



## Privacy Policy

Last modified: October 1, 2008

USA Climbing has created this Privacy Policy to disclose our online information practices and the choices you can make about the way your personal information is collected and used at the USA Climbing Website (Site).

### CHANGES TO THIS POLICY

USA Climbing reserves the right, at our discretion, to change, modify, add or remove portions of this Privacy Policy at any time. Such changes, revisions or modifications will be effective immediately upon notice to you, which may be given by any means including, without limitation, via posting on the Site. If the changes are significant, we will provide a more prominent notice. Each version has an effective date listed at the top of the policy. Your continued use of the Site after such notice will be deemed to constitute acceptance of such changes, revisions or modifications. Please check this Privacy Policy periodically for changes.

The Site and the materials contained in the Site are presented solely for the use of users located in the United States of America and its territories and possessions, excluding Puerto Rico, American Samoa, Guam and the Virgin Islands. Guests who choose to visit the Site from outside of the United States of America are advised that this Privacy Policy does not necessarily comply with the privacy laws and regulations of the country from which you are accessing the Site. We therefore request that you do NOT provide personal information to us if you are accessing the Site from outside of the United States of America.

### WE COLLECT CERTAIN PERSONAL INFORMATION

For purposes of this Privacy Policy, "personal information" means any individually identifiable information about a user of our Site including, but not limited to, your name, contact information (such as your mailing address and e-mail address), demographic information (such as your date of birth and income level), lifestyle-related information (such as your hobbies and interests), and financial information (such as your credit card number).

You may visit the Site as a guest, without providing any personal information to us. However, you may be required to provide personal information to us in order to take advantage of certain services and promotions offered via the Site. We may collect any personal information that you voluntarily provide to us in connection with your use of the Site,



including but not limited to in connection with your: participation in any online contest, sweepstakes or other promotions we might offer; making purchases from our online store; submission of questions or comments to us via the Site; use of the Site to transmit any User Content, including but not limited to participation in any e-mail services, message boards or chat rooms we may establish; inclusion in our online newsletter program; registration as a registered user of the Site; and donations

## OUR USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

We use the personal information that you voluntarily provide to us in order to fulfill the purpose for which you provided the information to us ( e.g. , in order to respond to your questions, to fulfill orders for products purchased via the Site, to award prizes pursuant to contests entered via the Site, etc.). We also use your contact information to send you information, advertising and promotional materials about USA Climbing, its member organizations, and their respective products, services and upcoming events. We may also call persons who provide their telephone numbers to us via the Site in order to provide you with information about USA Climbing, its member organizations, and their respective products, services and upcoming events, if you request.

We use the demographic and lifestyle-related information that you voluntarily provide to us in order to improve the content of the Site. We may also use this information to tailor your experience at the Site, showing you content, and to send you information, advertising and promotional materials about USA Climbing, its member organizations, and their respective products, services and upcoming events that we think might be of interest to you.

We use the financial information that you voluntarily provide to us solely to bill you for products you have ordered via the Site and donations to USA Climbing you have made via the Site.

The term "Site" refers to the several web sites owned by USA Climbing. We may disclose personal information that you provide to us via any one of the Sites with our other Sites. We may also disclose any personal information that you provide to us to any of our member organizations, who may use such personal information solely in accordance with the terms of this Privacy Policy.

We will not disclose any personal information that you provide to us to any unaffiliated third party, except in accordance with this Privacy Policy or with your consent. We may disclose any personal information that you provide to us to our service providers with respect to the Site, provided that such service providers have agreed to only use such personal information to the extent necessary to perform services on behalf of USA



Climbing. We may disclose personal information that you provide to us to USA Climbing's partners, sponsors, suppliers or other unaffiliated third parties. However, we reserve the right to disclose personal information that you provide to us to unaffiliated third parties that have agreed in writing to use your personal information only in accordance with the terms of this Privacy Policy. These unaffiliated third parties MAY use your personal information to send you information, advertising and promotional materials about their companies via mail, unless you OPT-OUT of receiving such third party materials. These unaffiliated third parties MAY NOT contact you via e-mail unless you OPT-IN to receiving such third party materials. To exercise your right to OPT-OUT of or OPT-IN to receiving such materials, please see the OPT-OUT/OPT-IN PROCEDURES section of this Privacy Policy.

We may disclose aggregate non-personally identifiable information about users of our Site to advertisers, sponsors, and other third parties. For example, we may disclose to any third party that X% of Site users are male, Y% of Site users reside in Colorado, etc. Our disclosure of aggregate information does not permit the recipient of such data to identify or contact any individual user of the Site.

Finally, we may use and disclose your personal information: (a) as is required by law; (b) to comply with legal process; (c) to investigate claims with respect to use of the Site; (d) as is reasonably necessary to enforce the terms of the Agreement; and (d) as is reasonably necessary to protect the interests, rights or property of USA Climbing, its member organizations or others.

We understand that some of your personal information may change over time, or that you may later desire that we no longer use or disclose personal information that you previously provided to us. You can either: (x) edit your personal information on the Site; (y) follow the instructions in our e-mail newsletter to make changes or remove yourself from our mailing list; or (z) contact us pursuant to the procedures specified in the CONTACTING US section of this Privacy Policy.

## POLICIES WITH RESPECT TO CHILDREN UNDER THE AGE OF 13

### Our Collection of Personal Information from Children Under the Age of 13

USA Climbing does not knowingly collect any personal information from children under the age of 13 (referred to herein as "children"). As is further explained in the USE OF IP ADDRESSES section of this Privacy Policy, we do not link the IP addresses of Site users to personal information other than in specified circumstances. As is further explained in the USE OF COOKIES section of this Privacy Policy, we do use cookies on our Site,



but such cookies are not linked to personal information unless such personal information is voluntarily provided to us via the Site.

We encourage parents and guardians to spend time online with their children, and to take an active role to protect the privacy of their children, including but not limited to instructing their children not to disclose any personal information over the Internet without their prior permission. Once we have received verifiable parental consent, we may actively collect personal information from a child so that the child may participate in the following services and activities in connection with his or her use of the Site: contests and promotions the rules of which permit entry by children; inclusion in our online newsletter program; and registration as a registered user of the Site.

We may collect the following types of personal information from children in connection with such services and activities: name and member name; age and birth date; e-mail address and mailing address; e-mail address of a parent or guardian; and favorite sports, hobbies, interests and extracurricular activities. USA Climbing will not condition a child's participation in any game, the offering of a prize, or a child's participation in any other activity on the child's disclosing more personal information than is reasonably necessary for the child to participate in such activity.

We note that, in the course of a child's use of our Site, the child may voluntarily provide further personal information about himself or herself to us – for example, by including personal information in messages submitted to us via the Site. We also note that we may collect personal information about a child from the child's parent or guardian – for example, if the parent or guardian requests that we send our newsletter to the child.

#### Our Use and Disclosure of Personal Information Collected from Children Under the Age of 13

USA Climbing does not knowingly use any personal information about children unless we have first received verifiable parental consent to do so.

Once we have received verifiable parental consent, we may use personal information about children for the following purposes:

fulfilling the purpose for which the child, parent or guardian provided that personal information (e.g. , contacting the child in response to a question submitted by the child; sending newsletters for which the child signed up to the child, etc.); and record keeping. Except as specified herein, USA Climbing does not knowingly disclose any personal information about children unless it has received specific verifiable parental consent to



disclose such personal information for a particular purpose (e.g. , publishing the name and image of a child who has won a contest). For purposes of this Privacy Policy, the “disclosure” of personal information about children refers to both: (a) USA Climbing’s disclosure of the personal information in identifiable form to a third party (other than a service provider with respect to our Site that has agreed not to use or disclose the personal information other than to the extent necessary to perform services on behalf of USA Climbing); and (b) making any such personal information publicly available in identifiable form by any means, including but not limited to, by public posting on the Site, or through an e-mail service, message board or chat room.

USA Climbing may use and/or disclose personal information about children, without parental consent, to the extent reasonably necessary to:

protect the security or integrity of our Site and online services; take precautions against liability; respond to judicial process; or provide information to law enforcement agencies or for an investigation on a matter related to public safety, to the extent permitted by law.

Parental Consent and Rights of Parents

Before knowingly collecting personal information from a child, USA Climbing will use reasonable efforts to ensure that the parent or guardian of the child: (a) receives notice of our personal information collection, use and disclosure practices; and also (b) authorizes the collection and/or use of personal information from the child.

In order for anyone to register as a registered user of the Site, enter any contest or promotion offered on the Site, sign-up for our newsletters, or otherwise participate in any e-mail services, message boards or chat rooms we may establish, he or she must submit an online form that includes such person’s date of birth. If the given date of birth establishes that the person is under the age of 13, the Site automatically provides an online form that requires such person to enter an e-mail address for his or her parent or guardian. We will then send notice of our personal information collection, use and disclosure practices to the parent or guardian at the given e-mail address. Unless we receive authorization from that e-mail address to do so, we will not activate the child’s account, and we will not knowingly collect any further personal information from the child. Further, we will delete all personal information previously provided to us by the child. Finally, if we do receive parental consent to the collection and/or use of personal information about the child, we will send a confirmatory e-mail to the e-mail address from which we received such consent, providing the parent or guardian the opportunity to revoke that consent.



Additionally, if a child wins any contest or promotion offered via the Site, notification and prizes are sent to the parent or guardian who originally provided the parental consent. We will not publish the name, age or image of any child who wins a contest without specific verifiable parental consent to do so. A parent or guardian who consents to our collection and use of personal information about his or her children has the right to simultaneously deny us permission to disclose that personal information.

Once we have received parental consent with respect to the collection, use and/or disclosure of personal information about a specific child, we will not collect, use and/or disclose personal information about that child in any way that materially differs from the practices set forth in our original notice to that child's parent or guardian without first providing notice of our new practices to the parent or guardian, and obtaining verifiable parental consent to the collection, use and/or disclosure of personal information about that child in accordance with our new practices.

A parent or guardian of a child who has provided personal information to us has the following rights:

- to require that we provide a description of the specific types or categories of personal information that we collect from children (such as name, address, e-mail address, favorite sports, hobbies and extracurricular activities);
- to, at any time, refuse to permit our further collection, use or disclosure of any personal information about his or her child;
- to review the personal information that we have collected from his or her child;
- to require us to modify any personal information that we have collected from his or her child; and
- to, any at time, require us to delete all personal information that we have collected from his or her child.

To exercise these rights, parents must contact us by one of the methods set forth in the CONTACTING US WITH RESPECT TO THIS PRIVACY POLICY section of this Privacy Policy.

Confidentiality, Security and Integrity of Personal Information Collected from Children Under the Age of 13



We use industry-standard security techniques to provide secure transmission of personal information from users' computers to our servers, and to protect against the loss, misuse or alteration of personal information we have collected at the Site. Please refer to the SECURITY AND INTEGRITY OF PERSONAL INFORMATION section of this Privacy Policy.

## USE OF IP ADDRESSES

An IP address is a number that is automatically assigned to your computer whenever you're surfing the web. Web servers, the big computers that "serve up" web pages, automatically identify your computer by its IP address.

When a user accesses web pages on our Site, our servers automatically log the user's IP address. USA Climbing uses IP addresses for purposes of system administration, auditing the use of the Site, and reporting aggregate information with respect to Site users to third parties. We do not normally link IP addresses to any information that personally identifies the user, meaning that the user remains anonymous to us. However, we will use IP addresses to determine the identity of a specific user: (a) as is required by law; (b) to comply with legal process; (c) to investigate claims with respect to use of the Site; (d) as is reasonably necessary to enforce the terms of the Agreement; and (d) as is reasonably necessary to protect the interests, rights or property of USA Climbing, its member organizations or others.

Notwithstanding the foregoing, some services within the Site, such as message boards, may display a user's IP address along with his or her user name and message. If you choose to take advantage of such services, you acknowledge and agree that you have voluntarily provided to us information that causes your IP address to link to personally identifying information, and that our obligations with respect to use and disclosure shall be the same as those that apply to any other personal information that you have voluntarily provided to us.

## SECURITY AND INTEGRITY OF PERSONAL INFORMATION

We use industry-standard security techniques to provide secure transmission of your personal information from your computer to our servers, and to protect against the loss, misuse or alteration of personal information we have collected at the Site. When you transmit any financial information via the Site, we use industry-standard SSL (secure socket layer) encryption. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure.



You are responsible for maintaining the confidentiality of your registration information and password, and for all uses of your password. You should remember to sign out of your USA Climbing account and close your browser window when you have finished using the Site, in order to protect against others' use of the Site under your password. For your protection, we will never ask you to divulge your password in an unsolicited phone call or e-mail.

#### OPT-OUT/OPT-IN PROCEDURES

Site users who are 13 years of age or older may OPT-OUT of:

receiving mail, e-mail and/or phone calls from USA Climbing and its member organizations with respect to USA Climbing, its member organizations, and their respective products, services and upcoming events; receiving information, advertising and promotional materials from third parties via mail. You may OPT-OUT of any such use of your personal information by:

using one of the methods described in the CONTACTING US section of this Privacy Policy; or with respect to personal information you have provided in connection with a purchase from our online store, following the OPT-OUT procedures identified in, or linked to, your order form. Site users who are 13 years of age or older may OPT-IN to receiving information, advertising and promotional materials from third parties via e-mail by using one of the methods described in the CONTACTING US section of this Privacy Policy.

#### CONTACTING US

If you have any questions about this Privacy Policy, including but not limited to, exercising parental rights, opting-out of receiving third party mailings, submitting questions with respect to our privacy practices, or requesting that we correct, update or delete personal information that you have previously provided to us by; please feel free to contact us via our website at [info@usaclimbing.org](mailto:info@usaclimbing.org).