

**PRIVACY POLICY**  
**THE USA FENCING ASSOCIATION PRIVACY POLICY**

**PLEASE READ THIS PRIVACY POLICY ("PRIVACY POLICY") CAREFULLY BEFORE USING THIS WEBSITE, APPLICATION OR ANY OTHER USFA PRODUCT OR SERVICE.**

The USA FENCING ("USFA") is a not-for-profit 501(c)(3) organization that produces and publishes usafencing.org, and member.usafencing.org/. The USFA may partner with certain companies ("Other Companies") to produce mobile application versions of these websites as well as related USFA application offerings including but not limited to event and coaching applications. The foregoing collectively comprise the "USFA Platform."

This Privacy Policy explains the types of information we collect via the USFA Platform which link to this Privacy Policy. This Privacy Policy also describes how we may use that information, when and to whom it may be disclosed, and the choices we offer for you to manage the personal information we collect related to your use of the USFA Platform. This Privacy Policy does not apply to information about the USFA's employees, contractors, agents, and job applicants in their capacity as such or information collected about you in your capacity as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, nonprofit or other legal entity.

The USFA Platform may link to services or properties operated by Other Companies (e.g., the International Olympic Committee, International Paralympic Committee, and International Fencing Federation) which are not subject to this Privacy Policy. You should familiarize yourself with the privacy practices of any Other Company whose services or properties you utilize and direct any concerns to that Company's respective administrator.

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**1. Personal Information We Collect**

While using the USFA Platform, we may ask you to provide us with and we may automatically collect certain information about you, including when you visit our website, access our content, submit a donation, create a membership, enroll in mailing lists, or otherwise communicate or transact with us through the USFA Platform.

Additionally, you may choose to provide information when you register for updates. If any of the foregoing is information that is linked or reasonably linkable to an identified or identifiable individual it will be deemed "Personal Information." We may also collect other personal information that is not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

The categories of Personal Information we collect, the sources from which we collect them, and the purposes for which we use each category are described below.

**Categories of Personal Information We Collect:**

- **Contact Information** - such as your or your organization's name, email address, phone number, mailing address, and social media handle. Collected directly from you when you create an account, register for

membership, or contact us. Used to provide the USFA Platform, respond to your requests, send communications, and comply with legal obligations.

- **Demographic Information** - such as date of birth, email, and zip code. Collected directly from you during registration. Used to administer membership, verify age eligibility (including for minors' programs), improve the Platform, and for marketing and advertising.
- **Membership and Participation Information** - such as membership status, membership type, event registrations, competition history, rankings, and coaching credentials. Collected directly from you and from affiliated fencing organizations. Used to administer membership and events, publish competition results, and operate the Platform.
- **Payment Information** - such as payment amounts and payment method used to complete transactions in-venue at a USFA event or through ticket platforms and box offices. Payment processing services connected with your use of the USFA Platform may be provided by us or a third-party payment processor. Collected directly from you during transactions. Used to process payments and prevent fraud.
- **Transaction History** - such as purchase activity through the USFA Platform or a USFA event. Collected directly from your transactions and from payment processors. Used to provide the Platform, improve services, and for marketing.
- **Marketing Information** - such as any marketing or communications preferences and details about how you engage with our communications. Collected directly from you and through automated tracking. Used to send relevant communications and for advertising.
- **Survey and Sweepstakes Responses** - such as the information you provide in response to our surveys, questionnaires, sweepstakes, or contests. Collected directly from you. Used to improve services and for marketing.
- **Online Activity Information** - such as the website you visited before browsing to the USFA Platform, pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access. Collected automatically through cookies and similar technologies. Used to improve the Platform and for advertising.
- **Browser and Device Information** - used to access our USFA Platform, such as browser type and settings, device type and settings, operating system, general location information such as city, state or geographic area, and mobile network information including carrier name. We also collect information about the interaction of your browsers and devices with our USFA Platform, including IP metadata, crash reports, and system activity. Collected automatically. Used for security, fraud prevention, and advertising.
- **Communications** - such as the information associated with your requests or inquiries, including for support, assistance, or event/ticket information, and any feedback you provide when you communicate with us. Collected directly from you. Used to respond to your inquiries and improve services.

#### **Sources of Personal Information:**

- **Personal Information You Provide.** We collect personal information when you voluntarily submit it to us, such as when you fill out a form on the USFA Platform, participate in a survey, and including through offline interactions like when you attend one of our events, or communicate with us.
- **Personal Information Automatically Collected.** The USFA, our service providers, and our advertising partners may automatically log information about you, your computer, or mobile device, and your activity over time on our USFA Platform. Like many online services, we use cookies and similar technologies to facilitate some of the automatic data collection described above, which may include cookies, web beacons, local storage, and session replay technologies.
- **Personal Information Obtained at our Facilities.** We collect personal information when you visit one of our venues as necessary to operate our venue and the respective event, to provide our services to you, and as otherwise described in this Privacy Policy or as noticed in-venue.
- **Personal Information Obtained from Third Parties.** In some circumstances, we may collect personal information about you from third parties or publicly available sources, such as our service providers, data analytics partners, third-party ticketing partners for our events, box offices, operating systems and platforms, social media platforms, data providers, or event promoters, producers, or sponsors. We may merge or combine such personal information with the personal information we collect from you directly or automatically.

## **2. How, and for What Purpose, We Use the Personal Information We Collect or Receive**

We use the information we collect and receive for the following general purposes:

- **Comply with Laws and Regulations.**
- We comply with applicable laws, lawful requests, and legal processes such as responding to subpoenas or requests from government authorities. We verify your identity for authentication and security purposes when you exercise your rights. We may contact you with legal notices and other information that may be relevant to your use of the USFA Platform. We may also disclose your personal information in accordance with your prior direction or, in some cases, we may specifically ask you for your consent to collect, use, or share your personal information, such as when required by law.
- **Compliance, Fraud Prevention, and Safety.**
- We may use personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) maintain the safety, security, and integrity of the USFA Platform, our facilities, and our products, business, databases, and other technology assets; (b) protect our, your, or others' rights, privacy, safety or property; (c) audit our internal processes for compliance with legal and contractual requirements and internal policies; (d) enforce the terms and conditions that govern the USFA Platform; and (e) prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.
- **Improve the USFA Platform.**
- We customize and personalize your use of the USFA Platform. We maintain and administer the USFA Platform, perform business analyses, and improve the quality of our business, the USFA Platform, and other products and services we offer. We find ways to improve the USFA Platform and services offered, including to study and improve the features and functionality of the USFA Platform and our business.
- **Provide the USFA Platform.**
- We may publish comments, images, video submissions and other information posted in our interactive online features that are voluntarily submitted. We may provide you with the products, promotions, services, newsletters, and information you request and respond to correspondence that we receive from you.
- **Marketing and Advertising.**
- We may work with third-party advertising companies and social media companies to help us advertise our business and to display ads for the USFA Platform, products, and events. These companies may use cookies and similar technologies to collect information about you over time and from your activities across non-affiliated websites, applications, or online services. These companies may use that information to serve ads that they think will interest you. In addition, some of these companies may use hashed customer lists that we share with them to deliver ads to you and to similar users on their platforms. You can learn more about your choices for limiting marketing and advertising in the "Your Choices and Member Rights" section below.

### 3. To Whom We Disclose the Personal Information We Collect or Receive

We are committed to maintaining your trust, and we want you to understand how we may share the information we collect. We will not sell, lease, publish, disclose or share your personal information with or to anyone else, except as set forth in this Privacy Policy. We will not sell, rent, or otherwise share your personal data to third parties for promotional/marketing purposes. However, we may share your information with service providers for business operations and/or legal authorities when required by law or to protect our rights. You can opt out of receiving text messages at any time by texting STOP to any text you receive from us. Mobile opt-ins are excluded from third party sharing for marketing purposes.

- **Member Organizations and Affiliates.** We may share your information with our member organizations and other affiliated entities for a variety of purposes, including business, operational, and marketing purposes.
- **Service Providers.** We may share your information with third-party service providers that perform certain functions or services on our behalf, such as to host the USFA Platform, manage databases, host a store or other e-commerce on the USFA Platform, perform analyses, or send communications for us. Service providers are permitted to use your information only for the purpose of providing services to us.
- **Select Business Partners and Sponsors.** We may share your information with select business partners and event sponsors so that they can provide you with special offers, promotional materials, and other materials

that may be of interest to you. These partners and sponsors may include fencing equipment suppliers, sports apparel companies, and other organizations that support USFA events and programs. You have the right to opt out of your information being shared with business partners and sponsors for their direct marketing purposes. To opt out, please see the "Your Choices and Member Rights" section below. Please note that the USFA is not responsible for the privacy practices of these business partners and sponsors, which may use your information for their own purposes.

- **Other Parties When Required By Law or as Necessary to Protect the USFA Platform.** We may disclose your information to third parties in order to protect the legal rights, safety, and security of the USFA, our member organizations and the users of our USFA Platform; enforce our Terms of Use; prevent fraud (or for risk management purposes); and comply with or respond to law enforcement or legal process or a request for cooperation by a government or other entity.
- **Third Parties; Advertising and Analytics.** We disclose information to third parties such as advertisers, data brokers and analytics providers, in order to serve advertisements on our and others' behalf across the internet and for analytics-related purposes. These parties may act as our service providers, or in certain contexts, independently decide how to process your information. For more information on advertising, marketing, and analytics, see the "Your Choices and Member Rights" section below.
- **Direct Marketing.** We may send you USFA related or other direct marketing communications as permitted by law, including materials, updates, information, special offers, and promotional material from us and our business partners. You may opt out of our marketing communications as described in the "Your Choices and Member Rights" section below.
- **Other Parties With Your Consent.** We may share information about you with third parties when you consent to such sharing, including when you post information to a user profile or a public area of the USFA Platform, such as a chat room, forum, blog, or other community tool.
- **Anonymous Information.** We may disclose aggregated, anonymous information with third parties for any purpose except as prohibited by law. This information is not linked to personal information that can identify you or another individual person.

#### 4. Your Choices and Member Rights

You have a number of choices and rights regarding how we handle information we collect or receive about you.

- **Your Choice Not to Share Your Information or Receive Promotional Messages.** You can opt-out of receiving promotional emails from us at any time by (i) modifying your registered user information on the USFA Platform; (ii) sending us an email at [information@usafencing.org](mailto:information@usafencing.org); (iii) contacting us by mail at USA Fencing, 210 USA Cycling Point, Suite 120, Colorado Springs, Colorado 80919, Attn: USAFencing.org; or (iv) following the removal instructions in the communication that you receive. Your opt-out is limited to the email address used and will not affect subsequent subscriptions. Please note that you cannot opt-out of non-promotional emails, such as those about your account, transactions, donations, servicing or our ongoing business relations.
- **Your Choice to Opt Out of Sponsor and Partner Marketing.** You have the right to opt out of your information being shared with our business partners and sponsors for their direct marketing purposes. To exercise this right, please email us at [information@usafencing.org](mailto:information@usafencing.org) with the subject line "Opt Out of Partner Marketing," or write to us at USA Fencing, 210 USA Cycling Point, Suite 120, Colorado Springs, Colorado 80919. We will process your request within a reasonable time. Please note that opting out of partner marketing will not affect our sharing of your information for other purposes described in this Privacy Policy.
- **Your Right to Access, Correct, or Delete Your Information.** If you wish to access, modify, verify, correct, or delete any of your Personal Information collected through the USFA Platform, you may: (i) edit your registered user information on the USFA Platform; (ii) email us at [information@usafencing.org](mailto:information@usafencing.org) with the subject line "Member Privacy Request"; or (iii) write to us at USA Fencing, 210 USA Cycling Point, Suite 120, Colorado Springs, Colorado 80919, Attn: Privacy Request. We will respond to verifiable requests within 45 days. In some cases, we may not be able to fully honor your request, such as where we are required to retain information by law or for legitimate business purposes. In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the USFA Platform. We are under no obligation to store such Personal Information

indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information.

- **Your Choice Not to Receive Targeted Ads.** If you do not want to receive targeted advertising, you may opt out of some network advertising programs that use your information by visiting the NAI Opt-out page at <http://www.networkadvertising.org/choices/>. Please note that even if you choose to opt out, you will still see advertisements while you are browsing online; however, the advertisements you see may be less relevant to you. Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities.
- **"Do Not Track" Signals.** Please note that while you may have the opportunity to opt-out of targeted advertising and you may be able to control the use of cookies through your web browser as described above, some web browsers may also give you the ability to enable a "do not track" setting. Because there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, the USFA currently does not take action in response to these signals.
- **Cookies.** Most browsers let you remove or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the USFA Platform and our site may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).
- **Communication Preferences.** You may manage your communication preferences at any time by logging into your USFA account and adjusting your notification settings, or by contacting us at [information@usafencing.org](mailto:information@usafencing.org).
- **Privacy Complaints.** If you believe your privacy rights have been violated or have a complaint about our privacy practices, you may submit a complaint to us by emailing [information@usafencing.org](mailto:information@usafencing.org) with the subject line "Privacy Complaint." We will acknowledge your complaint promptly and investigate and respond within a reasonable time.

## 5. Notice to Colorado Residents

This section applies only to Colorado residents and supplements the practices described in this Privacy Policy. It describes how we collect, use, and share personal information of Colorado residents, and their rights with respect to their personal information. For purposes of this section "personal information" means "personal data" as such term is defined in the Colorado Privacy Act ("CPA") but does not include information exempted from the scope of the CPA.

**Your Colorado Privacy Rights.** Under Colorado law, you may request the rights listed below. Please note, these rights are not absolute, and, in some cases, we may not be able to honor your request, such as when a legal exemption applies or if we are not able to verify your identity.

- **Access.** You can request that we confirm whether we process your personal information and to access that personal information.
- **Correct.** You can ask us to correct inaccurate personal information that we maintain about you.
- **Delete.** You can ask us to delete personal information provided by or obtained about you.
- **Portability.** You can request to obtain a copy of personal information in a portable and, to the extent technically feasible, readily usable format.
- **Opt-out of "sales" and targeted advertising.** If we "sell" your personal information or engage in "targeted advertising" according to Colorado law, you can opt-out.

### How to Exercise Your Colorado Privacy Rights.

- **Right to access, data portability, correct, or delete.** You can request to exercise your access, data portability, correct or deletion rights by emailing us at [information@usafencing.org](mailto:information@usafencing.org) with the subject line "Colorado Consumer Request" or by clicking the link on the bottom of the web page titled "Your Colorado Privacy Choices."
- **Right to opt-out of "sales" or targeted advertising.** You can request to opt-out of "sales" and targeted advertising related to your email address by emailing us at [information@usafencing.org](mailto:information@usafencing.org) with the subject line "Colorado Consumer Opt-Out Request." If you wish to opt out in desktop and mobile browsers on a

particular device, you can instruct your browser and device to decline or delete cookies through your browser and device settings. You can also visit the Digital Advertising Alliance at <https://digitaladvertisingalliance.org/> or Network Advertising Initiative at <https://thenai.org/> for desktop. To opt out of targeted advertising through mobile applications, please visit App Choices.

**Authentication Process.** We reserve the right to confirm your identity to process your requests. This is a security measure to help us ensure we do not disclose information to a person who is not entitled to receive it. The identity verification process may vary depending on how you submit your request. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

**Authorized Agents.** Consistent with Colorado law, you may designate an authorized agent to make an opt-out request on your behalf. If you do so, we may require proof of your identification, the authorized agent's proof of identification, and any other information that we may request in order to verify the request, including evidence of valid permission for the authorized agent to act on your behalf.

**Right to Appeal.** If we decline to take action on your request, you may appeal such refusal by emailing us at [information@usafencing.org](mailto:information@usafencing.org) within a reasonable time period after we send you our decision.

## 6. Data Security

We have adopted security procedures and technical and organizational measures to help protect against loss, misuse, and unauthorized access to the information we collect and receive. Please note that no data transmission or storage can be guaranteed to be 100% secure. As a result, while we strive to protect the information we maintain, we cannot guarantee or warrant the security of any information you disclose or transmit to our USFA Platform and cannot be responsible for the theft, destruction, or inadvertent disclosure of information.

You are responsible for maintaining the confidentiality of your account password and for any access to or use of the USFA Platform using your password, whether or not authorized by you. Please notify us promptly of any unauthorized use of your password or account or any other breach of security.

**Security Incident Response.** For purposes of this Privacy Policy, "sensitive personal information" includes payment card information, government-issued identification numbers, account credentials, and health or financial information. In the event of a security incident involving unauthorized access to or disclosure of sensitive personal information, we will notify affected individuals as required by applicable law and consistent with our internal incident response targets. Notification will be provided through channels appropriate to the circumstances, which may include email, postal mail, or notice posted on our website. We will also take steps to contain the incident, assess its scope, and implement measures to prevent recurrence.

## 7. Children's Privacy

Our USFA Platform is directed to a general audience, including youth athletes and their families. We are committed to complying with the Children's Online Privacy Protection Act ("COPPA") and other applicable laws governing the collection of information from children.

**Children Under 13.** We do not knowingly collect, use, or disclose personal information from children under the age of 13 without verifiable parental consent. If you are under 13 years of age, please do not submit any personal information through our USFA Platform without the express consent and participation of a parent or guardian.

**Parental Consent Process.** When a child under the age of 13 seeks to create an account or provide personal information, we require the parent or legal guardian to provide verifiable consent before we collect, use, or disclose the child's personal information. Parental consent will be obtained through one of the following methods: (i) a consent form signed and submitted by the parent or guardian; (ii) a telephone call with a USFA representative; or (iii) another method that reasonably ensures the consenting individual is the child's parent or legal guardian.

**Parental Rights Regarding Children's Information.** Parents and legal guardians of children under 13 may: (i) review the personal information we have collected from their child; (ii) request correction of inaccurate information

about their child; (iii) request deletion of their child's personal information; and (iv) withdraw consent for further collection or use of their child's information. To exercise these rights, parents or guardians may contact us at [information@usafencing.org](mailto:information@usafencing.org) with the subject line "COPPA Parental Request," or write to us at USA Fencing, 210 USA Cycling Point, Suite 120, Colorado Springs, Colorado 80919, Attn: Privacy Request. We will respond to such requests within a reasonable time and may require verification of your identity and relationship to the child.

**Youth Members Ages 13-17.** For members between the ages of 13 and 17, we recommend that parents and guardians review this Privacy Policy with their child. Parents and guardians of members in this age range may contact us regarding the member's information using the contact information provided in the "Contact Us" section below.

**Deletion of Children's Information.** If we learn that we have collected personal information from a child under age 13 without verifiable parental consent, we will take reasonable steps to delete that information as promptly as practicable. If you believe we may have collected information from your child in error, please contact us immediately at [information@usafencing.org](mailto:information@usafencing.org).

## 8. Links to Third Party Sites and Services

The USFA Platform may contain links to other websites or online services that are operated by third parties and that are not under the direct control of the USFA. Such links do not constitute an endorsement by the USFA of those other websites, the content displayed therein, or the persons or entities associated therewith. This Privacy Policy does not apply to such third-party content. We encourage you to review the privacy policies of these third-party websites or services.

## 9. Users Outside the U.S.

The USFA is based in the United States, and, regardless of where you use our USFA Platform or otherwise provide information to us, the information may be transferred to and maintained on servers located in the U.S. Please note that any information we obtain about you will be stored in accordance with U.S. privacy laws, regulations, and standards, which may not be equivalent to the laws in your country of residence. By using our USFA Platform, you consent to this collection, transfer, storage, and processing of information to and in the U.S.

## 10. Data Retention and Deletion

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, to comply with our legal obligations, resolve disputes, and enforce our agreements. The specific retention periods we apply vary depending on the category of personal information and the purpose for which it was collected:

- **Membership and Participation Information.** Retained for the duration of your active membership and for a period of seven (7) years following the termination or expiration of membership, to satisfy legal, regulatory, and operational requirements.
- **Contact and Demographic Information.** Retained for the duration of your relationship with us and for a period of five (5) years following your last interaction with the USFA Platform, unless a shorter period is required by law.
- **Payment and Transaction Information.** Retained for seven (7) years following the date of the transaction, as required for tax and financial recordkeeping purposes.
- **Marketing and Communications Information.** Retained until you opt out of communications or request deletion, after which we retain only a record of your opt-out to honor your preference.
- **Children's Information (under age 13).** Retained only as long as necessary to provide the requested service or as consented to by the parent or guardian, and deleted promptly upon parental request or upon our determination that the purpose for collection has been fulfilled.
- **Online Activity, Browser, and Device Information.** Retained for up to two (2) years, after which it is aggregated or anonymized.

When personal information is no longer needed for the purposes described in this Privacy Policy and no legal obligation requires its retention, we will delete or anonymize it using secure methods. If complete deletion is not immediately practicable, we will continue to protect the information and limit further use until deletion is possible.

## **11. Privacy Policy Updates**

We may modify this Privacy Policy at any time by posting revisions to the USFA Platform and revising the effective date on this policy, or by providing other appropriate notice. We encourage you to periodically review this statement to be informed of how we are protecting your Personal Information. Where required by applicable law, we will provide advance notice of material changes.

## **12. Contact Us**

If you have any questions about this Privacy Policy, wish to submit a privacy request or complaint, or have concerns about how your information is handled, please contact our Privacy team using any of the following methods:

- **Email:** [information@usafencing.org](mailto:information@usafencing.org)
- **Mail:** USA Fencing, 210 USA Cycling Point, Suite 120, Colorado Springs, Colorado 80919, Attn: Privacy

For specific request types, please use the following subject lines in your email:

- General privacy questions: "Privacy Inquiry"
- Access, correction, or deletion requests: "Member Privacy Request"
- Opt out of partner/sponsor marketing: "Opt Out of Partner Marketing"
- Colorado Consumer requests: "Colorado Consumer Request" or "Colorado Consumer Opt-Out Request"
- Parental/COPPA requests: "COPPA Parental Request"
- Privacy complaints: "Privacy Complaint"
- Mobile opt-out instructions: "Mobile Opt Out" or text STOP to unsubscribe

We are committed to working with you to obtain a fair resolution to any complaint or concern about privacy.