Privacy Policy v.1.1

Last updated: September 10th 2026

This Privacy Policy describes Our policies and procedures regarding the collection, use, and disclosure of your information when you use the Service and informs You of your privacy rights and how the law protects you.

We use your personal data to provide and improve the Service. By using the Service, you consent to the collection and use of information in accordance with this Privacy Policy.

Interpretation and definitions

Interpretation

Words whose initial letter is capitalized have meanings defined under the following conditions. The following definitions will have the same meaning regardless of whether they appear in the singular or plural.

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for You to access our Service or portions of our Service.

Affiliate means an entity that controls, is controlled by, or is under common control with a party, where "control" means ownership of 50% or more of the shares, equivalent interests, or other securities entitled to vote for the election of directors or other managing authority.

Application refers to 4POINT, the software program provided by the Company.

Business, for the purposes of CCPA/CPRA, refers to the Company as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information, doing business in the State of California.

CCPA and/or **CPRA** refer to the California Consumer Privacy Act (the "CCPA") as amended by the California Privacy Rights Act of 2020 (the "CPRA").

Company (referred to as "the Company," "We," "Us," or "Our" in this Agreement) refers to 4Point Development Corp, 417 S.E. Coconut Ave. Suite 1, Stuart, Florida, 34996.

For the purposes of the GDPR, the Company is the Data Controller.

Consumer, for the purpose of the CCPA/CPRA, means a natural person who is a resident of California. A resident, as defined by law, includes (1) any person who is in the United States for a purpose other than temporary or transitory, and (2) any person domiciled in the United States who is outside the United States for a temporary or transitory purpose. **Cookies are small files that a website places on your computer, mobile device,** or any other device, containing the details of your browsing history on that website among its many uses.

Country may refer to: Florida, United States

The Data Controller, for the purposes of the GDPR (General Data Protection Regulation), refers to the Company as the legal person that alone or jointly with others determines the purposes and means of the processing of Personal Data.

Device means any device that can access the Service, such as a computer, cell phone, or digital tablet.

GDPR refers to the EU's General Data Protection Regulation.

Personal data is any information that relates to an identified or identifiable individual.

For the purposes of the GDPR, Personal Data means any information relating to you, such as a name, identification number, location data, online identifier, or one or more factors specific to physical, physiological, genetic, mental, economic, cultural, or social identity.

For purposes of the CCPA/CPRA, Personal Data means any information that identifies, relates to, describes, or can be associated with, or that can reasonably be linked, directly or indirectly, with you.

The Service refers to the Application or the Website or both.

Service Provider means any natural or legal person who processes data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service, or to assist the Company in analyzing how the Service is used. For the purposes of the GDPR, service providers are considered data processors.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service's own infrastructure (e.g., the duration of a page visit).

The website refers to 4Point Development Corp, accessible from www.4pointdev.com/en

You mean the person accessing or using the Service, or the company, or other legal entity on behalf of which such person is accessing or using the Service, as applicable.

Under GDPR, you may be referred to as the Data Subject or as the User, as you are the person using the Service.

Collection and use of your data personal

Types of data collected

Personal data

When using Our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

Email address Name and surname
Phone Number Usage
Data

Location Data

4point Development through its App 4POINT, may *collect location data from the linked device to detect arrivals at and departures from approved family places, even when the app is closed or not in use.* ***4point Development*** *and its App* ***4POINT*** *may use this data to provide FNF (Friends & Family) safety alerts to the linked parent or guardian. Location samples may expire after 24 hours and are not used for advertising.*

If you, the User, grants location permission, ***4point Development through its App 4POINT,*** *may collect your device's current location when you submit an incident report or activate an* ***SOS*** *feature.* ***4point Development through its App 4POINT,*** *may use such location to identify where the incident occurred, route the report, and support authorized responders. The location may be stored with the incident record and may be available only to users whose assigned role permits access. It is retained under the responsible Entity's own independent incident-record retention policy and applicable law. Due to third-party network dependency and potential third-party network interruptions, 4Point Development cannot guarantee the transmission of location data while using the* ***4POINT*** *App.*

FNF (Family & Friends) is an optional family-safety feature. An Entity must enable FNF (Family & Friends), an approved family link must exist, both the parent or guardian and student must consent, and the linked student must separately grant each device's permission. Once enabled, ***4point Development through its App 4POINT,*** *may collect the location from the linked student's/User's device, even when the app is closed or not in use. We may use the data to detect arrival at or departure from approved family places and to provide alerts to the linked parent or guardian. FNF location samples may expire 24 hours after they are recorded. Expired samples may no longer be available through the service and are generally automatically deleted during the next retention sweep. Either participant may pause or end FNF, and the student may revoke device permission at any time and without prior notice to any other member or* ***4point Development*** *by opening* ***My Network****, select the* ***FNF*** *relationship, tap* ***End FNF*** *consent, and confirm* ***Yes***

Location Restrictions

4point Development or its App 4POINT, *may sell location data and may use* ***FNF*** *or incident location to select or target advertising. Advertisers may receive* ***FNF*** *location, incident location, student records, guardian records, or responder records.* ***4point Development through its App 4POINT,*** *may disclose location to service providers that process it on our behalf under contractual confidentiality and data-protection obligations, or when disclosure is required by local law in the country, state or city of use of the* ***4point Development solutions, including its 4POINT App.***

Background Location Feature Description

4point Development's *App* ***4POINT's*** *optional FNF family-safety feature may use background location from a linked student device to detect arrival and or departure from family places configured by the linked parent or guardian. Each given Entity must enable FNF, the family link must be approved, both participants must consent, and the student must enable background location. Background access is necessary because arrival and departure alerts must work while the app* ***4POINT*** *is closed or not in use. Location samples generally automatically expire after 24 hours and are not used for advertising. Due to third-party network dependency and potential third-party network interruptions,* ***4Point Development*** *cannot guarantee the transmission or automatic real-time deletion of location data.*

Optional FNF family safety can alert a linked parent or guardian when a linked student arrives at or leaves an approved family place (School, park, etc.). When the student enables FNF, ***4point Development*** *through its App* ***4POINT,*** *uses background location even when the app is closed or not in use. FNF location samples generally expire after 24 hours and are never used for advertising. Due to third-party network dependency and potential third-party network interruptions,* ***4Point Development*** *cannot guarantee the transmission of location data nor the automatic deletion, if and when requested by a User.*

Usage Data

Usage Data is collected automatically when you use the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers, and other diagnostic data.

When you access the Service through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, the unique ID of your mobile device, the IP address of your mobile device, your mobile operating system, the type of mobile internet browser you use, unique device identifiers, and other diagnostic data.

We may also collect information that your browser sends whenever you visit our Service or when you access the Service through a mobile device.

Information Collected During Use of the App

When you use our app, for the purpose of providing features of our app, we may collect, with your permission:

Information about your location
Pictures and other information from your Device's camera and photo library

We use this information to provide features of Our Service, to improve and personalize Our Service. The information may be uploaded to the Company's servers and/or a Service Provider's server or may simply be stored on your device. You can enable or disable access to this information at any time, through your device personal settings.

Tracking technologies and cookies

We use cookies and simplified tracking technologies to track activity on our service and store certain information. The tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies we use may include:

- **Cookies or browser cookies.** A cookie is a small file placed on your device. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some parts of our Service. Unless you have adjusted your browser settings to refuse cookies, our Service may use cookies.
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also known as clear gifs, pixel tags, and single-pixel gifs) that allow the Company, for example, to count users who have visited those pages or opened an email and for other website-related statistics (e.g., to record the popularity of a certain section and verify system and server integrity).

Cookies can be either "persistent" or "session" cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while session cookies are deleted as soon as you close your web browser. For more information about cookies, please see the Free Privacy Policy website article.

We use session and persistent cookies for the purposes detailed below:

Necessary/Essential Cookies Type:
Session Cookies Managed by: Us
Purpose: These cookies are essential to provide you with the services available through the website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these cookies, the services you have requested cannot be provided, and we only use these cookies to provide you with those services.
Cookie Policy / Cookie Acceptance Notice
Type: Persistent Cookies Managed
by: Us
Purpose: These Cookies identify whether users have agreed to the use of cookies on the Website.
Functionality cookies

Type: Persistent Cookies Managed by: Us

Purpose: These cookies allow us to remember choices you make when you use the website, such as remembering your login details or language preference. The purpose of these cookies is to provide you with a more personal experience and to prevent you from having to re-enter your preferences each time you use the website.

To learn more about the cookies we use and your choices regarding cookies, please visit our Cookie Policy or the Cookies section of our Privacy Policy.

Use of your personal data

The Company may use Personal Data for the following purposes:

To provide and maintain our Service, including to monitor the use of our Service.

To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide may give You access to different functionalities of the Service that are available to You as a registered user.

For the performance of a contract: the development, performance and performance of the contract for the purchase of the products, items or services You have purchased or any other contract with Us through the Service.

To contact you: To contact you by email, phone calls, SMS, or other equivalent forms of electronic communication, such as push notifications from a mobile application about updates or informational communications related to contracted functionalities, products, or services, including security updates, when necessary or relevant to their implementation.

To provide you with news, special offers, and general information about other goods, services, and events we offer that are similar to those you have already purchased or inquired about, unless you have opted out of receiving such information. **To manage your requests:** To fulfill and manage your requests to us.

For business transfers: We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or rescue of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data we hold about users of our service is among the assets transferred.

For Other Purposes: We may use your information for other purposes, such as analyzing data, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Service, products, services, marketing, and your experience.

We may share your personal information in the following situations:

- **With service providers:** We may share your personal information with service providers to monitor and analyze the use of our service, to contact you.
- **For Business Transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case We will require those affiliates to comply with this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners, or other companies that We control or that are under common control with us.
- **With business partners:** We may share your information with our business partners to offer you certain products, services, or promotions.
- **With Other Users: When** you share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside of you.
- **With your consent**: We may disclose your personal information for any other purpose with your consent.

Retention of your personal data

The Company will retain your personal data only for as long as necessary for the purposes set out in this Privacy Policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen security or to improve the functionality of our service, or we are legally required to retain this data for longer periods of time.

Transfer of your personal data

Your information, including Personal Data, is processed at the Company's operational offices and any other location where the parties involved in the processing are located. It means that this information may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where data protection laws may differ from those in your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your acceptance of that transfer.

The Company will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organization or country unless there are appropriate controls, including the security of your data and other personal information.

Delete your personal data

You have the right to delete or request that we assist in deleting the Personal Data we have collected about you.

Our Service may give you the ability to delete certain information about You from within the Service.

You may update, modify, or delete Your information at any time by logging into Your Account, if You have one, and visiting the account settings section that allows You to manage Your personal information. You may also contact us to request access to, correct, or delete any personal information You have provided to us.

Please note, however, that we may need to retain certain information where we have a legal obligation or legal basis to do so.

Disclosure of your personal data

Business Transactions

If the Company is involved in a merger, acquisition, or sale of assets, your personal data may be transferred. We will notify you before your personal data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests from public authorities (e.g., a court or government agency).

Other legal requirements

The Company may disclose your personal data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate potential wrongdoing in connection with the Service
- Protect the personal safety of Service Users or the public
- Protect Yourself Against Legal Liability

Security of your personal data

The security of your personal data is important to us, but please remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

Detailed information on the processing of your personal data

The service providers we use may have access to your personal data. These third-party providers collect, store, use, process, and transfer information about your activity on our service in accordance with their privacy policies.

Email Marketing

We may use your personal data to contact you with newsletters, branding or promotional materials and other information that may be of interest to you. You may opt out of receiving any or all of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

We may use email marketing service providers to manage and send you emails.

Mailchimp
Mailchimp is an email marketing sending service provided by The Rocket Science Group LLC.
To learn more about Mailchimp's privacy practices, please visit their Privacy Policy: https://mailchimp.com/legal/privacy/

GDPR Privacy

Legal basis for the personal data processing procedure under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have consented to the processing of Personal Data for one or more specific purposes.

- **Performance of a contract:** The provision of Personal Data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof.
- **Legal obligations:** The processing of Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** The processing of personal data is necessary to protect your vital interests or those of another natural person.
- **Public interests:** The processing of personal data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** The processing of personal data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will be happy to help clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a legal or contractual requirement, or a requirement necessary to enter into a contract.

Your rights under the GDPR

The Company is committed to respecting the confidentiality of your personal data and ensuring that you can exercise your rights.

You have the right under this Privacy Policy, and by law if you are located within the EU, to:

- **Request access to your Personal Data.** The right to access, update, or delete the information we hold about you. Where possible, you can access, update, or request deletion of your Personal Data directly in the settings section of your account. If you are unable to perform these actions yourself, please contact us to assist you. This also allows you to receive a copy of the Personal Data we hold about you.
- **Request correction of the Personal Data we hold about you.** You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Object to the processing of your personal data.** This right exists where we rely on a legitimate interest as a legal basis for our processing and there is something about your particular situation, which makes you want to object to our processing of your personal data on this ground. You also have the right to object to where we are processing your personal data for direct marketing purposes.
- **Request erasure of your Personal Data.** You have the right to ask us to delete or delete Personal Data where there is no good reason for us to continue processing it.
- **Request the submission of your personal data.** We will provide you, or a third party you have chosen, with your personal data in a structured, commonly used and machine-readable format. Please note that this right only applies to the

Automated information that you initially gave us consent to use or where we used the information to perform a contract with you.

- **Withdraw your consent.** You have the right to withdraw your consent to the use of your Personal Data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of the Service.

Exercising Your GDPR Data Protection Rights

You may exercise your rights of access, rectification, cancellation and opposition by contacting us. Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will do our best to respond to you as soon as possible.

You have the right to lodge a complaint with a Data Protection Authority about Our collection and use of Your Personal Data. For more information, if You are located in the European Economic Area (EEA), please contact your local data protection authority in the EEA.

CCPA/CPRA Privacy Notice

This section of the Privacy Notice for California Residents supplements the information contained in Our Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, can be associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or Device. The following is a list of categories of personal information that we may collect or that may have been collected from California residents in the past twelve (12) months.

Please note that the categories and examples provided in the list below are those defined in the CCPA/CPRA. This does not mean that all examples of that category of personal information have been collected by us, but rather reflects our good faith belief, to the best of our knowledge, that some of that information in the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if you provided such personal information directly to us.

Category A: Identifiers.

Examples: A real name, alias, mailing address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Collected: Yes.

Category B: Categories of personal information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some of the personal information included in this category may overlap with other categories.

Collected: Yes.

Category C: Protected classification features under California or federal law.

Examples: age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran status or military, genetic information (including family genetic information). Collected: No.

Category D: Commercial information.

Examples: Records and history of products or services purchased or considered. Collected: No.

Category E: Biometric Information.

Examples: genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, facial and voice prints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Collected: No.

Category F: Internet or other similar network activity.

Examples: Interaction with our Service or advertisement.

Collected: Yes.

Category G: Geolocation data. Examples:

Approximate physical location. Collected: Yes.

Category H: Sensory data.

Examples: audio, electronic, visual, thermal, olfactory or similar information. Collected: No.

Category I: Professional or employment information.

Examples: Current or past work history or performance evaluations. Collected: No.

Category J: Nonpublic education information (under the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).
Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class rosters, student schedules, student identification codes, student financial information, or student disciplinary records.
Collected: No.
Category K: Inferences drawn from other personal information.
Examples: A profile that reflects a person's preferences, characteristics, psychological tendencies, predispositions, behavior, attitudes, intelligence, skills, and aptitudes.
Collected: No.
Category L: Sensitive Personal Information.
Examples: account login information and password, geolocation data.
Collected: Yes.

Under CCPA/CPRA, personal information does not include:

- Publicly available in information from government records
- De-identified or aggregated consumer information
- Information excluded from the scope of the CCPA/CPRA, such as:

    - Medical or health information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data
    - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or the California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- **Directly from you**. For example, from forms you fill out on our Service, preferences you express or provide through our Service.
- **Indirectly from you**. For example, by observing your activity on our Service.
- **Automatically from you**. For example, through cookies that We or our Service Providers set on Your Device while You are browsing our Service.

- **From service providers**. For example, or other third-party vendors we use to provide the Service to you.

Use of Personal Information

We may use or disclose personal information we collect for "business purposes" or "business purposes" (as defined in the CCPA/CPRA), which may include the following examples:

- To operate our Service and provide Our Service to you.
- To provide you with support and respond to your inquiries, including to investigate and address your concerns and to monitor and improve our Service.
- To fulfill or fulfill the reason you provided the information. For example, if you share your contact information to ask a question about our Service, we will use that personal information to respond to your inquiry.
- To respond to law enforcement requests and as required by applicable law, court order, or government regulations.
- As described to you when collecting your personal information or as set forth in the CCPA/CPRA.
- For administrative and internal audit purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity, including, where necessary, prosecuting those responsible for such activities.
- Other unique uses.

Please note that the examples provided above are illustrative and are not intended to be exhaustive. For more details on how we use this information, please see the "Use of Your Personal Data" section.

If we decide to collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes, we will update this Privacy Policy.

Disclosure of Personal Information

We may use or disclose and may have used or disclosed in the past twelve (12) months the following categories of personal information for a business or commercial purpose:

Category A: Identifiers
Category B: Categories of personal information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
Category F: Internet or other similar network activity
Category G: Geolocation data
Category L: Sensitive Personal Information

Please note that the categories listed above are those defined in the CCPA / CPRA. This does not mean that all examples of that category of personal information have been disclosed, but rather reflects our good faith belief, to the best of our knowledge, that some of that information in the applicable category may be and may have been disclosed.

When we disclose personal information for a business or commercial purpose, we enter into a contract that describes the purpose and requires the recipient to keep that personal information confidential and not use it for any purpose except to perform the contract.

Sharing Personal Information

We may share, and have shared in the past twelve (12) months, your personal information identified in the above categories with the following categories of third parties:

Service Providers Our Affiliates
Our Business Partners
Third-party arts providers to whom You or Your agents authorize Us to disclose Your personal information in connection with the products or services We provide to You.

Sale of Personal Information

As defined in the CCPA/CPRA, "sell" and "sell" mean to sell, rent, disclose, disseminate, make available, transfer, or communicate orally, in writing, or by electronic or other means, a Consumer's personal information by the Company to a third party in exchange for onerous consideration. This means that we may have received some form of benefit in exchange for sharing personal information, but not necessarily a monetary benefit.

We do not sell personal information as the term sell is commonly understood. We allow service providers to use your personal information for the business purposes described in our Privacy Policy, and these may be considered a sale under CCPA/CPRA.

We may sell and have sold in the last twelve (12) months the following categories of personal information:

Category A: Identifiers
Category B: Categories of personal information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) Category F: Internet or other similar network activity
Category G: Geolocation Data Category L: Sensitive Personal Information

It should be noted that the categories listed above are those defined in the CCPA/CPRA. This does not mean that all examples of that category of personal information have in fact been sold, but rather reflects our good faith belief, to the best of our knowledge, that some of that information in the applicable category may be and may have been shared for value in return.

Sale of Personal Information of Children Under 16

We do not sell the personal information of consumers we know to be under 16 years of age, unless We receive affirmative authorization (the "right to opt-in") from the consumer who is between 13 and 16 years of age, or from the parent or guardian of a consumer under 13 years of age. Consumers who opt out of the sale of personal information may opt out of future sales at any time. To exercise the right to opt-out, You (or Your authorized representative) may submit a request to Us by contacting Us.

If you have reason to believe that a child under the age of 13 (or 16) has provided us with permanent information, please contact us with sufficient details to allow us to delete that information.

Your Rights Under the CCPA/CPRA

The CCPA/CPRA provides California residents with specific rights regarding their personal information. If you are a California resident, you have the following rights:

- **The Right to Notice.** You have the right to be notified of what categories of Personal Data are being collected and the purposes for which the Personal Data is used.
- **The Right to Know/Access.** Under CCPA/CPRA, you have the right to request that we disclose information to you about our collection, use, sale, disclosure for a business purpose, and sharing of personal information. Once we receive and confirm your request, we will disclose to you:
    - The categories of personal information we collect about you
    - The categories of sources of personal information we collect about you
    - Our business or commercial purposes for collecting or selling that personal information
    - The categories of third parties with whom we are that personal information
    - The specific pieces of personal information we collect about you
    - If we sold your personal information or disclosed your personal information for a business purpose, we will disclose to you:
        - The categories of personal information sold
        - The categories of categories of personal information disclosed

- **The right to say no to the sale or sharing of Personal Data (opt-out).** You have the right to tell us not to sell your personal information. To submit an opt-out request, please see the "Do Not Sell My Personal Information" section or contact us.
- **The right to correct personal data.** You have the right to correct or rectify any inaccurate personal information about you that we have collected. Once we receive and confirm your requirement, we will use commercially reasonable efforts to correct (and direct our service providers to correct) your personal information, unless an exception applies.
- **The right to limit the use and disclosure of sensitive Personal Data.** You have the right to request to limit the use or disclosure of certain sensitive personal information we collect about you, unless an exception applies. To submit, please see the "Limit the Use or Disclosure of My Sensitive Personal Information" section or contact us.
- **The right to delete personal data.** You have the right to request deletion of your personal data in certain circumstances, subject to certain exceptions. Once we receive and confirm your request, we will delete (and direct our electronic service providers to delete) your personal information from our records, unless an exception applies. We may deny your request for deletion if retention of the information is necessary for us or our service providers to:

    - Complete the transaction for which we collected the personal information, provide a good or service that You requested, take actions reasonably anticipated within the context of our ongoing business relationship with You, or perform our contract with You.
    - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activities, or prosecute those responsible for such activities.
    - Debug products to identify and repair errors that impair existing intended functionality.
    - Exercising freedom of expression, guaranteeing the right of another consumer to exercise his rights of freedom of expression or exercising another right provided for by law.
    - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
    - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may render impossible or seriously impair the research's achievement, if you previously provided informed consent.
    - Allow only internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
    - Comply with a legal obligation.

- Make other internal and lawful uses of that information that are compatible with the text in which you provided it.

- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of your rights as a consumer, including:

  - Denying you goods or services
  - Charging different prices or fees for goods or services, including using discounts or other benefits or imposing penalties
  - Provide you with a different level or quality of goods or services
  - Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services

Exercising Your CCPA/CPRA Data Protection Rights

Please see the "Do Not Sell My Personal Information" section and the "Limit the Use or Disclosure of My Sensitive Personal Information" section for more information on how to opt out and limit the use of sensitive information collected.

In addition, to exercise any of your rights under the CCPA/CPRA, and if you are a California resident, you may contact us:

- By email: support@4pointdev.com

Only You, or a person registered with the California Secretary of State that You authorize to act on Your behalf, may make a verifiable request related to Your personal information.

Your request to us must:

- Provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative
- Describe your request in sufficient detail to allow us to understand, evaluate, and respond to it appropriately

We are unable to respond to your request or provide you with the required information if we are unable to:

- Verify your identity or authority to make the request
- And confirm that personal information relates to you

We will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period for providing the required information may be extended once for an additional 45 days when reasonably necessary and with advance notice.

Any disclosures we provide will only cover the 12-month period prior to receipt of the verifiable request.

For data portability requests, we will select a format for providing your personal information that is readily usable and that allows you to transmit information from one entity to another entity without hindrance.

Do Not Sell My Personal Information

As defined in the CCPA/CPRA, "sell" and "sell" mean to sell, rent, release, disclose, disseminate, make available, transfer, or communicate orally, in writing, or by electronic or other means, a Consumer's personal information from the Company to a third party in exchange for onerous consideration. This means that we may have received some form of benefit in exchange for sharing personal information, but not necessarily a monetary benefit.

We do not sell personal information as term selling is commonly understood. We allow service providers to use your personal information for the business purposes described in our Privacy Policy, and these may be considered a sale under CCPA/CPRA.

You have the right to opt out of the sale of your personal information. Once we receive and confirm a verifiable request from your consumer, we will stop selling your personal information. To exercise your right to opt-out, please contact us.

Limit the use or disclosure of my sensitive personal information

If you are a California resident, you have the right to limit the use and disclosure of your sensitive personal information to that use that is necessary to perform the services or provide the goods reasonably expected by an average Consumer requesting services or goods.

We collect, use, and disclose sensitive personal information in the manner necessary to provide the Service. For more information about how we use your personal information, please see the "Use of Your Personal Data" section or contact us.

Children's Privacy

The Service may contain content appropriate for children under the age of 13. As a parent, you should be aware that through the Service children under the age of 13 may engage in activities that involve the collection or use of personal information. We make reasonable efforts to ensure that prior to collecting any personal information from a child, the child's parent receives notice and consents to our personal information practices.

We may also limit how we collect, use, and store information from Users between the ages of 13 and 18. In some cases, this means that we will not be able to provide certain functionality of the Service to these Users. If we need to rely on consent as a legal basis for processing your information and your country requires a parent's consent, we may require your parent's consent before collecting and using that information.

We may ask a User to verify their date of birth before collecting any personal information from them. If the User is under the age of 13, the Service will be blocked or redirected to a parental consent process.

Information Collected from Children Under the Age of 13

The Company may collect and store persistent identifiers such as cookies or children's IP addresses without parental consent for the purpose of supporting the internal workings of the Service.

We may collect and store other personal information about children if this information is submitted by a child with the prior consent of the parent or by the child's parent or guardian.

The Company may collect and store the following types of personal information about a child when submitted by a child with the prior consent of the parent or by the child's parent or guardian:

- Name and/or surname
- Date of birth
- Gender
- Grade Level
- Email address
- Phone Number
- Name of parent or guardian
- Parent/guardian email address

For more details about the information we may collect, you can refer to the "Types of Data Collected" section of this Privacy Policy. We follow our Standard Privacy Policy for the disclosure of personal information collected from and about children.

Parental Access

A parent who has already given the Company permission to collect and use their child's personal information may, at any time:

- Review, correct, or delete the child's personal information
- Suspend collection or use of the child's personal information

To make such a request, you may write to us using the contact information provided in this Privacy Policy.

Links to Other Websites

Our Service may include links to other websites that are not operated by Us. If you click on a third-party link, you will be directed to that third party's site. We strongly encourage you to review the Privacy Policy of each site you visit.

We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party sites or services.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will inform You via email and/or a prominent notice on Our Service, before the change becomes effective and we will update the "Last Updated" date at the top of this Privacy Policy.

We encourage you to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when posted on this page.

Contact Us

If you have any questions about this Privacy Policy, you can contact us:

- By email: support@4Pointdev.com