

Internet Privacy Policy for Thought Bubblez

Effective Date: 05/19/2025

1. Introduction

Thought Bubblez, a non-profit organization located in Hermiston, Oregon, is committed to protecting the privacy of our online users. This Privacy Policy outlines the types of information we collect, how we use it, and the measures we take to safeguard it. This policy is designed to comply with applicable federal and Oregon state laws, including the Oregon Consumer Privacy Act (OCPA). We understand the importance of your privacy and are dedicated to maintaining the confidentiality and security of your personal information. This policy applies to all information collected through our website and any related online services.

2. Information We Collect

We collect information from both adults (18 years of age or older) and, with parental consent, from children under 13. The information we collect is essential for providing our services, improving user experience, and ensuring the safety and security of our online environment.

A. Information Collected from Children Under 13

For children under 13, with parental consent, we collect the following information to enable interactive website features, such as educational games and marketing activities geared toward child interest. We adhere to the Children's Online Privacy Protection Act (COPPA) in our data collection practices for children:

- Child's first and last name: This allows us to personalize the child's experience on the website and address them appropriately.
- Parent's first and last name: This information is required to verify parental consent and communicate with parents regarding their child's use of the website.
- Parent's email address: We use this to obtain verifiable parental consent, provide important updates, and communicate about account-related matters.
- Parent's phone number: This allows us to contact parents directly if necessary, such as for urgent matters or to verify consent.

Age Verification for Children Under 13

Before any interaction on our website is permitted for a child under the age of 13, we will implement an age verification process. This process will include the following measures:

- **Age Verification Screen:** Upon a user's initial access to any interactive features on our website, a pop-up screen will appear, requiring the user to confirm they are 18 years of age or older.
- **Confirmation of Age:** The pop-up screen will state the following: "By accessing this website, you agree that you are 18 years of age or older. If you are not 18 years of age or older, a parent must log in and create a valid account."
- **Parental Account Requirement:** If a user indicates they are under 18, they will be directed to a parental account creation portal. This portal will require the following:
 - Parent's full name
 - Parent's email address
 - Parent's phone number
- **Website Inactivity for Underage Users:** The website and its interactive features will remain inactive for any user who indicates they are under 18 and does not complete the parental account creation process with a parent.
- **Limitations of Age Verification:** We acknowledge that this process has limitations. It is important to understand that while we take reasonable steps to verify age, we cannot guarantee with 100% certainty that all users are providing accurate information. It is possible for a person under the age of 18 to access the website by providing false information. It is the company's sole responsibility to identify these issues if they arise, correct them, and provide information to the appropriate authority.
- **COPPA Compliance:** All information collected during the parental account creation process will be used in compliance with COPPA, solely for the purpose of obtaining verifiable parental consent.

B. Information Collected from Adults (18+)

For adults, we collect the following information:

- **Standard user data** (e.g., name, email address, age, phone number, birthday, address): This information is used to create and manage user accounts, provide personalized services, and communicate with users.
- **Account login information:** This includes usernames and passwords, which are necessary for users to access and manage their accounts securely.

- Social media login information (if used for login portals): If users choose to log in using their social media accounts, we may collect information as permitted by those platforms, to streamline the registration and login process.
- Google metadata (if used for login portals): Similar to social media login, this data may be collected to facilitate account creation and login for users who choose to use their Google accounts.
- Payment information (including card information) for transactions, event bookings, and sales: This information is collected to process payments for services, events, and merchandise offered through our website. We use secure payment processors to protect this sensitive data.
- Information provided in volunteer applications (which may be downloaded and submitted in person): This information is collected from individuals who wish to volunteer with Thought Bubblez. The applications are typically downloaded from the website and submitted in person.
- Information provided through our website's chat feature: This information is collected to respond to user inquiries, provide support, and improve our services. Chat logs may be retained for quality assurance and training purposes.
- Blog postings and comments (from members who confirm they are 18+): This information is collected to facilitate community discussions and allow users to share their thoughts and ideas on our blog. Users are required to confirm they are 18+ to participate.

3. How We Use Your Information

We use the collected information for the following purposes:

- **For children under 13:** To provide access to interactive website features, including educational games and marketing activities, with parental consent. This includes:
 - Personalizing the child's experience on the website.
 - Providing age-appropriate content and activities.
 - Communicating with parents about their child's use of the website.
 - Ensuring the safety and security of the child's online experience.
- **For adults:**
 - To process transactions and reservations: This includes processing payments for events, memberships, and other services offered through our website.
 - To manage user accounts and provide website access: This includes creating and maintaining user accounts, allowing users to log in securely, and providing access to website features and services.
 - To communicate with users, including responding to inquiries and providing

customer support: This includes sending emails, responding to chat messages, and providing assistance with any issues or questions.

- For marketing and promotional purposes (with opt-out options): This includes sending newsletters, promotional emails, and information about upcoming events and programs. Users will have the option to opt out of receiving such communications.
- To improve our website and services: We analyze user data to understand how our website is used and to make improvements to its design, functionality, and content.
- To facilitate community blog participation: This includes allowing users to post comments, participate in discussions, and interact with other community members.
- To process volunteer applications: This includes reviewing applications, contacting applicants, and managing volunteer placements.
- To provide information about community educational resources: This includes sharing information about educational programs, events, and resources available in the community.

4. Legal Basis for Processing

We process personal information based on the following legal grounds, as required by the Oregon Consumer Privacy Act (OCPA) and other applicable laws:

- **Consent:** We rely on parental consent for collecting and processing data from children under 13, and on your consent for specific processing activities for adults (e.g., marketing). We will obtain clear, affirmative consent before collecting or using your data for purposes other than those stated in this Privacy Policy.
- **Contract:** We process information as necessary to fulfill our contractual obligations, such as processing payments, managing memberships, and providing services you have requested.
- **Legal Obligations:** We process information as necessary to comply with legal obligations, such as responding to subpoenas, court orders, or other legal requests.
- **Legitimate Interests:** We process information for our legitimate interests in providing and improving our services, but only when these interests are not overridden by your rights and interests. This includes:
 - Analyzing website usage to improve our services.
 - Ensuring the security of our website and systems.
 - Personalizing user experiences.
 - Communicating with users about important updates and information.

5. Data Sharing and Disclosure

We may share your information with third parties in the following circumstances:

- **Service Providers:** We may share information with third-party service providers who assist us in operating our website, processing payments, and delivering services. These providers are contractually obligated to protect your information and use it only for the purposes for which it was disclosed. Examples include:
 - Payment processors (to process transactions)
 - Website hosting providers (to host our website)
 - Email service providers (to send emails)
 - Analytics providers (to analyze website usage)
- **Legal Compliance:** We may disclose information when required by law, such as in response to a subpoena, court order, or other legal process. We may also disclose information to protect our rights or the rights of others, or to prevent fraud or other illegal activity.
- **Business Transfers:** In the event of a merger, acquisition, or other transfer of ownership, user information may be transferred to the new entity. We will provide notice of any such transfer and ensure that the new entity agrees to abide by this Privacy Policy.
- **With Consent:** We may share information with third parties with your consent. For example, we may ask for your permission to share your information with a partner organization for a specific purpose.
- **Community Blog:** Information shared in the community blog, including posts and comments, will be visible to other blog members. Users should exercise caution when sharing personal information in this public forum.

6. Data Security

We take reasonable and appropriate measures to protect your personal information from unauthorized access, use, or disclosure. These measures include:

- Encryption of sensitive data (e.g., payment information) during transmission: We use encryption technologies, such as Secure Socket Layer (SSL) or Transport Layer Security (TLS), to protect your data during transmission.
- Secure storage of data: We store your data on secure servers with restricted access. We also implement measures to protect against data loss, such as regular backups.
- Access controls to limit who can access your information: We limit access to your personal information to authorized personnel who need it to perform their job duties.

- Regular security assessments: We conduct regular security assessments to identify and address potential vulnerabilities in our systems.
 - Firewalls
 - Intrusion detection systems
 - Data breach response plan

7. Data Retention

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, or as required by law. We will periodically review our data retention practices and delete information that is no longer needed. Specific data retention periods include:

- Account information: Retained as long as the account is active.
- Transaction data: Retained for the period required by tax and accounting laws.
- Chat logs: Retained for a specific period for customer service and quality assurance purposes.
- Marketing data: Retained until the user opts out.

8. Children's Privacy

We comply with the Children's Online Privacy Protection Act (COPPA). We do not knowingly collect personal information from children under 13 without verifiable parental consent. Our practices include:

- Providing clear notice to parents about our data collection practices.
- Obtaining verifiable parental consent before collecting personal information from children under 13.
- Allowing parents to review their child's personal information.
- Providing parents with the ability to request deletion of their child's information.
- Not conditioning a child's participation in an activity on the child providing more personal information than is reasonably necessary for the activity.
- If we learn that we have collected personal information from a child under 13 without parental consent, we will promptly delete that information.
- Parents have the right to review their child's personal information, request that it be deleted, and refuse to allow further collection or use of their child's information. To do so, parents can contact us using the information provided in Section 14.

9. Your Rights Under the Oregon Consumer Privacy Act (OCPA)

The OCPA provides Oregon residents with certain rights regarding their personal data. These rights include:

- **Right to Know:** You have the right to confirm whether or not we process your personal data and to access your personal data. This includes the right to request a copy of your personal data and information about how we use it.
- **Right to Correct:** You have the right to correct inaccuracies in your personal data. This allows you to ensure that your information is accurate and up-to-date.
- **Right to Delete:** You have the right to delete your personal data. This means you can request that we erase your personal information from our records.
- **Right to Data Portability:** You have the right to obtain a copy of your personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- **Right to Opt Out:** You have the right to opt out of the processing of your personal data for targeted advertising, the sale of personal data, or profiling.
 - Targeted advertising: You can opt out of receiving advertisements that are tailored to your interests based on your personal data.
 - Sale of personal data: You can opt out of us selling your personal data to third parties.
 - Profiling: You can opt out of us using your personal data to make automated decisions that have legal or similarly significant effects on you.

10. How to Exercise Your Rights

To exercise your rights under the OCPA or to request a copy of the information we have gathered, please contact us at:

Elizabeth Wilcox @ (541) 892-3040

or

thoughtbubblezor@gmail.com

We will respond to your request within the timeframes required by the OCPA. We may need to verify your identity before we can fulfill your request.

11. Out-of-State Users

While our organization is based in Oregon, our website is accessible to users both in Oregon and out of state. We strive to comply with Oregon privacy laws, which provide significant protection for your data. If you are accessing our website from another state, please be aware that your state's laws may differ from those of Oregon. By using our website, you acknowledge that your information will be processed in accordance with this Privacy Policy, which adheres to the requirements of Oregon state law and also meets applicable federal regulations of the United States of America.

12. Links to Other Websites

Our website may contain links to other websites. We are not responsible for the privacy practices of those websites. We encourage you to review the privacy policies of any third-party websites you visit. These links are provided for your convenience and information, and their inclusion does not imply our endorsement of the linked website.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will post any changes on our website and update the effective date. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your information. Material changes to this Privacy Policy will be communicated to users, as required by law.

14. Contact Us

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

Elizabeth Wilcox @ (541) 892-3040

or

thoughtbubblezor@gmail.com