

# Children's Privacy Policy

## OPERATOR OF THIS WEB SITE

The operator of this Web site and the VIR Kids Club is VIRginia International Raceway, LLC; Connie Nyholm; Kathy Stout; VIR Operations, LLC; Blue Chip Racing Resorts, LLC; The Villas at South Bend, LLC; The Lodge at VIR, LLC; South Bend Farm, Inc.; Patriot Racing, LLC; ViJo, LLC and VMTP, LLC (collectively the "VIR Entities"). For information, please contact us at 434-822-7700

## CHILDREN'S PRIVACY POLICY

In compliance with federal law, we inform Parents and legal guardians (collectively, "Parents") about how we collect, use, and disclose personal information, as defined below, from children up to 12 years of age (each, a "Child" or collectively, "Children").

Prior to collecting the personal information of any Child we first obtain the consent of that Child's Parents. The consent form from Parents will include a notice describing this Children's Privacy Policy and will ask for the Parent's consent to our collection and use of personal information from or about her/his Child. If the consent form is not completed by the Parent and not returned properly, the Child will not be able to access those of our activities requiring registration and we will not collect any personal information from that Child.

VIR does not have any plans or intentions to disclose any information about Children to third parties for noninternal purposes. We recognize a Child's Parent has the option to consent to our collection and use of her/his Child's personal information without consenting to the disclosure of that information to third parties for outside use by a third party. If at a future time VIR changes its plans and desires to disclose information to third parties for their outside use, VIR will first seek the consent of Parents for such use of their Children's personal information. If at any time disclosure is necessary to make available a service which has been requested and a Parent has not provided consent for such disclosure, then the Child will not have access to such service.

The personal information about a Child that is collected online in connection with the VIR Kids Club, includes full name, home address, email address, telephone number and other similarly related information that would allow someone to identify or contact the Child. In addition, the personal information collected might include preferences of the Child such as favorite driver, favorite games, hobbies and other interests and activities the Child enjoys; in addition, our web-based systems collect information through cookies and other types of online tracking mechanisms. Usage of a cookie is in no way linked to any personally identifiable information while on our site.

## INFORMATION WE COLLECT AND HOW; WHAT WE USE IT FOR

In registering for the VIR Kids Club, we collect the following information from a Child during the registration process:

- Parent's Full Name
- Parent's Email Address
- Mailing Address
- Phone Number
- Child's Full Name
- Child's Birth Date

We collect birth dates to validate the Child's age and to send birthday post cards to all members in the VIR Kids Club. Except for the items of information set forth above, we do not collect any other personal information from Children during our registration process.

With Parental consent, we collect an email address to send the Child and Parent emails related to a subscription or newsletter and, as mentioned above, to send a Happy Birthday email to a Child as a benefit of membership in the VIR Kids Club.

We will not require a Child to disclose more information than is reasonably necessary to participate in an activity as a condition of participation.

We use the information we collect for internal business purposes only; we will not provide any Child's personal information to a third party except to the extent such information is used by a third party strictly in support of our internal operations. Our internal purposes include marketing offers, tickets or promotions back to the Child, notifying contest winners, and/or to give credit to a Child for work she/he has created.

#### **HOW A PARENT GIVES HER/HIS CONSENT**

A Parent must consent to her/his Child being entered into the VIR Kids Club. A Child may make an initial inquiry into membership. Upon receiving the Child's request for membership, VIRginia International Raceway sends an email to the Parent informing her/him of the Child's request for membership and explaining that the Parent's consent is required for her/his Child's membership in the VIR Kids Club and our collection of certain personal information of the Child.

If a Parent denies consent, we will delete all information about the Child until another request is made. If the Parent grants consent, the Child's membership request into the VIR Kids Club will be processed and the Parent will receive a follow-up email stating the membership has been confirmed.

#### **DISCLOSURE OF INFORMATION**

We do not share Children's personal information with anyone other than those who provide support for the internal operations of the Web site and our agents (e.g., contractors who provide fulfillment services or technical support to the Web site).

When necessary, however, will we transfer or otherwise disclose personal information in response to judicial process, to comply with legal requirements, and, as permitted under provisions of law, to provide information to law enforcement agencies or in connection with an investigation on a matter related to public safety

## **SECURITY OF INFORMATION**

VIRginia International Raceway's Web site takes precautions to secure all personally identifiable information by means of physical, electronic, and procedural safeguards.

## **CHANGES TO THIS PRIVACY STATEMENT**

On occasion, it may be necessary for us to change the terms of the Children's Privacy Policy. We will do so by posting updated text on this site, and your continued use constitutes acceptance of those changes. To ensure that you are aware of current privacy practices, we recommend that you check this site periodically. We will not materially change how we handle previously collected information without providing notice and an opportunity to choose how we use that information.

## **INFORMATION SHARING AND DISCLOSURE**

We do not share Children's personal information with anyone, except as herein set forth. We will share personal information about a Child with other third parties providing services on our behalf, such as in connection with the winning of a prize or contest or when we need to send the information to companies that work on our behalf to provide a product or service that has been requested by a Parent on behalf of a Child. We may also disclose Children's personal information in order to respond to subpoenas, court orders or legal process, to provide information to law enforcement agencies or in connection with an investigation on a matter related to public safety, all only to the extent permitted by law; we also may disclose Children's personal information to a current or future subsidiary or affiliated company or a successor company (resulting from a merger or acquisition) to the extent such may have a need for such information to carry on services related to the VIR Kids Club. Unless we tell you otherwise, any companies that work on our behalf to provide a product or service does not have any right to use the personal information we provide to them beyond what is necessary to assist us.

## **ACCESS VERIFICATION**

At any time a Parent can refuse to permit us to collect further personal information from her/his Child and can request that any personal information we have collected be deleted from our records. We use two methods to allow Parents to access, change, or delete the information that we have collected from their Children.

A Parent can contact our VIR Kids Club Membership Staff to access, change, or delete the personal information that we have collected from her/his Child by sending an email to [msmith@VIRNow.com](mailto:msmith@VIRNow.com). Please include the Child's Name and the Parent's email address in the message so we can better assist with your inquiry or request.

## **QUESTIONS OR CONCERNS**

If you need further assistance, you may contact us by sending an email with your questions or comments to [msmith@VIRnow.com](mailto:msmith@VIRnow.com) or by writing us at:

VIRginia International Raceway  
1245 Pine Tree Rd  
Alton, VA 24520

ATTN: Mitchell Smith

You may also call 434-822-7700 x114 and ask to speak with a representative of the VIR Kids Club Staff. (NOTE: If you are not 18 years of age or older, you must have your Parent or guardian's permission to call.)