

# COPPA – Children’s Online Privacy Protection Act

# Agenda

- What is COPPA?
- New COPPA Changes
- Impact on Non-Profit Organizations

# What is COPPA?

- **Original Enactment:** 1998:
- **Purpose:** Give parents greater control over what information their children can give over the Internet
- **General Rule:** “Operators” of commercial websites and online services must provide notice and obtain parent’s consent before collecting personal information from children under 13

# What Are “Online Services”?

- “Any service that is available over the Internet, or that connects to the Internet or a wide-area network”
- Including...
  - Mobile apps, network-connected games, online purchasing, VOIP services, Internet-enabled gaming platforms, location services

# Who Is Covered?

- Operators of commercial web sites or online services, or a portion thereof, that are “directed to children” (under 13) and collect personal information from collection
- Operators of general audience web sites or online services who have “actual knowledge” that they collect personal information from children
- Third parties (e.g., social plug-ins and ad networks) with actual knowledge that they are collecting personal information directly from users of another site or online service directed to children
  - (First parties are strictly liable for actions of third parties on first party’s site or service)

# “Personal Information”

- First and last name
- Home or other physical address (street name, name of city/town)
- Online contact information
- Telephone number
- Social security number
- Screen name/user name
- Persistent identifiers (recognize user over time and across different sites)
- Photograph, video, or audio file that contains a child’s image or voice
- Geolocation information sufficient to identify street and city/town

# Other Issues

- Age Screening
- Direct Notice to Parents
- Verifiable Parental Consent