COPPA DIRECT NOTICE TO LAUNCH USERS

This Direct Notice under the Children's Online Privacy Protection Act ("COPPA") to parents of children using LAUNCH (the "Service"; "app") gives Kirtland Federal Credit Union ("Kirtland CU"; the "credit union") additional information on LAUNCH practices in collecting and using personally identifiable information from children under 13 years of age with regard to the LAUNCH app located on the IOS and Android App store ("Site") and our related sites, players, widgets, tools, apps, data, software, API's and other services that we provide ("Services").

For purposes of this COPPA Direct Notice, (i) "child" or "children" mean a child or children under 13 years of age that is/are child(s) and (ii) "you", "your", "parent", refers to the parent or legal guardian authorized to enter into contracts, and opening and maintaining accounts as joint owner, on behalf of such child(ren) using the app, Kirtland CU and LAUNCH collection, and use of such child(ren) personal data.

Notice

Your consent is required before we will collect, use or disclose your child's personally identifiable information. Subject to your consent, to allow your child to use the Site and Services, LAUNCH will collect, use and disclose your child's information as set forth in this COPPA Direct Notice, our COPPA Privacy Policy, our Online Privacy Policy, and in our general Privacy Notice.

What information does the Service and Site collect and use?

Personally identifiable information of children under 13 is only collected from such children with your consent, and if Kirtland CU or LAUNCH becomes aware of a child under the age of 13 providing personally identifiable information without your consent, we will attempt to delete that information as permitted by law.

While we may receive personally identifiable information directly from you about your children, Kirtland CU or LAUNCH may directly collect from your children:

- An email address,
- A phone number,
- A password,
- The child's real name,
- A username (which may be a real name or a pseudonym),
- 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 gamer, or some other category of creator),
- Details of 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 the child posts that may include personally identifiable information, including their voice.

We use session cookies to make it easier for your child to navigate the Site and Services. For our Site and Services, we set a persistent cookie to store your child's general usage behavior and IP addresses but not personally identifiable information. Persistent cookies enable us to track, store and target the interests of our users to enhance their experience on our Site and with our Services. If your child rejects cookies, your child's ability to use our Site and Services may be limited.

LAUNCH also collects the following information automatically:

- The Internet Protocol (IP) address of the device from which a child accesses the Services (this can sometimes be used to derive the country or city from which a child is accessing the Site and/or Services
- The specific actions that a child takes on the Site or Services, including the buttons clicked on within the app, the tasks they complete, loans they apply for, requests for money they submit, trophies they earn, progress on trophies, allowance earned, allowance dates and frequency, allowance amount, card limits, card transactions they perform, PIN number configured, invalid PIN attempts, the child's photo, budget entered, and loan payments made.
- The time, frequency and duration of a child's visits to the Site or Services.
- The child's device type, manufacturer, and model.
- The child's unique device identifier.
- The child's unique push notification ID for sending device notifications.

How will Kirtland CU, LAUNCH and the Site/Service use this information?

We use the information that we collect about your child for the following purposes as more specifically described in our COPPA Policy:

- To provide our Services; and
- 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 aggregated or de-identified information about children for research, analysis, and similar purposes. When we do so, we strip out names, e-mail, contact information, and other personal identifiers. We may use aggregated 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.

Does Kirtland CU or LAUNCH share this information with any third parties?

We do not sell or share children's personal information, and a child may not make his or her personal information public through the service. 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 Kirtland CU and other users of our Services.

How does the Site get consent from parents for the collection of personally identifiable information?

For all children who are going to utilize the Service, the parent must complete the registration for the child. During the registration the parent must mark that they have reviewed and approve the usage of the app/Service by the child and that they have agreed to this COPPA Direct Notice.

It is not possible for a child to be registered in the platform unless the parent has agreed to the terms of this disclosure. If a child is found to have been set up and the parent has not given authorization, that child can and will be removed from the platform immediately. If a parent signs up for the service but does not complete the registration including opting into the COPPA Direct Notice during a single session, the registration will be considered void. At that point, the parent will need to reregister, opt into the COPPA Direct Notice, and set up their child again.

Can a parent review, change or delete the information collected by Kirtland CU, the Site, or the Service about their child?

Parents may login to the Site/Service at any time and review the information entered by their child(ren). Parents have a right to review the information collected about their child(ren), respectively, and to delete it, and to tell us to stop using it.

To exercise these rights, the parent can login to the software and review information entered and collected by Kirtland CU and LAUNCH. In addition, the parent can remove a child from the platform at any time by going to the "Remove Child" option from within the parent menu in the app/Service.

The parent may also contact Kirtland CU at:

Kirtland Credit Union
PO Box 80570
Albuquerque, NM 87198
(505) 254-4369 or 1.800.880.5328
KirtlandCU.org (https://www.kirtlandcu.org)

You will be required to authenticate yourself as the child's parent/joint owner on the account to receive information about that child or to make changes to the account or other related services.

Please note that copies of information may remain in cached or archived form on our systems after you request us to delete the information.