

PR Blocks Privacy Policy — Training Programs, Teams and the PR Blocks App

PR Blocks Inc

212 Latrobe Ave, St. Augustine, FL 32095

Effective Date: October 21, 2026

Privacy Officer: Stephen Hupp, President | stevehupp@prblocks.com

1. SCOPE

This Privacy Policy applies to PR Blocks Inc’s (“PR Blocks,” “we,” “us,” or “our”) youth and adult track and field training programs, teams, and facilities, and to the following websites, web applications, and mobile applications owned and operated by PR Blocks Inc, including the PR Blocks App:

prblocks.com · prblocks.app

(collectively, the “Services”). All of these addresses are owned and operated by PR Blocks Inc. under the PR Blocks brand; none of them is a separate company, partner, or affiliate. This Policy describes how we collect, use, share, and protect personal data, and explains the rights of users and parents or legal guardians of minor athletes.

This Policy does not apply to PR Blocks’ applications for coaches, such as PR Blocks Track & Field Tools, including when they are offered at a prblocks.com address (such as tools.prblocks.com) or in the Apple App Store or Google Play. Those applications have their own privacy policy, available within each application.

2. DATA CONTROLLER AND PRIVACY OFFICER

PR Blocks Inc is the data controller for all personal data collected through the Services.

Privacy Officer:

Stephen Hupp, President

212 Latrobe Ave, St. Augustine, FL 32095

stevehupp@prblocks.com

All privacy-related requests, questions, and complaints should be directed to the Privacy Officer at the contact information above.

3. MINIMUM AGE REQUIREMENTS AND CONSENT TIERS

Minimum Age. The minimum age to register as an athlete with PR Blocks is **8 years old**.

Under Age 13 (COPPA). We do not knowingly collect personal data from children under 13 without verifiable parental or legal guardian consent obtained before account creation or any data collection, as required by the Children's Online Privacy Protection Act, 15 U.S.C. §§ 6501–6506, and its implementing regulations, 16 C.F.R. Part 312. Participation in the Services is not conditioned on a child disclosing more personal data than is reasonably necessary for participation, consistent with 16 C.F.R. § 312.7.

Ages 13–17. Athletes ages 13 through 17 may participate only with parental or legal guardian authorization and ongoing oversight. A parent or guardian must execute the annual consent waiver described in Section 6.

Age 18 and Older. Athletes who have reached the age of majority (18) may register, create an account, and consent to legal agreements on their own behalf without a parent or guardian.

4. CATEGORIES OF PERSONAL DATA COLLECTED AND PURPOSES

We collect the following categories of personal data for the stated purposes:

Contact Information (name, email address, phone number): Used for registration, account management, and communications with athletes and their families.

Mobile Number and Text-Message Records (your mobile number; the date, time, method, and wording of your text-message opt-in; opt-out and help requests; and the texts you exchange with us): Used only to send the text messages you agreed to, answer your texts, keep a record of your consent, and honor STOP requests. See Section 9.

Identity and Eligibility Data (date of birth, biological sex at birth): Used solely to determine competitive team placement and age-group eligibility. This data is not used for any other purpose.

Athlete Performance Data (personal records, track meet results): Used solely for internal athletic program management and team placement. See Section 11 for use limitations.

Photos and Videos: Shared publicly only when a signed media release is on file (see Section 10). Coaching video clips are recorded for training, kept private, and deleted on the schedule in Section 13.

Authentication and Session Data (session tokens, local storage preferences): Collected automatically by the FlutterFlow/Supabase application infrastructure to maintain secure login sessions and core app functionality.

Website Usage Data (aggregate traffic, page visits): Collected through Wix Analytics for platform performance measurement. This data is aggregated and not linked to individual users.

Messages in the PR Blocks app. Messages you send through the app are stored by PR Blocks and may be reviewed by our staff or our SafeSport coordinator for the safety of participants. Every message is also screened automatically, including by an AI service that processes the text of the message and a few messages before it, for threats, harassment, grooming, and attempts to move a conversation off the app. A person reviews anything the screen flags. The screen does not delete messages or file reports on its own. Conversations that include an athlete under 18 always include a parent or guardian. Message text sent to the AI service is used only to produce the review and is not used to train AI models.

The PR Blocks Assistant. The Assistant is an optional chat helper in the app that answers questions about our programs, schedules, and how to use the app. What you type is sent to our AI service provider, Anthropic, to produce the answer. To answer questions about your own account, the Assistant can see only a limited summary, such as first names, whether a waiver is signed, membership status, and upcoming sessions; it never sees dates of birth, addresses, medical information, payment details, or staff pay. Assistant conversations are stored by PR Blocks under the same retention rules as app messages, may be reviewed by a manager to improve the answers, and are flagged to our SafeSport coordinator if they raise a safety concern; the Assistant never files a report on its own. It is not available to athletes under 13. Text sent to Anthropic is used only to produce the answer and is not used to train AI models.

We collect personal data only for the purposes identified above, consistent with the purpose-limitation requirements of 16 C.F.R. § 312.4.

5. COPPA PARENTAL NOTICE

This section is addressed directly to parents and legal guardians of athletes under age 13.

What we collect from children under 13: Name, email address (of parent or guardian), phone number, date of birth, biological sex at birth, and athlete performance data (personal records, meet results). We do not use photos or videos of children under 13 for promotion or marketing without a separately given media release. Coaching video clips of children under 13 are recorded for training only with the parent's or guardian's consent (waiver section 6A), are kept private to the family and PR Blocks staff, and are never published without that media release.

How we use it: Solely for registration, team placement, internal program management, and communications with the parent or guardian. We do not use this data for advertising, profiling, or any commercial purpose directed at the child.

Who sees it: Data is accessible only to authorized PR Blocks staff and the third-party service providers listed in Section 8, each of which is contractually restricted from using the data for any purpose other than providing services to PR Blocks.

Your rights: You may review, correct, or request deletion of your child's personal data at any time by contacting stevehupp@prblocks.com. Deletion requests are subject to the statutory retention floor described in Section 13.

How to withdraw consent: You may withdraw consent at any time by written notice to stevehupp@prblocks.com. Withdrawal of consent will result in the child's inability to participate in the Services.

We provide this notice directly to parents before collecting any personal data from a child under 13, as required by 16 C.F.R. § 312.4(b).

6. PARENTAL AND GUARDIAN CONSENT MECHANISM

Before we collect any personal data from a minor athlete, a parent or legal guardian must execute a written consent form — paper or digital — that covers registration, performance data collection, and the media release opt-in or opt-out described in Section 10. This consent is renewed annually through the required annual waiver.

Electronic consent is valid and enforceable under Florida's Uniform Electronic Transactions Act, Fla. Stat. § 668.50. Digital consent forms are transmitted and stored securely through our application infrastructure.

For athletes under 13, consent constitutes verifiable parental consent as required by 16 C.F.R. § 312.5. We retain records of all executed consents for the period specified in Section 13.

7. COOKIES AND TRACKING TECHNOLOGIES

Essential and Security Cookies (Wix): Required for site security, fraud prevention, load balancing, and maintaining active web sessions. These cookies cannot be disabled without impairing core site functionality.

Performance and Analytics Cookies (Wix Analytics): Collect aggregate data on website traffic, page visits, and general performance. This data is not linked to individual users and is used solely to improve site performance.

Authentication and Local Storage (FlutterFlow / Supabase): Store secure session authentication tokens and local user preferences on the user's device or browser to maintain login sessions and enable core application features.

No Advertising Pixels or Retargeting Cookies. PR Blocks does not use advertising pixels, retargeting cookies, or third-party tracking scripts, including Meta Pixel and Google Ads tracking. Any representation to the contrary would be inaccurate and inconsistent with our practices under 15 U.S.C. § 45.

8. THIRD-PARTY DATA SHARING

We share personal data only with the following service providers, and only so that they can operate the Services for us. We do not sell, rent, or trade personal data, and we never share

mobile phone numbers or text-message consent with anyone for their own marketing or promotional purposes (see Section 9).

Supabase — Encrypted cloud database storage and backend infrastructure. Processes all athlete and account data on our behalf.

Stripe — Payment processing. Stripe operates a PCI-DSS compliant payment system. PR Blocks does not store payment card data. Stripe’s privacy policy governs its handling of payment information.

Meta (Facebook / Instagram) and X (formerly Twitter) — Publishing on PR Blocks’ own social media accounts. We post athlete competition results and, where a signed media release is on file, photos and videos, on our own pages. We do not give Meta or X any contact details, phone numbers, or text-message data, and we do not use their advertising or audience-matching tools. See Section 10.

Twilio — Delivers our text messages. Twilio receives a mobile number and the message content only to send and receive texts on our behalf, and may not use them for any other purpose. Text messages are sent only to adults who opt in and are subject to the Telephone Consumer Protection Act, 47 U.S.C. § 227. Message frequency varies. Msg & data rates may apply.

Google Workspace — Cloud-based email, document storage, and productivity tools used by PR Blocks staff.

Wix — Website hosting and infrastructure for our public-facing websites.

Mailchimp (or an equivalent email platform) — Sends PR Blocks’ own emails to people who agreed to receive them. It receives email addresses only — never mobile phone numbers or text-message consent — and may not use them for any other purpose.

Anthropic (Claude) — Our AI service provider, used for two things only: screening the text of messages sent in the PR Blocks app (and a few messages before each) for safety, and answering questions in the PR Blocks Assistant (see Section 4). It receives only the text needed for that, processes it on our behalf, may not use it for any other purpose, and does not use it to train AI models.

Each of these providers is engaged under a data processing agreement or equivalent contractual terms restricting their use of personal data to the services they provide to PR Blocks. We disclose third-party sharing practices as required by Fla. Stat. § 501.171.

9. SMS TEXT MESSAGES

The program. PR Blocks Inc. sends text messages from (904) 827-7514. We text only adults (18+) who opt in, and we ask separately for each kind of text: on our website forms and in the PR Blocks App there are two separate, optional, unchecked boxes, and you may tick either, both, or neither: **Reminders and updates** (texts about your account and activities, such as practice and session reminders, schedule and weather changes, cancellation notices, and payment notices) and **Offers** (promotional and marketing texts, such as program announcements, special offers, and

sign-up reminders). Texting JOIN to (904) 827-7514 signs you up for Offers only. Consent is not a condition of any purchase.

What we collect and how we use it. When you opt in, we collect your mobile number; the date, time, method, and exact wording of your opt-in; any opt-out or help requests; and the texts you exchange with us. We use this information only to send the messages you agreed to, answer your texts, keep a record of your consent, and honor STOP requests. We do not text anyone under 18.

Frequency, cost, and opting out. Message frequency varies. Msg & data rates may apply. Reply **STOP** to any message to unsubscribe, **START** to resubscribe, or **HELP** for help. You can also email help@prblocks.com or call 904-323-0524.

No sharing. We do not share, sell, or provide your mobile phone number or messaging consent data to third parties or affiliates for marketing or promotional purposes. No mobile information will be shared with third parties or affiliates for marketing or promotional purposes. Information sharing with subcontractors in support services, such as our text-message provider Twilio, is permitted only to deliver our messages. All other categories of sharing in this Policy exclude text-messaging originator opt-in data and consent; this information will not be shared with any third parties.

10. MEDIA RELEASE AND RIGHT OF PUBLICITY

Photos and videos featuring minor athletes are collected and shared on Meta (Facebook/Instagram) and X only when a parent or legal guardian has opted in to the media release as part of the annual waiver. Families who opt out will not have their athlete's image or likeness shared on any PR Blocks social media or marketing channel.

The media release covers non-commercial athletic program promotion. Use of an athlete's name, image, or likeness for commercial advertising purposes requires a separate, specific written authorization, consistent with Fla. Stat. § 540.08.

A parent or guardian may withdraw media release consent at any time by written notice to stevehupp@prblocks.com. Withdrawal applies prospectively; it does not require removal of content already published in reliance on a valid prior release.

11. USE LIMITATIONS AND NO PROFILING

Athlete performance data (personal records, meet results, team placement data) is used solely for internal athletic program management and competitive team placement. We do not use performance data or any other personal data for:

- automated profiling or scoring of athletes or their families;
- targeted advertising directed at individual athletes or families; or
- any commercial purpose beyond operating the Services.

These limitations are maintained consistent with 15 U.S.C. § 45 and Fla. Stat. §§ 501.201–501.213 (Florida Deceptive and Unfair Trade Practices Act, “FDUTPA”).

12. DATA SECURITY

We implement the following safeguards to protect personal data, including sensitive data such as date of birth, biological sex at birth, and athlete performance records:

- **Encrypted storage** via Supabase, using industry-standard encryption at rest and in transit.
- **PCI-DSS compliant payment processing** via Stripe; PR Blocks does not store payment card data.
- **Restricted access controls** limiting staff access to personal data on a need-to-know basis.
- **Regular security reviews** of our systems and third-party provider configurations.

These measures constitute reasonable security safeguards as required by Fla. Stat. § 501.171(2). No security system is impenetrable; in the event of a breach, we will follow the procedures in Section 15.

13. DATA RETENTION AND DELETION

Minor Athlete Records. Participant records, performance metrics, parental consents, electronic communications, and photo/video releases for minor athletes are retained until the athlete reaches **age 25**, at which point records are permanently deleted. This retention period satisfies Florida’s statutory record retention schedules and the applicable statutes of limitations under Fla. Stat. § 95.11(3).

Effect on Deletion Requests. Deletion requests submitted before the athlete reaches age 25 will be acknowledged, but records subject to the statutory retention floor cannot be permanently deleted until that threshold is met. We will notify the requestor of this limitation at the time of the request.

Adult Athlete Records. Records for athletes who registered at age 18 or older are retained for seven (7) years following the last date of active participation, then permanently deleted, unless a longer retention period is required by law.

Coaching Video Clips. Coaching video clips are kept for 180 days unless the family marks them as keepers (up to 12 per athlete). Keeper clips are kept while the athlete trains with us and for 2 years after their last date of active participation. We send a reminder before any clip is deleted so the family can download it. A still image of each clip, with its date, event, and coaching notes, is kept with the athlete's other records as described above: until age 25 for athletes who registered as minors, or seven (7) years after the last date of active participation for athletes who registered as adults. Clips are private to the athlete's family and PR Blocks staff, are never sold, and are never used for marketing or shown on an athlete's public PR Profile without a signed media

release. A clip connected to a safety report, complaint, or incident is kept until that matter is resolved.

14. DATA SUBJECT RIGHTS

Users and parents or legal guardians of minor athletes may submit requests to:

- **Access** personal data we hold about them or their child;
- **Correct** inaccurate or incomplete personal data; or
- **Delete** personal data, subject to the retention floor in Section 13.

How to Submit a Request. Send a written request to stevehupp@prblocks.com identifying the athlete and the nature of the request. We will respond within 30 days.

Identity Verification. We may require reasonable verification of identity or parental relationship before processing a request.

Limitations. Deletion requests are subject to the statutory retention floor described in Section 13. We align our data rights practices with the Florida Digital Bill of Rights, Fla. Stat. §§ 501.701–501.721, as applicable.

Member Portal. Users may log in to the member portal at **prblocks.app** to view and manage certain personal data associated with their account.

15. BREACH NOTIFICATION

If we discover a security breach that compromises personal data, we will:

1. Notify affected users and, for minor athletes, their parents or legal guardians, by email within **30 days** of discovering the breach. The notice will describe the categories of data compromised and the steps we are taking in response.
 2. Notify the Florida Attorney General if the breach affects more than **500 Florida residents**, within 30 days of discovery, as required by Fla. Stat. § 501.171(3)–(4).
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16. MARKETING COMMUNICATIONS OPT-OUT

Email. Every marketing email we send includes a functioning unsubscribe link, as required by 15 U.S.C. § 7704(a)(3), and our physical mailing address, as required by 15 U.S.C. §§ 7701–7713 (CAN-SPAM Act). We will honor opt-out requests within **10 business days**.

Text Messages. Reply **STOP** to any PR Blocks text to stop texts from that number, or turn texts off in the PR Blocks App. See Section 9.

Social Media Advertising. Users may adjust their advertising preferences directly on Meta platforms (facebook.com/settings → Ads) and X (x.com/settings → Privacy and Safety → Ads Preferences).

Transactional Communications. Opt-out from marketing communications does not affect transactional or operational messages (e.g., registration confirmations, payment receipts, safety notices).

17. POLICY UPDATES AND NOTIFICATION

We will update this Privacy Policy when our data practices change. When we do:

1. The updated Policy will be posted on our website with a revised effective date.
2. We will notify registered users by email within **14 days** of the updated Policy going live.

Continued use of the Services after the effective date of a revised Policy constitutes acceptance of the revised terms.

18. GOVERNING LAW, VENUE, AND DISPUTE RESOLUTION

Governing Law. This Privacy Policy is governed by the laws of the State of Florida, including Fla. Stat. §§ 501.201 et seq. (FDUTPA), without regard to conflict-of-law principles.

Binding Arbitration. Any dispute arising out of or relating to this Privacy Policy or our data practices that cannot be resolved informally shall be resolved by binding arbitration administered by the **American Arbitration Association (AAA)** in accordance with its Commercial Arbitration Rules or, where applicable, its Consumer Arbitration Rules. Arbitration shall take place in **St. Johns County, Florida**.

AAA Contact: www.adr.org | (800) 778-7879 | CustomerService@adr.org

The arbitrator's award shall be final and binding and may be entered as a judgment in any court of competent jurisdiction. Class arbitration and class actions are waived to the fullest extent permitted by law.

Opt-Out. A user who does not wish to be bound by the arbitration clause may opt out by sending written notice to stevehupp@prblocks.com within **30 days** of first accepting this Privacy Policy. Opting out does not affect any other provision of this Policy.

Disclosure. The arbitration clause is conspicuously disclosed here as required by AAA Consumer Arbitration Rules, Rule R-1.

19. CONTACT INFORMATION

All privacy-related requests, questions, media release withdrawals, opt-out requests, and data rights submissions should be directed to:

Stephen Hupp, President — Privacy Officer

PR Blocks Inc

212 Latrobe Ave

St. Augustine, FL 32095

help@prblocks.com

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