CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA)

REVIEW CONSIDERATIONS

Review Considerations

Review Area	Requirements / Recommendations
Policy/Procedures	Adopt a policy for implementing COPPA that includes location of privacy notice on website, notice to parents, when new consent notices will be sent, and access verification.
Coverage	The COPPA rule applies to operators of commercial websites and online services directed to children under 13 that collect personal information from children, and operators of general audience sites with actual knowledge that they are collecting information from children under 13. Exemptions: Prior parental consent is not required when: • An operator collects a child's or parent's email address to provide notice and seek consent; • An operator collects an email address to respond to a *one-time* request from a child and then deletes it; • An operator collects an email address to respond *more than once to a specific* request – such as for a subscription to a newsletter. In this case, the operator must notify the parent that it is communicating regularly with the child and give the parent the opportunity to stop the communication before sending or delivering a second communication to a child; • An operator collects a child's name or online contact information to protect the safety of a child who is participating on the site. In this case, the operator must notify the parent and give him or her the opportunity to prevent further use of the information; • An operator collects a child's name or online contact information to protect the security or

	liability of the site or to respond to law enforcement, if necessary, and does not use it for any other purpose.
Privacy Notice	Ensure the link to the privacy notice appears on the home page of the website or online service and at each area where it collects personal information from children. If the credit union operates a general audience site with a separate children's area, it must post a clear and prominent link to its privacy notice on the home page of the children's area. Provide a clearly written and understandable privacy notice that includes the following information: • Name and contact information of the credit union; • Types of personal information collected from children and the procedures used for collecting the information; • How the credit union uses the personal information; • Whether the credit union discloses the information to third parties; • Notification that the parent has the option to agree to the collection and use of the child's information without consenting to its disclosure to third parties; • Notification that the credit union may not require a child to disclose more information than is reasonably necessary to participate in an activity as a condition of participation; and • Notification that the parent can review the child's personal information, ask to have it deleted, and refuse to allow any further collection or use of the child's information. The notice also must state the procedures for the parent to follow.
Notice to Parents	Provide a notice to parents that contains the same information included on the notice on the website. • The credit union must notify a parent that it wishes to collect personal information from the child.

	• The notice must also state that the parent's consent is required for the collection, use, and disclosure of the information and how the parent can provide consent. • The credit union must obtain verifiable consent, meaning that the credit union must make reasonable efforts to ensure that the parent receives the notice and consents. • The required method of consent depends on the use of the child's information.
New Notice for Consent	Send a *new notice and request for consent to parents* if there are material changes in the collection, use or disclosure practices to which the parent had previously agreed.
Access Verification	Disclose, at a parent's request, the general kinds of personal information you collect online from children (for example, name, address, telephone number, email address, hobbies), as well as the specific information collected from children who visit your sites. Use reasonable procedures to ensure you are dealing with the child's parent before you provide access to the child's specific information. Use any of these of methods to verify the parent's identity, including: • obtaining a signed form from the parent via postal mail or facsimile; • accepting and verifying a credit card number; • taking calls from parents on a toll-free telephone number staffed by trained personnel; • email accompanied by digital signature; • email accompanied by a PIN or password obtained through one of the verification methods above. Operators who follow one of these procedures acting in good faith to a request for parental access are protected from liability under federal and state law for inadvertent disclosures of a child's information to someone who purports to be a parent.
Record Retention	Retain all records associated with COPPA and compliance efforts for at least an examination and audit cycle.

Training	Provide training to employees whose duties are affected by the requirements of the regulation.
Updating	Update policies, procedures, disclosures, and notices if there are material changes in the collection, use or disclosure practices to which the parent had previously agreed. Ensure effective communication and distribution of updated notices, disclosures and request for consent to parents.
Internal Review	Conduct an internal review at least annually to assess compliance with the regulation and conformity of the credit union's practices with its policies and procedures.