



CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA)

Last updated: January 1st, 2024

What information is collected about children?

We collect some personal information from children so that we can provide video conferencing services. Data is retained for service providing only.

How information is collected?

We may collect information about children directly from children, as well as automatically through a child's use of our site, applications and services. We will not require a child to disclose more information than is reasonably necessary to use our Services.

Information we collect directly:

From children under the age of 13, we utilize the date of birth to verify the child's age but do not store the age. We only store whether or not they are under the age of 13. If a child is under the age of 13, we collect the child's first name, and last initial. We do not ask children for their full last name. Children must create their own usernames, but are not required to provide an email. We only use user name and email address (if provided) to track a child's progress in our courses or to reset passwords; we will not contact a child using his or her email address or username. We may also collect additional demographic information (such as race and gender) from children; however, we do not associate this with the child's name or other personal information and we use it only to compile aggregate and de-identified information about participants in our courses. Parents may ask us to stop collecting personal information from their child by emailing us at admin@telaworks.com if a parent directs us to stop collecting and using a child's personal information, we must disable information collection.

Information we collect automatically:

We may automatically collect the following information about a child's use of our site through cookies and other technologies: domain name; browser type and operating system; web pages viewed; links clicked; the length of time spent on our Site; the length of time our courses were taken; Google Analytics statistics; the referring URL, or the webpage that led the child to our Site; language information; device name and model; operating system type, name, and version; and activities within our Site. We may also collect IP address, device identifier or a similar unique identifier from users of our Site, including children; we only use such identifiers to support the internal operations of our Site and we do not use such identifiers to collect information about the child outside of our Site.

How we use children's information:

We use personal information collected from children for the following purposes:

- 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 the age of 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 maintaining or analyzing their functioning; performing network communications; authenticating users or personalizing 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.

How we share children's information:

We do not sell children's personal information, and a child may not make his or her personal information public through our services. 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 Telaworks, Inc. and other users of our services.

For example, we may share children's personal information as follows:

- **Service Providers:** We may disclose the information we collect from children to third-party vendors, service providers, contractors, or agents who perform functions on our behalf.
- **Business Transfers:** If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the personal information we have collected from our users to the other company.
- **In Response to Legal Process:** We also may disclose the personal information we collect in order to comply with the law, a judicial proceeding, court order, subpoena, or other legal process.
- **To Protect Us and Others.** We also may disclose the personal information we collect where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our terms of service, privacy policy, or this COPPA policy, or as evidence in litigation in which Telaworks, Inc. is involved.
- **With Parents.** Parents may request information about the information we have collected from their child by contacting us at admin@telaworks.com.

Your rights to our use of children's personal information:

Parents have a right to review the information we have collected about their children and students, respectively, and to delete it, and to tell us to stop using it. To access these rights, you may contact us at admin@telaworks.com. You will be required to authenticate yourself as the child's parent to receive information about that child. Please note that copies of information may remain in cached or archived form on our systems after you request us to delete it.