

# Children's Online Privacy Protection Act (Supplement to Privacy Policy)

Cincinnati Ohio Police Federal Credit Union (COPFCU) is committed to safeguarding information about our members and visitors to our website. This includes information that we may receive from children. This statement explains our collection, use and security of personal information received from a child, as is required and relating to The Children's Privacy Protection Act (COPPA). This act was passed to give parents/guardians increased control over what information is collected from children online and how such information is used. The law applies to websites and services which knowingly collect information from children under the age of 13.

### **COPFCU Website & Email**

COPFCU's website and online services are not directed to children under the age of 13. As such, COPFCU will not knowingly collect, use or distribute personal information from children under the age of 13 without prior verifiable consent from a parent/guardian. If we determine that we have inadvertently gathered personal information from a user under the age of 13 without the consent of their parent/guardian, we will promptly delete any and all personal information from our records. Further, this information will not be shared with third parties.

Should COPFCU receive an email from a child under the age of 13, COPFCU may elect to respond to the child's inquiry and/or contact the parent/guardian to respond. COPFCU will use reasonable procedures to ensure we are dealing with the child's parent/guardian before we provide access to the child's specific information. Once the response has been provided, the email from the child will be deleted.

We do not require child members of COPFCU to disclose more information than is reasonably necessary to participate in Kid's Club contests, games or other activities, or as a condition of participation.

#### **Sharing of Information**

COPFCU only shares personal information with third party vendors who are tasked with maintaining the child member's account (transaction processing provider and statement provider) and promoting the Kid's Club activities, events and rewards (email provider). All information we have for child members has been provided with consent of the parent/guardian. At any time, the parent/guardian may revoke his/her consent for the child to receive emails for Kid's Club contests, games or other activities.

#### **Parental Consent**

We do not collect, use or disclose personally identifiable information from a child without obtaining prior parental consent. At this time, we do not seek to collect personally identifiable information from children under the age of 13. Should that policy change, we will notify the parents/guardians, post the fact that information is being collected, obtain consent from parents in compliance with COPPA, and inform parents about procedures available to review and/or prevent the information from being collected. If you have any questions or concerns about COPFCU's Children's Online Privacy Protection Policy, you may write, call or email us at:

## COPFCU | 959 W. 8<sup>th</sup> Street | Cincinnati, OH 45203 1-800-810-0221 info@copfcu.com

For additional information on COPPA protections, you can also visit the <u>Federal Trade Commission's website</u>.