

PRIVACY POLICY

Effective Date: June 25, 2025

Every Child Is A Genius LLC (hereinafter referred to as the Company, we, us, or our) respects and values your privacy. Therefore, we have developed this Privacy Policy to explain how we collect, use, disclose, retain, and delete your personal information and children's personal information when you use our website <https://worldofgeniuses.com> (hereinafter referred to as the Website), The World of Geniuses web application and related services (hereinafter collectively referred to as Services), as well as during other types of communication and interaction with us. The policy also describes your privacy rights and how you can use them.

This Privacy Policy does not apply to any personal information of individuals who act in a commercial or labor context or as the Company's contractors, including personal information provided by an individual to conclude an independent contractor (ambassador) agreement with Every Child Is A Genius LLC and during the implementation of such agreement.

Please read this Privacy Policy carefully. If any of its provisions are unclear to you or you have any additional questions, you can email us at info@echig.com.

Some functions of our Website may be available without providing personal information. However, e.g. in order to create an account, purchase or provide testing services, and fulfill legal obligations under U.S. law (including providing your parental consent to collect, use, and disclose certain personal information of your child), we will need certain personal data. If you choose not to provide the necessary information, we will not be able to provide you with access to Services in this part or to related product features.

By using our Website and Services, you agree to be bound by our Privacy Policy. If you do not agree to our Privacy Policy, you may not access or otherwise use our Services or participate in them.

THE SERVICES ARE INTENDED FOR USE BY ADULTS AT THE AGE OF 18 AND OLDER. If you are a minor who is under 18, you should not purchase or use Services without the support and supervision of your parent or legal guardian.

LINKS TO OTHER WEBSITES

Our Website may contain links to other websites, social media platforms, plug-ins and applications that are not operated by us. Third-party websites and services have their own terms, conditions and privacy policies, and you should read those carefully before you submit any personal information to them. We have no control over those third-party websites and are not responsible for their privacy statements.

PERSONAL INFORMATION WE COLLECT

We use the term “personal information” — also referred to as “personal data” or “personally identifiable information” in the laws of some jurisdictions — to denote information that means individually identifiable information about you and does not include de-identified data or publicly available information.

Below are the types of personal information that we may collect from or about you, depending on how you interact with our Services, (hereinafter collectively referred to as your Personal Information):

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Personal information which you provide to us directly or through third parties

- **Full name and contact details:** For example, when you purchase services from us, create an account, or give your verifiable parental consent to the collection, use, and disclosure of your child's personal information.
- **Account information:** If you register an account on our Website, you may be required to provide us with certain personal information, such as your full name, email address, credentials, and date of birth. You can also voluntarily provide us with additional personal information.

If you log in to our Website or Services via a third-party platform such as Google, the third-party platform will send us your information as you indicate.

- **Communication and interaction data:** If you communicate with us, e.g., by email, in a technical support chat during testing, or through our web pages, we may collect personal information that you provide to us, including your name, email address, and any other information you voluntarily decide to submit, as well as the contents of your messages.

- **Data you provide when giving your verifiable parental consent** to the collection, use, and disclosure of a tested child's personal information. According to U.S. laws, we have no right to collect, use, or disclose personal information of any child without a verifiable consent of one of their parents or their legal guardian (hereinafter referred to as a/the Parent). Therefore, depending on the way of purchasing the testing service, a Parent will be asked to use a method for verifiable parental consent pursuant to the Children's Online Privacy Protection Act (COPPA) and indicated in our relevant notice to the Parent.

For instance, if you purchase a service, you can give your verifiable parental consent at the time of payment by using a credit card or other online payment system that notifies you as the primary account holder of each discrete transaction. The completion of such a payment will represent your parental consent.

If you apply for a gift certificate or participate in a free voluntary technical testing of our Services functionality, we will need to use another way to verify your parental consent to collection, use, and disclosure of your tested child's personal information. This process will include verifying the consenting Parent's identity via a secure method also pursuant to COPPA. To do that, we will offer you to undergo identity verification via a specialized verification service that will check your government-issued identity document against databases of such information. Confirmation of the authenticity of your identity document will represent your parental consent.

This step is taken in the interests of the tested child and to confirm that the consenting individual is indeed the child's parent or legal guardian. In this case, you will need to provide the identity verification service provider with your identity document that contains your personal information. The identity document will be safely processed and deleted from the service provider's records after the verification is completed.

Please note: Complying with applicable laws, we try to facilitate and improve your user experience and our interaction with you. For this purpose, in the Notice to Obtain Parent's Affirmative Consent to the Collection, Use and Disclosure of a Child's Personal Information, which we send to you personally, we propose that you give us a one-time general consent to the collection, use, and disclosure of your child's personal information as per the list specified in the notice and detailed in the section "Children's Privacy" hereof. This is a legal way to avoid the need for a Parent to repeatedly undergo the procedure described above for verifying parental consent before every collection of a child's personal information.

- **Payment processing data:** If a payment (e.g., for testing) is required to access Services, we may obtain from a third party the name and contact information of the person who made the payment, payment method details, and transaction data. Payment processing service is provided by the [Stripe](#) platform (its privacy policy is available at the link).
- **Your child's full name, date of birth, and sex:** For example, when you as the legal representative of your minor child purchase services from us, give your verifiable parental consent to the collection, use, and disclosure of the child's personal information, create the child's account within your account on the Website, update or change information about the child in the account.
- **Videos automatically generated during video recording of the child's testing, and photos and audio files obtained from those:** When providing our Services, we collect video records of a child's testing process, containing responses, actions, interactions, and behavior of the tested child, as well as photographs and audio files generated from those videos. The Parent is present during the test and gets into the camera's field of view, so the videos also contain their visual data. We collect this information for, among other things, ensuring safety and transparency of the entire process and verifying the Parent's voluntary consent to their child's participation.
- **Feedback:** Where applicable, we will collect your feedback as set forth in our [User Agreement](#).
- **Any other unrequested personal information** that you share with us on your own initiative.

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Categories of personal information we collect automatically

When you visit our Website or use our Services, we automatically collect certain information which may include personal data, through technologies such as cookies, pixels, and browser storage. The types of information collected and the methods of collection are described below.

1. Through analytics and product improvement technologies

We use analytical tools to identify how users engage with our Website and Services, to monitor performance, and to improve user experiences.

- **Product analytics (PostHog):** We use PostHog to collect information about your interactions with our Website and Services. This includes data such as the pages you view, your clicks, time spent on the pages, navigation patterns, and user flow. We may also use user tracking technologies to review your interactions in order to identify and resolve technical issues and improve usability. This tool collects identifiers such as a unique user ID, device ID, and your IP address. We have configured this tool to mask sensitive data from being recorded where possible.
- **Privacy-focused analytics (Simple Analytics):** We also use Simple Analytics — a privacy-focused analytical tool that provides us with aggregate traffic data without collecting any personal information. It does not use cookies, does not collect your IP address, and does not track you individually. It collects anonymous data points such as the referrer, browser type, and country (derived from your time zone).

2. Through advertising and retargeting technologies

We use third-party tracking technologies, often called pixels, to optimize our advertising and retargeting campaigns, to track conversions, and for analytical purposes.

- **Meta (Facebook) Pixel and X (Twitter) Pixel:** These pixels collect information about your actions on our Website, e.g., pages you visit and purchases you make. This information, along with data like your IP address, browser type, and unique cookie identifiers, is shared with Meta (Facebook) and X (Twitter). These data are used for advertising and analytical purposes, including measuring the effectiveness of our campaigns and delivering targeted ads to you on their platforms.

3. Through security and authentication technologies

We use technologies to protect our Website and Services from fraudulent and malicious activity as well as to provide convenient login options.

- **Security and bot detection (Google reCaptcha):** To protect our Website and Services from spam and automated abuse, we use Google reCaptcha. This tool operates in the background to distinguish between human users and bots. To do this, reCaptcha collects hardware and software information, such as device and application data, as well as information about your interactions with the Website and Services, e.g., mouse movements and keyboard patterns. This information is sent to Google for analysis. Your use of reCaptcha is subject to Google's Privacy Policy and Terms of Use.

- **Google account login:** When you choose to log in using your Google account via the option “Continue with Google,” we receive certain profile information from Google after you grant your consent. The data we thus receive include your name, email address, and profile picture. Google does not share your password with us. Depending on the permissions you grant, we may also request access to additional account information. Your email address may be used to verify existing accounts, to link your Google account to a valid account on our Website, or to create a new account.

4. Through client-side storage technologies

We use browser storage technologies to improve your user experience and to ensure proper functioning of our Website and Services.

- **LocalStorage and SessionStorage:** These web storage technologies allow us to store data in your device’s browser. LocalStorage data are stored until they are manually deleted or cleared, while SessionStorage data are automatically deleted when you close the browser tab or session. The data stored may include your user preferences, settings, session identifiers, authentication tokens, information you enter into templates, and other data necessary for operation and configuration of our Website and Services. These data are stored locally on your device and are not automatically transmitted to our servers unless specifically programmed.

Therefore, based on the technologies described above, we may automatically collect the following categories of personal information:

- **Technical performance data:** Information about how our services operate on your device, including load times, error alerts, and technical diagnostics;
- **Device and browser information:** IP addresses, cookie identifiers, and user IDs assigned by our systems; browser types and versions, operating systems, device identifiers, screen resolution, time zone settings, language preferences, and installed browser plug-ins;
- **Internet or other electronic network activity information:** For instance, your browsing history on our Website, search history, and information about your interactions with our Website, Services, applications, or advertising. This includes page views, clicks, session records, and form interaction data;
- **Geolocation data:** General geographic information inferred from your IP address or time zone settings, but not precise geolocation data, unless otherwise requested and permitted;

- **Commercial information:** Such as records of products or services purchased, obtained, or considered;
- **Authentication data:** When you log in, we may collect information required for authentication, such as your username, email address, profile data from third-party services (e.g., Google), and session management data;
- **Security and fraud prevention data:** Information collected to detect and prevent fraudulent or unauthorized activity, including behavioral patterns, device characteristics, risk analysis data, and bot detection signals.

COOKIES

Cookies are small text files that are sent to a web browser from a website you open. Cookies are stored in your browser to ensure that major features of the Website function properly and that your visits are more convenient.

Every Child Is A Genius LLC uses cookies necessary for the Website and Services operation. They ensure basic functionality of Services, such as authorization, security, fulfillment of user requests for Services, ensuring proper operation of the Website's client-side logic, and maintaining user sessions.

In addition, we use analytical and tracking technologies such as PostHog and Simple Analytics to understand how users interact with our Website and to improve performance of our Services. Simple Analytics operates without cookies and collects anonymous data only, while PostHog may use cookies to track user engagement.

For advertising and marketing purposes, we use Meta (Facebook) Pixel and X (Twitter) Pixel. These technologies place cookies that collect information about your interaction with our Website, including pages you visit and your device information. These data are used for targeted advertising, conversion tracking, and retargeting campaigns. Google reCaptcha also uses cookies and collects device and browser information to protect our Website and Services from fraudulent activity and automated abuse.

For more information about our use of cookies, please refer to our [Cookie Policy](#).

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Publicly available data.

We use information publicly available on the Internet to train our AI models. We understand that personal information may be accidentally included in those datasets.

HOW WE USE PERSONAL INFORMATION

We may use your Personal Information for the following purposes:

- **Provision of Services:** We use your Personal Information in order to provide Services that you request from us, to evaluate and improve them, as well as to provide individual test results.
- **Account creation and support:** Your Personal Information is required to create your account which contains a child's account (if necessary). The information is stored in our system to ensure the provision of Services and to simplify your return to them. This allows you to return to using the Services without re-entering data and makes it possible to place new orders more quickly or enable additional features in the future.
- **Contacting you:** For instance, we can send you information about our Services, events, upcoming changes or improvements of Services. This may include sending you non-promotional emails, such as emails about your access to Services or changes to our terms and policies, legally required notices, or feedback requests.
- **Maintaining security and preventing fraud:** For example, maintaining the security of your accounts, our Services and Website, detecting and preventing fraud and other types of unauthorized use of our Services and Website, violations of any law, rule or regulation, or the terms or policies for our Services.
- **Legal purposes:** For instance, compliance with our legal obligations, enforcement of legal or regulatory requirements, protection of the rights, privacy, safety, or property of our users, the Company, or third parties. This may include detecting what state you are located in so that we can comply with relevant legal obligations, etc.
- **Supporting and helping you when you use our Services:** For example, troubleshooting and providing you with support when needed.
- **Analytics, development and improvement of our Services:** For instance, to analyze how users interact with our Website and Services in order to understand their needs, identify popular features, fix problems, and generally improve user experiences; to develop new features or improve current features of our Services, or to train our AI models.

- **Marketing and advertising:** For example, to measure the effectiveness of our advertising campaigns and to provide you with targeted advertising on third-party platforms (such as Meta and X). This includes tracking your actions on our Website after you view or click on our ads, and creating retargeting audiences to show you relevant ads.
- **Any additional purposes for which you give your specific consent.**

HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

We use various analytical and technology services that process your Personal Information in different ways:

- **Disclosure for advertising purposes:** We use Meta (Facebook) Pixel and X (Twitter) Pixel that share your Personal Information with those platforms for targeted advertising, retargeting, and cross-context advertising. These tools collect information about your interactions with our Website, including pages you visit, IP address, browser type, and device information, and use this data to show you relevant ads on Facebook, Instagram, and X (Twitter).
- **Disclosure for security purposes:** Google reCaptcha collects information about your device, browser, and behavioral patterns and shares this data with Google for fraud prevention and security purposes. Google may also use this information to improve its services.
- **Analytical data not shared with third parties:** Simple Analytics collects anonymized data about visits to our Website, but does not share any information with third parties or track individual users. PostHog may share certain information with subprocessors to ensure functionality of the Services.

HOW YOU CAN EXERCISE YOUR RIGHTS

We do not sell, exchange, or rent your Personal Information.

- We do not sell your Personal Information in the conventional sense.
- However, the use of advertising pixels means that your data are shared with Meta (Facebook) and X (Twitter) for advertising purposes, which may constitute an exchange of data for cross-context behavioral advertising under certain state laws.

- We do not provide public access to your Personal Information unless you give your specific consent.

We may also disclose your Personal Information to others in the following cases:

- **To our service providers and contractors** (hereinafter collectively referred to as service providers) with whom we have entered into a contract. These services are necessary, e.g., to support our Website, authenticate users, protect the security and integrity of the Website and Services, prevent fraud, process payments, and for other purposes, depending on your interaction with us. Access of the said service providers to your Personal Information is limited only to the information reasonably necessary for a service provider to perform its limited function for us and within the purposes for which we collect it.
- **To affiliated companies or due to a transfer of business:** We may disclose and/or transfer your Personal Information due to a sale, merger, or change of control of the Company or its subdivision responsible for the services that your Personal Information is associated with, solely for the purposes for which your Personal Information is collected.
- **For legal purposes, including to government authorities:** (i) to comply with laws or respond to lawful requests and legal process; (ii) to protect the Company's rights and property, including to enforce our agreements, policies, and terms of service; (iii) to protect against legal liability, or (iv) to protect the personal safety of the Company, its customers, or any person, including to investigate alleged fraud, harassment, or other violation of any law or regulation.

YOUR PRIVACY RIGHTS AND CHOICES

Depending on where you are located and subject to applicable legal exceptions, you may have certain rights with respect to your Personal Information, such as:

- The right to request access, rectification, update, or deletion of your Personal Information.
- If we collect and process your Personal Information with your consent, you may withdraw your consent at any time. The consent withdrawal will not affect the legality of any processing that we have carried out prior to such withdrawal.
- The right to submit certain confidentiality requests through an authorized agent.

- The right not to be discriminated against in exercising the rights granted to you by applicable privacy laws.
- The right to appeal the decision we make regarding your request for exercising rights.

Please note that your refusal to permit further use of your Personal Information collected by us or its future collection, as well as deletion of your Personal Information, may deprive us of the opportunity to provide the Services you request, e.g., to conduct testing and/or deliver its results, or to maintain your account functioning. In this case, we will stop providing the Services you request, in accordance with our [User Agreement](#), and delete the Personal Information you provided.

You may also have additional rights under the state laws currently in force, which vary depending on your jurisdiction and applicable law.

We do not engage in profiling (i.e. automated processing of personal information to evaluate, analyze, or predict individual characteristics, such as personal preferences, interests, behavior, etc.), which utilizes your Personal Information for automated decision-making that produces legal or similarly significant effects. Therefore, we do not offer an opt-out for this type of profiling.

HOW YOU CAN EXERCISE YOUR RIGHTS

You can exercise some of the above rights in your account, but for others to be exercised, you will need to send us an email request at info@echig.com. After you submit your request, we will respond within the term permitted by applicable privacy laws.

For you to exercise certain rights, we will need to verify your identity or collect more personal information from you than we currently have in order to ensure that you have the right to access the requested personal information and no one else is trying to impersonate you. This will help us protect your data from fraudulent requests.

Authorized agents. In order to exercise your rights through an authorized agent (as defined in applicable laws), you must provide your authorized agent with a written permission to exercise your rights on your behalf, and we may request a copy of the written permission from your authorized agent when they make a request on your behalf. We reserve the right to deny a request from an authorized agent who does not submit proof that you have authorized them to act on your behalf.

Appeals. If we refuse to take action on your request within a reasonable period of time after receiving it, you may appeal our decision via info@echig.com. In such an appeal, you must: (1) provide sufficient information so that we can verify that you are the person whom the original request pertains to and identify the original request, and (2) provide a description of the grounds for your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under applicable law. We respond to all appeal requests as soon as we reasonably can and no later than legally required.

NOTICE OF THE COMPANY'S INFORMATION PRACTICES WITH REGARD TO CHILDREN (CHILDREN'S PRIVACY)

We adhere to our obligations to protect children's personal information and comply with U.S. privacy laws.

This section describes what personal information (also referred to as “personal data,” “sensitive data,” or “personally identifiable information” in the laws of some jurisdictions) we collect about and from tested children, how we use such personal information, and our disclosure practices for such information.

Our child testing services are provided only under parental supervision, and we do not collect personal information directly from children under the age of 18 without their Parents' consent. A purchase of testing service, a creation of a child account within a Parent's account, the use of the accounts, and any other interaction or communication with the Company while using the Services and Website is carried out solely by the Parent who acts on behalf of their child and makes decisions in the child's interests.

Every Child Is A Genius LLC is the exclusive distributor of Quantum G testing services in the United States as part of the World of Geniuses project and an operator that collects personal information from children and maintains it through the Website <https://worldofgeniuses.com> and online services, according to COPPA provisions. We accept inquiries from Parents concerning the Privacy Policy and the use of children's information via email: info@echig.com.

We collect, use, and disclose personal information from children under the age of 18 in accordance with the Children's Online Privacy Protection Act (COPPA), the rules adopted pursuant to COPPA, and other applicable laws, after receiving the verifiable consent of a child's Parent. If you do not give such a consent, we will not be able to provide the Services you request.

If we become aware that personal information of a child under 18 has been collected on our Website without the verifiable consent of the child's Parent, we will use all reasonable efforts to delete such information from our database.

To ensure the best interests, safety and well-being of a tested child, as well as the process transparency, testing is only conducted in the presence of the child's Parent. The Parent helps the tested child to prepare according to the [User Agreement](#) and preparation and test taking recommendations posted on the Website, ensures compliance with those, and monitors the testing process.

The Website does not enable a tested child to make their personal information publicly available.

WHAT PERSONAL INFORMATION OF THE CHILD WE COLLECT

Through the Website, we intend to obtain the following types of your child's personal information (hereinafter collectively referred to as the Child's Personal Information):

1

The Child's Personal Information provided by the Parent directly:

- **Full name, date of birth, and sex**, which you as the Parent provide to us when you, e.g. request or purchase services from us, give your parental consent to the collection, use, and disclosure of the Child's Personal Information, create the child's account within your account on the Website, update or change information about the child in the account.

We may use this information to provide Services, create and maintain the child's account, maintain security, prevent fraud, verify the child's identity, for legal purposes, to provide you with support and assistance when you use our Services, as well as to develop and improve the Services (for more information, please see the section "How We Use the Child's Personal Information").

2

Personal information collected from the child in their Parent's presence:

- **Biometric data** as facial embeddings that cannot recreate the original image (they are collected immediately before the test and during testing). We may use them to provide Services, maintain security, prevent fraud, verify the child's identity, or for legal purposes.
- **Videos automatically generated during video recording of the child's testing, and photos and audio files obtained from those:** When providing our Services, we collect video records of your child's testing process, containing responses, actions, interactions, and behavior of the child, as well as photographs and audio files generated from those videos. We may use these materials to provide Services, maintain security, prevent fraud, verify the child's identity, for legal purposes, to provide you with support and assistance when you use our Services, as well as to develop and improve the Services.

We may also unintentionally receive other personal information which we do not request and which you as the Parent can share with us on your own initiative, e.g., when using the Services, contacting us by email, during your child's testing, or which your child can share with us in your presence, for instance, while taking the test.

HOW WE USE THE CHILD'S PERSONAL INFORMATION

We may use the Child's Personal Information for the following purposes:

- **Provision of Services:** We use the Child's Personal Information in order to provide Services that you request from us, to evaluate and improve them, as well as to provide individual test results.
- **Account creation and support:** Personal information is required to create the child's account within the Parent's account. The information is stored in our system to ensure the provision of Services and to simplify your return to them. This allows you to return to using the Services without re-entering data, and also makes it possible to more quickly place new orders that match the child's age, or enable additional features in the future, e.g., taking a test for an older age group at an older age, or accessing new services..

- **Maintaining security and preventing fraud:** For example, maintaining the security of our Services and Website and your accounts (including your child's account), detecting and preventing fraud and other types of unauthorized use of our Services and Website, violations of any law, rule or regulation, or the terms or policies for our Services.
- **The child's identity verification:** Personal information is required to verify the child's identity, e.g., for making sure that the same child is taking the test from start to finish.
- **Legal purposes:** For instance, compliance with our legal obligations, enforcement of legal or regulatory requirements, protection of the rights, privacy, safety, or property of our users, the Company, or third parties.
- **Supporting and helping you when you use our Services:** For example, troubleshooting and providing you with support when needed.
- **Developing and improving our Services:** For instance, developing new features and improving the current features of our Services, or training our AI models.
- **Any additional purposes for which you give your specific consent.**

HOW WE MAY DISCLOSE THE CHILD'S PERSONAL INFORMATION

We do not sell, exchange, or rent to third parties the personal information we collect from the child (including biometric data), nor do we share the Child's Personal Information or transfer it for profit (as defined in COPPA, the rules adopted pursuant to COPPA, and other applicable laws).

We further do not make the Child's Personal Information received from you publicly available in any form, except cases when you give your specific consent thereto (e.g., when Parents' feedback is published).

We may disclose the personal information collected from the child (including biometric data) to others in the following cases:

- **To our service providers and contractors** (hereinafter collectively referred to as service providers) that are able to maintain the confidentiality, security and integrity of such information, and provide guarantees that they will maintain the information in this way. Access of any service provider to the Child's Personal Information is limited only to the information reasonably necessary for the service provider to perform its limited function for us and within the purposes for which we collect it.

We do not share the Child's Personal Information with service providers for their own commercial, marketing, or other purposes. Furthermore, service providers will not disclose or use the Child's Personal Information to contact the child, including through behavioral advertising, or to amass a profile on the child.

- **To affiliated companies or due to a transfer of business:** We may disclose and/or transfer the Child's Personal Information to affiliated companies or due to a sale, merger, or change of control of the Company or its subdivision responsible for the services that such personal information is associated with, solely for the purposes for which the Child's Personal Information is collected.
- **For legal purposes, including to government authorities:** (i) to comply with laws or respond to lawful requests and legal process; (ii) to protect the Company's rights and property, including to enforce our agreements, policies, and terms of service; (iii) to protect against legal liability, or (iv) to protect the personal safety of the Company, its customers, or any person, including to investigate alleged fraud, harassment, or other violation of any law or regulation.

PARENT'S RIGHTS

Depending on where you are located and subject to applicable legal exceptions, you may have certain rights with respect to your Child's Personal Information. The Parent may request review, rectification, or deletion of the Child's Personal Information, as well as refuse further collection or use of the Child's Personal Information by emailing us at info@echig.com.

Please note that your refusal to permit further use of the Child's Personal Information collected by us or its future collection, as well as deletion of the Child's Personal Information, may deprive us of the opportunity to provide the Services you request, e.g., to conduct testing and/or deliver its results, or to maintain the child's account functioning. In this case, we will stop providing the Services you request, in accordance with our [User Agreement](#), and delete the Child's Personal Information you provided.

For you to claim these rights, we may need to verify your identity in order to confirm your right to access the Child's Personal Information. This is a security measure ensuring that the Child's Personal Information will not be disclosed to any individual who doesn't have the right to receive it. To verify your identity, we may need to collect more personal information from you than we currently have.

We do not engage in profiling (i.e. automated processing of personal information to evaluate, analyze, or predict individual characteristics, such as personal preferences, interests, behavior, etc.), which utilizes the Child's Personal Information for automated decision-making that produces legal or similarly significant effects. Therefore, we do not offer an opt-out for this type of profiling.

We do not process the Child's Personal Information for the purpose of targeted advertising and do not disclose it to third parties for them to contact the child, including through behavioral advertising, or to amass a profile on the child. We do not sell, exchange, or rent to third parties the Child's Personal Information we collect (including biometric data), nor do we provide access to it or transfer it for profit. Therefore, we do not offer an opt-out for processing the Child's Personal Information for these purposes.

You may also have additional rights that vary depending on your jurisdiction and applicable law.

If substantial changes are made to our practices of collecting, using, or disclosing children's personal information to which a Parent has previously consented, we will send the Parent a notification to the email address associated with their account and request their verifiable parental consent.

PERSONAL INFORMATION RETENTION

We will retain your Personal Information and your Child's Personal Information (including biometric data) for the period necessary to satisfy the purposes for which it has been collected, unless it is necessary to retain this information longer for legal, compliance, or safety purposes. For instance, we may retain the said personal information:

- When we have a legal obligation to do so (e.g., for financial reporting or other reporting purposes, to certify the provision of Services, or if we receive a court ruling for longer retention of personal information);
- To address and resolve requests and complaints (e.g., if you submit a complaint);
- To protect the safety, security, and integrity of our business, Services and Website, as well as to protect our rights and property and those of others (e.g., if we detect misuse of our Services or unusual activity on your account or in your interactions with us); and
- For litigation, regulatory or other legal matters (e.g., we will retain your information if there is an ongoing legal claim and the information is relevant to the claim).

The length of biometric data retention periods may be specific to applicable laws of certain states. For example, for residents of Illinois, biometric data are retained until the purpose for collecting or obtaining them is satisfied, or within three (3) years after a Parent's last interaction with us, whichever occurs first, unless we are otherwise required to retain such data by law or as part of a legal process. After the specified period, biometric data are destroyed in a secure and irreversible manner, including a complete deletion of electronic records from servers and backups and a use of methods that exclude data recovery.

After expiration of the retention periods mentioned above, we will take reasonable measures to delete your Personal Information and the Child's Personal Information (including biometric data) in such a way that they are not maintained in retrievable form and cannot be retrieved in the normal course of business.

We retain your account data until the account is deleted. If you decide to delete your account, please select the "Delete Account" option in the settings. For security reasons, to make sure that the deletion request is really made by you, we will email you a unique code that you will need to use to confirm your decision. After that, the requested account and its data will be scheduled for deletion in thirty (30) calendar days. During the period of 30 calendar days after the deletion request, a notice of the scheduled deletion will be displayed in your account, indicating the ultimate deletion date. Within this time, you may cancel the deletion by clicking on the "Recover Account" button, after which a verification code will be sent to your email address. Please enter the received code to restore your account and cancel the scheduled deletion.

If you do not use the account recovery option within the specified 30-day period, we will permanently delete your account and its details, except for certain data collected for improving the operation of our Website and Services and their further development, for maintaining security and preventing fraud, or for other legal and/or our legitimate purposes. For instance, we are required to retain information about past transactions for financial reporting purposes and to certify the provision of Services. Deletion of your account is permanent. After your account is deleted, we will not be able to reopen or reactivate it or to restore your data.

PERSONAL INFORMATION SECURITY

Every Child Is A Genius LLC implements commercially reasonable technical, administrative, and organizational measures designed to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

The personal information collected by the Company is stored and processed on servers located in the United States of America, using reasonable security measures necessary to protect it from loss, misuse, unauthorized access, disclosure, alteration, or destruction. The measures include, but are not limited to: encryption of personal information; its de-identification or anonymization where possible and appropriate; practices of data minimization and deletion of information that is no longer necessary; limited access control and regular security assessments. However, no security measure or method of data transmission over the Internet is 100% secure. In addition, you are solely responsible for protecting your username (login) and password, limiting access to your devices, and signing out of websites and accounts after your sessions.

PRIVACY POLICY UPDATES

We may update our Privacy Policy when necessary, including making substantial changes to it. When we do that, we publish an updated version of the policy with a modified effective date on our Website. All changes and updates take effect immediately after such publication. If applicable law requires a different type of notice, we will notify you accordingly.

If you use our Services after any changes to the Privacy Policy have been published, all of the changes made will apply to your use of the Services.

HOW TO CONTACT US

If you have any questions, suggestions, or complaints regarding our collection, use, or retention of personal information, or if you wish to exercise any of your rights in relation to your Personal Information, or if you need help in solving issues, please email us at info@echig.com.