

BACKGROUND

The Children's Online Privacy Protection Act of 1998 (COPPA) restricts the collection, use, or disclosure of personal information from or about children under the age of 13 on the internet. The primary goal of COPPA is to place parents/guardians in control over what information is collected from their young children online. The rule applies to operators of commercial websites and online services (including mobile apps) and to operators of general audience websites.

POLICY

TrailNorth Federal Credit Union will comply with the Children's Online Privacy Protection Act in the operation of online services and its website; and will diligently protect the privacy of children under 13 and the online collection of data and personal information from children using its website or service. TFCU does not intend for our website to be directed at children less than 13 years old, however individuals within the age group could register for or log in to online accounts. We will request that these individuals do not provide personal information through the website.

TFCU does not knowingly collect or use personal information from children under 13 without containing verifiable consent from parents/guardians. The credit union will make reasonable efforts (taking into consideration available technology) to ensure that before personal information is collected from a child, a parent-guardian of the child receives notice of TFCU's information practices and consents to those practices. The credit union is collecting information if it:

- 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 (e.g. collecting information on domain names and times of visits).

COPPA defines the personal information that may be collected from children to 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
- Other data and/or facts that can be tied to individually identifiable information; including hobbies, interests and information collected through cookies or other types of tracking mechanisms

Historically, as it relates to COPPA and pertaining to the scope of information collection, TFCU has only utilized photographic images of children to post on our website. Those images are typically award or prize winners. There is no indication that any other type of additional information will ever be collected by us in the future.

CONSENT REQUIREMENT

TFCU will give parents/guardians the option to agree to the collection and use of the child's personal information without agreeing to the disclosure of that information to third parties. 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. Consent is also not required when the credit union:

- Collects a child email address for the purpose of:
 - a. Providing notice and seeking parent/guardian consent;
 - b. Responding to a one time request from a child and then promptly deleting it;
 - c. Protecting the security or liability of the website or service; or to respond to law enforcement.
- Collects an audio file with a child's voice when:
 - a. It is collected solely as a replacement of written words, such as to perform a search or to fulfill a verbal instruction or request; and
 - b. The recording is held only for a brief time and only for that purpose (not making any other use of the file before it is destroyed).
 - c. The audio file exception would not apply when the credit union requests information via voice that would otherwise be considered personal information.

TFCU 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.

At any time, a parent/guardian may revoke his/her consent in writing, 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 we may have retained. Upon receipt of revocation, TFCU 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.

If children under 13 send us any type of online correspondence with their personal information to answer a quiz, submit a story or any other like situation, TFCU will respond as appropriate. We will not condition their participation in an activity on the provision of more personal information than is necessary for them to participate in the activity. We may collect information on domain names, dates and times of visits, and number of page reviews. This information does not contain any personal information and will only be used to continue improving the overall value of our website.

TFCU's Children's Online Privacy Disclosure will be clearly written and understandable. The credit union will post a link to the Children's Online Privacy Disclosure on the home page of its website or online service and at each area where it collects information from children.

*Adopted by the Board of Directors of the Ticonderoga Federal Credit Union August 18, 2015
Amended by the Board of Directors of the Ticonderoga Federal Credit Union August 28, 2018*