CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA) CHECKLIST

	Yes	No
Location		
1. Is there a link to the privacy policy on the home page of the website or on the home page of the children's area of the website? [16 C.F.R § 312.4(b)]	_____	_____
2. Are the links to the privacy policy near each and every place on the website where the credit union collects personal information from children? [16 C.F.R. § 312.4(b)(1)(iii)]	_____	_____
3. Does the link to the privacy policy stand out so that the website visitor can locate it easily? [16 C.F.R. § 312.4(b)(1)(ii)]	_____	_____
4. Is the link in a different color, a different font, or a larger type size? [16 C.F.R. § 312.4(b)(1)(ii)]	_____	_____
5. Is the link to the privacy policy labeled clearly so a visitor can tell what it is? [16 C.F.R. § 312.4(b)(1)(ii)]	_____	_____
Content		
6. Does the privacy policy include the names of all the website operators who collect or maintain personal information from children through the site? [16 C.F.R. § 312.4(b)(2)(i)]	_____	_____
7. Does the privacy policy provide mailing addresses for all the website operators who collect or maintain personal information through the site? (If yes, go to question 10.) [16 C.F.R. § 312.4(b)(2)(i)]	_____	_____
8. Does the privacy policy provide the telephone numbers for all website operators who collect or maintain personal information through the site? [16 C.F.R. § 312.4(b)(2)(i)]	_____	_____
9. Does the privacy policy provide the email addresses of all website operators who collect or maintain personal information through the site? [16 C.F.R.		

§ 312.4(b)(2)(i)] _____ _____

10. Does the privacy policy state each type of personal information (full name, email address, mailing address, phone number, etc.) that the credit union collects from children? [16 C.F.R. § 312.4(b)(2)(ii)] _____ _____

11. Is the statement of the types of personal information collected descriptive enough to let parents know the kinds of personal information the credit union will be collecting from their children? [16 C.F.R. § 312.4(b)(2)(ii)] _____ _____

12. Does the privacy policy tell parents whether personal information is collected actively (from the child) or passively (for example, through cookies)? [16 C.F.R. § 312.4 (b)(2)(ii)] _____ _____

13. Does the privacy policy tell parents how the website will use the personal information that it collects? [16 C.F.R. § 312.4(b)(2)(iii)] _____ _____

14. Does the website share or disclose children's personal information with third parties? (If no, go to question 19.) [16 C.F.R. § 312.4(b)(2)(iv)] _____ _____

15. Does the privacy policy state the kinds of business in which the third parties are engaged? [16 C.F.R. § 312.4(b)(2)(iv)] _____ _____

16. Does the privacy policy tell parents the general purposes for which the third parties will use the children's personal information? [16 C.F.R. § 312.4(b)(2)(iv)] _____ _____

17. Does the privacy policy state whether the third parties with which the site shares personal information have agreed to maintain the confidentiality, security and integrity of the information? [16 C.F.R. § 312.4(b)(2)(iv)] _____ _____

18. Does the privacy policy tell parents they can agree to the collection and use of their child's personal information by the site without agreeing to the credit union disclosing the information to third parties? (If yes, go to question 20.) [16 C.F.R. § 312.4(b)(2)(iv)] _____ _____

19. Does the privacy policy clearly state that the credit union

website does not disclose personal information to third parties? [16 C.F.R. § 312.4(b)(2)(iv)] _____ _____

20. Does the privacy policy state that the site cannot condition a child's participation in an activity on the child's disclosure of more personal information than is reasonably necessary to participate in the activity? [16 C.F.R. § 312.4(b)(2)(v) & 16 C.F.R. § 312.7] _____ _____

21. Does the privacy policy let parents know that they can review the personal information that the website has collected from their child? [16 C.F.R. §§ 312.4(b)(2)(vi), 312.6] _____ _____

22. Does the privacy policy tell parents how they can review their child's personal information? [16 C.F.R. §§ 312.4(b)(2)(vi), 312.6] _____ _____

23. Does the privacy policy tell parents they can have their child's personal information deleted from the site and how they can have it deleted? [16 C.F.R. §§ 312.4(b)(2)(vi), 312.6] _____ _____

24. Does the privacy policy tell parents that they can stop the website from further collecting or using additional personal information from their child and how they can stop further collection? [16 C.F.R. §§ 312.4(b)(2)(vi), 312.6] _____ _____

Style

25. Is the privacy policy clear, understandable and easy to read? [16 C.F.R. § 312.4(a)] _____ _____

26. Does the privacy policy give a complete description of the information practices, explain all the personal information the credit union collects and spell out how the credit union will use the information? [16 C.F.R. § 312.4(a)] _____ _____

27. Does the privacy policy include any contradictory, confusing or ambiguous language? [16 C.F.R. § 312.4(a)] _____ _____

28. Does the privacy policy contain any material or content that does not relate to the credit union's information practices? [16 C.F.R. § 312.4(a)] _____ _____

29. Is the privacy policy well-organized and easy to follow? [16 C.F.R. § 312.4(a)] _____ _____

30. Do the practices reflect the promises the credit union makes in the privacy policy? _____ _____

Comments _____
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