

**Allegacy FCU
Executive Policy**

Children’s Online Privacy Protection (COPPA) Policy
OWNER: General Counsel
Effective Date: 02/01/2021

LSC.005C

POLICY STATEMENT

Allegacy Federal Credit Union (“Credit Union”) recognizes its obligation to protect the privacy of members under the age of 13 as set forth in the Children’s Online Privacy Protection Act.

BACKGROUND

The Children’s Online Privacy Protection Act (COPPA) is a federal law intended to protect the privacy of minors under the age of 13 by placing their parents in control over what information is collected online and retained about their children.

1. DEFINITIONS

- 1.1. Children are minors under the age of 13 years of age.
- 1.2. PI is Private member information.

2. SCOPE

- 2.1. The following policy statements apply to all operating units of the Credit Union, its affiliates, subsidiaries, employees, contractors, temporary employees, consultants, including those users affiliated with third parties who access/use credit union information systems. It pertains to all information systems both located in Credit Union offices and those off-site locations if these systems are under the control or jurisdiction of Credit Union. This policy does not replace, but works in conjunction with the other policies of the Credit Union such as the Information Security Policy and Privacy Policy.

3. PURPOSE

- 3.1. It is the intent of Credit Union to comply with COPPA, which governs and protects the privacy of minors under the age of 13 years.

4. POLICY

- 4.1. Credit Union will establish and maintain reasonable procedures to protect the confidentiality, security, and integrity of personal information (PI) collected from Children on Credit Union’s website.
- 4.2. It is Credit Union’s policy to:
 - 4.2.1. Post clear and comprehensive Privacy Policies on its website describing Credit Union’s information practices for Children’s PI;

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- 4.2.2.** Provide notice to parents, and with limited exceptions, obtain verifiable parental consent before collecting personal information from Children;
 - 4.2.3.** Give parents the choice to consent to Credit Union’s collection and use of their child’s information and provide parents access to their child’s personal information to review and/or have it deleted subject to other laws that may require retention of member information for a period of time. (Since Credit Union collects PI to open and maintain minors’ accounts; the deletion of the child’s PI will result in the closure and/or deletion of account and membership with the Credit Union).
 - 4.2.4.** Minimize the data collected on the portions of Credit Union’s website.
 - 4.2.5.** Take reasonable steps to release PI only to service providers and third parties capable of maintaining the PI’s confidentiality, security, and integrity.
 - 4.2.6.** Hold on to PI only as long as is reasonably necessary for the purpose for which it was collected.
 - 4.2.7.** Securely dispose of PI once there is no longer a legitimate reason for retaining it.
- 4.3.** It is Credit Union’s policy to collect information on domain names, dates and times of visits, and number of page views. This information contains no PI. It will only be used to keep track of usage of Credit Union’s site, and it will help Credit Union to continue to improve the overall value of our site. Visitor Information is never sold, given, or discussed with third parties.

5. ROLES, RESPONSIBILITIES AND DELEGATION OF AUTHORITY.

- 5.1.** The General Counsel: The General Counsel has the ultimate responsibility for ensuring the Credit Union complies with and conducts its online marketing and website in compliance with COPPA.
- 5.2.** Deposit/Digital Compliance Officer: The Deposit/Digital Compliance Officer will monitor COPPA for any changes and adjust the requirements of the Credit Union’s COPPA policy accordingly.

6. Requirements

- 6.1.** Credit Union will not sell, give, or share our youngest member’s PI with any third party vendor or any other organization, except as laid out above in 4.2.5. Credit Union will not condition our youngest member’s participation in an activity on the provision of more PI than is necessary for our youngest members to participate in the activity of opening and maintaining an account/membership.

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6.2. For those parent(s) of a child whom has sent emails to Credit Union regarding items posted on the Credit Union website those parent(s) will have the right to review the information their child has sent to Credit Union. If Credit Union collects a child's PI for purposes of responding more than once to a specific request from the child, the parent(s) have the right to refuse to permit further contact with their child. In addition, parent(s) can also require that Credit Union delete their child's information subject to the other laws and regulations that may require the Credit Union to retain certain member data for a period of time.

7. MONITORING & REPORTING

7.1. The General Counsel is responsible for monitoring and maintaining the COPPA policy and procedure.

8. EXCEPTIONS

8.1. There may be no exceptions to this Policy.

9. REFERENCES

9.1. FTC 16 CFR Part 312

9.2. NCUA Regulatory Alert, NO: 01 – RA- 07

9.3. Children's Online Privacy Protection Act (COPPA) as may be amended from time to time.

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