

# Everything you need to know about complying with COPPA

**The Children's Online Privacy Protection Act of 1998 (COPPA) is a U.S. federal law, enforced by the Federal Trade Commission (FTC) and state Attorneys General.**

- COPPA applies to the online collection of personal information from US residents under 13 years old
- Personal information includes persistent identifiers, geolocation and photo, video and voice recordings relating to children
- Advertising that is targeted using behavioural data or interest-based profiles is prohibited under COPPA

## When advertising to children consider:

- **DATA PRIVACY:** could data from under-16s be collected in the course of delivering your ad? ← Regulated by FTC with COPPA
- **ADVERTISING EXPERIENCE:** are the form, content and messaging appropriate for the target age of intended audience? ← guidelines from the Children's Advertising Review Unit (CARU)

## When does COPPA apply?

- If you know the user is under 13
- If you have child-directed content on your site, in your ad or online service

## What does COPPA cover?

COPPA specifies:

- That no personal data may be collected from under-13s without parental consent
- what a website operator must include in a privacy policy
- how to obtain verifiable consent from a parent or guardian

## What's at risk?

- Fines: up to \$42,530 per violation
- Cost of litigation
- The significant brand damage of negative PR

## Some more important info on COPPA

- COPPA seeks to **put parents in control** over what information is collected from their children.
- It applies to any website, online service or mobile app that is **directed at children** or which is aware that it has an audience of under-13s **in the US**, whether the owner operates there or not.
- Many companies have been fined by the FTC, both youth' brands and general audience businesses
- COPPA **prohibits the collection of any information** that can identify a person, including name, address, online username, image, voice recording, telephone or social security number, geolocation, or a persistent identifier such as a **cookie ID**, device ID or IP address). **You've read that right! COOKIES BEWARE!**
- Legal liability starts with the publisher, but moves up the chain to include ad network, agency and brand to the extent they are aware the campaign is intended for young audiences.

*"As the youth digital media sector continues to see rapid growth, it's critical that a clear COPPA-compliant standard for ad-serving technology is established that protects the privacy of children"*

**Electronic Software Rating Board (ESRB)**



## How to comply with COPPA

- Don't track under-16s anywhere
- Shorten & control your ad delivery chain—ensure each party:
  - confirms 'actual knowledge'
  - understands COPPA
- Contextual advertising only
  - No DMPs, no profiling
  - No behavioural targeting
- Be a good citizen on social media
  - Treat social media pages as own sites
  - Don't use social plugins on child-directed sites
- Over-invest in transparency and disclosure

## Devices regulated by COPPA



## What is considered personal information under COPPA?



- Address
- Full Name
- Telephone Number
- Social Security Number
- Online Contact Information

+ Anything that links these together



- A Persistent Identifier over time
- Photography, Voice or Video
- Geolocation

## Don't worry, SuperAwesome has you covered

- The largest youth digital media platform in the world, we reach over **500M under-16s globally** on mobile, desktop, video, virtual world and social
- Our technology drives youth-safe advertising, safe-social engagement, influencer marketing, family authentication and data privacy compliance for **hundreds of brands and agencies** around the world
- Our technology is designed for the data-privacy requirements of the under-16s' market: **certified COPPA (US) compliant** with support for GDPR (EU) and other data privacy laws

