NEW YORK STATE
OLYMPIC REGIONAL DEVELOPMENT AUTHORITY

Internet Privacy Policy

Policy on the Collection, Use, Retention, Disclosure, and Protection of Information

Last Updated: October 7, 2026

1. Purpose, Legal Framework, and Scope

This Internet Privacy Policy (hereinafter the "Policy") describes the practices of the New York State Olympic Regional Development Authority ("Olympic Authority") for collecting, using, retaining, disclosing, and protecting information obtained from Users through its Website(s). It is intended to satisfy New York State Technology Law § 203 and should be read consistently with the Internet Security and Privacy Act (State Technology Law Article 2), the Freedom of Information Law (Public Officers Law Article 6), the Personal Privacy Protection Law (Public Officers Law Article 6-A), applicable records-retention requirements, and Olympic Authority information-security policies and standards.

This Policy applies only to the Website(s), as defined below. It does not govern websites, applications, or services outside the Olympic Authority's control, even when a Website may link to them. Those external services may have separate privacy policies.

The Olympic Authority does not Collect Personal Information through its Website(s) unless a User voluntarily provides it, such as by sending an email or initiating an online transaction, or unless Collection is otherwise authorized by law. Certain information may be required to complete a transaction or provide a requested service.

2. Definitions

Collect or Collection. To store information, including through cookie technology, for later retrieval to initiate communication with or make determinations about the person who is the subject of the information.

Disclose or Disclosure. To reveal, release, transfer, disseminate, or otherwise communicate information orally, in writing, or by electronic or other means, other than to the person who is the subject of the information.

Personal Information. Any information concerning a natural person that, because of a name, number, symbol, mark, or other identifier, can be used to identify that natural person.

User. Any natural person who uses the internet to access the Website(s).

Website(s). The internet website or portions of websites operated by or for the Olympic Authority and within its control.

3. Information Collected Automatically

When a User visits a Website, the Olympic Authority may automatically Collect and store technical information about the visit, including:

- the Internet Protocol address and domain name used to access the Website, but not the User's email address;
- the type and version of the browser and operating system used;
- the date and time of the visit;
- the pages, files, forms, or services accessed or downloaded;
- the referring webpage or website address; and
- technical request, response, and system information used to operate, secure, and troubleshoot the Website.

Consistent with the New York State model Internet Privacy Policy, the foregoing technical information is not deemed Personal Information. The Olympic Authority uses it to administer and secure Website(s); evaluate system performance; identify unauthorized activity or problem areas; understand how Users interact with the Website(s); and improve Website content, accessibility, and services.

The Olympic Authority does not sell or Distribute information collected through Website(s) for third-party commercial marketing purposes. The Olympic Authority may use information as described in this Policy to communicate with Users about Olympic Authority programs, events, venues, products, and services, including through promotional communications when the User has subscribed, requested such communications, or otherwise consented to that use.

4. Cookies and Similar Technologies

Cookies are small text files stored by a web browser or device that help distinguish among Website Users and support Website functions. Website(s) may use session cookies to enable, enhance, secure, or customize a User's visit. Session cookies are generally erased during operation of the browser or when the browser is closed.

If a User chooses to register for or personalize an online service, Website(s) may use a persistent cookie to recognize the User on a later visit or tailor information based on the User's selections. Persistent cookies are used only as permitted by the Website's applicable consent or preference mechanism.

A User may be able to refuse new cookies, delete existing cookies, or adjust browser or device settings. Refusing or deleting cookies may limit the availability or operation of certain Website features.

5. Information a User Voluntarily Provides

Email Communications

If a User sends an email to the Olympic Authority through or in connection with a Website, the Olympic Authority will Collect the User's email address and the contents of the message,

including any text, documents, audio, video, images, or other attachments the User provides. The Olympic Authority may use that information to respond, address an issue identified by the User, improve a Website or its services, or forward the message to the appropriate Olympic Authority program unit or another governmental entity for appropriate action.

An email address provided solely for the purpose of contacting the Olympic Authority will not be used to send marketing or promotional communications unless the User separately subscribes to, requests, or otherwise consents to receiving those communications.

News, Program, Event, and Promotional Communications

A User may voluntarily subscribe to an email list or SMS (text message) communications while visiting a Website. When Users voluntarily provide their contact information (such as name, email address, or mobile phone number) for these subscriptions, that information will be used to send Users newsletters, news releases, venue updates, program and event announcements, registration information, ticket offers, promotional materials, and other information concerning Olympic Authority programs, events, venues, products, and services. Some of these communications may be promotional or commercial in nature.

By opting in to receive SMS communications, you consent to receive recurring text messages. Message frequency may vary. Standard message and data rates may apply based on your mobile carrier. You may opt out of SMS communications at any time by following the unsubscribe instructions provided in the message (such as replying "STOP"), and you may opt out of email communications by using the unsubscribe link included in emails.

The Olympic Authority does not sell, rent, or trade email addresses or disclose them to unaffiliated third parties for those third parties' independent marketing purposes. The Olympic Authority may provide email addresses to contractors or service providers that distribute communications on its behalf, subject to applicable law, contractual confidentiality and security requirements, and restrictions limiting use of the information to services performed for the Olympic Authority.

User Choice and Unsubscribing

Subscribing to Olympic Authority marketing or promotional communications is voluntary. A User who chooses not to subscribe may not receive news, event announcements, promotional offers, or similar updates by email or SMS communications, but that choice will not ordinarily prevent the User from accessing publicly available Website content or obtaining Olympic Authority services through other available means.

A User may unsubscribe from marketing or promotional communications by using the unsubscribe or opt-out mechanism included in the applicable email or SMS communication. An unsubscribe request will not prevent the Olympic Authority from sending transactional, account-related, safety, registration, customer-service, or other nonmarketing communications that relate to an existing transaction or service requested by the User.

Online Transactions

A User may initiate an online transaction, such as submitting an inquiry, completing a survey, creating or using an account, registering for a program or event, purchasing goods or services, or completing another form. The Olympic Authority uses information the User provides, including Personal Information, to administer the applicable transaction or program; provide requested goods, services, or information; process and document the transaction; communicate with the User; and perform related governmental or business functions.

The nature of a transaction may require the User to provide specified information. If the User does not provide required information, the Olympic Authority may be unable to complete the transaction or provide the requested product, service, benefit, registration, or response.

Information Concerning Minors

Except in connection with an Olympic Authority program or transaction involving minor children, the Olympic Authority does not knowingly collect Personal Information from children or create profiles of children through its Website(s). Users are cautioned, however, that the collection of Personal Information submitted in an e-mail, SMS communication, or through an online transaction will be treated as though it was submitted by an adult or with appropriate adult authorization and may, unless protected from Disclosure by Federal or State law, be subject to public access. The Olympic Authority strongly encourages parents, legal guardians, and teachers to be involved in children's internet activities and to provide guidance whenever children are asked to provide Personal Information online.

The collection of Personal Information concerning a child that is required for an Olympic Authority program must be submitted by a parent or legal guardian, or with appropriate parental or guardian authorization and supervision.

6. Information and Choice

A User may browse and download most publicly available Website content without voluntarily providing Personal Information. A User may choose not to send an email, respond to a survey, register, place an order, or complete another online transaction. That choice may limit the User's ability to receive a particular service, product, benefit, response, or other transaction-specific functionality, but generally will not prevent the User from using other publicly available features of the Website(s) or from contacting the Olympic Authority by another available method.

7. Use and Disclosure of Information

The Collection and Disclosure of Personal Information through the Website(s) are governed by the Internet Security and Privacy Act and other applicable law. A User's voluntary Disclosure of Personal Information to the Olympic Authority, whether solicited or unsolicited, constitutes consent to the Collection and Disclosure of that information for the purposes reasonably ascertainable from the nature and terms of the User's submission.

The Olympic Authority may also Collect or Disclose Personal Information without User consent when the Collection or Disclosure is:

- necessary to perform the Olympic Authority's statutory duties or operate a program authorized by law, or is otherwise authorized by State or Federal statute or regulation;
- made pursuant to a court order or as otherwise required or permitted by law;
- necessary to validate a User's identity; or
- limited to information used solely for statistical purposes in a form that cannot identify any particular person.

Access to Personal Information is limited to Olympic Authority employees, agents, contractors, service providers, and other authorized persons who need the information to perform official duties or services for an authorized Olympic Authority purpose, subject to applicable law and contractual requirements.

Information collected through a Website may also be disclosed when authorized or required under the Freedom of Information Law, the Personal Privacy Protection Law, or another applicable law. The Olympic Authority may Disclose relevant information to Federal, State, or local law-enforcement or cybersecurity authorities to investigate, prevent, or respond to unauthorized access, attempted unauthorized access, fraud, security incidents, or other inappropriate use of a Website or other Olympic Authority information-technology assets.

The Olympic Authority may utilize third-party service providers to facilitate the distribution of email and SMS communications. These providers are contractually obligated to safeguard Personal Information, use it solely for authorized communication purposes, and comply with applicable privacy and security requirements. Personal Information will not be sold or used for commercial marketing by such providers.

8. Retention of Information

The Olympic Authority retains records created or received through its Website(s) in accordance with applicable New York State Archives records-retention and disposition schedules, any Olympic Authority-specific retention schedules, and applicable legal, audit, litigation-hold, investigation, security, and operational requirements.

Information collected through email and SMS subscription services, including contact details and communication preferences, will be retained in accordance with applicable records retention schedules and only for as long as necessary to fulfill the communication purpose or comply with legal requirements.

Information, including Personal Information, submitted by email or through an online transaction is retained according to the records-retention and disposition schedule applicable to the program unit and record series to which the submission relates. Information about an applicable retention schedule may be requested from the Policy’s contact identified below.

9. Access to and Correction of Personal Information

Except as otherwise provided by law, a User may request access to Personal Information pertaining to that User that the Olympic Authority collected through its Website(s) and may

request correction or amendment of information that is inaccurate, irrelevant, untimely, or incomplete. Requests are governed by State Technology Law § 205 and Public Officers Law § 95.

A request must reasonably describe the information sought and be submitted in writing to the Policy's contact at the mailing or email address listed below. The Olympic Authority may require reasonable proof of identity, such as verification of a signature, an identifier generally known only to the User, or another appropriate method. The Olympic Authority will not request more identity information than reasonably necessary to verify the requester.

For a proper access request, within five business days after receipt, the Olympic Authority will:

- provide access to the requested Personal Information;
- deny access in whole or in part in writing and explain the reasons for the denial; or
- acknowledge receipt in writing and state the approximate date when the request will be granted or denied, which will not be more than 30 days after the acknowledgment.

For a written request to correct or amend Personal Information, the Olympic Authority will, within 30 business days after receipt, make the correction or amendment in whole or in part, or inform the User in writing of the refusal and the reasons for it. A User may appeal a denial in the manner and within the time provided by Public Officers Law § 95. When feasible, the Olympic Authority may provide secure online access to Personal Information; online access will be provided only when it can be provided securely.

10. Confidentiality, Integrity, and Security

The Olympic Authority is committed to protecting information collected through its Website(s) against unauthorized access, use, alteration, loss, or Disclosure. Access is limited to authorized personnel and service providers who require the information to perform official duties or contracted services.

Consistent with Olympic Authority information-security requirements, the Olympic Authority uses administrative, technical, and physical safeguards appropriate to the sensitivity of the information and the risks presented. These safeguards may include access controls, authentication, monitoring, logging, auditing, encryption, secure transmission, system and data backup, vulnerability management, incident response, and secure disposal. The Olympic Authority also monitors Website traffic and systems to identify unauthorized attempts to upload, change, access, or damage information or otherwise interfere with Website availability.

If a security incident requires notice, the Olympic Authority will provide notice and make required governmental reports in accordance with applicable law, including State Technology Law § 208. No method of electronic transmission or storage can be guaranteed to be completely secure, and this Policy does not warrant that Website security is fail-proof.

11. External Websites and Third-Party Services

The Olympic Authority Website(s) may link to websites, applications, authentication services, payment processors, registration platforms, social-media services, or other resources operated by governmental or private entities. A link does not constitute an endorsement of the external resource's content, viewpoints, accuracy, opinions, policies, products, services, or accessibility.

When a User leaves a Website or uses a service outside the Olympic Authority's control, the external service's terms and privacy policy govern information collected by that service. If a third party operates a portion of the Website on the Olympic Authority's behalf and within the Olympic Authority's control, that portion remains subject to the requirements applicable to an Olympic Authority Website.

12. Changes to this Policy

The Olympic Authority may revise this Policy to reflect changes in law, technology, Website functionality, or information practices. The Olympic Authority will post the revised Policy on its Website(s) and update the "Last Updated" date. Unless otherwise stated, a revision becomes effective when posted.

13. Contact Information

Questions about this Policy and requests concerning Personal Information collected through the Website should be directed to:

Information Technology Assistant Counsel
New York State Olympic Regional Development Authority
37 Church Street
Lake Placid, New York 12946
Email: ITLegal@orda.org

Authority and References

- New York State Technology Law Article 2, including §§ 202-210;
- New York Public Officers Law Articles 6 and 6-A, including § 95;
- New York State Olympic Regional Development Authority, Information Security Policy (updated September 1, 2026); and
- New York State Archives, General Retention and Disposition Schedule for New York State Government Records, as applicable.