

Children's Privacy Policy

The NASA Goddard OPTIMUS PRIME Spinoff Promotion and Research Challenge is owned and operated by NASA in conjunction with PRIVO. This addendum to the NASA Web Privacy Policy and Important Notices is unique to this Challenge as it relates to the collection, use and disclosure of children's personal information in compliance with The Children's Online Privacy Protection Act (COPPA). The NASA general policy can be found here: http://www.nasa.gov/about/highlights/HP_Privacy.html.

This policy is effective as of January 22nd, 2016.
Last updated on October 17th, 2018.

Kids Privacy Assured by PRIVO:

COPPA Safe Harbor Certification & GDPRkids™ Privacy Assured

The NASA Goddard OPTIMUS PRIME Spinoff Promotion and Research Challenge is a member of the PRIVO Kids Privacy Assured Program ("the Program") for COPPA Safe Harbor Certification and **GDPRkids™**. PRIVO is an independent, third-party organization committed to safeguarding children's personal information collected online.



The Program certification applies to the digital properties listed on the validation page that is viewable by clicking [here](#) or on the PRIVO COPPA certification seal. The COPPA certification seal posted above indicates NASA Goddard OPTIMUS PRIME Spinoff Promotion and Research Challenge has established COPPA compliant privacy practices and has agreed to submit to PRIVO's oversight and consumer dispute resolution process. If you have questions or concerns about our privacy practices, please contact us at (202)358-1767 or bryan.d.mccall@nasa.gov. If you have further concerns after you have contacted us, you can contact PRIVO directly at privacy@privo.com.



The Program applies to the digital properties listed on the validation page that is viewable by clicking [here](#) or on the PRIVO **GDPRkids™** verified shield above. The PRIVO **GDPRkids™** Privacy Assured Program supports child directed services known as Information Society Services under the General Data Protection Regulation (GDPR), to comply with the requirements of this legislation. It impacts any child directed service in an EU Member State and any service globally that collects and or processes the

personal data of children and minors. There is no safe harbor for the GDPR to date, but to ensure this company's services meet the program requirements, we conduct regular monitoring and consulting.

Interaction with Children in the NASA Goddard OPTIMUS PRIME Spinoff Promotion and Research Challenge

This NASA Goddard OPSPARC was created to support the NASA outreach initiative to educate students about NASA spinoffs, recognize innovation through technology transfer and to promote innovative communication of spinoff stories to the public through collages and online multimedia posters. All students taking part of a Mission are required to have parental consent. Because these students are primarily under the COPPA protected age of 13, NASA has hired PRIVO, a specialist in youth registration and parental consent management, to handle the collection, secure storage and availability of all registration data needed to enter and facilitate the Challenge and to process the necessary level of verifiable parental consent needed to not only comply with COPPA and the GDPR, but to ensure that parents have agreed to the intended use of all multimedia submissions related to the Challenge. NASA and PRIVO do not collect more information than is reasonably necessary to fulfil the initiatives being joined and to obtain verifiable parental consent.

When a student indicates that they want to register, they are directed to a co-branded registration process hosted by PRIVO.

The following information is collected from the student:

- child's first name
- date of birth
- gender (optional)
- grade
- username and display name
- password
- parent email address to send an email to the parent requesting their consent
- student email address for password reset (optional)

The parent is provided with all the information needed to make informed consent and to complete the registration and account creation for their child, with the ability to opt in to receive the following:

- NASA OPSPARC Participation Certificate, requiring the student's last name and mailing address, in addition to optionally providing the child's school information
- NASA Outreach Program & Youth Communications requiring an email

A parent is required to create a parent account that includes the following:

- first name
- username
- password
- adult identity verification

A parent maintains complete control of the data collected and its intended and continued use. The parent and child account can be leveraged by the account holders to initiate registration and consent on other PRIVO enabled sites. This provides value to the parent in that they do not have to create a separate verifiable parent account for every site their child may join.

A coach is required to create an account with the following:

- first name
- last name (optional)
- username
- password
- date of birth
- school / after school program information (optional)
- adult identity verification (optional)

A coach can add their students to the challenge, but all students will require parent consent. The coach may be asked to provide a parent email. The coach has the option to opt in to receive the NASA Outreach and Youth Communications.

To compete in the Challenge, students must create a multimedia poster that is hosted on a third-party service provider, Adobe Spark platform. Adobe Spark does not share user's information with any other third party and does not engage in targeted advertising. Users 17 and under with full verifiable parent consent can submit their entries to the platform and the child can share their submitted project. For more information on the use of this platform please contact privacy@privo.com.

Third Parties

To operate the Challenge we work with PRIVO, HubSpot, Adobe Spark and Google Analytics. PRIVO powers account creation and the parental consent platform. HubSpot hosts the NASA OPSPARC website and email communications. They do not share user data with any other third parties. Adobe Spark provides the multimedia tool for students to create and host their projects submitted to the Challenge. Google Analytics is used to provide aggregated statistical data of the website usage. All children have full verifiable parental consent before any projects are submitted and shared. For more information on these third-party service providers please contact us at the email below.

You can review, revise and/or request your information is deleted at any time by contacting privacy@privo.com.

Privacy Vaults Online, Inc., d/b/a PRIVO

17949 Main St., #1025
Dumfries, VA 22026-1025
703-569-0504 (telephone)
703-783-8752 (fax)
privacy@privo.com(email)
Attn: Privacy Officer

A Note to EU Citizens

PRIVO complies with the rights given to EU Citizens under the General Data Protection Regulation (GDPR). These rights are as follows:

- to correct the personal data we have about you;
- to withdraw your consent to the processing of your personal data;
- to obtain a copy of the personal data we hold about you;
- to have your personal data deleted;
- to transfer your personal data to another controller to provide you with services;
- to restrict the personal data we have;
- to request we stop processing your personal data.

You can take action any of these rights by contacting us at privacy@privo.com.

If you are an EU citizen and would like to make a complaint about the way we process your personal data, you can contact the relevant Data Protection Authority (DPA). Please contact us at privacy@privo.com to find out more.