

ONLINE PRIVACY NOTICE
Effective as of September 21, 2022

1. Introduction.

- (a) **Web Site Owner.** Amrak Integrated Communications LLC a Florida Limited Liability Company ("Company") is the owner of this web site ("Company Web Site"). Company can be contacted by mail at 5023 SW 59th Avenue, Miami, Florida 33155, by phone at (323) 920-5752, or by e-mail at community@amraksolutions.com. This online privacy notice discloses Company information practices for this Company Web Site, including what type of personal identifiable information is requested in order to make a purchase, how the information is used, and with whom the information is shared. Note that other Company web sites may be governed by privacy notices containing different information practices applicable to those sites.
- (b) **Web Site Visits.** Company collects certain information from Company Web Site visitors. This includes, but is not limited to, the home server domain name, e-mail address, type of computer and web browser, what pages visitor accessed, and limited information about search requests. This information is used to solve technical problems and to calculate overall usage statistics.
- (c) **Web Site Transactions.** At times, Company will need personal information regarding a customer or a prospect. For example, to process an order or provide a subscription, Company may need to know a customer's name, mailing address, e-mail address and credit card details. It is Company's intent to inform you before Company collects personal information, such as user's name and/or address on the Internet. If you tell us that you do not wish to have this information used as a basis for further contact with you, Company will respect your wishes.

2. Personal Information That May Be Collected.

- (a) **Identifying Information.** In order to access designated subscriber services and/or restricted areas within the Company Web site, Company will request a user to provide certain personal identifying information, which may include: name, postal address, e-mail address, screen name, password, telephone number, facsimile number, method of payment, and, if applicable, credit card number. Company may request additional information necessary to establish and maintain customer's account.
- (b) **Service Quality Monitoring.** Some Web site transactions may require a customer to telephone Company, or Company to call the customer. Company will not contact you by telephone without your prior consent, except to confirm an order placed online and/or to inform a customer of the status of such order. Customer should be aware that it is Company's practice to monitor, and in some cases record such calls for staff training or quality assurance purposes.
- (c) **Information from Children.** Company does not sell products or services for purchase by children, and will not collect or post information from a child under the age of 16

without the involvement of a parent or guardian. Company will notify the child's parent or guardian at the e-mail address provided by the prospective customer, alerting the parent or guardian to the child's use of the Web site and providing instructions as to how the parent or guardian can delete the child's registration from the Web site. Company does not use personally identifying information collected from children for marketing or promotional purposes, and does not disclose such information to any third party for any purpose whatsoever. See below, COPPA Privacy policy for more details regarding privacy policy for children under the age of 16.

- (d) **Lost or Stolen Information.** If a customer's password is lost or stolen, the customer should promptly notify Company in order to enable Company to cancel the lost or stolen information and to update its records with a changed password.
- (e) **Chat Rooms, Forums and Bulletin Boards.** If customer participates in an Company chat room, discussion forum, or posts messages to an Company bulletin board, customer should be aware that the information disclosed and shared will be broadly available to other persons, both inside of and/or outside Company, who have access to that chat room, forum or bulletin board. Some individual Company chat rooms, forums or bulletin boards have additional rules and conditions regarding participation. Also, participant's expressed opinion is his or her own and should not be considered as reflecting the opinion of Company.
- (f) **Links to Other Web Sites.** An Company Web site may contain links to other web sites. Company is not responsible for the privacy practices or the content of those other Web sites.

3. Uses Made of the Information.

- (a) **Limited Uses Identified.** Personal information collected by Company will be used by Company for the following purposes:
 - (A) Distribution of gamified learning digital content.
 - (B) Rewarding consumption of digital educational content through digital badges and prizes.
 - (C) Providing access based on educational progress to apprenticeship, scholarship and internship programs.
 - (D) Participation in a digital CRM email loyalty program.
 - (E) Identify you when you sign in to your account;
 - (F) Respond to your requests and to provide you with the Services;
 - (G) Respond to your inquiries and contact you about changes to the Site and/or the Services;
 - (H) Send you notices (for example, in the form of e-mails, mailings, and the like) regarding products or services you are receiving, and for billing and collection purposes;
 - (I) Send you information we think you may find useful or that you have requested from us;

- (J) Enhance and improve the Site or the Service, such as through personalized features and content;
 - (K) Analyze the use of the Site and the Service and the people visiting to improve our content and Site and the Service;
 - (L) Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies, or as otherwise required by law;
 - (M) For any other purposes disclosed at the time the information is collected or to which you consent; and
- (b) **Marketing Uses.** Unless customer provides notice to the Company that the Customer does not wish to be provided with products, services, and related information by emailing community@amraksolutions.com , Company reserves the right to provide customer with information about Company's Web site, Company products and services, and related information in which customer has indicated an interest.
- (c) **Stored Information Uses.** Company stores and retains the information entered on the Company Web site. Stored information is used by Company and Company agents: to support customer interaction with the Company Web site; to deliver customer purchases; and/or to contact customer again about other Company services and products.
- (d) **Online Advertising.** Some companies that help Company deliver interactive on-line advertising, such as banner ads, may collect and use information about Company's customers to help Company better understand the types of advertising or promotions that are most appealing to Company's customers. After it is collected the information is aggregated so it is not identifiable to a specific individual. If, however, customer would prefer that these companies not collect such information, please contact us by emailing us at community@amraksolutions.com.

4. Disclosure of the Information.

- (a) **Within Corporate Organization.** Company is a multinational organization, with legal entities, business processes, management structures, and technical systems that cross borders. Company may share your personal information within the Company corporate organization, and may transfer the information to countries in the world where Company conducts business. Some countries may provide less legal protection for customer personal information. In such countries Company will still handle customer personal information in the manner described herein.
- (b) **Mergers and Acquisitions.** For the purpose of developing and expanding its business, Company may share, rent, sell or buy business assets. In such transactions, customer information is generally one of the transferred business assets. Also, in the event Company is acquired, customer information will be one of the transferred assets.
- (c) **Agents.** Company employs or engages other companies and individuals to perform business functions on behalf of Company. These persons are provided with personal identifying information required to perform their functions, but are prohibited by

contract from using the information for other purposes. These persons engage in a variety of functions which include, but are not limited to, fulfilling orders, delivering packages, removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing credit card payments and providing customer services.

- (d) **Affiliated Businesses.** Company works closely with affiliated businesses operating web site stores, providing services or selling products on each other's Web sites. These businesses identify themselves to customers. Customer information related to a transaction with an affiliated business is shared with that affiliated business.
- (e) **Marketing Analysis by Third Parties.** Company reserves the right to disclose to third parties personal information about customers for marketing analysis; however, any information disclosed will be in the form of aggregate data that does not describe or identify an individual customer.
- (f) **Disclosure to Governmental Authorities.** Under certain circumstances, personal information may be subject to disclosure pursuant to a judicial or other government subpoenas, warrants or orders.

5. Use of Computer Tracking Technologies.

- (a) **No Tracking of Personal Information.** Company's Web Site(s) are not set up to track, collect or distribute personal information not entered by visitors. Through web site access logs Company does collect clickstream data and HTTP protocol elements, which generate certain kinds of non-identifying site usage data, such as the number of hits and visits to our sites. This information is used for internal purposes by technical support staff for research and development, user analysis and business decision making, all of which provides better services to the public. The statistics garnered, which contain no personal information and cannot be used to gather such information, may also be provided to third parties.
- (b) **Use of Cookies.** Company, or its third party vendors, collects non-identifiable and personal information through the use of various technologies, including "cookies." A cookie is an alphanumeric identifier that a Web site can transfer to customer's hard drive through customer's browser. The cookie is then stored on customer's computer as an anonymous tag that identifies the customer's computer, but not the customer. Cookies may be sent by Company or its third party vendors. Customer can set its browser to notify customer before a cookie is received, giving an opportunity to decide whether to accept the cookie. Customer may also set its browser to turn off cookies; however, some Web sites may not then work properly.
- (c) **Use of Web Beacon Technologies.** Company may also use Web beacon or other technologies to better tailor its Web site(s) to provide better customer service. If these technologies are in use, when a visitor accesses these pages of the Web site, a non-identifiable notice of that visit is generated which may be processed by Company or by its suppliers. Web beacons usually work in conjunction with cookies. If customer does not want cookie information to be associated with customer's visits to these pages, customer can set its browser to turn off cookies; however, Web beacon and other

technologies will still detect visits to these pages, but the notices they generate cannot be associated with other non-identifiable cookie information and are disregarded.

- (d) **Collection of Non-Identifiable Information.** Company may collect non-identifiable information from user visits to the Company Web site(s) in order to provide better customer service. Examples of such collecting include: traffic analysis, such as tracking of the domains from which users visit, or tracking numbers of visitors; measuring visitor activity on Company Web site(s); Web site and system administration; user analysis; and business decision making. Such information is sometimes known as "clickstream data." Company or its contractors may use this data to analyze trends and statistics.
- (e) **Collection of Personal Information.** Company collects personal identifying information from customer during a transaction. Company may extract some personally identifying information about that transaction in a non-identifiable format and combine it with other non-identifiable information, such as clickstream data. This information is used and analyzed only at an aggregate level (not at an individual level) to help Company understand trends and patterns. This information is not reviewed at an individual level.

6. Information Security.

- (a) **Commitment to Online Security.** Company employs physical, electronic and managerial procedures to safeguard the security and integrity of personal information. Personal information is accessible only by staff designated to handle online requests or complaints. All Company agents and contractors with access to personal information on the Company web site(s) are also bound to adhere to Company security standards.
- (b) **No Liability for Acts of Third Parties.** Company will exercise all reasonable efforts to safeguard the confidentiality of customer personal information. However, transmissions protected by industry standard security technology and implemented by human beings cannot be made absolutely secure. Consequently, Company shall not be liable for unauthorized disclosure of personal information due to no fault of Company including, but not limited to, errors in transmission and unauthorized acts of Company staff and third parties.

7. Privacy Policy Changes and Opt-Out Rights.

- (a) **Changes to Privacy Policy.** This privacy notice was last updated on September 19, 2022. Company reserves the right to change its privacy policy statement at any time. A notice of such change will be posted on the Company Web site on page capitanesdelfuturo.org for thirty (30) days prior to the implementation of such change.
- (b) **Opt-Out Right.** Customer has the right at any time to cease permitting personal information to be collected, used or disclosed by Company and/or by any third parties with whom Company has shared and/or transferred such personal information. Right of cancellation may be exercised by contacting Company via e-mail at community@amraksolutions.com, telephone or certified postal mail. After processing

the cancellation, Company will delete customer or prospective customer's personal information from its data base.

8. Access Rights to Data.

- (a) **Information Maintained by COMPANY.** Upon customer's request, Company will provide a reasonable description of customer's personally identifiable information that Company maintains in its data bank. Company can be contacted by e-mail at community@amraksolutions.com, telephone at (323) 920-5752, or certified postal mail at 5023 SW 59th Avenue, Miami, Florida 33155.
- (b) **Corrections and Changes to Personal Information.** Help Company to keep customer personal information accurate. If customer's personal information changes, or if customer notes an error upon review of customer information that Company has on file, please promptly e-mail Company at community@amraksolutions.com and provide the new or correct information.
- (c) **Your California Privacy Rights.** Beginning on January 1, 2005, California Civil Code Section 1798.83 permits customers of Company who are California residents to request certain information regarding Company's disclosure of personal information for their direct marketing purposes. To make such a request, please write to: Amrak Integrated Communications LLC a Florida Limited Liability Company 5023 SW 59th Avenue, Miami, Florida 33155. Within 30 days of receiving such a request, Company will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. Company reserves its right not to respond to requests submitted other than to the address specified in this paragraph.

California's privacy laws require a company to provide notice to California users of their rights to receive information on to which entities their information was shared for marketing purposes.

9. Accountability.

- (a) **Questions, Problems and Complaints.** If you have a question about this policy statement, or a complaint about Company compliance with this privacy policy, you may contact Company by e-mail at community@amraksolutions.com. If Company is unable to resolve your complaint to your reasonable satisfaction or if customer does not receive acknowledgment of an inquiry, customer may elect to proceed by sending via certified mail a request to Amrak Integrated Communications LLC a Florida Limited Liability Company at 5023 SW 59th Avenue, Miami, Florida 33155.
- (b) **Terms of Use.** If customer chooses to subscribe to Company's services, customer's action is hereby deemed acceptance of Company practices described in this policy statement. Any dispute over privacy between customer and Company is subject to the provisions of this notice and to Company's Terms of Use Agreement which is hereby incorporated herein and which can be read at capitanesdelfuturo.org.

CHILDREN’S ONLINE PRIVACY PROTECTION ACT OF 1998 (“COPPA”) PRIVACY POLICY

Effective as of September 21, 2022

We at Amrak Integrated Communications LLC a Florida Limited Liability Company (“Company,” “we,” “us,” or “our”) created this privacy policy (“Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy relates to the information collection and use practices of Company in connection with our online services (the “Services”), which are made available to you through our website located at www.capitanesdelfuturo.org (the “Site”).

We strive to educate parents and kids about how to appropriately safeguard their privacy when using our Services. We are committed to complying with the Children’s Online Privacy Protection Act of 1998 (“COPPA”), which requires us to inform parents and legal guardians about our information collection and use practices. COPPA also requires that we obtain parental consent before we allow children under the age of 13 to access and/or use our Services. We urge kids to check with their parents before entering information through our Site and/or Services, and we recommend that parents discuss with their kids restrictions regarding the online release of Personal Information (as defined below) to anyone they don’t know.

By visiting our Site and/or using our Services, or by permitting your child to use our Services, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

10. Information We Collect.

Personal Information

We do not collect any personal information from you unless you voluntarily provide it to us.

When you sign up to become a user of the Site (a “User”), you will be asked to provide us with certain personal information, such as your first name, last name, and email address. In this Privacy Policy, we refer to this information as “Personal Information.” Other than the online contact information required to obtain parental consent, we do not collect any Personal Information from Users under the age of 13 unless the User’s parent or legal guardian has first provided us with consent for that User to use the Services and disclose Personal Information to us. If you are a User under the age of 13, please do not send any Personal Information to us if we have not obtained prior consent from your parent or guardian. If we learn we have collected Personal Information from a User under the age of 13 without parental consent, or if we learn a User under the age of 13 has provided us Personal Information beyond what we request from him or her, we will delete that information as quickly as possible. If you believe that a User under the age of 13 may have provided us Personal Information in violation of this Privacy Policy, please contact us at community@amraksolutions.com.

Usage Information

Like most websites, we use automatic data collection technology when you visit the Site to record information that identifies your computer, to track your use of our Site, and to collect certain basic information about you and your surfing habits. This information includes information about your operating system, your IP addresses, browser type and language, referring and exit pages and URLs, keywords, date and time, amount of time spent on particular pages, what sections of a website you visit, and similar information concerning your use of the Site and the Services (the “Usage Information”).

We collect this Usage Information by using cookies and pixel tags (also called web beacons or clear gifs). Cookies are small packets of data that a website stores on your computer’s hard drive so that your computer will “remember” information about your visit. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of website users. You can reject cookies by following the directions provided in your Internet provider’s “help” file. If you reject cookies, you may still visit the Site, but may not be able to use some areas of the Site and/or the Services.

We do not collect Personal Information in this way, but if you’ve provided us with Personal Information, we may associate that information with the information that is collected automatically. Automatic data collection may be performed on our behalf by our services providers.

11. How We Use Your Information. We may use your Personal Information and Usage Information in a manner that is consistent with this Privacy Policy and the context of our relationship with you. We will use your Personal Information and Usage Information collected through the Site for the following purposes:

- (a) To identify you when you sign in to your account;
- (b) To respond to your requests and to provide you with the Services;
- (c) To respond to your inquiries and contact you about changes to the Site and/or the Services;
- (d) To send you notices (for example, in the form of e-mails, mailings, and the like) regarding products or services you are receiving, and for billing and collection purposes;
- (e) To send you information we think you may find useful or that you have requested from us;
- (f) To enhance and improve the Site or the Service, such as through personalized features and content;
- (g) To analyze the use of the Site and the Service and the people visiting to improve our content and Site and the Service;
- (h) To investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies, or as otherwise required by law;

- (i) For any other purposes disclosed at the time the information is collected or to which you consent; and
- (j) As otherwise specifically described in this Privacy Policy.

12. Disclosure of Personal Information to Third Parties. We do not disclose your Personal Information to third parties for their direct marketing purposes.

We, like many businesses, sometimes hire other companies to perform certain business-related functions. Examples include mailing information, maintaining databases, hosting services, and processing payments. When we employ another company to perform a function of this nature, we provide them with the information that they need to perform their specific function, which may include Personal Information.

If we or all or substantially all of our assets are acquired, we expect that the information that we have collected, including Personal Information, would be transferred along with our other business assets.

We may disclose your Personal Information and Usage Information to government authorities and to other third parties when compelled to do so by government authorities, at our discretion, or otherwise as required by law, including but not limited to in response to court orders and subpoenas. We may also disclose your Personal Information and Usage Information when we have reason to believe that someone is or may be causing injury to or interference with our rights or property, other users of this Site, or anyone else that could be harmed by such activities.

13. How We Protect Your Information. We take commercially reasonable steps to protect the Personal Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

14. Accessing and Modifying Account Information. You may update the information that is stored in your user account by visiting the website and logging into their portal or by e-mailing us at community@amraksolutions.com.

We strive to help parents ensure that their kids have a safe experience using our Services. Parents or legal guardians can review any Personal Information collected about their child under 13 years of age, have this information deleted, request that there be no further collection or use of their child's Personal Information, and/or allow for our collection and use of their child's Personal Information while withholding consent for us to disclose it to third parties. We take steps to verify the identity of anyone requesting information about a child and to ensure that the person is in fact the child's parent or legal guardian.

- 15. Your Choices.** If you wish to stop receiving promotional e-mails, you may do so by by e-mailing community@amraksolutions.com. You may also choose to unsubscribe from our e-mails by following the instructions in the bottom of the email.
- 16. Links.** The Site may contain content, services, advertising and other materials that link to websites operated by third parties. We have no control over those other sites, and this Privacy Policy does not apply to them. Please refer to the privacy policies of those sites for more information on how the operators of those sites collect and use your Personal Information.
- 17. California Privacy Rights: Shine the Light Law.** Under California Civil Code Section 1798.83, California residents who have an established business relationship with us may choose to opt out of our sharing their contact information with third parties for direct marketing purposes. If you are a California resident and you wish to opt out, please send an e-mail to community@amraksolutions.com.
- 18. Important Notice to Users Outside the U.S.** The Site and the Services are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to the United States. By providing us with any information through the Site or the Services, you consent to this transfer.
- 19. Changes to This Privacy Policy.** This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time and will post any changes on the Site as soon as they go into effect. By accessing the Site or using the Services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.
- 20. How to Contact Us.** If you have questions about this Privacy Policy, please e-mail us at community@amraksolutions.com, "PRIVACY POLICY" in the subject line, or mail us at the following address: 5023 SW 59th Avenue, Miami, Florida 33155.