Rocket City Federal Credit Union Children's Online Privacy Protection Act

The Credit Union will comply with the Children's Online Privacy Protection Act (COPPA) in the operation of online services and its website; and will diligently protect the privacy of children under thirteen and the online collection of data and information from children using its website or service.

The Credit Union is collecting information if the Credit Union:

- Requests, prompts, or encourages the submission of information, even if it is optional;
- Allows information be made publicly available before the Credit Union takes reasonable measures to delete all or virtually all personal information before postings are public and delete all information from the Credit Union's records; or Passively tracks a child online.
- The Credit Union will not require Children to disclose more information that is reasonably necessary to participate in the credit union's website or online service as a condition of participation.

The personal information that may be collected from children can include:

- Full name
- Home address
- Geolocation information sufficient to identify a street name and city or town;
- Online contact information;
- Telephone number;
- Social Security number;
- Photo, video, or audio file containing a child's image or voice;
- Persistent identifier that can be used to recognize a user over time and across different sites, including a cookie number, an IP address, a processor or device serial number, or a unique device identifier;
- Any information that allows someone to identify or contact the child; and
- Other data and/or facts that can be tied to individually identifiable information; including:
 - 1. Hobbies;
 - 2. Interests; and
 - 3. Information collected through cookies and other types of tracking mechanisms.

The Credit Union does not need to get parental/guardian consent to release information to others who use it solely to provide support for the internal operations of the Credit Union's website or service, including technical support.

It is the Credit Union's intent not to disclose collected information to third parties concerning children's collected information.

The Credit Union will send a new notice and request for consent to parents/guardians if there are material changes in the collection, use or disclosure practices to which the parent/guardian had previously agreed.

Prior parent/guardian consent is not required when the Credit Union collects a child's email address for the purpose of:

- Providing notice and seeking parent/guardian consent;
- Responding to a one time request from a child and then promptly deleting it;

• Protecting the security or liability of the website or service; or to respond to law enforcement.

At a parent/guardian's request, the Credit Union will disclose the general kinds of personal information they collect online from children (for example, name, address, telephone number, email address, hobbies), as well as the specific information collected from their children who visit the Credit Union's website or service.

The Credit Union will use reasonable procedures to ensure they are dealing with the child's parent/guardian before they provide access to the child's specific information.

At any time, a parent/guardian may revoke his/her consent, refuse to allow the Credit Union to further use or collect their child's personal information, and direct the Credit Union to delete any information the Credit Union may have retained.

The Credit Union will promptly delete any information it has about a child after a parent/guardian revokes consent for the Credit Union to collect and retain the information.

For any questions or concerns you may contact the credit union.

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