

In the City Camps Privacy Policy

Introduction: In the City Camp, Inc. (ITC) understands the importance of protecting the privacy of its website users. This Privacy Policy describes the policies and practices of ITC regarding collection of information from visitors to its websites and social media pages, if applicable, and the uses, maintenance, protection, and disclosure of such information by ITC. This website is intended for United States residents only; if you are visiting this website from a location outside the United States, your communications through this website will necessarily result in the transfer of information across international borders, and, in so doing, you consent to the processing or collection of your information in the United States. This Privacy Policy does not apply to information collected by ITC offline or through other means or by any third party. Please read this policy carefully to understand our practices and policies regarding your information and how we will treat it. If you do not agree with our policies or procedures, you have the option not to use this website. By accessing, using or interacting with this website, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see the section entitled "Changes to Our Privacy Policy" below). Your continued use of this website after we make changes to this Privacy Policy is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 13: Although ITC provides services to children under the age of 13 who attend ITC camps and receive other services, our website is not intended for children under 13 years of age, whose parents or guardians must consent to sharing of the children's personal information. No one under age 13 may provide any personal information to or on this website. ITC does not knowingly collect personal information from children through this website— parents and guardians may interact with ITC apart from this website with respect to personal information of persons under the age of 13 years. Users under the age of 13 must not use or provide any information on this website or on or through any of its features, and must not register on this website or make any purchase through this website or use any of its interactive features to provide any information about themselves to us, including name, address, telephone number, e-mail address, or any screen name or user name in use. If we learn that an individual interacting with ITC's website or social media pages is under the age of 13 years, we will delete that information from our databases. If you believe we might have any information from or about a child under 13, please contact our Privacy Officer at campoffice@inthecitycamps.org.

Non-United States Persons: ITC does not operate outside the United States. This website is hosted in the United States and is not intended for non-United States persons. ITC processes data in accordance with this Privacy Policy and with applicable law in the United States. Any personal information about non-United States persons (including persons resident in the European Union ("EU") and considered EU data subjects) provided via this website is processed in the United States by ITC or by a third party acting on behalf of ITC. In certain countries outside the United States, individuals are entitled to the right to access, correct, transmit, restrict, delete, and object to processing of the personal information we have collected, and may also be entitled to withdraw consent to processing of personal information. When you provide personal information to ITC through this website, you consent to the processing of your information in the United States in accordance with this Privacy Policy. If you are an EU data subject, at any time you wish to know what data we process about you, you can request to gain access to that information by making a request to our Privacy Officer at

campoffice@inthecitycamps.org and ITC will provide you with reasonable opportunities to gain access to and update or delete your information. If you are an EU data subject, you have certain other rights with respect to your information provided to ITC – you can make any requests with respect to those rights by e-mail to our Privacy Officer at campoffice@inthecitycamps.org.

Personal Information ITC Collects: Certain areas of ITC’s website and social media pages may require individuals to register and/or create an account or otherwise provide contact information to enable access to content and services. Information that individuals opt to provide to ITC in connection with registration or other provision of such information may include name, date of birth, gender, home address or ZIP code, e-mail address, phone number, and preferred ITC location. ITC collects such information as part of the registration or other process of connecting with you. ITC may also use a variety of technologies to collect information directly from individuals, including cookies and web beacons, and may collect information provided by the individual’s web browser, such as internet protocol address and operating system. Our web server uses an extended log file format which captures: date and time of visit, referring address (location from which a visitor comes to this website), types of computing devices and Internet browsers, and visitors’ IP addresses. (Each computer that connects to the Internet is assigned a unique number, an IP address, for identification purposes). The log file does not capture a visitor’s email address.

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

Removal of cookies from computing devices: Individuals may remove cookies from their computing devices’ memories, including cookies placed by or through the use of the ITC website or social media pages. Please check with the applicable browser provider for more information on removing cookies.

Nature of ITC’s Use of Information Collected: The information collected by ITC on its websites and through its social media pages is used to improve the services we offer, to improve the website and social media content we provide, to contact customers regarding updates to such content, and for other marketing purposes.

ITC Sharing of Personally Identifiable Information with Others: Most of the information collected by ITC is statistical data that is not capable of identifying a particular individual. However, the information collected by ITC may include information that may allow an individual to be personally identified (PII). If an individual does not wish for ITC to share information with others as described in this Privacy Policy, such individual may choose not to interact with ITC’s

website or social media pages. In all instances, ITC endeavors to design and implement its practices and policies to abide by applicable law and to reasonably secure and protect information we collect from individuals against unauthorized disclosure and third-party access. In some cases, ITC may disclose PII to third parties, such as:

- **Our service providers:** We contract with companies who help with parts of our business operations. We require that our service providers only use PII in connection with the services they perform for us, including services performed in fulfilling the purpose for which an individual provided PII.
- **Third-party service providers:** We may disclose PII to certain business customers and contractors, service providers, and other third parties those business customers may use to support their operations. For example, if a consumer provides to us camp-related contact and purchase information, we may disclose that contact and purchase information to our third-party business customers who may serve you.
- **Service providers to our advertisers:** Our advertisers may contract with companies who handle data (such as advertisers' customer lists) for them.
- **Courts or opposing parties in legal proceedings:** When we are under a legal obligation to do so, for example to comply with a binding order of a court, or where disclosure is necessary to exercise, establish, or defend the legal rights of ITC, our advertisers or any other third party.
- **The consuming public in connection with individuals' feedback provided to ITC:** If an individual provides feedback or commentary to us, we may use and disclose such feedback and commentary for any purpose, provided that if we store that feedback in a manner that connects it to the individual and his or her PII, we will treat that PII in accordance with this Privacy Policy.
- **Third Parties Using Aggregated and/or Anonymized Information:** We may disclose aggregated, anonymized information to our advertisers and other third parties.
- **Any third party in accordance to individuals' express permission.**

We also share anonymized technical data that we collect about individuals' Internet connections, browsing habits, and computing devices and web browsers (such as data relating to our cookies, tracking pixels, and similar technologies) with other advertising companies in the digital advertising ecosystem. This enables them and us to better target ads to individuals.

In all instances of disclosure of individual information, including PII, to third parties, ITC endeavors to require such third parties to abide by privacy policies and practices that are consistent with those discussed in this Privacy Policy, but ITC is not responsible for the privacy practices of those third parties. ITC encourages individuals to review the applicable privacy policies of all third parties to which they may be directed in connection with ITC's website and social media pages.

Opting out of receiving further ITC communication: We recognize how important online privacy is, so we offer the following options for controlling the targeted ads individuals receive and how we use collected data (California residents may have additional personal information rights and choices – please see the "California Privacy Rights" section below):

- **Individuals can opt-out of receiving targeted ads served by ITC:** Individuals can opt out of receiving targeted ads served by ITC or on its behalf by clicking on the opt-out icon in

the ads ITC serves. Please note that, if an individual deletes cookies or upgrades a web browser after having opted out, additional opt-out action may be required. Further, if an individual uses multiple browsers or devices, opt-out action may be required on each browser or device.

- **Individuals can opt-out of receiving targeted, interest-based or on-line behavioral ads through advertising associations:** Individuals may use the Network Advertising Initiative (NAI) opt-out tool at <http://www.networkadvertising.org/choices/>, which will allow the individuals to opt out of seeing targeted ads from ITC and from NAI-approved member companies. Individuals may also opt out of receiving targeted, interest-based, or on-line behavioral ads from other companies that perform ad targeting services by visiting the Digital Advertising Alliance website at <http://www.aboutads.info/choices/> and Your Online Choices website at <http://www.youronlinechoices.com/>.

Access to and correction of PII held by ITC: If an individual wishes to gain access to, correct, amend, or delete any PII or other information about such individual held by ITC, he or she may submit a request to ITC's Privacy Officer at campoffice@inthecitycamps.org. ITC will exercise good faith efforts to provide access to such information to the extent it is available within a reasonable time, and to correct, amend, or delete such information to the extent it is believed to be inaccurate or sought to be deleted, except where the burden or expense of providing access, correction, or amendment would be disproportionate to the risks to the privacy of the individual in the particular instance or where the rights of other persons would be violated.

California Privacy Rights: If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. California Civil Code Section 1798.83 (also known as the "Shine the Light" law) permits users of our website who are California residents to request certain information regarding our disclosure of PII to third parties for such third parties' direct marketing purposes. To make such a request, please send an e-mail request to our Privacy Officer at campoffice@inthecitycamps.org.

Notice to California Residents under the Age of 18: If you are under the age of 18, and we have actual knowledge of your age, under California law you may request and obtain removal of certain content or information you have provided to us. To do so, please contact our Privacy Officer at campoffice@inthecitycamps.org. Please be aware that removal of your information does not ensure complete removal of the content. For example, removal may not be permitted if another provision of law requires the content to be maintained.

Data Security: ITC has implemented measures designed to secure personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of personal information also depends on individual conduct – where ITC has given individuals access to certain parts of its website or social media pages through passwords and the like, such individuals are responsible for keeping such access information confidential. Unfortunately, the transmission of information via the Internet is not fully secure, and although ITC endeavors to protect personal information against unauthorized access or distribution, we cannot guarantee the security of personal information transmitted to ITC's website or social media pages, and such transmission of personal information is at the individual's own risk.

Contact information: To ask questions, comment about this Privacy Policy, or ITC's privacy practices, or to request access, changes, or amendments to the personal information ITC stores about an individual, please use the following contact information:

ITC Privacy Officer

campoffice@inthecitycamps.org

Changes to Our Privacy Policy: ITC's policy is to post any changes to this Privacy Policy on this page and to provide notice of any material changes made to how we treat users' personal information through notice posted on the ITC website's homepage. We may amend this Privacy Policy at any time. Please check back frequently for any such changes. It is the user's responsibility to periodically visit this page to check for any changes to this Privacy Policy. Any use of this website constitutes the applicable individual's agreement to this Privacy Policy as in effect on the date of such use. The date this Privacy Policy was last updated is identified below.

Last Updated: June 16, 2020