TomoClub Cookie Policy Last Updated: August 1, 2025

At TomoClub, Inc. ("TomoClub," "we," "us," or "our"), we are committed to ensuring transparency about how we collect and use data through our public informational website, www.tomoclub.org (the "Website"). This Cookie Policy explains how and why we use cookies and similar technologies when you visit our Website. Cookies play an important role in helping us provide, improve, and secure our services, and understanding how these technologies work empowers you to make informed decisions about your online privacy. This Cookie Policy is part of our broader Privacy Policy, and by continuing to use our Website, you consent to the use of cookies and similar tracking technologies as described below.

1. What Are Cookies?

Cookies are small data files that are placed on your device—such as a computer, smartphone, or tablet—when you visit a website. These files are stored by your browser and serve a variety of purposes, from enabling core site functionality to remembering your preferences and measuring how you interact with the website. Cookies are widely used by website owners to make their websites work more efficiently, as well as to provide reporting information. Some cookies are only stored temporarily for the duration of your session (session cookies), while others remain on your device for a longer period (persistent cookies). In addition to cookies, we may use related technologies such as pixel tags, web beacons, and local storage, which serve similar purposes. These technologies help us better understand our users, personalize your experience, and improve the overall performance and security of our Website.

2. Types of Cookies We Use

TomoClub uses several different types of cookies on its Website, each serving a specific function. These cookies may be set by us (referred to as "first-party cookies") or by third parties (referred to as "third-party cookies") whose services we use on our Website. The categories include:

a. Essential Cookies

Essential cookies are required for the Website to function properly. These cookies support basic features such as page navigation, secure access to different areas of the Website, and form submissions. They enable you to log in securely (if applicable), remember language preferences, and maintain session state while navigating the Website. Without these cookies, the Website may not be able to provide services or features that you request, and parts of the site may not function as intended.

b. Performance & Analytics Cookies

Performance and analytics cookies collect information about how visitors interact with our Website. These cookies help us understand which pages are most frequently visited, how much time users spend on the site, where visitors come from, and what features are used

most often. We use tools like Google Analytics and Hotjar to gain valuable insights into user behavior, enabling us to improve our Website design, content, and functionality. These cookies do not collect information that directly identifies a visitor; rather, they help us measure usage trends and evaluate the effectiveness of our communication efforts.

c. Functionality Cookies

Functionality cookies allow the Website to remember the choices you make and provide enhanced, more personalized features. For example, they may remember your language preference, geographic region, or customizations you have made to the layout or settings of the Website. These cookies are used to provide you with a smoother experience and to ensure that your preferences are saved across sessions. While not strictly necessary for basic operation, these cookies improve the way the Website functions and enhances your user experience.

d. Marketing & Tracking Cookies

Marketing and tracking cookies are used to deliver content and advertisements that are more relevant to you and your interests. While we do not use advertising cookies on areas of the Website that are designed for students or within our Education Services, we may use these technologies on our public-facing Website to better understand engagement with promotional content or outreach materials. These cookies may also track browsing habits across different websites if you engage with embedded content. However, we are committed to ethical data use and limit tracking to ensure compliance with applicable privacy laws.

3. Third-Party Cookies

In addition to the cookies set by TomoClub, we may use third-party cookies that are placed by service providers we partner with to enhance our Website functionality and analytics. These cookies are set by domains other than tomoclub.org and are used for a range of purposes, including monitoring traffic, improving content quality, and measuring the effectiveness of campaigns. For example:

- Google Analytics uses cookies to collect data such as the number of visitors to the site, where visitors have come from, and what pages they have visited. This helps us improve our Website performance and user experience.
- Hotjar tracks user interactions, including mouse movements and scrolling, to generate anonymized heatmaps and session recordings that help us understand user behavior on our pages.
- **Social Media Plugins**, if used, may place cookies to support social sharing or login features, and may collect data on how users interact with those features.

We do not control how third-party cookies operate, and we encourage you to review their respective privacy and cookie policies for more information about how they use your information.

4. Managing Your Cookie Preferences

You have the right to manage your cookie preferences and control how cookies are used on your device. Most web browsers provide options to view, delete, or block cookies, and to notify you when cookies are being set. You can typically find these settings in the "Privacy" or "Security" sections of your browser's settings menu. While essential cookies cannot usually be disabled, you can choose to disable all non-essential cookies.

Please note that disabling certain types of cookies may impact your ability to access or use some features of the Website, and some functionality may not work as intended. If you choose to opt out of cookies used for analytics, you can also install tools like the Google Analytics Opt-out Browser Add-on. This tool prevents Google Analytics from collecting information about your Website visits. Additionally, you may manage preferences on cookie banners when first visiting the Website, if such a banner is enabled.

5. Cookies on Our Education Services

TomoClub is deeply committed to student safety and data privacy, especially for minors. As such, we do **not** use advertising cookies, behavioral tracking cookies, or any third-party cookies for marketing purposes within our Education Services platform or in areas of the Website that are specifically designed for students or accessed through a login system. All student and educator-related data collection is governed by our separate **Education Services Privacy Policy**, which complies with relevant student data privacy regulations such as COPPA, FERPA, and local data protection laws. Any information collected through the Education Services platform is used strictly for educational, operational, and support purposes.

6. Changes to This Cookie Policy

We may periodically update this Cookie Policy to reflect changes in our use of cookies, updates to relevant laws or regulations, or modifications to the tools we use to monitor and analyze Website activity. When we make material changes to this Policy, we will update the "Last Updated" date at the top of the document and, where appropriate, provide additional notice on the Website (such as banners or email notifications). We encourage users to review this Policy from time to time to stay informed about how we use cookies and your available choices. Continued use of the Website after updates are posted signifies your acceptance of the updated policy.

7. Contact Us

If you have any questions, concerns, or requests regarding our Cookie Policy or any other aspect of our data practices, we encourage you to get in touch with us. We take privacy seriously and are committed to providing clear and helpful information.

TomoClub, Inc.

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