

SUBJECT: CHILDREN'S PRIVACY POLICY

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I. PURPOSE

The Naperville Public Library (NPL) recognizes the need to provide additional privacy protections when children provide personal information on the web. The purpose of this policy is to make clear what information the NPL collects, how NPL uses the information and parent/guardian rights. The following guidelines supplement our Confidentiality and Privacy Policy (230) and follow the rules set by the Children's Online Privacy Protection Act (COPPA) and other applicable laws. In this policy, "child" refers to an individual under 13 years old and "parent" refers to a child's parent or guardian.

II. SCOPE

A. Information We Collect

When a child uses NPL's website to register for a service or program, the NPL may collect the following personal information:

- Name
- Birthdate
- Address
- Email Address
- NPL Card Number
- School
- Grade
- Emergency Contact
- Days of Availability

NPL has adopted this privacy and confidentiality policy so children can participate in NPL activities without giving out unnecessary personal information. We do not require a user to disclose more information than is reasonably necessary to participate in an activity.

NPL allows a parent to review his or her child's personal information, ask to have it deleted, and refuse to allow any further collection or use of his or her child's information (see below for further instructions).

B. How We Use the Information

NPL uses the personal information a child submits to operate, maintain, and provide to the child the features and functionality of the service or program.

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NPL may use certain information about a child without identifying a child as an individual to third parties. We do this for purposes such as analyzing how the service or program is used, diagnosing service or technical problems, and maintaining security.

I. PROVISIONS

A. Disclosure of Information

NPL does not sell, trade, disclose or otherwise transfer to outside parties any child's personal information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing our programs, so long as those parties agree to keep this information confidential. We may also release a child's information when we believe release is appropriate to comply with the law, enforce NPL policies, or protect our or others' rights, property, or safety.

Parents have the option to agree to our collecting and use of their child's personal information without agreeing to the disclosure of the information to third parties. However, when a parent agrees to the collection and use of their child's personal information, NPL may release that information to third parties who use it solely to provide support for the internal operations of the website service, including technical support. A child may participate in certain activities at NPL without consenting to our disclosure of said child's personal information to third parties.

B. Parental Consent

NPL requires parental consent before we collect data from children and/or permit a child to use our services. Please click the consent waiver and submit accordingly (see [Parental Consent form](#) on NPL website). If you do not agree to the consent waver, please contact NPL's HR Manager for additional registration options.

C. Change in This Policy

NPL may amend the Children's Privacy Policy at any time. We will apply material changes to this policy only in compliance with applicable law, including any applicable provisions of COPPA that require parent consent. **All policy updates will be posted on our website with revision effective dates.** In the event NPL amends the policy in a way that materially affects the way

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NPL collects, uses or discloses a child's personal information the parent will be notified and a new consent form will be required.

D. Account Revisions

Parents may review, correct, update, or delete their child's personal information that has been provided to us at any time by contacting NPL's HR Manager.

E. Revoking and Deleting Their Consent

At any time, parents may revoke their consent, refuse to allow us to further use or collect their child's personal information, and direct us to delete the information. If a parent revokes his or her consent, the child may become ineligible to participate in current applicable NPL services or programs. That child will continue to have access to services and programs that do not require the child's personal information. If a parent chooses to delete his or her child's information, NPL will not use it for any purpose except where required by applicable laws, regulations, or standards.

To revoke parental consent, or if there are any questions regarding this privacy policy, please contact NPL's HR Manager.

F. Certification

Certifying the validity of information may be required of an applicant. False information contained in the application may cause rejection of application or forfeit current participation in NPL activities.

Direct Notice to Parents

It is Naperville Public Library's (NPL) intention to adhere to the Children's Online Privacy and Protection Act (COPPA). Our Children's Privacy Policy describes our practices of collecting, using, and disclosing personal information from children under 13. Please review the Children's Privacy Policy which provides the parental consent requirement and instruction. We also suggest you review our Confidentiality and Privacy Policy (230). If you have any questions about these policies, you may contact the NPL HR Manager.

Direct Notice to Children

Thank you for your interest in Naperville Public Library's (NPL) programs and services. You may be required to provide your name, birthdate, address, grade, school, library card number, email address, emergency contact and days of availability to participate in some programs or

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services. If you are under age 13, you must get your parent/guardian to agree to your sharing this information with NPL. Please ask a parent/guardian to read this notice and follow the instructions provided in our Children's Online Privacy Policy for submitting consent.