

Online Privacy Policy

Little Kids Rock (“LKR”) is committed to protecting the privacy of children and other visitors who access our sites and applications. By accessing any of LKR’s sites or applications, you are consenting to this Online Privacy Policy (the “Policy”). This Policy describes what information LKR collects from users, including children, when they visit LKR’s sites; how such information is used; when such information may be disclosed to third parties; how users, parents, and guardians can control the use and disclosure of information concerning children; and how information is protected. This Policy is also in accordance with the U.S. Children’s Online Privacy Protection Act (“COPPA”), and outlines our practices in the United States regarding children’s personal information. Children should always check with their parents or guardians before entering information on any website or application and LKR encourages families to discuss their household guidelines regarding the online sharing of personal information.

The Information We Collect, How We Use It, and How and When We Communicate With Parents

LKR offers to its users a range of sites and applications, some of which are primarily targeted at children, and others that are intended for users of all ages and their teachers and families. This Policy summarizes potential instances of collection and outlines how and when we will provide parental notice and/or seek parental consent when collecting information from children. 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 activity request or allow the child to continue to participate in the activity, and ensure the security of our users and our services, or as required by law. In the event we discover we have collected information from a child in a manner inconsistent with COPPA’s requirements, we will either delete the information or immediately seek the parent’s consent for that collection.

Our sites and applications offer a variety of activities, including chat communications, email newsletters, and contests, among other things. For notification and security purposes, these activities may require LKR to collect information from participating users, including children under the age of thirteen (13). As outlined below, LKR may request certain information from users including (i) birth date (including from children, to validate their age); (ii) username and password; (iii) the child’s email address; (iv) a parent or guardian’s email address; and (iv) other profile information such as communications preferences.

Verifiable Parental Consent

Consistent with the requirements of COPPA, in some instances where we ask for the personal information of a child under the age of 13 beyond just the child’s email address (and sometimes first name), we will ask for a parent or guardian email address before we collect any personal information from the child. In the email to the child’s parent or guardian we will (i) state that LKR has collected the parent/guardian’s email address from the child in order to obtain the parent/guardian’s consent; (ii) state that the parent/guardian’s consent is required for the collection, use, or disclosure of such information, and that LKR will not collect, use, or disclose any personal information from the child if the parent/guardian does not provide such consent; (iii) set forth the additional items of personal information LKR intends to collect from the child, or the potential opportunities

for the disclosure of personal information, should the parent/guardian provide consent; (iv) contain a hyperlink to this Policy; (v) provide the means by which the parent/guardian can provide verifiable consent to the collection, use, and disclosure of information; and (vi) state that if the parent/guardian does not provide consent within a reasonable time from the date the direct notice was sent, LKR will delete the parent/guardian's email address from its records. 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 feel free to contact us at privacycontact@littlekidsrock.org. We will not use parent emails provided for parental consent purposes to market to the parent, unless the parent has expressly opted-in to email marketing or has separately participated in an activity that allows for such email contact.

With regard to school-based activities, COPPA allows teachers and school administrators to act in the stead of parents to provide consent for the collection of personal information from children. Schools should always 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 site.

Chat / Commenting and Electronic Contact with Children

Certain lessons, games, and activities that are directed to children allow users to communicate directly with LKR staff by means of a chat system or may allow users the ability to comment on a post or activity. In most cases, these chat /commenting systems employ filters that are intended to prevent the communication of both personal information and age-inappropriate words and phrases. In addition to filters, we may employ moderation and/or encourage other users to flag inappropriate communications. We strongly encourage children who use these interactive features on our sites and applications never to provide personal information about themselves or any third party, and certainly never to attempt to circumvent our filters or moderation. We also recommend that parents/guardians carefully supervise their children when the children participate in online activities.

Where LKR employs a chat /commenting system that does not filter personal information, we will first seek consent from the parent/guardian in the manner described under the heading "Verifiable Parental Consent."

Additionally, in order to respond to a question or request from a user, LKR may need to ask for the user's online contact information, such as an email address. If the user is a child under the age of 13, LKR will delete this information immediately after responding to the question or request.

In connection with certain activities or services, we may need to communicate with the child more than once. In such instances we will retain the child's online contact information to honor the request and for no other purpose such as marketing. Whenever we collect a child's online contact information for ongoing communications, we will simultaneously require a parent email address in order to notify the parent/guardian. We will send a direct notice to the parent/guardian's email address that (i) states that LKR has collected the child's online contact information from the child in order to communicate with the child; (ii) states that the LKR has collected the parent/guardian's online contact information from the child in order to notify the parent/guardian that the child has communicated with LKR; (iii) states that the online contact information collected from the child will not be used for any other purpose, disclosed, or combined with any other information collected from the child; (iv) states that the parent/guardian may refuse to permit further contact with the child and require the deletion of the parent/guardian's and child's online contact information, and how

the parent/guardian can do so; (v) states that if the parent/guardian fails to respond to this direct notice, LKR may use the online contact information collected from the child for the purpose of the communications; and (vi) provides a hyperlink to this Policy.

Any contact between a child and LKR staff via electronic chats, emails, or any other means, will be conducted in accordance with applicable laws, agreements, and contractual requirements.

Electronic Newsletters

Visitors can provide their emails addresses to receive periodic newsletters from LKR. These newsletters inform users about new content added to LKR's sites and applications. Visitors may change their preferences regarding emails at any time through the unsubscribe link in the newsletters.

If the visitor is a child under the age of 13, in order to receive our newsletter(s), that child will be asked to provide a parent/guardian's email address in addition to his/her own. We will send a direct notice to the parent/guardian's email address that (i) states that LKR has collected the child's online contact information from the child in order to provide newsletters to the child; (ii) states that the LKR has collected the parent/guardian's online contact information from the child in order to notify the parent/guardian that the child has registered to receive newsletters from LKR; (iii) states that the online contact information collected from the child will not be used for any other purpose, disclosed, or combined with any other information collected from the child; (iv) states that the parent/guardian may refuse to permit further contact with the child and require the deletion of the parent/guardian's and child's online contact information, and how the parent/guardian can do so; (v) states that if the parent/guardian fails to respond to this direct notice, LKR may use the online contact information collected from the child for the purpose of sending newsletters; and (vi) provides a hyperlink to this Policy.

The link to remove the child's information will expire approximately forty-eight (48) hours from the time it is sent, but at any time after receiving this notification email, the child's parent/guardian may request that we stop sending the child the newsletter(s) by following the "unsubscribe" instructions from the end of any of the newsletter emails. When a child provides a parent's/guardian's email address when signing up for newsletter(s), that email address is used to send the notification email message and is subsequently deleted from our system.

Contests

LKR may host online contests to encourage users, including children, to engage with the sites and applications' content. For contests, we typically require only the information necessary for a user to participate, such as the user's email address, first name (to distinguish among family members), teacher name and parent email address (to notify the parent where required by law), if applicable. We only contact the parent for more personalized information for prize-fulfillment purposes when the child wins the contest. After a contest ends, LKR will delete the contact information collected. Of course, some contests may ask the child to submit their own created content ("User Generated Content") along with the child's entry. In those instances, we may require parental consent prior to submission, and will seek parental consent in the manner described under the heading "Verifiable Parental Consent."

By submitting User Generated Content, users, or parents/guardians on behalf of their children, acknowledge and agree that they have proper rights to the User Generated Content, and grant to LKR a nonexclusive, perpetual, irrevocable, gratis (*i.e.* free) license to utilize the User Generated Content in all ways provided for under Section 106 of the U.S. Copyright Act, including, but not limited to, the right to reproduce, perform, and create works derivative of, that User Generated Content. Submitting User Generated Content does not surrender the users' copyright.

Persistent Identifiers

When users, including children, interact with us, certain information may automatically be collected, both to make our sites and applications more interesting and useful to users and for various purposes related to our business. 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 or applications, 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 LKR or by a third party. This data is principally used for internal purposes only, in order to:

- provide users with access to features and activities on our sites and applications
- customize content and improve our sites and applications
- conduct research and analysis to address the performance of our sites and applications
- generate anonymous reporting for use by LKR

In the event we collect (or allow others to collect) such information from children on our sites and applications for other purposes, we will seek parental consent in the manner specific to the interaction as described in this Policy, or otherwise as described under the heading "Verifiable Parental Consent."

California Privacy Rights

California Civil Code Section 1798.83 permits our visitors who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to or write us: privacycontact@littlekidsrock.org, or you may contact us via regular mail at:

Little Kids Rock
P.O. Box 43369
Montclair NJ 07043-0369

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to privacycontact@littlekidsrock.org. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

Changes To This Policy and Notice

LKR reserves the right to revise this Policy at any time for any reason in our sole discretion by posting an updated Policy without advance notice to you. Such revisions shall be effective immediately upon posting and if you use LKR's sites or applications after they become effective it will signify your agreement to be bound by the changes. We shall post or display notices of material changes on LKR's sites or applications and/or email you or notify you upon login about these changes; the form of such notice is at our discretion. However, we encourage you to check this Policy often for updates.

Please contact us at the mailing address, email, or phone number below with questions about our Policy and collection and use practices:

Little Kids Rock
P.O. Box 43369
Montclair NJ 07043-0369
Phone: (973) 746-7078

Email: privacycontact@littlekidsrock.org

In any correspondence such as email 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.