

# Privacy Policy

The SIFMA Foundation has created this statement so that you understand our information gathering and dissemination practices both on and off the website.

The SIFMA Foundation is an educational, charitable (501c3) organization that is dedicated to advancing financial readiness for elementary, middle and high school students in schools and other youth serving nonprofits nationwide. Launched in 1977, the SIFMA Foundation offers programs and tools such as The Stock Market Game that equip educators to advance their students' financial capability. To date, our programs have enabled 18 million students to prepare effectively for their financial futures, improve their academic and life skills, and gain exposure to opportunities for college and careers.

## Children

**In order to respect the privacy of minors, SIFMA Foundation does not knowingly collect, maintain or process Personal Information submitted online via our Internet Services by anyone under the age of 18.**

## What Personal Information We Collect

The SIFMA Foundation's Stock Market Game website ([www.stockmarketgame.org](http://www.stockmarketgame.org)) is a non-commercial, educational website. It is designed to enable educators to access curricula and enriching educational simulations for their students and is meant solely for the purpose of reinforcing positive outcomes for youth development.

The website does not collect any personal information about you (the user), unless you specifically and knowingly provide such information when you register for or participate in our programs. In this case, we request basic contact information (such as name, e-mail address, phone, and school address) for the purpose of providing you access to the password protected curricula and student simulations, and we request the grade levels, school type, and subject area that are of interest to you.

We retain varying amounts of the information you provide us only for as long as necessary for our legitimate interests in pursuing the educational support purposes outlined in this Privacy Policy.

## **When We Collect It**

Submitting personal information is not required to use the SIFMA Foundation website except to access password-protected portions of the educational website. We only collect information from you, as stated above, when you knowingly and voluntarily provide this information in registering for SIFMA Foundation's educational programs.

## **What We Do With It**

We use your information to generate customized teacher and student accounts and their accompanying passwords so that you may safely and accurately access teaching materials, rubrics and lesson plans and your students may access the interactive educational online activities that support The Stock Market Game investment simulation.

For United States residents, we will send you information specific to your program participation, but you can opt-out of any electronic mailings. We maintain compliance with marketing requirements outlined in the CAN-SPAM Act, the Telephone Consumer Protection Act, and other applicable law.

For European Union and Canadian residents, we undertake marketing only with your expressive affirmative consent and in compliance with applicable data privacy laws. EU and Canadian residents are added to the marketing lists only when they provide express affirmative consent consistent with applicable data protection laws, so be sure to let us know what information is most useful.

## **Disclosure and Transfer of Personal Information**

We may on rare occasion disclose limited personal information you provide via registration to outside companies that help us bring you the noncommercial, educational services we offer. For example, we may work with an outside company to: (a) manage our databases; (b) assist us in distributing our program-related emails; (c) assist us with direct marketing and data collection; (d) provide us storage and analysis; (d) provide fraud prevention; and (e) provide other services designed to assist us in maximizing our program reach and positive educational impact. We require that these outside companies agree to keep confidential all information we share with them and to use the information only to perform their obligations in our agreements with them.

We may disclose information to comply with applicable laws and regulations, such as to respond to a subpoena or similar legal process, to protect against misuse or unauthorized use of our website, to limit our legal liability, and to protect our rights or to protect the rights, property, or safety of visitors of this website or the public, and to otherwise cooperate with law enforcement or regulatory authorities.

We may transfer or share a copy of your registration information in the event that the SIFMA Foundation or one of its properties goes through a business transition, such as a merger or being acquired by another organization. You will be notified via email or prominent notice on our website prior to a change of ownership or control of your personal information, if your personal information will be used contrary to this policy.

Nothing in this Privacy Policy is intended to interfere with the ability of the SIFMA Foundation to transfer all or part of its activities or assets to an affiliate or independent third party at any time, for any purpose, without any limitation. The SIFMA Foundation specifically reserves the right to transfer or share, as needed, with that third party a copy of personally identifiable information collected from its websites.

### **Cookies and Other Tracking Technologies**

The SIFMA Foundation uses Google analytics; you may turn off Google analytics tracking and disable cookies in your browser settings. Google Analytics does not share actual IP address information with Google Analytics customers.

We may also track users by IP address and by Cookies (cookies can be disabled in your browser settings) for broad demographic data, as well as to help make sure that we are delivering the information you want.

“Do Not Track” signals are options available on your browser to tell operators of websites that you do not wish to have your online activity tracked. Our websites operate no differently if these “Do Not Track” signals are enabled or disabled. Our Internet Services do not allow any third parties to collect Personal Information about your online activities over time or across websites for their own purposes.

### **California Privacy Rights**

Under California Civil Code Section 1798.83, California customers are entitled to request information relating to whether a business has disclosed personal information to any third parties for the third parties’ direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like to make such a request, please submit your request in writing at the address information below.

### **EU Data Storage, Access, The Right to be Forgotten, and Dispute Resolution**

We store personal data for different periods of time consistent with the purposes for which they were originally collected, as subsequently further authorized, or when required or allowed under applicable law.

Individuals in Europe have certain data subject rights which may be subject to limitations and/or restrictions. These rights may include the right to: (i) request access to and rectification or erasure of their personal data; (ii) obtain restriction of processing or to object to processing of their personal data; and (iii) the right to data portability. If you wish to exercise one of the above mentioned rights, please send us your request via email to: [smg@sifma.org](mailto:smg@sifma.org). Individuals in Europe may also have the right to lodge a complaint about the processing of their personal data with their local data protection authority.

In addition to the rights above, the SIFMA Foundation is committed to providing all individuals with access to their personal data. If you believe that the SIFMA Foundation may be processing data about you and wish to have access to that information, we can provide you with that data or at least an explanation of why we cannot do so in the particular context, such as if responding to the request would be unreasonably expensive. Please also let us know if you have any questions, concerns, disputes, or issues. We are always open to dialogue to resolve issues. If your concerns cannot be resolved, we can enter into appropriate third-party neutral dispute resolution. If you need to reach us about a privacy or data protection issue, please contact us at the information below.

### **How to contact us about privacy**

If you have any questions about our privacy policy, the information we have collected from you online, the practices of this site or your interaction with this website, please send email to: [smg@sifma.org](mailto:smg@sifma.org) or call 212.313.1000 or write us at 120 Broadway, New York, NY 10271.