



# Children's Online Privacy Policy

Young Americans, doing business as Young Americans Center for Financial Education and Young Americans Bank ("YA"), is committed to protecting the privacy of children who use our site and programs. This Children's Online Privacy Policy explains how we collect that information, disclose that information, and how we obtain parental consent with respect to information provided by children under the age of 13 ("child" or "children"). This policy is in accordance with the U.S. Children's Online Privacy Protection Act ("COPPA"), and outlines our practices regarding children's personal information. For more information about COPPA and general tips about protecting children's online privacy, please visit the [Federal Trade Commission's website](#). If you have questions or concerns regarding our Children's Online Privacy Policy, please contact us:

Betsy Sklar  
Vice President Business Partnerships and Development  
Young Americans Center for Financial Education  
3550 E. First Ave.  
Denver, CO 80206

303-321-2265

[bsklar@yacenter.org](mailto:bsklar@yacenter.org)

## Section 1

### **The information we collect from children, how it is used, and how we communicate with parents**

YA offers a website which has some content that is primarily targeted at children. We offer a variety of programs and events, and some events may collect information from children. Below, we summarize potential instances of collection and outline how and when we will provide parental notice and/or seek parental consent. In any instance that we collect personal information from a child, we will retain that information only so long as reasonably necessary to fulfill the event request or allow the child to participate in the event, and ensure the security of our users and our services, or as required by law. If we discover that we have collected information from a child in a manner inconsistent with COPPA's requirements, we will either discontinue use of the information or immediately seek the parent's consent for that collection.

#### **Registration**

Children can, in many cases, register to participate in an event with YA. During the registration process, we may ask the child to provide certain information for notification and security purposes, including a parent or guardian's email address, the child's first and last name, the child's age and/or birthdate, the child's gender, the child's business name, the child's school name, and/or the child's organization affiliation. We will not require a child to provide more information than is reasonably necessary in order to participate in an activity.



**About the collection of parent email address:** Consistent with the requirements of COPPA, on any child-targeted page, or in any instance where we ask for age and determine the user is age 12 or under, we will ask for a parent or guardian email address. If you believe your child is participating in an activity that collects personal information and you or another parent/guardian have NOT received notice seeking your consent, please feel free to contact us. The parent email is the email YA will use for marketing/communication messages, which the user may opt out of at any time.

### **Email Contact with a Child**

On occasion, in order to respond to a question or request from a child, YA may need to ask for the child's online contact information, such as an email address. YA will discontinue use immediately after responding to the question or fulfilling the request.

### **Persistent Identifiers**

When users interact with us, certain information may automatically be collected, both to make our website more interesting and useful to children and for various purposes related to YA. The age and identity of a user is indeterminable by YA. Examples include the type of computer operating system, the user's IP address or mobile device identifier, the web browser, the frequency with which the user visits various parts of our sites, and information regarding the online or mobile service provider. This information is collected using technologies such as cookies, flash cookies, web beacons, and other unique identifiers. This information may be collected by YA or by a third party such as Google Analytics. This data is principally used for internal purposes only, in order to:

- customize content and improve our website and programs
- conduct research and analysis to address the performance of our website
- generate anonymous reporting for use by YA

## **Section 2**

### **When information collected from children is available to others**

In addition to rare instances where a child's personal information is made available publicly (after receiving parental consent), we also may share or disclose personal information collected from children in a limited number of instances, including but not limited to the following:

- We may share information with our service providers if necessary for them to perform a business, professional, or technology support function for us. Data is protected under a mutual non-disclosure agreement.
- We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our website; (iii) to protect the security or integrity of our website, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.



### Section 3 Parental choices and controls

At any time, parents can refuse to permit us to collect further personal information from their children, and can request that we discontinue using the personal information we have collected. Please keep in mind that a request to discontinue use may lead to a termination of a child's participation in our programs. Inquiries may be directed to:

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In any correspondence such as e-mail or mail, please include the child's name and the parent's email address and telephone number. To protect children's privacy and security, we will take reasonable steps to help verify a parent's identity before granting access to any personal information.