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Launch Federal Credit Union

**POLICY: CHILDREN'S ONLINE PRIVACY PROTECTION ACT**

**GOVERNING LAW/REGULATION:**  
Children's Online Privacy Protection Act (COPPA), 15 U.S.C. 6501-6505, and the Federal Trade Commission (FTC)'s implementing Rule, 16 C.F.R. 312.

**PURPOSE**

The Children's Online Privacy Protection Act (COPPA) was enacted in 1998. Its primary goal is to place parents in control over what information is collected from their children under age 13 while online. COPPA applies only to websites and online services, including mobile apps, that collect, use or disclose personal information from children. COPPA protects personal information collected online from children, including personal information about themselves, their parents, friends, or other persons. Operators that collect information from children under age 13 must provide notice to the children's parents and obtain verifiable parental consent prior to collecting personal information online from children. This policy does not replace, and is in addition to, the Privacy Of Consumer Financial Information Policy under Regulation P.

**POLICY STATEMENT**

Launch FCU recognizes its responsibility to protect the privacy and personal information of our youngest members (children under the age of 13). It is the intent of this Credit Union to comply with the Children's Online Privacy Protection Act (COPPA) that governs and protects the privacy of our youngest members.

**BOARD RESPONSIBILITY**

The Board of Directors is ultimately responsible for Launch FCU's adherence to all applicable laws and regulations governing collection, use, or disclosure of personal information obtained from children via the Credit Union's website or other online services, including social media platforms or mobile apps. For effective administration of this Policy, the Board designates the VP/ eServices to direct the activities required to implement and maintain compliance with this Policy. The Board will review this Policy whenever a change in law or regulation requires a Policy review, the Credit Union changes its online information collection practices, or when a matter of noncompliance is brought to the Board's attention by an employee, a member, legal counsel, or a person having audit or regulatory oversight, but no less frequently than once annually.

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## OVERVIEW

The Board's designee to direct activities related to this Policy is authorized to engage key Credit Union employees to develop, implement, and maintain appropriate detailed COPPA procedures, incorporating the following elements.

### Definitions

Procedures will include clear definitions, as set out in the COPPA final rules, including, but not limited to, the following terms:

- Child
- Collects or collection,
- Disclose or disclosure,
- Online contact information,
- Operator,
- Personal information,
- Release of personal information, and
- Website or online service directed to children.

### Content

The following minimum compliance requirements will be considered when developing, implementing and maintaining COPPA procedures while also considering the Credit Union's actual practices:

1. Post a clear and comprehensive online privacy Policy describing our information practices for personal information collected online from children.
2. Provide direct notice to parents and obtain verifiable parental consent, with limited exceptions, before collecting personal information online from children;
3. Give parents the choice of consenting to our collection and internal use of a child's information, but prohibiting us from disclosing that information to third parties (unless disclosure is integral to our site or service, in which case, we will make this clear to parents);
4. Provide parents access to their child's personal information to review and have the information deleted;
5. Give parents the opportunity to prevent further use or online collection of a child's personal information;
6. Maintain the confidentiality, security, and integrity of information we collect from children, including taking reasonable steps to release such information only to parties capable of maintaining its confidentiality and security; and
7. Retain personal information collected online from a child for only as long as is necessary to fulfill the purpose for which it was collected and delete the information using reasonable measures to protect against its unauthorized access or use.

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**Guidelines and Practices**

The Credit Union may collect information on dates and times of visits, and number of page views. This information contains no personal information. It will only be used to keep track of usage of our site, and it will help the Credit Union to continue to improve the overall value of our site. Visitor information is never sold, given, or discussed with third parties.

We will not sell, give, or share their personal information to/with any third-party vendor or any other organization. We will not require a child to disclose more information than is reasonably necessary to participate in an activity.

**NOTICES**

The Credit Union is committed to protecting our youngest members and will comply with all COPPA notice requirements.

**General Notice**

The General Notice on our web site will be clear and easy to read, appear on the home page and on each page where information is collected, and will comply with 16 C.F.R. 312.4(d).

**Direct Notice**

The Direct Notice to the Parent will comply with 16 C.F.R. 312.4(c).

**TRAINING**

Employees involved in the design and administration of the Credit Union’s online services, including our website, social media platforms and mobile apps, will receive initial and periodic COPPA training, specific to each employee’s duties.

**ADVERTISING**

All advertising or marketing delivered online (via website, social media platforms or mobile apps) and targeted to children under the age of 13 must be reviewed and approved, prior to publication, by the Compliance Department to ensure all COPPA requirements, notices, or restrictions have been considered and incorporated. Marketing directed to children by the credit union or third-party operators, such as games, prizes, or other activity, will not require or encourage the child to disclose more personal information than is reasonably necessary to participate in the activity.

**RECORD RETENTION**

Launch FCU will retain copies of all records evidencing compliance with this Policy in accordance with its Record Retention Policy.