

TomoClub Website Privacy Policy

Last Updated: August 1, 2025

This Privacy Policy (“Policy”) explains how TomoClub, Inc. (“TomoClub,” “we,” “us,” or “our”) collects, uses, discloses, and protects the personal information of individuals who visit and interact with our public informational website located at www.tomoclub.org (the “Website”). This Policy outlines our practices regarding the type of data we collect, the reasons for collection, and how we handle, store, and protect your personal information. Please note that this Policy only applies to information collected via our public Website and does not cover our Education Services, which include student games, AI literacy modules, professional development for educators, or any platform functionality that requires logging in. Those services are governed by a separate Education Services Privacy Policy, which can be reviewed when accessing the relevant platform or service.

1. Your Consent

By accessing or using the Website, you acknowledge that you have read and understood this Privacy Policy and that you consent to the collection, use, processing, and transfer of your personal information as described herein and in accordance with applicable United States laws. We may update this Policy from time to time to reflect changes in our practices, technologies, legal obligations, or for other operational reasons. If you continue to use the Website after the revised Policy has been posted, your continued use indicates your acceptance of those changes. While we may notify users of significant updates via email or Website banners, it remains your responsibility to review this Policy periodically. You may withdraw your consent at any time, subject to legal and contractual restrictions.

2. What Information We Collect

TomoClub collects personal and non-personal information through various means when you interact with our Website. This includes:

2.1 Information You Provide

We collect personal data that you voluntarily provide when you engage with the Website. This includes your name, email address, organization, job title, or any other details you may submit through our online forms, such as when you request a demo, subscribe to newsletters, contact us for support, or fill out feedback or survey forms. Any data you provide is used strictly for the purpose for which it was submitted, and we do not request sensitive personal data unless it is essential for service delivery.

2.2 Information Collected Automatically

When you browse the Website, we, along with third-party service providers, collect technical and behavioral information automatically through tools such as cookies, analytics scripts, and tracking pixels. This information includes your IP address, browser type, device model, operating system, geographic location, referring URLs, time spent on pages, and interaction patterns (such as clicks or scrolling behavior). We may also gather error logs, crash reports, or diagnostic data to help us troubleshoot issues and enhance user experience.

2.3 Third-Party Sources

In some cases, we receive information about you from third-party sources, such as analytics vendors and advertising partners. These data sources may provide additional insights like demographics or aggregated behavior trends, which we may combine with our own data to better understand Website usage and user preferences. If any of this third-party information is combined with personally identifiable information, we treat the combined data in accordance with this Policy.

3. How We Use Information

The information we collect is used for a variety of business, operational, and legal purposes. These include but are not limited to: providing and maintaining the Website; analyzing and improving Website performance and user experience; responding to your questions, requests, or demo inquiries; sending you newsletters, product updates, or marketing materials if you have opted in to receive them; customizing your Website experience to make it more relevant; detecting and preventing fraudulent activities or security threats; and conducting internal research and analytics to better understand how users engage with our Website. Rest assured, if you choose to unsubscribe from marketing communications, we will still send essential updates related to legal notices, service status, or requested information.

4. Cookies & Tracking Technologies

To enhance user experience, analyze traffic, and support marketing initiatives, we use cookies, pixel tags, and local storage. Cookies help us remember user preferences, display customized content, and measure engagement with specific Website features. We use third-party analytics services such as Google Analytics and Hotjar to gain insights into user behavior, including navigation patterns, dwell time, and click-through rates. These services may set their own cookies on your device. You may disable or delete cookies through your browser settings, but doing so may impair some features or functionality of the Website. Please note that our Education Services do not employ behavioral advertising trackers on content targeted to minors, and we are committed to maintaining a responsible and privacy-conscious environment.

5. Sharing of Information

We are committed to protecting your privacy and do not sell your personal information to advertisers, marketing agencies, or any unrelated third parties. We may share information in limited circumstances, such as with trusted affiliates and service providers who perform functions on our behalf (e.g., analytics, cloud storage, marketing communications) under strict confidentiality and data protection agreements. We may also disclose information in compliance with applicable legal requirements or in response to valid law enforcement requests. Additionally, in the event of a business transaction such as a merger, acquisition, or sale of assets, your information may be transferred as part of that process. Any data that is shared for research or analysis purposes is first anonymized or aggregated so that it cannot reasonably identify an individual.

6. Your Rights & Choices

We respect your rights regarding your personal information. You may request access to your data, ask for corrections or updates, or request the deletion of your data, subject to legal and contractual limitations. You can also choose to opt out of marketing communications at any time by clicking the unsubscribe link in emails or contacting us directly. If you have previously provided consent for specific data uses, you may withdraw that consent where permitted by law. All such requests can be made by contacting us at **privacy@tomoclub.org**, and we will respond in accordance with applicable data protection regulations.

7. Data Retention

We retain personal data only for as long as it is necessary to fulfill the purposes described in this Policy or to comply with legal, regulatory, or contractual requirements. Once your data is no longer needed, we will securely delete or anonymize it in accordance with our data retention protocols. The retention period may vary depending on the type of data, the nature of our relationship with you, and the legal context in which the data was collected.

8. Data Security

TomoClub employs a range of industry-standard technical, physical, and administrative safeguards to protect your personal information from unauthorized access, disclosure, alteration, or destruction. These measures include data encryption during transmission and storage, regular security audits, secure coding practices, and restricted access controls. All employees handling sensitive data are trained in privacy and security protocols. However, no method of transmission over the internet or method of electronic storage is 100% secure. While we make every effort to safeguard your data, we cannot guarantee absolute security, and by using the Website, you accept these inherent risks.

9. Children's Privacy

Our Website is intended for use by individuals aged 13 and older. We do not knowingly collect or solicit personal information from children under the age of 13. If we discover that we have inadvertently gathered data from a child under 13, we will take immediate steps to delete the information. Parents or guardians who believe that their child has provided personal data through this Website should contact us at **privacy@tomoclub.org**, and we will respond promptly to address the concern.

10. California or Other Jurisdiction-Specific Rights

If you are a resident of California or another jurisdiction with specific privacy rights (such as under the CCPA, GDPR, or other regional laws), you may have legal rights to access, correct, delete, or object to the sale of your personal information. To exercise these rights, please contact us using the details provided below. We will respond to such requests in accordance with the laws applicable to your location. Where required, we may need to verify your identity before processing your request to ensure the protection of your data.

11. International Users

Our servers and operations are located primarily in the United States, which means that if you are accessing the Website from outside the U.S., your information may be transferred to, processed in, and stored on servers located in the U.S. By using this Website, you acknowledge and consent to the transfer and processing of your data in the United States, which may not offer the same level of data protection as your country of residence. Nonetheless, we ensure that appropriate safeguards are in place to protect your personal data in accordance with applicable laws.

12. Changes to This Policy

TomoClub may update this Privacy Policy from time to time in response to evolving legal, technical, or business developments. When changes are made, we will update the “Last Updated” date at the top of the Policy and, where required, provide more direct notice (such as via email or Website banners). Your continued use of the Website after the changes are posted constitutes your agreement to the revised Policy. Previous versions of this Policy can be made available upon request.

13. Contact Us

If you have any questions, feedback, or concerns about this Privacy Policy or our data practices, please feel free to contact us. We value transparency and are committed to addressing your concerns promptly and professionally.

TomoClub, Inc.

Email: info@tomoclub.org

Website: www.tomoclub.org

Address: 103 Lakeview Court, King of Prussia, PA, United States