

## Privacy Policy of International Child Art Foundation

Effective Date: [February 16, 2023]; Last Updated: [February 16, 2023]

This privacy policy (“**Privacy Policy**”) applies to the website administered by the International Child Art Foundation (“**ICAF**,” “**we**,” “**our**,” or “**us**”) located at <https://icaf.org> (the “**Website**”) and describes our practices regarding how we treat personal information on the Website where it appears.

By using the Website or otherwise providing any personal information to ICAF, you are consenting to the collection, use, and disclosure of your personal information in accordance with this Privacy Policy.

For purposes of this Privacy Policy, personal information does not include de-identified or aggregated information that does not identify you.

[Note: Users of the Website in the European Union (“**EU**”) must read the information provided below in section **IX**]

The terms and conditions of using this Website (“**Terms**”) are as follows:

### **I. Changes to the Privacy Policy**

From time to time, ICAF may change or update this Privacy Policy. These changes may be made at any time with or without prior notice. If the changes made are material (that is, we make a major change in the important points of this Privacy Policy), we may notify you of the changes in a more prominent way, such as through an email. Your inaction or continued use of the Website, or your provision of information to us after any such notices, will tell us that you agree to these changes.

### **II. Collection, Use, and Disclosure of Information**

We may collect certain personal information from you when you visit or browse the Website. It is important to note that the type of information collected will depend on your interaction with us.

#### *1. What Information We Collect*

**We collect your contact information.** For example, we may collect your name, mailing street, email address, telephone number, and other personally identifying information when you interact with the Website, such as when you fill out a form available on the Website or to otherwise contact us.

**We collect demographic information.** For example, we may collect your age.

**We collect usage and device information.** When you use the Website, we may collect information about your visit and your device. The information may include the date/time of your visit or your IP address.

#### *2. How We Collect Your Information*

**We collect information directly from you.** We collect information when you fill out a form available on the Website. We use all such information solely for the purpose for which it is given.

**We collect information from you passively.** We do not automatically collect information about visitors to the Website, other than the information that is normally collected by a web server, such as IP address, page hits, and number of visitors to the site.

### *3. How We Use Your Information*

**We use information as disclosed and described here.**

**We use information to help improve the Website.** For example, we may use your information to compile usage statistics and other data regarding the use of our services.

**We use information for security purposes.** We may use your information to protect our organization or our visitors.

**We use information as otherwise permitted by law (or as we may notify you).**

### *4. How We Share Your Information*

**We do not share your information with any third party.**

## **III. Third Party Analytics Providers**

We work with third party analytics service providers, including but not limited to Google Analytics, to help improve the Website. Google Analytics provides us with certain data regarding the demographics of the users that visit the Website and their activities on the Website. To provide this service, Google Analytics may use cookies, over which we have no control. Google Analytics may collect certain information about you from your computer including but not limited to: information regarding your visit (such as the pages you visit and the length of your visit), information about your device (such as your IP address), how you got to the website, and other information about you. You can learn more about Google Analytics and how it collects and processes data (including how to control the information sent to Google) by visiting: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

You can opt-out of Google Analytics by using the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

## **IV. Third Party Links**

The Website may link to third party websites or apps. The Website may also include third party content. We do not control these third parties. This Privacy Policy does not apply to the privacy practices of these third-party websites or apps and we are not responsible for the practices of these third-party sites or apps. Please read the privacy policies of other websites carefully.

## **V. Children**

Our Website is meant for use by or with adults. When you complete a form with us, you are stating that you are over 18 years of age or are under 18 acting with parental consent. If you have any issues

with parental consent, please contact us at the email address provided below. You agree that any information you provide to us about yourself in connection with this Website is true.

If we discover that we have received information directly from a child under the age of 18 without parental consent, we will delete that information. If you are a parent or legal guardian and believe we have collected information directly from your child without your consent, you may contact us at the email address provided below to request that such information be deleted and/or that we refrain from further use or collection of the applicable information of your child.

We encourage parents to go online with their children and to be aware of which sites their children are visiting. We also offer the following suggestions for parents to help make their children's online experience safer:

- Teach children never to give personal information, unless supervised by a parent or responsible adult. This includes name, address, phone number, name of school, etc.
- Look for website privacy policies to learn how your child's information is being treated.
- Visit the Federal Trade Commission (FTC) website for more tips on protecting children's privacy online, particularly with regard to commercial websites, which are covered by the Children's Online Privacy Protection Act (COPPA). There are restrictions on these websites related to collecting information on children under the age of 13.

## **VI. Information Security**

We use appropriate and reasonable security measures as required by relevant law. The Internet is not 100% secure and there is always some risk in transmitting information over the Internet. Therefore, we cannot promise you that your use of the Website will be completely safe. In addition, standard email communications are not secure. Therefore, you should not transmit any sensitive information to us through email.

## **VII. Storage of Information**

Information we collect is stored in the United States. If you live outside of the United States, you understand and agree that we may transfer your information to the United States. Information we transfer from Europe to the United States will be subject to appropriate safeguards under applicable law. United States law may not afford the same level of protection as laws in your country. By submitting your information, you agree to the processing of it in the United States as permitted by law.

## **VIII. Contact Us**

If you have any questions about this Privacy Policy or our privacy practices or would like to review, correct, or update certain information you provided to us, please contact us at [childart@icaf.org](mailto:childart@icaf.org) or reach us by mail or phone here:

International Child Art Foundation  
P O Box 58133

Washington, DC 20037 USA  
Tel: +1 202 530 1000

## **IX. Individuals Located in the EU – Additional Information**

This section of the Privacy Policy only applies to users of the Website in the European Union. Sections I through VIII also apply to our processing of your information. Any information in this section prevails on any conflicting one included in the previous sections of this Privacy Policy.

### *1. Purpose and Legal Basis for Processing*

ICAF is the controller and responsible for the processing of your personal information. When we use your personal information for the purposes described in the “Collection, Use, and Disclosure of Information” section above, the legal basis for the processing is as follows:

- Except as otherwise set out below, the legal basis we rely on to process any personal information is article 6(1)(f) of the General Data Protection Regulation (“GDPR”), which allows us to process personal information when it is necessary for the purposes of our legitimate interests. We believe we have a legitimate interest in conducting the activities necessary to supporting our mission as a non-profit organization. In doing so, we considered your rights and expectations and have assessed that your interest, fundamental rights and freedoms are not put at risk. When we collect and process your personal information based on legitimate interest, you have specific rights (see Section IX (4) below for more information in that regard).
- If we process personal information for the purpose of complying with laws and regulations, the legal basis we rely on to process your personal information is article 6(1)(c), which allows us to process personal information when it is necessary for compliance with a legal obligation to which we are subject.
- If we ask for, and you provide, your consent before we process any personal information for a specified purpose, the legal basis we rely on to process your personal information is article 6(1)(a), which allows us to process personal information when an individual has consented to the processing for a specified purpose. This is the case, for instance, when you sign-up to our newsletter.

### *2. Retention of Personal Information*

We will only retain your personal information for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal

information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

### *3. Data Transfers*

The personal information that we collect about you may be transferred to and/or stored at one or more countries outside the European Economic Area ("**EEA**"). In such cases, we will take appropriate steps to ensure an adequate level of data protection in the country of the recipient as required under the GDPR. If we cannot ensure such an adequate level of data protection, your personal data will only be transferred outside the EEA if you have given your prior consent to the transfer.

### *4. Additional Rights*

Under certain circumstances, you have the following rights under EU data protection laws in relation to your personal information that we process within the scope of this Privacy Policy. These are:

- The right to request access to your personal information. There are some exemptions to the right of access, which means you may not always receive access to all of the personal information that we process.
- The right to request correction of your personal information.
- The right to request erasure of your personal information.
- The right to object to processing of your personal information (for instance when we process your personal information based on our legitimate interests).
- The right to request restriction of processing your personal information.
- The right to request transfer of your personal information. This right only applies when we are processing information based on your consent or under, or in talks about entering into, a contract and the processing is automated.
- The right to withdraw consent, where we have asked for and you have given your consent to our processing of your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain or services to you.

If you wish to exercise any of the rights set out above, please contact us through the “Contact Us” section above.

You also have the right to make a complaint to the applicable EU data protection supervisory authority about the manner in which we process your personal information. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance through the “Contact Us” section above.