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Data Privacy Overview

COMET understands that the privacy and security of our Clients' data is one of our most important responsibilities, and is proud of our culture of awareness of the importance of data security. We understand that our approach to security must always be evolving with today's fast changing technology and threat profile. The Chief Executive Officer (CEO) leads a Continuous Improvement program which includes the security domain so vital to our company, our clients and others that we serve. Our Data Protection Officer (DPO) is responsible for overseeing COMET's Information Security Program and its implementation to ensure compliance with appropriate standards (See item [E. Data Privacy Standards](#)).

This data privacy policy explains who we are, how we collect, share and use Personal Information, and how you can exercise your privacy rights. We recommend that you read this data privacy policy in full to ensure you are fully informed.

A. About Us

The COMET System is an online, longitudinal individual-centric data platform with associated web-based applications (the "*Services*") operated by COMET Informatics LLC, a company headquartered in the State of New York in the United States ("*we*," "*us*," "*our*," and "*COMET*"). The Services enable our Client Users to, among other things, track demographics, program registration, attendance and other data regarding individuals and children that they serve. We also provide other related services, such as data management services and integration services.

B. Compliance Effectiveness

COMET recognizes the importance of an effective compliance program and leverages the following fundamental elements:

1. Implementing written policies, procedures and standards of conduct.
2. Designating a compliance officer and compliance committee.
3. Conducting effective training and education.

4. Developing effective lines of communication.
5. Conducting internal monitoring and auditing.
6. Enforcing standards through well-publicized disciplinary guidelines.
7. Responding promptly to detected offenses and undertaking corrective action.

C. Data Privacy Contact

If you have any questions or comments regarding our use of Personal Information, or if you have a privacy concern, then please contact our DPO:

Data Protection Officer: [Jason Brundage](#)
Email: DPO@comet4children.com
Phone: 585-673-3200
COMET Informatics LLC
1080 Pittsford Victor Rd Suite 302
Pittsford, NY 14534 USA

You may also contact our CEO:

CEO: [Leonard C. Gingello, Jr.](#)
Email: leonard.gingello@comet4children.com
Phone: 585-673-3200 x131

D. Key Terms

In this privacy policy, these terms have the following meanings:

- "*Individual*" is a person or group of people (in many cases, children) that a Client User may track through our Services. In other words, an Individual is anyone a Client User is leveraging the COMET System to manage and all associated information related to those Individuals (for example, email addresses).
- "*Client User*" means any person or entity that is registered with us to use the Services.
- "*Personal Information*" means any information that identifies or can be used to identify a Client User, an Individual, or a Visitor, directly or indirectly. Examples of Personal Information include, but are not limited to, first and last name, date of birth, email address, gender, birth mother, occupation, or other demographic information.
- "*Website(s)*" means any website(s) we own and operate (such as www.comet4children.com) or any web pages, interactive features, applications, widgets, blogs, social networks, social network "tabs," or other online, mobile, or wireless offerings that post a link to this privacy policy.
- "*Visitor*" means any person who visits any of our Websites.
- "*you*" and "*your*" means, depending on the context, either a Client User, an Individual, or a Visitor.

E. Data Privacy Standards

The COMET team uses the following standards to guide our policies and procedures.

New York State Education Law Section 2-d and Part 121:

COMET adheres to and follows the guidance of New York State Education Law Section 2-d and Part 121 which includes guidance to educational agencies, and their third-party contractors, as defined in New York State Education Law 2-D, on ways to strengthen data privacy and security to protect student data and annual professional performance review data.

FERPA: Under the federal Family Educational Rights and Privacy Act (FERPA), educational institutions have the responsibility to protect the privacy of student records. The law applies to institutions that receive funds from the U.S. Department of Education under any program that the department administers. For those clients designated as subject to FERPA, COMET is able to support compliance to this standard.

HIPPA: Clients that use COMET to handle electronic protected health information (ePHI) might be subject to rules of the Health Insurance Portability and Accountability Act (HIPAA), which aims to ensure the confidentiality, integrity, and security of ePHI. For those clients designated as subject to HIPAA, COMET is able to support compliance to this standard.

GDPR: The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Union (EU). GDPR came into effect across the EU on May 25, 2018. Recognizing the effective nature of this standard, COMET is putting measures in place to verify compliance to GDPR across its public website and within the COMET system.

F. Confidential Data: How We Use It

COMET does not sell or release individual or child data for any commercial purpose. Data used for general training, sales and marketing is not representative of any actual person. Any other use of child data is limited to in-house use for the purpose of feature delivery or client support and is supported in our Terms of Service. Access to child data is restricted to approved and authorized staff only. In addition, access to servers containing

confidential data is controlled through the use of a firewall, secure networks, and user directory service permissions. Note that COMET allows Client Users to collect, view, export and report on child data. It is therefore the Client's responsibility to maintain the confidentiality of the data within their control.

G. Data Access: How We Limit It

Access to confidential data in the COMET System is limited to authorized staff only. Authorized staff members are provided accounts that are managed by a user directory service and secured by a firewalled private network.

When we work with subcontractors or other third party vendors, COMET ensures that all appropriate non-disclosure and/or confidentiality agreements are in place and that all parties agree to adhere to our Data Privacy and Data Security Policies. Child data is only exchanged between the COMET System and third party vendors when a community collaborative opts to use our data sharing features within the product. Those features have built-in security measures and are controlled by the community collaborative.

At times, COMET may make pre-release versions of the COMET System application available for User Acceptance Testing (UAT) on databases hosted by COMET. These databases are located on our secure network and access is limited to approved users who have requested to participate in this testing process. Users will only be granted access to copies of their own data, and will not have rights to view other clients' data. Access to this data is protected using SSL encryption.

When staff employment is terminated, the employee's accounts are disabled and passwords are changed. Email accounts are forwarded to another member of the team until the account is removed completely. We also ensure that the

terminated employee no longer has physical access inside the COMET location.

General Privacy Information

A. How We Share Information

We may share and disclose your Personal Information to the following types of third parties for the purposes described in this privacy policy (for purposes of this section, "you" and "your" refer to Client Users, Individuals, and Visitors unless otherwise indicated):

(i) Our service providers: Sometimes, we share your information with our third-party service providers (including Children's Institute), who help us provide and support our Services and other business-related functions.

(ii) Any competent law enforcement body, regulatory body, government agency, court or other third party where we believe disclosure is necessary (a) as a matter of applicable law or regulation, (b) to exercise, establish, or defend our legal rights, or (c) to protect your vital interests or those of any other person.

(iii) A potential buyer (and its agents and advisors) in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition.

(iv) Any other person with your consent.

B. Legal Basis for Processing Personal Information (EEA Persons Only)

If you are from the European Economic Area, our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it.

However, we will normally collect and use Personal Information from you where the processing is in our legitimate interests and not overridden by your data-protection interests or fundamental rights and freedoms. Typically, our legitimate interests include

improving, maintaining, providing, and enhancing our technology, products, and services; ensuring the security of the Services and our Websites; and for our marketing activities.

If you are a Client User, we may need the Personal Information to perform a contract with you. In some limited cases, we may also have a legal obligation to collect Personal Information from you.

If we ask you to provide Personal Information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not, as well as of the possible consequences if you do not provide your Personal Information. Where required by law, we will collect Personal Information only where we have your consent.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, then please contact our [Data Privacy Contact](#).

C. Your Choices and Opt-Outs

Client Users and Visitors who have opted in to our marketing emails can opt out of receiving marketing emails from us at any time by clicking the "unsubscribe" link at the bottom of our marketing messages.

Also, all opt-out requests can be made by emailing our [Data Privacy Contact](#). Please note that some communications (such as service messages, account notifications, billing information) are considered transactional and necessary for account management, and Client Users cannot opt out of these messages unless you cancel your COMET System account.

D. Our Security

We take appropriate and reasonable technical and organizational measures to protect Personal Information from loss, misuse, unauthorized access,

disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. For further information about our security practices, please see our [Data Security Policy](#). If you have any questions about the security of your Personal Information, you may contact our [Data Privacy Contact](#).

COMET System accounts require a username and password to log in. Client Users must keep their username and password secure, and never disclose it to a third party. We do not send forgotten passwords to Client Users; we send instructions on how to reset them.

E. Data Storage, Protection and Location

Confidential data is stored on COMET servers located within a third-party data center facility. These servers are secured by a firewall and authentication. COMET also uses an offsite backup company with whom we have confidentiality agreements in place. Our servers and offices are located in the United States, so your information may be transferred to, stored, or processed in the United States.

F. Retention of Data

We retain Personal Information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we'll refer to these criteria in order to determine retention period:

- Whether we have a legal or contractual need to retain the data
- Whether the data is necessary to provide our Services
- Whether our Client Users have the ability to access and delete the data within their COMET accounts
- Whether our Client Users would reasonably expect that we would retain the data until they remove it or until their COMET accounts are closed or terminated

When we have no ongoing legitimate business need to process your Personal Information, we will either

delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

G. Changes to this Policy

We may change this privacy policy at any time and from time to time. The most recent version of the privacy policy is reflected by the version and date located at the bottom of this privacy policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this privacy policy or other notice on the Websites. We encourage you to review this privacy policy often to stay informed of changes that may affect you. Our electronically or otherwise properly stored copies of this privacy policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this privacy policy that was in effect on each respective date you visited the Website.

Data Privacy - Client Users

This section applies to the Personal Information we collect and process from a Client User or potential Client User through the provision of the Services. (If you are not a Client User, the Visitors or Individuals section of this policy may be more applicable to you and your data.) *In this section, "you" and "your" refer to Client Users and potential Client Users.*

A. Information We Collect

The Personal Information that we may collect broadly falls into the following categories:

(i) Information you provide to us: In the course of engaging with our Services, you may provide Personal Information about you and your Individuals. Personal Information is often, but not exclusively, provided to us when you sign up for and use the Services, consult with our account management team, send us an email, integrate the Services with another website or service, or communicate with us in any other way.

We will let you know prior to collection whether the provision of Personal Information we are collecting is compulsory or if it may be provided on a voluntary basis and the consequences, if any, of not providing the information. By giving us this information, you agree to this information being collected, used and disclosed as described in our Terms of Service and in this privacy policy.

(ii) Information we collect automatically: When you use the Services, we may automatically collect certain information about your device and usage of the Services. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies is discussed more below, and in more detail in our Cookie Statement here.

(iii) Information we collect from other sources: From time to time, we may obtain information about you or your Individuals from third-party

sources, such as public databases, social media platforms, external data providers and our partners. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us.

B. Use of Personal Information

We may use the Personal Information we collect through the Services or other sources for a range of reasons, including:

- To bill and collect money owed to us by you.
- To send you system alert messages.
- To communicate with you about your account and provide customer support.
- To enforce compliance with our Terms of Service and applicable law, and to protect the rights and safety of our Client Users and third parties, as well as our own.
- To provide, support and improve the Services and to provide suggestions to you.
- To respond to lawful requests by public authorities, including meeting national security or law enforcement requirements, to meet legal requirements, complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms, or to prosecute and defend a court, arbitration, or similar legal proceeding.
- To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- To support third-party evaluation efforts with our partner, [Children's Institute](#).
- For our collaborative community projects. Our collaborative community projects use and integrate Personal Information into COMET client accounts according to valid data sharing agreements between organizations and Individual consents, complying with FERPA and HIPAA laws where appropriate and designated.
- Other purposes. To carry out other legitimate business purposes, as well as other lawful purposes about which we will notify you.

C. Cookies and Tracking Technologies

We and our partners may use various technologies to collect and store information when you use our Services, and this may include using cookies and

similar tracking technologies. For example, if you receive and engage with a COMET email campaign, we track certain behavior such as whether the email sent through the Zoho Campaign platform was delivered and opened and whether links within the email were clicked. Reports are available to us when we send email to you, so we may collect and review that information. Interacting with our public website allows us to collect information such as your IP address, browser, and other similar details. We use this information to measure the performance of our email campaigns, and to provide analytics information and enhance the effectiveness of our Services. Our use of cookies and other tracking technologies is discussed in more detail in our Cookie Policy.

D. Client User Distribution Lists

COMET's marketing team creates appropriate Distribution Lists to communicate with our Client Users about training, releases and tips for using the COMET System. These Distribution Lists are stored on a secure Zoho Campaigns server. We do not, under any circumstances, sell these Distribution Lists.

E. Other Data Protection Rights

You and the Individuals you manage using the COMET system may have the following data protection rights:

- To access, correct, update or request deletion of Personal Information. COMET takes reasonable steps to ensure that the Client User data we collect is reliable for its intended use, accurate, complete and up to date. As a Client User, you can manage many of your own profile settings through the COMET System, or you may contact us directly by emailing us at support@comet4children.com.
- In addition, residents of the European Economic Area (EEA) can object to processing of their Personal Information, ask to restrict processing of their Personal Information or request portability of their Personal Information. You can exercise these rights by contacting our [Data Privacy Contact](#). If any of your Individuals wishes to exercise any of these

rights, they should contact you directly, or contact us as described in the "Data Privacy - Individuals" section.

- Similarly, if Personal Information is collected or processed on the basis of consent, the data subject can withdraw their consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent. If you receive these requests from Individuals, you may need to use the Consent Management features of the COMET System.
- The right to complain to a data protection authority about the collection and use of Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available [here](#).
- We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request. If we receive a request from one of your Contacts, we will either direct the Contact to reach out to you, or, if appropriate, we may respond directly to their request.

Data Privacy - Individuals

This section applies to the information we process about our Client Users' Individuals as a data controller pursuant to our legitimate business interests, as explained in the "Legal Basis for Processing" section below. Our Services are intended for use by our Client Users. As a result, for much of the Personal Information we collect and process about Individuals through the Services, we act as a processor on behalf of our Client Users. COMET is not responsible for the privacy or security practices of our Client Users, which may differ from those set forth in this privacy policy. Please check with specific Client Users about the policies they have in place. *For purposes of this section, "you" and "your" refer to Individuals.*

A. Information We Collect

The Personal Information that we may collect or receive about you broadly falls into the following categories:

(i) Information we receive about Individuals from our Client Users: A Client User may provide Personal Information about you and your child to us through the Services. For example, when a Client User uploads an import spreadsheet or integrates the Services with another website or service, or when you register your child using the COMET online application for a Client User's programs, they may provide us with certain contact information or other Personal Information about you such as your name, email address, address or telephone number.

(ii) Information we collect automatically: When you interact with any of our Services, we may collect information about your device and interaction with an email. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies is discussed more below, and in more detail in our Cookie Policy.

(iii) Information we collect from other sources: From time to time, we may obtain information about you from third-party sources, such as social media platforms and external data providers. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us.

B. Use of Personal Information

We may use the Personal Information we collect or receive about you for our legitimate business interests, including:

- To enforce compliance with our Terms of Service and applicable law.
- To protect the rights and safety of our Client Users and third parties, as well as our own.
- To respond to lawful requests by public authorities, including meeting national security or law enforcement requirements, to meet legal requirements, complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms, or to prosecute and defend a court, arbitration, or similar legal proceeding.
- To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- To provide, support and improve the Services.
- To support third-party evaluation efforts with our partner, [Children's Institute](#).
- For our collaborative community projects. Our collaborative community projects use and integrate Personal Information into COMET client accounts according to valid data sharing agreements between organizations and Individual consents, complying with FERPA and HIPAA laws where appropriate and designated.
- Other purposes. To carry out other legitimate business purposes, as well as other lawful purposes.

C. Cookies and Tracking Technologies

We and our partners may use various technologies to collect and store information when you use our Services, and this may include using cookies and similar tracking technologies. For example, if you receive and engage with a COMET email campaign,

we track certain behavior such as whether the email sent through the Zoho Campaign platform was delivered and opened and whether links within the email were clicked. Reports are available to us when we send email to you, so we may collect and review that information. Interacting with our public website allows us to collect information such as your IP address, browser, and other similar details. We use this information to measure the performance of our email campaigns, our public website and to provide analytics information and enhance the effectiveness of our Services. Our use of cookies and other tracking technologies is discussed in more detail in our Cookie Policy.

D. Legal Basis for Processing

We process Personal Information about you as a data controller as described in this section, where such processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. Our legitimate interests typically include: improving, maintaining, providing, and enhancing our technology, products and services; and ensuring the security of the Services and our Website.

E. Other Data Protection Rights

You may have the following data protection rights:

- To access, correct, update or request deletion of your Personal Information. COMET takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating or deleting your Personal Information, or altering your data, by contacting our [Data Privacy Contact](#). We will consider your request in accordance with applicable laws.
- In addition, if you are a resident of the European Economic Area (EEA), you can object to processing of your Personal Information, ask us to restrict processing of your Personal Information or request portability of your Personal Information. You can exercise these rights by contacting our [Data Privacy Contact](#).

- You have the right to complain to a data protection authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available [here](#).
- As described above, for much of the Personal Information we collect and process about Contacts through the Services, we act as a processor on behalf of our Client Users. In such cases, if you are an Individual and want to exercise any data protection rights that may be available to you under applicable law or have questions or concerns about how your Personal Information is handled by COMET as a processor on behalf of our Client Users, you should contact the relevant Client User that is using the COMET Services, and refer to their separate privacy policies.
- If you no longer want to be managed by one of our Client Users through the COMET System or any of our Services, please contact the Client User directly to update or delete your data. If you contact us directly, we may remove or update your information within a reasonable time and after providing notice to the Client User of your request.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

Data Privacy - Visitors

This section applies to Personal Information that we collect and process through our Websites and in the usual course of our business, such as events, sales, social media and marketing activities. *In this section "you" and "your" refers to Visitors.*

A. Information We Collect

(i) Information you provide to us on the Websites or otherwise: Certain parts of our Websites may ask you to provide Personal Information voluntarily. For example, we may ask you to provide certain Personal Information (such as your name, contact details, company name, profile information) in order to sign up for a newsletter, download resources from our public website, or otherwise submit inquiries to us. We may also collect Personal Information, such as your contact information and feedback, when you attend our events, take part in surveys, or through other business or marketing interactions we may have with you. You may choose to provide additional information when you communicate with us or otherwise interact with us, and we will keep copies of any such communications for our records.

The Personal Information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your Personal Information. We will also let you know prior to collection whether the provision of the Personal Information we are collecting is required or voluntary and the consequences, if any, of not providing the information.

(ii) Information we collect automatically through the Websites: When you visit our Websites, we may also collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered Personal Information under applicable data protection laws.

B. Use of Personal Information

We may use the information we collect through our Websites for a range of reasons, including:

- To provide, operate, optimize, and maintain our Websites.
- To send you information for marketing purposes, in accordance with your marketing preferences.
- For recruitment purposes if you have applied for a role with COMET.
- To respond to your online inquiries and requests, and to provide you with information and access to resources or services that you have requested from us.
- To manage our Websites and system administration and security.
- To improve the navigation and content of our Websites.
- To identify any server problems or other IT or network issues.
- To process transactions and potentially to set up online accounts.
- To compile aggregated statistics about site usage and to better understand the preferences of our Visitors.
- To carry out research and development to improve our products and services.
- To customize content and layout of the Websites.
- To carry out other legitimate business purposes, as well as other lawful purposes.

In addition, we may combine Personal Information with other information we collect or obtain about you to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the safeguards in this privacy policy applicable to, Personal Information.

C. Public Information & Third-Party Websites

- **Blog.** We may have blogs on our Websites. Any information you include in a comment on our blog may be read, collected, and used by anyone. If your Personal Information appears on our blogs and you want it removed, contact

our [Data Privacy Contact](#). If we are unable to remove your information, we will tell you why.

- **Social media platforms and widgets.** Our Websites include social media features, such as the Facebook Like button. These features may collect information about your IP address and which page you are visiting on our Website, and they may set a cookie to make sure the feature functions properly.
- **Links to third-party websites.** Our Websites include links to other websites, whose privacy practices may be different from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.
- **Contests and sweepstakes.** We may, from time to time, offer surveys, contests, sweepstakes, or other promotions on our Websites or through social media (collectively, "Promotions").

D. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to collect and use Personal Information about you, including to serve interest-based advertising. For further information about the types of cookies and tracking technologies we use, why, and how you can control them, please see our Cookie Policy.

E. Other Data Protection Rights

You have the following data protection rights:

- To access, correct, update or request deletion of your Personal Information. COMET takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating or deleting your Personal Information, or altering your data, by contacting our [Data Privacy Contact](#). We will consider your request in accordance with applicable laws.
- In addition, if you are a resident of the European Economic Area (EEA), you can object to processing of your Personal Information, ask us to restrict processing of your Personal Information or request

portability of your Personal Information. You can exercise these rights by contacting our [Data Privacy Contact](#).

- Similarly, if we have collected and processed your Personal Information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available [here](#).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

Our Child Data Privacy Commitment

COMET will:

- ✓ Collect, use, share and retain child personal information only for purposes for which we were authorized by the client, parent, eligible student or guardian.
- ✓ Disclose in contracts or privacy policies, what types of child personal information we collect, if any, and the purposes for which the information we maintain is used or shared with third parties.
- ✓ Support access to and correction of child personally identifiable information by the child or their authorized parent.
- ✓ Maintain a comprehensive security program that is reasonably designed to protect the security, privacy, confidentiality, and integrity of child personal information against risks – such as unauthorized access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information.
- ✓ Require that our vendors with whom child personal information is shared, if any, are obligated to implement these same commitments for the given child personal information.
- ✓ Allow a successor entity to maintain the child personal information, in the case of our merger or acquisition by another entity, provided the successor entity is subject to these same commitments for the previously collected child personal information.

COMET will not:

- ✗ Collect, maintain, use or share child personal information beyond that needed for authorized purposes, or as authorized by the parent.
- ✗ Sell child personal information.
- ✗ Use or disclose child information collected (whether personal information or otherwise) for behavioral targeting of advertisements to children.
- ✗ Build a personal profile of a child other than for supporting authorized purposes or as authorized by the parent.
- ✗ Make material changes to COMET data privacy policies without first providing prominent notice and allowing choices before data is used in any manner inconsistent with terms initially provided
- ✗ Make material changes to other policies or practices governing the use of child personal information that are inconsistent with contractual requirements.