

COPPA Privacy Policy for the FCU FAM® Application

Florida Credit Union (“we,” “our,” “us”) values the privacy of children and of all of its users. This COPPA Privacy Policy (“COPPA Policy”) is designed to comply with the Children’s Online Privacy Protection Act (“COPPA”) and contains important information about how we collect, use, and disclose the personal information we collect from children under thirteen years old who take courses (the “Services”) provided through our [website](#) and mobile application and accessible via online banking (collectively, the “Site”). This Site and Services may be used by children under 13. This COPPA Privacy Policy applies to the information we collect from children under 13 through the Site directed towards children. Florida Credit Union will handle children’s personal information as described in this COPPA Policy. Any personal information we collect about other users (e.g., teens and adults) will be treated in accordance with the Florida Credit Union [Privacy Policy \(“Privacy Policy”\)](#). The use of our Site and any dispute over privacy, is subject to this COPPA Policy, the [Privacy Policy](#), and our [FCU FAM® Agreement and Disclosure](#), including its applicable limitations on damages and the resolution of disputes. Our [FCU FAM® Agreement and Disclosure](#), Privacy Policy, and Membership and Account Agreement are incorporated by reference into this COPPA Policy.

Who Will Collect Information About Children?

Florida Credit Union operates the Site and Services and will collect children’s personal information as described in this COPPA Policy and our Privacy Policy. We can be contacted by:

- Email - AskFCU@flcu.org
- Phone - +352-377-4141

FCU FAM® financial education solutions are offered in conjunction with an outside service provider. They will have access to the data provided by your child but are contractually obligated to not disclose the data to any other third party or unauthorized individuals. Florida Credit Union may service providers with statistical information.

What Information Do We Collect About Children and Why?

As described in further detail below, we collect some personal information from children so that we can track their utilization of the product and track rewards. Data is retained to provide financial management services to the child.

How is Information Collected?

As a parent or legal guardian, you will create the account, register the child, and provide information about the child. This includes creating a username and password and registering the child’s device. When registering the child, we will track the mobile device they are utilizing so that notifications can be sent from the child to the parent. We may also collect additional demographic information from the parent. In addition, we may collect information about children directly from children, as well as automatically through a child’s use of our Site and Services. We may directly 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. We will not require a child to disclose more information than is reasonably necessary to use our Services. A copy of a notice of our COPPA Policy is posted at the bottom of all pages within FCU FAM™. From children under 13, we use the date of birth to verify the child’s age. We collect the child’s first name. We do not ask for the child’s last name.

Parents may request that we stop collecting information by contacting us via email at AskFCU@flcu.org. However, this will prevent the use of the Services. Upon termination of Services all children’s data will be permanently deleted from the solution.

Information We Collect Automatically

We may automatically collect the following information about a child’s use of our Site through cookies and other technologies: domain name; browser type and operating system; web pages viewed; links clicked; buttons clicked; the length of time spent on our Site; the length of time our solution was utilized; Google Analytics statistics; the referring URL, or the webpage that led the child to our Site; device name and model; operating system type, name, and version; and activities within our Site. We may also collect IP addresses, push notification ID, device identifier or a similar unique identifier from users of our product, including

children. We use such identifiers only to support the internal operations of our product and we do not use such identifiers to collect information about the child outside of our Site.

Other Information We Collect About Children

We collect information about children's performance and activities on our Site, including financial performance. This information is for internal use only and will not be disclosed to other entities; however, we do not use this information in personally identifiable form for our own commercial purposes. Before we analyze or use any activity data for our own commercial purposes, we de-identify and/or aggregate such information.

How We Use Children's Information

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.

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.

How We Share Children's Information

We do not sell 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 statistical information 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, if substantially all of our assets are transferred to another Credit Union, or as part of a regulatory merger proceeding, 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 and Conditions, Privacy Policy, or this COPPA Policy, 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. Contact us via email 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.

Your Rights to Review, Delete, and Control Our Use of Children's Personal Information

Parents have a right to review the information we have collected about their children, respectively, and to delete it, and to tell us to stop using it. To exercise these rights, Contact us via email at AskFCU@flcu.org. You will be required to authenticate yourself as the child's parent 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.

Changes to This COPPA Policy

This COPPA Policy is current as of the date of this document. We may change this COPPA Policy from time to time in our sole discretion, so please be sure to check back periodically.

We will post any changes to this COPPA Policy on our Site, at <https://www.flcu.org>. Your continued use of the Site and the Services following any change shall constitute your acceptance of such change. If we make any changes to this COPPA Policy that materially affects our practices with regard to the personal information we have previously collected from a child, we will provide you with notice in advance of such change by highlighting the change on our Site.