

CHILDREN'S ONLINE PRIVACY POLICY

The Elizabeth Smart Foundation (“we”, “us,” “our,” and the “Foundation”) takes the privacy of children seriously. The following Children’s Online Privacy Policy sets forth our information collection, disclosure, and parental consent processes with respect to the collection of information of children 12 years old or younger (“child” or “children”). Unless otherwise defined in this Children’s Online Privacy Policy, all capitalized terms shall have the meanings set forth in our general [Privacy Policy](#).

What Information Do We Collect From Children?

Login and Account Registration. If a login is required, during the login registration process, we may collect the following information, including (i) a parent or legal guardian’s name and email address, and (ii) the child’s name, age, gender, email address. If a child registers an account on the Sites, the Foundation will seek verifiable parental consent by email prior to authorizing the account and allowing the child to use the account when using the Sites. Moreover, the Foundation will also seek verifiable parental consent by email if an activity, program or the Services allows a child to provide personal information. In any event, we will not require a child to provide more information than is reasonably necessary in order to participate in an activity on the Sites.

Summary of Applicable Parent Notice/Consent:

- ✓ Verifiable parental consent by email (described below).

How We Use This Information: This information is used only internally to:

- ✓ Perform network communications;
- ✓ Authenticate users of, or personalize the content on, the Sites or Services;
- ✓ Protect the security or integrity of the user, Sites, or Services;
- ✓ Ensure legal or regulatory compliance;
- ✓ Respond to inquiries;
- ✓ Provide the Services requested; and
- ✓ Setup and administer an account.

Summary of Applicable Parent Notice/Consent:

- ✓ Verifiable parental consent by email (described below); or
- ✓ High level verifiable parental consent (described below).

Continuous Communications with a Child. In connection with certain activities or Services, the Foundation may collect a child’s online contact information, such as email address, to communicate with the child more than once. In such instances, the Foundation retains the child’s online contact information to honor the request and for no other purpose such as marketing. Whenever the Foundation collects a child’s online contact information for continuous communication, the Foundation simultaneously requires a parent email address in order to notify the parent about the collection and use of the child’s information, as well as to provide the parent an opportunity to prevent further contact with the child. On some occasions a child may be engaged in more than one ongoing communication, and a parent may be required to “opt-out” of each communication individually.

Summary of Applicable Parent Notice/Consent:

- ✓ Verifiable parental consent by email (described below).

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One-Time Communications with a Child. If the Foundation responds to a question or request from a child, the Foundation may need to inquire and ask for the child's online contact information, such as an email address. The Foundation will then delete this information immediately after responding to the question or request.

Information we collect automatically. If a child visits the Sites to browse, read, or download information, the child's web browser may automatically send us the child's Network Information.

How We Use This Information: This information is used only internally to:

- ✓ Maintain or analyze the functioning of the Sites or Services;
- ✓ Perform network communications;
- ✓ Authenticate users of, or personalize the content on, the Sites or Services;
- ✓ Serve contextualize advertising on the Sites or Services or cap the frequency of advertising;
- ✓ Protect the security or integrity of the user, Sites, or Services;
- ✓ Ensure legal or regulatory compliance;
- ✓ Respond to inquiries;
- ✓ Provide the Services requested; and
- ✓ Setup and administer an account.

In the event we collect (or allow others to collect) such information from children on the Sites for other purposes, we will notify parents and obtain verifiable parental consent.

When Is Information Collected From Children Publicly Available?

On those occasions where a child's personal information is posted publicly, the Foundation will only do so after receiving high-level verifiable parental consent. Additionally, the Foundation may share or disclose personal information collected from children in a limited number of instances, including the following:

- The Foundation may share information with service providers if necessary to perform a professional, business, or technology support function for the Foundation.
- The Foundation may disclose personal information if permitted or required by law, such as, in response to a court order or a subpoena.
- To the extent permitted by applicable law, the Foundation also may disclose personal information collected from children under the following circumstances:
 - If the Foundation believes disclosure may prevent crime, facilitate an investigation related to public safety or protect the safety of a child using our Sites;
 - In response to a law enforcement or public agency's (including schools or children services) request;
 - To protect the security or integrity of the Sites, applications, and other technology, as well as the technology of the Foundation's service providers; or

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- Enables the Foundation to take precautions against liability.

How Do We Obtain Verifiable Parental Consent?

Email Consent. We will ask for the email address of a parent or legal guardian before we collect any personal information from a child. In the email we will explain what information we are collecting, how we plan to use it, how the parent can provide consent, and how the parent can revoke consent.

If we do not receive parental consent within a reasonable time, we delete the parent contact information and any other information collected from the child in connection with that activity.

If you believe your child is participating in an activity that collects personal information and you or another parent/guardian have NOT received an email providing notice or seeking your consent, please contact us at info@elizabethsmartfoundation.org. We will not use parent emails provided for parental consent for marketing purposes, unless the parent has expressly opted in to email marketing or has separately participated in an activity that allows for such email contact.

High-Level Consent. In the event the Foundation collects personal information from a child that is posted publicly, the Foundation will seek high level verifiable parental consent prior to doing so. This includes, but is not limited to, asking for a credit card or other payment method for verification (with a nominal charge involved), speaking with a trained representative by telephone or video chat, or requiring a signed consent form by mail, email attachment, or fax. After providing high-level verifiable parental consent, a parent may have the opportunity to use a pin or password in future communications as a way to confirm the parent's identity.

Teacher Consent in Lieu of a Parent. With respect to certain school-based activities, teachers and school administrators may provide consent for the collection of personal information from children. Schools should notify parents about these activities. For more information on parental rights with respect to a child's educational record under the Family Educational Rights and Privacy Act (FERPA), please visit the [FERPA website](#).

Parental Choices & Controls

At any time, parents can refuse the Foundation from collecting further personal information from their children in association with a particular account, and can request that the Foundation delete from our records the personal information the Foundation collected in connection with that account. ***A request to delete records may lead to a termination of an account or Services provided by the Foundation.***

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

How to Contact Us:

Please contact us at the email address or phone number below with any inquiries relating to this Children's Online Privacy Policy, the [Privacy Policy](#), or the Foundation's collection and use practices:

Telephone Number: 385-388-8300

Email Address: info@elizabethsmartfoundation.org