

Children's Online Privacy Protection Act (COPPA);

First Credit Union (FCU) is serious about protecting individual family's privacy and has been working hard to provide members with the best services and the highest quality interaction on the internet in an environment that is safe. In compliance with the Children's Online Privacy Protection Act (COPPA), FCU has adopted the following policies to keep children safe (*there are exceptions to these policies as noted below under the heading "Exceptions to Verifiable Parental Consent and Information Collected from Children"*):

- FCU will not knowingly collect, use or distribute personal information from children under the age of 13 without prior verifiable consent from a parent or guardian. If we determine that we have inadvertently gathered Personal Information from a user under the age of 13, we will promptly delete any and all Personal Information from our records. The Children's Online Privacy Protection Act of 1998 and all amendments made to the law and any other applicable laws that have been established to protect the privacy of minors and we will abide by all federal and state laws and guidelines regarding youth privacy.
- Personal Information collected from children under the age of 13 will be used solely by FCU for internal purposes and will not be sold or otherwise distributed to third parties.
- FCU will **NOT** knowingly allow children under the age of 13 access to free form chat, message boards, email accounts or other services within FCU that would allow them to publicly post or otherwise distribute personal information without prior verifiable consent from a parent or guardian.
- FCU will **NOT** knowingly ask a child under the age of 13 to divulge more information than is needed to participate in any program, activity or service.
- FCU will **NOT** knowingly keep any personal information that is inadvertently included in a child's submission if we know that the child is under the age of 13. Upon notice to us, any submissions obtained will be deleted.

Personal Information Collection and Use;

- Information collected will be limited to name, address, email and program required information.
- Information collected will be used solely for First Credit Union marketing purposes.
- Information collected will not be shared with third parties.

Parent Rights Section;

- You do not have to disclose information about a child under the age of 13 more than is required to participate in selected credit union programs and activities.

- To comply with the COPPA law protecting minors online, we need to verify that your child is over 13 years of age. If they are not, we will need permission from you before we can begin to obtain any information from your child.

Exceptions to Verifiable Parental Consent and Information collected from Children;

- The only “personal information” FCU collects is from parents and that takes place when an adult contacts FCU via direct e-mail.
- To let a parent know that his or her child is using FCU’s site or mobile app, but no personal information is being collected.
- To respond to a one time request made by a child.
- If multiple requests are made by a child FCU will only collect the child’s and parent’s online contact information and nothing more.
- To protect the safety of a child.
- To protect the security, integrity and liability of FCU’s site or service, or to respond to legal or judicial proceedings.
- To help with internal operations of FCU’s website or online service.
- If FCU knows someone misrepresented age on a registration, claiming to be over 13 years of age when they are not.