings, device type and settings, operating system, and related information. We also collect information about the interaction of your child's browsers, and devices with our Services, including IP address, crash reports, system activity, and the date and time of your child's request.

Your child's activity

We collect information about your child's activity in our Services, which we use to do things like recommend opportunities your child may be eligible for. Your child's activity information that we collect may include things like search terms and application history.

Your child's location information

We collect information about your child's location when they use our Services. Your child's location can be determined by IP address. The types of location data we collect depends in part on your settings and your child's devices.

How We Use Information We Collect

The Privacy Policy explains in greater detail how we may use the data we collect in association with your child's use of the Services. In general, we use your child's information: to provide, maintain, and improve our Services; to develop new Services; to customize our Services for your child; to measure performance and understand how our Services are used; to communicate directly with you or your child in relation to our Services; and to help improve the reliability of our Services.

Information Your Child Can Share

Your child may be able to share Personal Information with Authorized Users when using the Services or applying for an opportunity.

Personal Information We Share

Personal Information we collect may be shared in limited circumstances. We do not share personal information with third-party companies, organizations, and individuals except in the following cases:

We will share Personal Information with consent.

We provide Personal Information to trusted businesses or persons to process it for us, based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

We will share Personal Information with companies, organizations or individuals if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request;
- enforce applicable Terms of Service, including investigation of potential violations;
- detect, prevent, or otherwise address fraud, security or technical issues;
- protect against harm to the rights, property or safety of the federal government, our users or the public as required or permitted by law; or
- any other purposes stated elsewhere in this Privacy Policy.

We may also share non-personally identifiable information (such as trends about the general use of our services) publicly and with our trusted business partners. For example, we share information publicly to show trends and data about the general use of our Services.

Access to Your Child's Personal Information

You can access, update and request the removal your child's Personal Information by signing into their account. If you do not remember your child's password, you can reset it using the instructions provided. Once signed in, you can use the various controls provided to help manage your child's settings and Personal Information.

If at any time you wish to stop further collection or use of your child's Personal Information, you can request the deletion your child's user account by contacting us. Your child's account and related Personal Information will be deleted within a reasonable period of time, subject to our contractual obligations and relevant state and federal laws, rules, and regulations. Deleting your child's Personal Information will result in the inability to use the Services and apply for opportunities. Please note we may need to retain

certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion.

Contact Us

If you have any questions about your child's profile, don't hesitate to contact us. You can contact us by email at zintellect@orau.org.

If you have questions about how we collect and use your child's data, you can contact us at zintellect@orau.org. You can also contact your local data protection authority if you have concerns regarding your rights under local law.