

# **NSCRO.ORG PRIVACY POLICY**

Effective Date: March 1, 2020

Thank you for visiting NSCRO.org. The National Small College Rugby Organization (the “Organization”) has updated its privacy policy (“Privacy Policy”) in light of the California Consumer Privacy Act, which requires the Organization to provide certain information about how it collects and uses the personal information of California residents and to grant those California residents certain rights with respect to their data.

This Privacy Policy sets out how the Organization and certain of its partners may collect and use any personal information which you provide through the services. This Privacy Policy explains our online information practices and the choices you can make about the way your information is collected and used by this digital service, which includes any online or mobile websites applications or digital services owned, operated or offered by, on behalf of, or in conjunction with the Organization, including any online or mobile website, application or digital service installation through which this Privacy Policy appears (each a “Service,” collectively the “Services”). “Users” are persons that use the Services.

California law requires us to provide certain information about how we collect and use the personal information of California residents and to grant those California residents certain rights with respect to their data. If you are a California resident, please see Section VII of this Privacy Policy for these disclosures and a description of your privacy rights, including a right to access, delete, or opt out of the sale of your information.

## **I. INFORMATION COLLECTED**

The Organization collects any information that you provide to the Services, including, for example, when you register for an account and provide your email address, a password, and your name. Depending on how you use the Services, the Organization may also collect:

- Contact information such as address and phone number of players and family members;
- Team member information, including where applicable information about your children;
- Messages and chat you send via the services;
- Team information, such as rosters, schedules, attendance, statistics, and scores;
- Activity information you upload, including photos, news, information and other content;
- Payment information;
- Messages and feedback you send to the Organization; and
- Transactional information.

## **II. AUTOMATICALLY COLLECTED INFORMATION**

The Organization may also collect information from your device when you use the Services, including:

- Information about your computer, mobile phone, tablet, and all other similar electronic or mobile devices, including your IP address, operating system and browser type, device identifiers, device settings, device attributes, browser settings, the web pages of the Services you have visited, Services visited before and after you visit a Service, and the content and advertisements you have accessed, seen, forwarded and/or clicked-on;
- Social Media Information. If you engage with the Services through social media services or other third-party platforms, such as Facebook, the Organization may have access to certain Information in your profile depending on your privacy settings; and
- When the Organization interacts with you through or content on third party websites, applications, integrations or platforms, we may obtain information regarding the content you have viewed, and information about advertisements within the content you have been shown or may have clicked on.

## **III. USE OF INFORMATION**

Your information may be used by the Organization to:

- Provide the Services;
- Provide and communicate with you about the Services or your account with us;
- Fulfill your requests regarding the Services, including without limitation requests for newsletters and notifications;
- Respond to your inquires;
- Enforce legal terms that govern your use of our Services, and/or for the purposes for which you provided the information;
- Provide technical support for the Services;
- Send you information;
- Prevent fraud or potentially illegal activities (including, without limitation, copyright infringement) on or through then Services and defend legal rights;
- Protect the safety of our Users;
- Customize or personalize ads, offers and content made available to you based on your visits to and/or usage of the Services or other online or mobile websites, applications, platforms or services, and analyze the performance of those ads, offers and content, as well as your interaction with them;

- Perform analysis regarding how you use the Services or any part thereof; and
- Comply with applicable law.

When you provide information from your social media account, it can help enable the Organization to do things like (1) give you exclusive content, (2) personalize your online experience with us within and outside our Services, (3) contact you through the social media service or directly by sending you the latest news, special offerings, and rewards, and (4) enable you to share your experience and content via social media services. When you provide information about yourself to us through an application, through our Services, or on social media services or other third-party platforms, it may be publicly viewed by other members of these services and we cannot prevent further use of the information by third parties.

The Organization may use "cookies" or similar technologies to associate certain of the information with a unique identifier that then associates the information with your device or browser. The Organization may combine any of the information it collects, for any of the above purposes, and may sometimes enhance the information with other information that we obtain from third party sources. Please also be aware that if you choose to submit information or content for publication (e.g., a letter to our editors, a posting to a blog or a discussion board, or a video), we may publish that information and content, along with other information about you (such as your name, screen name, or location). If you register and create a profile with our Service, the screen name you select as well as other content you submit to your profile (e.g., photos, comments, video, reviews) will be displayed publicly on the Service, is searchable, can be found by third parties and may be reused and redistributed by us in our sole discretion.

#### **IV. DISCLOSURE OF INFORMATION**

The Organization may share your information as follows:

- To Service providers that perform certain business-related functions on its behalf;
- To Social Networks: if you use social networks through the services;
- To other Users: depending on how you use the Services your information may be available to other members your league;
- As required by law in with Law Enforcement Agencies or Regulators;
- In response to legal process, for example, in response to a court order or a subpoena, a law enforcement or government's agency's request or similar request;
- National Governing Bodies: The Organization may share your information with the following National Governing Body of your sport, for instance, to confirm your eligibility to participate in a sport;
- With third parties in order to investigate, prevent, or take action (in our sole discretion) regarding potentially illegal activities, suspected fraud, situations involving potential

threats to any person, us, or the Services, or violations of our policies, the law, to verify or enforce compliance with the policies governing your Services;

- We may transfer some or all of your information if the Organization undergoes a business transition, like a merger, acquisition by another company, or sale of all or part of our assets, or if a substantial portion of our or of a business unit's assets is sold or merged in this way; and
- We may share the information with affiliated and unaffiliated third parties (e.g., or third-party's service providers, advertisers, advertising networks and platforms, agencies, other marketers, magazine publishers, retailers, participatory databases, and non-profit organizations) that wish to market products or services to you. If you wish to opt out from such sharing please visit the **How to Contact Us/Opting Out of Marketing Communications** section below for further instructions.

Please note that the Services covered by this Privacy Policy may offer content (e.g., contests, sweepstakes, promotions, games, application, or social network integrations) that is sponsored by or co-branded with identified third parties. By virtue of these relationships, the third parties may obtain information from their visitors. The Organization has no control over these third parties' use of this information, which is subject to their own privacy policies.

## V. **OTHER INFORMATION ABOUT YOUR PRIVACY**

1. **Linked Services.** Some of the Services contain links to or integrations with other services such as Facebook, Twitter, LinkedIn, and other media services and platforms whose information practices may be different than ours. Visitors should consult these other services' privacy notices as we have no control over information that is submitted to, or collected by, these third parties.
2. **International Transfer.** This Service is governed by and operated in accordance with US law. If you are located outside of the US, you use this Service at your own risk. The Organization may have Users who live outside of the United States, so it may be necessary to transfer your information internationally. In particular, your Information will be transferred to and processed in the United States where many of our databases operate. By using this Service, you acknowledge that the data protection and other laws of other countries, such as the United States, may provide a less comprehensive or protective standard of protection than those in your country (e.g., the European Union's General Data Protection Regulation), and consent to your information being collected, processed and transferred as set forth in this Privacy Policy and US law. NSCRO's privacy protections are aggressive and thorough. That being said, your privacy information held with NSCRO are only used to further the charitable mission of NSCRO.

- 3. How You Can Access or Correct Information.** Access to certain personal Information that is collected from our Services and that we maintain may be available to you. For example, if you created a password-protected account within our Service, you can access that account to review certain information you provided. You may also send an e-mail or letter to the following e-mail or street address requesting access to or correction of your personal information. Please include your registration information for such service such as first name, last name and e-mail address in the request. We may ask you to provide additional information for identity verification purposes, or to verify that you are in possession of an applicable email account.

NSCRO  
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Marlton, NJ 08053-9412

- 4. How to Contact Us/Opting Out of Marketing Communications.** If you have any questions or concerns about the online Privacy Policy for this Service or its implementation, or if you would like to opt out from our sharing of your personal Information with unaffiliated third parties for the third parties' direct marketing purposes you may contact our Privacy Policy Coordinator at the above address or [privacy@nscro.org](mailto:privacy@nscro.org) and request that we opt you out of such sharing. We may ask you to provide additional information for identity verification purposes, or to verify that you are in possession of an applicable email account.

If you have signed up to receive our e-mails and prefer not to receive marketing information from this Service, follow the "unsubscribe" instructions provided on any marketing e-mail you receive from this Service. If you have signed up to receive text messages from us and no longer wish to receive such messages, you may follow the instructions to stop the delivery of such messages, which may include by replying "STOP" to the received text message.

## **VI. CHILDREN'S ONLINE PRIVACY PROTECTION ACT ("COPPA")**

COPPA, the Children's Online Privacy Protection Act, applies to individually identifiable information about a child that is collected online, such as full name, home address, email address, telephone number or any other information that would allow someone to identify or contact the child. The Act and Rule also cover other types of information -- for example, hobbies, interests and information collected through cookies or other types of tracking mechanisms -- when they are tied to individually identifiable information.

To comply with COPPA, the Organization will require parental consent for children under the age of thirteen (13) to register or provide other information to the Organization through the use of the

internet website, [www.NSCRO.org](http://www.NSCRO.org). If, at any time, this Privacy Policy changes to allow for the collection of information from children under the age of 13, the changes will be notified in this document, and additional information will be provided pursuant to COPPA, in the form of: (a) names and contact information of operators employed by the Organization to collect this data; (b) types of information and reasons for the Organization to obtain this information from children; (c) procedures by which parents can review a child's personal information.

## **CHILDREN 13 & UNDER**

Please pay close attention to the information outlined in this document. You are required to have your parents understanding and consent before you enter any personally identifiable information into any forms on the Organization's website.

## **PARENTS**

Please be sure to read this Privacy Policy. The Organization requires your consent prior to any child thirteen (13) or under entering any personally identifiable information into the Organization's website. Please notify the Organization immediately if you have any concerns regarding the Organization and COPPA. We encourage parents and guardians to spend time online with their children, and to take an active role to protect the privacy of their children, including, but not limited to, instructing their children not to disclose any personal information over the Internet without your prior permission. For additional information concerning COPPA, parents and guardians are encouraged to visit [www.coppa.org](http://www.coppa.org).

## **VII. CALIFORNIA AND CCPA PRIVACY RIGHTS AND DISCLOSURES**

This section addresses legal obligations and rights laid out in the California Consumer Privacy Act, or CCPA. These obligations and rights apply to businesses doing business in California and to California residents and information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with California consumers or households ("California Information"). The information contained in this section applies to California Information collected and used by NSCRO (for the purposes of this section, "we" or "us"). If you are a California resident and would like to learn more about this information, please review the following sections.

### **1. California Information We Collected and Shared**

This section provides the information California residents need to exercise their rights over their California Information. Here is information about the California Information we have collected

from and shared about consumers over the twelve months prior to the Effective Date of this Privacy Policy.

### CALIFORNIA INFORMATION WE COLLECTED

- Address and other identifiers – such as name, postal address, zip code, email address, account name, Social Security number, driver’s license number, payment card numbers, passport number, or other similar identifiers
- Unique and online identifiers – such as IP address, device IDs, or other similar identifiers
- Characteristics of protected classifications – such as race, ethnicity, or sexual orientation
- Commercial information – such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Internet, gaming or other electronic network activity information – such as browsing history, search history and information regarding an individual’s interaction with an internet website, application, or advertisement
- Professional or educational Information
- Biometric information
- Video footage (e.g., CCTV); Audio recordings; Photographs; Calendar information
- Location information – (e.g. if you access our Sites on your mobile device we may collect Information about your device’s precise location.)
- In game or online viewing activities (e.g., videos viewed, pages viewed)
- Inferences drawn from California Information, such as individual profiles, preferences, characteristics, behaviors.

We collected these categories of California Information for the following purposes:

- Performing services on behalf of the business, such as customer service, processing or fulfilling orders, providing content recommendations, and processing payments
- Auditing customer transactions
- Fraud and crime prevention
- Debugging errors in systems
- Marketing and advertising
- Internal research, analytics and development – e.g., user-preference analytics
- Developing, maintaining, provisioning or upgrading networks, products, services, or devices.

We obtained California Information from a variety of sources, including:

- Directly from you, including technical and usage information when you use our Sites
- Linked sites, such as Social Media Sites, and third-party platforms
- Our joint-ventures and promotional and strategic partners

- Information suppliers
- Distributors and other vendors
- Marketing mailing lists
- Other users submitting California Information about you, such as to invite you to participate in an offering, make recommendations, or share content
- Publicly available sources.

## CALIFORNIA INFORMATION WE SHARED

In the year before the date this policy was issued, we shared these categories of California Information for operational purposes with providers who provide services for us:

- Address and other identifiers – such as name, postal address, email address, account name, Social Security number, driver’s license number, payment card numbers passport number, or other similar identifiers
- Unique and online identifiers – IP address, device IDs, or other similar identifiers
- Commercial information – such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Internet, gaming or other electronic network activity information – such as browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement
- Professional or educational Information
- Biometric information
- Video footage (e.g., CCTV); Audio recordings; Photographs; Calendar information
- Location information – (e.g. if you access our Sites on your mobile device we may collect Information about your device’s precise location.)
- Online viewing activities (e.g., videos viewed, pages viewed)
- Inferences drawn from California Information, such as individual preferences, characteristics, behaviors.

The California Consumer Privacy Act defines “sale” very broadly. It includes the sharing of California Information in exchange for anything of value. According to this broad definition, in the year before the date this policy was issued, we also sold the following categories of California Information:

- Address and other identifiers – such as name, postal address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers
- Unique and online identifiers – IP address, device IDs, or other similar identifiers
- Commercial information – such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies

- Internet, gaming or other electronic network activity information – such as browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement
- Location information - (e.g. if you access our Sites on your mobile device we may collect Information about your device’s precise location.)
- Inferences drawn from California Information, such as individual profiles, preferences, characteristics, behaviors.

## **2. Your California Privacy Rights to Request Disclosure of Information We Collect and Share about You**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information about our practices related to the disclosure of your personal information by certain members of NSCRO to certain third parties for their direct marketing purposes. You may be able to opt-out of our sharing of your personal information with unaffiliated third parties for the third parties’ direct marketing purposes in certain circumstances. Please send your request (along with your full name, email address, postal address, and the subject line labeled “Your California Privacy Rights”) by email at [privacy@nscro.org](mailto:privacy@nscro.org).

In addition, if you are a California resident, the CCPA grants you the right to request certain information about our practices with respect to California Information. In particular, you can request the following:

- The categories and specific pieces of your California Information that we’ve collected.
- The categories of sources from which we collected California Information.
- The business or commercial purposes for which we collected or sold California Information.
- The categories of third parties with which we shared California Information.

You can submit a request to us for the following additional information:

- The categories of third parties to which we’ve sold California Information, and the category or categories of California Information sold to each
- The categories of California Information that we’ve shared with service providers who provide services for us

## **3. Your Right to Request the Deletion of California Information**

Upon your request, we will delete the California Information we have collected about you, except for situations when that information is necessary for us to: provide you with a product or service that you requested; perform a contract we entered into with you; maintain the functionality or security of our systems; comply with or exercise rights provided by the law; or use the information internally in ways that are compatible with the context in which you provided the information to us, or that are reasonably aligned with your expectations based on your relationship with us.

#### **4. Your Right to Ask Us Not to Sell Your California Information**

You can always tell us not to sell your California Information by visiting here: [Do Not Sell My Personal Information](#).

Once we receive and process your request, we will not sell your California Information unless you later allow us to do so.

#### **5. Do Not Track Notice**

We do not currently take actions to respond to Do Not Track signals and similar signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a standard once one is created.

See the Your Choices section to learn how to control data collection for certain purposes.

#### **6. Our Support for the Exercise of Your Data Rights**

We are committed to providing you control over your California Information. If you exercise any of these rights explained in this section of the Privacy Policy, we will not disadvantage you. You will not be denied or charged different prices or rates for goods or services or provided a different level or quality of goods or services.

#### **7. Consumers Under 16 Years Old**

CCPA has specific rules regarding the use of California Information from consumers under 16 years of age. In particular, consistent with the CCPA, if we have the California Information of a consumer under the age of 16, we will not sell the information unless we receive affirmative permission to do so. If the consumer is between the ages of 13 and 16 years of age, the consumer may provide that permission; if the consumer is under the age of 13, the consumer's parent or guardian must provide the permission.

If you would like further information on how we handle California Information from consumers under the age of 16 years of age, or if you have questions about these information practices, you may contact us at [privacy@nscro.org](mailto:privacy@nscro.org) or at NSCRO, 230 N. Maple Ave., Suite B1 #295, Marlton, NJ 08053-9412.

## **VIII. LIST OF NSCRO'S AFFLITATES OR SPONSORS**

Please visit [here](#) to see a representative list of the Organizations sponsors and affiliates that currently may have access to the Information collected from Users on our Services as set forth in this Privacy Policy. This list also includes companies that are affiliated with the Organization, with whom we may share Information we collect on our Services. We may update this list from time-to-time, so please check back periodically to keep up-to-date.

## **IX. UPDATES**

From time to time, we may update this Privacy Policy. We will notify you about material changes by either sending an email message to the email address you most recently provided to us or by posting a notice on our Service. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and with whom we share it.