

Adirondack Swimming Policy on Children's Online Privacy Protection

The Children's Online Privacy Protection Act (COPPA) of 1998 (<http://www.coppa.org/coppa.htm>) aims to protect the privacy of individuals under the age of 13 and applies to any individual, partnership, corporation, trust, estate, cooperative, association, or other entity that operates websites on the Internet or an online service, and who collect or maintain personal information from or about the users of or visitors to such websites or online services.

Although COPPA pertains to websites or online services operated for commercial purposes and does not include nonprofit entities, Adirondack Swimming believes that protecting children's privacy is an imperative and makes every effort to comply with the spirit of the Act. In so doing, Adirondack Swimming does not collect, maintain or disclose personal information related to children on our website. Furthermore, Adirondack Swimming extends the scope of COPPA by applying its policy to all swimmers under the age of 18.

COPPA covers the disclosure of personal information about children, which includes:

- the release of personal information collected from a child in identifiable form by an operator for any purpose, except where such information is provided to a person other than the operator who provides support for the internal operations of the website and does not disclose or use that information for any other purpose; and
- making personal information collected from a child by a website or online service directed to children or with actual knowledge that such information was collected from a child, publicly available in identifiable form, by any means including by a public posting, through the Internet, or through, for example, a home page of a website

The term "personal information" means individually identifiable information about an individual collected online, including

- a first and last name;
- a home or other physical address including street name and name of a city or town;
- an e-mail address;
- a telephone number;

- a Social Security number;
- any other identifier that permits the physical or online contacting of a specific individual; or
- information concerning the child or the parents of that child that the website collects online from the child and combines with an identifier described above

In compliance with the spirit of COPPA, Adirondack Swimming will not collect personal information from a child in any manner that violates the guidelines prescribed below and will:

- provide notice on its website of what information is collected from children, how such information is used, and disclosure practices for such information;
- obtain verifiable parental/guardian consent for the collection, use, or disclosure of personal information from children;
- provide, upon request of a parent/guardian whose child has provided personal information, upon proper identification of that parent/guardian:
 - a description of the specific types of personal information collected from the child;
 - the opportunity to refuse to permit Adirondack Swimming to further use or maintain in retrievable form, or collect in the future, personal information from that child; and
 - notwithstanding any other provision of law, a means that is reasonable under the circumstances for the parent to obtain any personal information collected from that child;
- maintain reasonable procedures to protect the confidentiality, security, and integrity of personal information collected from children.

Verifiable parental/guardian consent is not required and will not be sought when:

- online contact information collected from a child is used only to respond directly on a one-time basis to a specific request from the child and is not used to re-contact the child and is not maintained in retrievable form by Adirondack Swimming;
- a request for the name or online contact information of a parent/guardian or child is used for the sole purpose of obtaining parental consent or providing notice under this policy and where such information is not maintained in retrievable form by Adirondack Swimming if parental consent is not obtained after a reasonable time;

- online contact information collected from a child is used only to respond more than once directly to a specific request from the child and is not used to re-contact the child beyond the scope of that request:
 - if, before any additional response after the initial response to the child, Adirondack Swimming uses reasonable efforts to provide a parent/guardian notice of the online contact information collected from the child, the purposes for which it is to be used, and an opportunity for the parent/guardian to request that the operator make no further use of the information and that it not be maintained in retrievable form; or
 - without notice to the parent/guardian in such circumstances as are appropriate, taking into consideration the benefits to the child of access to information and services, and risks to the security and privacy of the child;
- the name of the child and online contact information (to the extent reasonably necessary to protect the safety of a child participant on the site) is:
 - used only for the purpose of protecting such safety;
 - not used to re-contact the child or for any other purpose; and
 - not disclosed on the site, if the operator uses reasonable efforts to provide a parent/guardian notice of the name and online contact information collected from the child, the purposes for which it is to be used, and an opportunity for the parent to request that the operator make no further use of the information and that it not be maintained in retrievable form;
- the collection, use, or dissemination of such information by the Adirondack Swimming necessary
 - to protect the security or integrity of our website;
 - to take precautions against liability;
 - to respond to judicial process; or
 - to the extent permitted under other provisions of law, to provide information to law enforcement agencies or for an investigation on a matter related to public safety.