

COPPA NOTICE: DIRECT NOTICE TO PARENTS AND LEGAL GUARDIANS FOR THE FCU FAM Application

This COPPA NOTICE: Direct Notice to Parents and Legal Guardians (“COPPA Notice”) of children using FCU FAM gives additional information on Florida Credit Union’s practices in collecting and using personally identifiable information from children under 13 years of age with regard to the FCU FAM App, accessible through Florida Credit Union’s online banking platform either through Florida Credit Union’s website or its mobile application (“Site”) and our related sites, players, widgets, tools, apps, data, software, API’s and other services that we provide (“Services”).

For purposes of this COPPA Notice, (i) “child” or “children” mean a child or children under 13 years of age that is/are child(s), (ii) “you” or “your” refers to the parent, legal guardian, or other person that is authorized to enter into contracts on behalf of such child, as an agent of parents and legal guardians of children using the Site regarding FCU FAM’s collection and use of such child’s personal data, and (iii) “we,” “us,” or “our” refers to Florida Credit Union.

Notice

Your consent is required before we will collect, use or disclose your child’s personally identifiable information. Subject to your consent, in order to allow your child to use the FCU FAM Site and Services, FCU FAM would like to collect, use and disclose your child’s information as set forth in this COPPA Notice and in our [COPPA Privacy Policy](#).

What information does the Services and Site collect and use?

Personally identifiable information of children under 13 is collected from such children only with your consent, and if FCU FAM becomes aware of a child under the age of 13 providing personal without your consent, we will attempt to delete that information. While we may receive personally identifiable information directly from you about your children, FCU FAM directly may collect from your children the following: email, password, real name, a user name (which may be a real name or a pseudonym), date of birth, telephone number, the city and country in which the child lives, a profile picture or avatar, information about how the child categorizes him or herself with respect to his or her content (for example, whether the child is a musician, a label or some other category of creator), details of their other websites and social media profiles, including links to those websites and profiles, information from correspondence sent to us from a child, information included in any survey responses and information that children post that may include personally identifiable information, including their voice.

On our Site and Services, we use session cookies to make it easier for your child to navigate the Site and Services. For our Site and Services, we set a persistent cookie to store your child’s general usage behavior and IP addresses but not personally identifiable information. Persistent cookies enable us to track, store and target the interests of our users to enhance the experience on our Site. If your child rejects cookies, your child’s ability to our Site and Services may be limited.

Florida Credit Union also collects the following information automatically:

- The Internet Protocol (IP) address of the device from which a child accesses the Services (this can sometimes be used to derive the country or city from which a child is accessing the Services).
- The specific actions that children take on the Services, including the buttons clicked on in the Site, webpages viewed, the tasks they complete, loans they apply for, requests for money they submit, trophies they earn, progress on trophies, allowance earned, allowance dates and frequency, allowance amount, card limits, card transactions they perform, PIN number configured, invalid PIN attempts, the child’s photo, budget entered, and loan payments made.
- The time, frequency and duration of a child’s visits to the Services.
- The child’s device type, manufacturer, and model.
- The child’s unique device identifier.
- The child’s unique push notification ID for sending device notifications.
- Domain name.
- Browser type and operating system, type, name and version.
- Google Analytics statistics.
- The referring URL or the webpage that led the child to our Site.

How will Florida Credit Union and the Site use this information?

We use the information that we collect about your child for the following educational purposes as more specifically described in our COPPA Privacy Policy. We use personal information collected from children for the following purposes:

- To provide our Services
- To respond to customer service and technical support issues and requests
- To better understand how users' access and use our Site and Services;
- To improve our Site and Services and respond to user desires and preferences; and
- To conduct research or analysis, including research and analysis by third parties.

We de-identify and/or aggregate the information we collect from children under 13 before we use it for any other purposes, as noted below.

- **Unique Identifiers.** We only collect and use unique identifiers, such as IP addresses, as necessary to operate our Site or Services, including to maintain or analyze their functioning; perform network communications; authenticate users or personalize content; and protect the security or integrity of users and our Site and Services. We never use unique identifiers to track users across third-party apps or websites.
- **Aggregate or De-identified Information.** We may use aggregate or de-identified information about children for research, analysis, and similar purposes. When we do so, we strip out names, email, contact information, and other personal identifiers. We may use aggregate or de-identified information for the following purposes:
 - To better understand how users' access and use our Site and Services;
 - To improve our Site and Services and respond to user desires and preferences; and
 - To conduct research or analysis, including research and analysis by third parties.

Does Florida Credit Union share this information with any third parties?

Florida Credit Union does not sell or share children's personal information, and a child may not make his or her personal information public through our services. In general, we may disclose the personal information that we collect about children to provide our Services, to comply with the law, and to protect Florida Credit Union and other users of our Services. For example, we may share children's personal information as follows:

- **Service Providers.** We may disclose the statistical information we collect from children to third-party vendors, service providers, contractors, or agents who perform functions on our behalf.
- **Business Transfers.** If we are acquired by or merged with another Credit Union, we may transfer the personal information we have collected from our users to the other Credit Union.
- **In Response to Legal Process.** We also may disclose the personal information we collect in order to comply with the law, a judicial proceeding, court order, subpoena, or other legal process.
- **To Protect Us and Others.** We also may disclose the personal information we collect where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Service, Privacy Policy, COPPA Privacy Policy, or this Direct Notice or as evidence in litigation in which Florida Credit Union is involved.
- **With Parents.** Parents may request information about the information we have collected from their child by contacting us at AskFCU@flcu.org.
- **Aggregate and De-Identified Information.** We may also use and share aggregate or de-identified information about users with third parties for marketing, research, or similar purposes.

How does the Site get consent from parents or legal guardians for the collection of personally identifiable information?

For all children who are going to use the service the parent must complete the registration for the child. During the registration the parent must mark that they have reviewed and approve the use of the Site by their child and that they have agreed to this COPPA Notice.

It is not possible for a child to be registered in the platform unless the parent or legal guardian has agreed to the terms of this notice. If a child is found to have been setup and the parent or legal guardian has not given authorization, that child can and will be removed from the platform immediately. If a parent signs up for the service but does not complete the registration including opting into this Direct Notice during a single session, the registration will be considered void. At that point the parent or legal guardian will need to reregister, opt into this Direct Notice, and setup their children again.

Can a parent review, change or delete the information collected by the Site and Services about his or her child?

Parents and legal guardians have a right to review the information we have collected about their children, respectively, to delete it, to tell us to stop using it, and to tell us to stop collecting it. If you tell us to stop collecting information about your child, this will prevent you and/or your child from being able to use the Service. To exercise these rights, the parent or legal guardian can login to the software and review information entered and collected by Florida Credit Union. In addition, the parent can remove a child from the platform at any time by going to the "Remove Child" option from within the parent menu in the Site. Parents may login to the product at any time and review the information entered by their children.

In addition, the parent or legal guardian may contact us at AskFCU@fclu.org. You will be required to authenticate yourself as the child's parent or legal guardian to receive information about that child. Please note that copies of information may remain in cached or archived form on our systems after you request us to delete it. Parents may login to the product at any time and review the information entered by their children.