

Limited Exceptions to COPPA’s Verifiable Parental Consent Requirement

In general, you must get a parent’s verifiable consent before collecting personal information from their child. But there are some limited exceptions to that requirement that allow you to collect information without parental consent. Keep in mind that the kind of information you may collect under each exception is narrow. You can’t collect anything more. Also, if you collect information under one of these exceptions, you can’t use it or disclose it for any other purpose.

Reason you may collect information without parental consent	The kind of information you may collect	Limits on how you may use the information	If you collect information under this exception, what you must tell parents in your direct notice
To get verifiable parental consent	child’s and parent’s name and online contact information	You must delete their contact information if you don’t get consent within a reasonable time.	
To give voluntary notice to a parent about their child’s participation on a site or service that doesn’t collect personal information	parent’s online contact information	You can’t otherwise collect, use, or disclose the information.	<p>You must:</p> <ul style="list-style-type: none"> ● tell parents you collected their online contact information to let them know about their child’s activities on a site or service that doesn’t collect personal information; ● tell them their online contact information won’t be used for any other purpose; ● tell them they may refuse their child’s participation and require that you delete their contact information; and ● hyperlink to your privacy policy.
To respond directly to a child’s specific one-time request (for example, if the child wants to enter a contest)	child’s online contact information	You can’t use the information to contact the child again and you must delete it after you respond to the request.	

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<p>To respond directly more than once to a child’s specific request (for example, if the child want to receive a newsletter)</p>	<p>child’s and parent’s online contact information</p>		<p>You must:</p> <ul style="list-style-type: none"> ● tell parents you collected their online contact information to let them know their child has asked for multiple online communications; ● tell parents you collected their child’s online contact information to provide the multiple communications they asked for; ● tell parents the online contact information won’t be used for any other purpose and won’t be disclosed or combined with other information; ● tell parents that if they don’t opt out, you may use the child’s online contact information for that purpose; and ● hyperlink to your privacy policy.
<p>To protect a child’s safety</p>	<p>child’s and parent’s name and online contact information</p>		<p>You must:</p> <ul style="list-style-type: none"> ● tell parents you collected the names and contact information to protect a child’s safety; ● tell parents the information won’t be used or disclosed for any other purpose; ● tell parents they may refuse to permit the use of the contact information and require you to delete it; and ● hyperlink to your privacy policy

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<p>To protect the security or integrity of your site or service, to take precautions against liability, to respond to judicial process, or — as permitted by law — to provide information to law enforcement</p>	<p>child’s name and online contact information</p>	<p>You can’t use the information to contact a specific person, conduct behavioral advertising, or amass a profile on a person.</p> <p>You can’t use personal information other than a persistent identifier for this exception.</p>	
<p>To provide support for internal operations of your site or service.</p> <p>This includes:</p> <ul style="list-style-type: none"> ● maintaining or analyzing the functioning of the site, ● performing network communications, ● authenticating users of the site or personalizing content, ● serving contextual ads or frequency capping, ● protecting the security or integrity of the user or the site ● legal or regulatory compliance, or ● fulfilling a child’s request under the one-time contact or multiple contact exceptions. 	<p>persistent identifier</p>		

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<p>If you have actual knowledge that a person’s information was collected through a child-directed site, but their previous registration indicates the person is 13 or over</p> <p>This exception applies only if:</p> <ul style="list-style-type: none"> • you collect only a persistent identifier and no other personal information; • the person affirmatively interacts with your site or service to trigger the collection; and • you have already conducted an age-screen of the person indicating he or she is 13 or over. 	<p>persistent identifier</p>	<p>You can’t collect other personal information.</p>	