



## DESERT FINANCIAL CREDIT UNION DIRECT NOTICE TO PARENTS

**Effective Date: November 20, 2024**

This Direct Notice under the Children's Online Privacy Protection Act ("COPPA Notice") provides parents opening and maintaining accounts for children with Desert Financial Credit Union's ("Desert Financial") practices for collecting and using personally identifiable information from children under the age of 13 when using the Kickstart Application (the "Service") within Desert Financial's Online and Mobile Banking Platforms and [www.desertfinancial.com](http://www.desertfinancial.com) (the "Site").

For purposes of this COPPA Notice, (i) "child" or "children" means an individual under the age of 13 years and (ii) "you" or "your" refers to the parent that is authorized to enter into contracts on behalf of such child(ren), or a legal guardian of the child(ren) opening and maintaining an account for a child and/or use of the Service.

### Notice

Your consent is required before Desert Financial will collect, use or disclose your child's personally identifiable information. Subject to your consent, the Service will collect, use and disclose your child's information as set forth in this COPPA Notice, our [Children's Privacy Policy](#), and in our general [Privacy Policy](#).

### What information does Desert Financial and Kickstart collect and use?

Children's personally identifiable information is only collected with your consent. If Desert Financial becomes aware of a child under the age of 13 providing personal without your consent, we will delete that information as permitted by law.

While we may receive personally identifiable information directly from you about your children, Desert Financial or the Service may directly collect from your child(ren):

- An email address,
- Password,
- 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 or some other category of creator),
- Information from correspondence sent to us from a child,
- Information included in any survey responses, and
- Information that children post that may include personally identifiable information, including their voice.

We use session cookies to make it easier for your child to navigate our Site and Service. For our Site, 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 the experience on our Site. If your child rejects cookies, your child's ability to use or navigate our Site and Service may be limited.

Desert Financial and/or the Service also collects the following information automatically:

- The Internet Protocol (IP) address of the device from which a child accesses the Site (this can sometimes be used to derive the country or city from which a child is accessing the Site and/or Service.)
- The specific actions that a child takes on the Site, including the buttons clicked within the Service.
- The time, frequency and duration of a child's visits to the Service.
- 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 Desert Financial, the Service and the Site use this information?**

The information collected about your child will be used as described in our Children's Privacy Policy.

**Does Desert Financial or the Service share this information with any third parties?**

Neither Desert Financial nor the Service sells or shares children's personal information, and a child may not make their personal information public through the service. In general, we may disclose the personal information that we collect about children to provide our Service, to comply with the law, and to protect Desert Financial and other users of our Service.

**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 joint owner of the account must complete the registration for the child. During the registration the parent must mark that they have reviewed and approve the usage of the Service by their child and that they agree to this COPPA Notice.

If a parent signs up for the Service but does not complete the registration including agreeing to the COPPA Policy notice during a single session the registration will be considered void and the parent's online contact information will be deleted. At that point the parent will need to reregister, agree to the COPPA Policy notice, and setup their child(ren) again.

**Can a parent review, change or delete the information collected by Desert Financial or the Service about their child?**

Parents have a right to review the information collected about their children, respectively, and to delete it, and to tell us to stop using it. To exercise these rights, the parent can login to the Service and review information entered and collected by Desert Financial or the Service. In addition, the parent has the ability to remove a child from the platform at any time by going to the "Remove Child" option from within the parent menu in the Service.

In addition, the parent may contact Desert Financial by calling us at (602) 433-7000 or toll-free at (800) 456-9171. You will be required to authenticate yourself as the joint owner on the account to receive information about that child. Please note that copies of information may remain in cached or archived form on our systems after your request to delete the child's information. Parents may login to the Service at any time and review the information entered by their children.