

## **Privacy Policy**

**Updated June 11, 2014**

Foundation Associates, LLC (“FA”) recognizes that visitors and users of its website at It Takes Brains.org (the “Website”) value their privacy. This Privacy Policy details important information regarding the use and disclosure of information about our users collected on the Website. Your use of the Website and any personal information you provide on the Website remain subject to the terms of this Privacy Policy and FA’s Terms and Conditions of Use.

Please note that any video, image, or other content posted at the direction of a user onto the Website becomes published content and is not considered personally identifiable information subject to this Privacy Policy.

### **1. The Information FA Collects**

**User Provided Information:** You provide certain personally identifiable information (such as your name and email address) to FA when choosing to participate in various activities on the Website, which may include providing feedback, participating in surveys or filling out information forms.

**Cookies Information:** When you visit the Website, we may send one or more cookies - a small text file containing a string of alphanumeric characters - to your computer that uniquely identifies your browser. FA currently uses only session cookies. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Website may not function properly if the ability to accept cookies is disabled. Please note that this information applies to the use of cookies by FA and does not cover the use of cookies or other tracking technology by any third parties.

**Log File Information:** When you use the Website, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol (“IP”) address, browser type, browser language, referring/exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the date and time of your request, and one or more cookies that may uniquely identify your browser.

### **2. The Way FA Uses Information**

If you submit personally identifiable information to us through the Website, then we use your personal information to operate, maintain, and provide to you the features and functionality of the Website, including to improve the quality of the Website and tailor the Website to you.

Any personal information or other content that you voluntarily disclose online (in the discussion boards, in messages and chat areas, etc., if and when they become part of the Website) becomes publicly available and can be collected and used by others, including FA, without any additional permission. In the course of using this Website, you may choose to provide us with information to help us serve your needs. For example, you may send us electronic mail (through a mailer or a web form) to request information, you may sign up for a mailing list, or you may send us your address so we may send you materials. Any personally identifiable information you send us will be used only for the purpose indicated. Requests for information will be directed to the appropriate staff to respond to the request, and may be recorded to help us update our Website to better respond to similar requests.

We do not use your email address or other personally identifiable information to send commercial or marketing messages without your consent. We may, however, use your email address without further consent for non-marketing or administrative purposes (such as notifying you of major Website changes or for customer service purposes).

We use both your personally identifiable information and certain non-personally-identifiable information (such as anonymous user usage data, cookies, IP addresses, browser type, click stream data, etc.) to improve the quality and design of the Website and to create new features, promotions, functionality, and services by storing, tracking, and analyzing user preferences and trends.

We use cookies and log file information to: (a) monitor the effectiveness of our marketing campaigns; (b) monitor aggregate metrics such as total number of visitors, pages viewed, etc.; and (c) track your entries and submissions.

We may create anonymous data records from your personal information by excluding information (such as your name) that make the data personally identifiable to you. We use this anonymous data to analyze request and usage patterns so that we may enhance the content of our Website and improve Website navigation. FA reserves the right to use such anonymous data for any purpose and disclose the anonymous data to third parties in its sole discretion.

When you click on a link to any other website or location, you will leave our Website and go to another site and another entity may collect personal information or anonymous data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of data after you click on links to such outside websites.

### **3. When FA Discloses Information**

We provide personally identifiable information and non-personally-identifiable information to other businesses or persons for the sole purpose of processing such information on our behalf. We require that these parties agree to process such information in compliance with our privacy policy, and we use reasonable efforts to limit their use of such information and to use other appropriate confidentiality and security measures.

We do not share your personally identifiable information (such as name or email address) with other third party companies for their commercial or marketing use without your consent.

We do share non-personally-identifiable information (such as anonymous user usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to assist them in understanding the usage patterns for certain content, services, advertisements, promotions, and/or functionality on the Website.

We may release personally identifiable information and/or non-personally-identifiable information if required to do so by law, or in the good faith belief that such action is necessary to comply with state and federal laws or respond to a court order, subpoena, or search warrant.

FA also reserves the right to disclose personally identifiable information and/or non-personally-identifiable information that FA believes, in good faith, is appropriate or necessary to enforce our Terms and Conditions of Use, take precautions against liability, to investigate and defend itself against any third party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of our Website, and to protect the rights, property, or personal safety of FA, our users or others.

FA is committed to protecting the security of your personal information. We use a variety of industry-standard security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while FA uses reasonable efforts to protect your personal information, FA cannot guarantee its absolute security.

#### **4. Your Choices**

You may, of course, decline to submit personally identifiable information through the Website, in which case FA may not be able to provide certain services to you. Please note that media files uploaded by users to the Website cannot be removed and remain subject to our Terms and Conditions of Use.

#### **5. Our Commitment to Children's Privacy**

Protecting the privacy of young children is especially important. For that reason, FA does not knowingly collect or maintain personally identifiable information or non-personally-identifiable information on the Website from persons under 13 years of age, and no part of our Website is directed to persons under 13. If you are under 13 years of age, then please do not use or access the Website at any time or in any manner. If FA learns that personally identifiable information of persons under 13 years of age has been collected on the Website without verified parental consent, then FA will take the appropriate steps to delete this information.

#### **6. Special Note to International Users**

The Website is hosted in the United States and is intended for and directed to users in the United States. If you are accessing the Website from the European Union, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure, that differ from United States laws, please be advised that through your continued use of the Website, which is governed by U.S. law, this Privacy Policy, and our Terms and Conditions of Use, you are transferring your personal information to the United States and you consent to that transfer.

#### **7. In the Event of Merger, Sale, or Bankruptcy**

In the event that FA is acquired by or merged with a third party entity, we reserve the right, in any of these circumstances, to transfer or assign the information we have collected from our users as part of such merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used.

#### **8. Changes and Updates to this Privacy Policy**

This Privacy Policy may be revised periodically and this will be reflected by the date above. Please revisit this page to stay aware of any changes. In general, we only use your personal information in the manner described in the Privacy Policy in effect when we received the personal information you provided. Your continued use of the Website constitutes your agreement to this Privacy Policy and any future revisions.