

Website Privacy Policy

Connecticut Association of Schools / Connecticut Interscholastic Athletic Conference

Last Updated: September 23, 2024

The Connecticut Association of Schools, Inc. ("CAS", "we", "us" or "our") is committed to respecting the privacy of our customers and their employees and users. This Privacy Policy describes how our website operates and how we collect, use, and share Personal Information, as defined herein. This Privacy Policy ("Policy" or "Privacy Policy") applies to <https://www.casciac.org/>, <http://cas.casciac.org/>, <https://ciac.fpsports.org/> and other CAS websites, services or products that collect Personal Information and provide a link to this Privacy Policy (the "Sites").

By accessing and utilizing our Sites, you acknowledge to have read and understood this Privacy Policy. Please note, if you elect to not share your Personal Information with us, we may be unable to provide you with certain products, services and functionalities we offer through our Sites.

1. Categories of Personal Information We Collect and How We Collect It

In order to provide you with access to certain services or data within our Sites, we may require that you provide certain Personal Information. The term "Personal Information" as used in this Policy means any information that identifies an individual either alone or in combination with other data. We may also collect information that does not, on its own, identify an individual person. When non-identifying information is combined with other information so that it does identify an individual person, we treat the combination as Personal Information.

We collect the following Categories of Personal Information:

- **Contact Information** (e.g., Name, Street Address, Email Address, Telephone Number)

How we collect it:

We only collect Contact Information when you provide it to us. For example, by submitting your email address or other contact information to receive news and other information from us.

- **Browser & Site Access Information ("Clickstream" Information):** This includes information which may include the name of the domain and host from which you access the Internet; the browser software you use and your operating system; the internet address of the website from which you linked to the Sites; the internet address of the device you used to access the Sites and the general location from which such access occurred; and the times when you accessed the Sites.

How we collect it:

We collect this information automatically when you browse or download content from our Sites using certain data collection tools described more fully under "Cookies and Tracking Activity" below.

We do not collect or process sensitive personal information, such as race or ethnic origin, religious or philosophical beliefs, political affiliations or opinions, genetic or biometric data, health information, information about sexual orientation or history, precise geolocation data, or other information considered to be “sensitive” under applicable privacy laws.

2. How We Use Personal Information

We use Personal Information collected on our Sites to process requests and transactions you make through the Sites and deliver the content or services you may enroll in or request. To do this, it may be necessary to share Personal Information with carefully selected vendors and business partners we work with. We also may use it, together with preferences you indicate, to customize your online experience and to provide you with more relevant information and updates.

We may use or process (or disclose to a service provider to process on our behalf) the Personal Information we collect for one or more of the following business purposes:

- To fulfill or satisfy the reason for which the information was provided.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To improve our Sites and for testing, research, analysis and product development.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including this Policy and our Site Terms and Conditions.
- As necessary or appropriate to protect the rights, property or safety of CAS or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in this Privacy Policy.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different or unrelated purposes without updating this Policy.

Protection of Personal Information. We maintain reasonable administrative, technical, and physical safeguards to protect the Personal Information we collect and process.

Retention of Personal Information. We retain Personal Information for a reasonable period after we no longer need it for the purpose for which it was collected (or for any subsequent purpose that is compatible with the original purpose), taking into account legal requirements that apply to us as well as our legitimate interests. When you provide us your Contact Information to receive information about our products and services or our commercial offers, we will retain the information until you withdraw your consent by unsubscribing or as described below under “Your Individual Rights.”

3. How We Share Personal Information

We **will not sell** your Personal Information. We will process your Personal Information for the purpose it was collected and as described in this Privacy Policy, including as follows:

- With third-parties to whom you authorize us to disclose your Personal Information;
- With our trusted service providers to process Personal Information on our behalf as described above under “How We Use Personal Information”;
- With affiliated entities under common control with us;
- With businesses we partner with to provide services to you or our customers;
- With our auditors, legal advisors, and similar third-party professionals;
- For marketing campaigns conducted by us or a third-party service provider to offer products or services we believe may be of interest to our customers; or
- In connection with any merger, sale of CAS assets, financing, or acquisition of all or a portion of our business.

Our service providers and our affiliates are required to keep confidential and secure the Personal Information received from us substantially in accordance with this Privacy Policy, and they may not use Personal Information for any other purpose other than for the purpose for which we provided it. When we share your Personal Information with service providers we engage to process data on our behalf, including our affiliates, we will ensure those third parties are contractually bound to guarantee the same levels of privacy protection and confidentiality observed by CAS when handling your Personal Information, and as required under applicable laws.

For more information about your rights to decide how we share your Personal Information, please refer to “Your Individual Rights and Choices” below.

We may also share information with third-parties in the following unique circumstances:

- when required by law or to otherwise cooperate with law enforcement activity; or
- when it is necessary to protect our rights or property from fraudulent, abusive, or unlawful activity, to the extent permitted by law.

4. Your Individual Rights and Choices

You may access, verify, update or correct your Personal Information, or have any of your Personal Information deleted as more fully described below. You may also ask us to change your preferences regarding how we use or disclose your information or let us know that you do not wish to receive any further communication from us.

Access to Specific Information and Data Portability Rights. You have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting your Personal Information.
- The categories of third-parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you.

- If requested, we will provide you with a copy of your personal information in a machine-readable format.

You may contact us for such information or to opt out of the sharing of your personal information with third parties for marketing purposes at any time by contacting us as described below under “How to Exercise Your Rights”.

Correction Request Rights. You have the right to request that we correct any inaccurate Personal Information that we collected and retained about you, subject to certain exceptions. You may be able to correct certain information yourself by logging in and updating your online profile if our Sites include such functionality. With respect to Personal Information unavailable for editing within your online profile, once we receive and confirm your verifiable consumer request, we will update (and direct our service providers to update) your Personal Information within our records, unless an exception applies. We may deny your correction request if we cannot verify your identity, or if we determine, under the totality of the circumstances that the contested Personal Information in our possession is more likely than not to be accurate.

Deletion Request Rights. You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it and applicable law.

Non-Discrimination. We will not discriminate against you for exercising any of your rights described in this Privacy Policy. Unless otherwise permitted by applicable law, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

How to Exercise Your Rights.

To exercise the access, data portability, correction, deletion, and other rights described in this Privacy Policy, please submit a verifiable consumer request to us by either:

- Calling us at (203) 250-1111
- Emailing us at jmirable@casciac.org

Only you or a person that you authorize to act on your behalf, as evidenced by registration with the Secretary of State in which you reside, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format.

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We do generally do not charge a fee to respond to your verifiable consumer request. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

5. Cookies & Tracking Activity

"Cookies" are small text files that are automatically placed on your computer or other device when you visit a website. The cookies are stored by the internet browser. The browser sends the cookies back to the website on each subsequent visit, allowing the website to recognize your computer or device. This recognition enables the website provider to observe your activity on the website, deliver a personalized, responsive service and improve the website.

Cookies make the use of our Sites easier by, among other things, saving your preferences. We may also use cookies to deliver content tailored to your interests. Our cookies may enable us to relate your use of our Sites to Personal Information that you previously submitted.

The information we collect with cookies allows us to statistically analyze usage of our Sites, and to improve and customize our content and other offerings. However, we only disclose information collected with cookies to third-parties on an aggregated basis without the use of any information that personally identifies you.

Categories of Cookies We May Use. To support our Sites and our services, we may use one or more of the following cookies throughout our Sites for the purposes set forth below:

- Essential Cookies: These cookies are essential to provide you with services available through our Sites and to enable you to use some of its features. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
- Functionality or Customization Cookies: These cookies allow us to remember choices you make when you use our services. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Sites.
- Analytics and Performance Cookies: These cookies are used to collect information about traffic to our Sites and how users use our Sites and services. The information gathered does not identify any individual visitor. The information is aggregated and therefore anonymous. It includes the number of visitors to our Sites, the websites that referred them to our Sites, the pages that they visited on our Sites, what time of day they visited our Sites, whether they have visited our Sites before, and other similar information. We use this information to help operate our Sites more efficiently, to gather broad demographic information, and to monitor the level of activity on our Sites. We use Google Analytics for this purpose to improve how our Sites operate. Google Analytics uses its own cookies.
 - You can find out more information about Google Analytics cookies here: <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies>.
 - You can find out more about how Google protects your data here: <http://www.google.com/analytics/learn/privacy.html>.
 - To opt out of our Google Analytics Cookies, click here: <https://tools.google.com/dlpage/gaoptout/>

Web Beacons. We may also use other similar technologies on our Sites to recognize and track visitors to our Sites. A web beacon (also known as a “tracking pixel” or “clear GIF”) is a clear graphic image (typically a one-pixel tag) that is delivered through a web browser or HTML e-mail, typically in conjunction with a cookie. Certain email communications you receive from us may contain web beacons. Web beacons allow us, for example, to obtain information such as the IP address of the computer device that downloaded the page on which the web beacon appears, the URL of the page on which the web beacon appears, the time the page containing the web beacon was viewed, the browser type used to view the page and the information in cookies. We use web beacons for activities such as monitoring the effectiveness of our communications, to understand whether users have come to our Sites from an online advertisement displayed on a third-party website, to measure how ads have been viewed and to improve Site performance.

Third-Party Cookies. Please note that third-parties (including, for example, advertising networks and providers of external services like web traffic analysis services) use third-party cookies in connection with your use of their websites and services, over which we have no control. These third-party cookies are likely to be analytical or performance cookies or targeting cookies. These companies may use information about your visits to our Sites and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements.

Additional Information About Cookies. You can find more information about cookies and how they work, what cookies have been set on your computer or mobile device and how to manage and delete them at <http://www.allaboutcookies.org>.

Managing Cookies. You can adjust your computer browser settings so that you are informed when a cookie is being placed on your browser. You can also set your browser to decline or accept all cookies. When you first access our Sites you may receive a message advising you that cookies and similar technologies are in use. By clicking “accept cookies,” you understand and agree to the use of the cookies and use of similar technologies described in this Policy.

Do Not Track. Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating that you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Sites do not currently respond to DNT signals. You can use the range of other tools we provide to control data collection and use, as described above. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

6. Miscellaneous

- a. **Third-Party Sites.** Our Sites may contain links to other websites that operate independently from CAS. Linked websites may have their own privacy policies or notices. If you visit any linked websites, we strongly suggest you review their privacy policy. Any information you provide when you visit a nonaffiliated website is subject to the privacy policies posted on those websites. We are not responsible for the content of any websites that are not affiliated with or owned by CAS, any use of those websites, or the privacy practices of those websites. We may also provide social media features on our Sites that enable you to share information with your social networks and to interact with us on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies or notices and settings on the social media sites with which you interact to make sure you understand the information that could be shared by those sites. You may elect to not use CAS’s social media features and/or adjust your personal settings and preferences to protect your privacy.
- b. **Advertisements Linking to our Sites.** We may hire other companies to place our banner ads on other websites and to perform tracking and reporting activities (“Third-party advertisement servers”). They do not collect personally identifiable information in doing this

work for us, and we do not give any of your Personal Information to them. Third-party advertisement servers are subject to their own privacy policies. If you would like more information about the privacy policies of these third-party advertisement servers, including information on how to opt out of their tracking methods, we refer you to the privacy policies of their websites.

- c. **Applicability to Children.** Our Sites and services are not intended for children. We do not knowingly solicit data online from or market online to children under the age of 13. If you are under the age of 13, you are prohibited from using the Sites without the consent of your parent or guardian.
- d. **Information for Users Outside the United States.** Our Sites are operated in the United States and CAS is not established in any other country, nor does it target citizens in other countries with respect to the Sites. If you are located in another jurisdiction, please be aware that information you provide to us will be transferred to, stored and processed in the United States. By using our Sites or providing us with any information, you consent to this transfer, processing, and storage of your information in the United States, a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you reside or are a citizen. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. However, no system is completely secure or error-free. We do not, and cannot, guarantee the complete security of your information.
- e. **Changes to this Policy.** We may change this Privacy Policy from time to time at our discretion. We will indicate at the top of the Privacy Policy when it was most recently updated. We will not use your Personal Information in ways that differ materially from this Privacy Policy without prior notice to you, and in no event will we use your Personal Information in ways prohibited by law.
- f. **Contact Us.** To exercise any of your rights under this Privacy Policy or for any questions regarding this Policy, we encourage you to contact us by either calling (203)525-1133 or emailing jmirabelle@casciac.org.