



## **Health Force**

Children's Online Privacy Policy

October 13, 2015

Population Health Innovations ("PHI") is committed to protecting the privacy of children who use our sites and applications. This Children's Online Privacy Policy explains our information collection, disclosure, and parental consent practices with respect to information provided by children under the age of 13 ("child" or "children"), and uses terms that are defined in our general Privacy Policy. This policy is in accordance with the U.S. Children's Online Privacy Protection Act ("COPPA"), and outlines our practices regarding children's personal information. For more information about COPPA and general tips about protecting children's online privacy, please visit [OnGuard Online](#).

## **1. The Information We Collect from Children, How We Use It, and How and When We Communicate With Parents**

PHI offers to its users a range of sites and applications, some of which are primarily targeted at children, and others that are intended for users of all ages and their families. Our sites and applications offer a variety of activities, including activities that may collect information from children. Below we summarize potential instances of collection and outline how and when we will provide parental notice and/or seek parental consent. In any instance that we collect personal information from a child, we will retain that information only so long as reasonably necessary to fulfill the activity request or allow the child to continue to participate in the activity, and ensure the security of our users and our services, or as required by law. In the event we discover we have collected information from a child in a manner inconsistent with COPPA's requirements, we will either delete the information or immediately seek the parent's consent for that collection.

### Registration

Children can register with our sites and applications to view content, play games, participate in contests, and engage in special features, among other things. During the registration process, we may ask the child to provide certain information for notification and security purposes, including



a parent or guardian's email address, the child's name, the child's account username, and password. We also ask for birth dates to validate ages. We strongly advise children never to provide any personal information in their usernames. Please note that children can choose whether to share their information with us, but certain features cannot function without it. As a result, children may not be able to access certain features if required information has not been provided. We will not require a child to provide more information than is reasonably necessary in order to participate in an online activity.

About the collection of parent email address: Consistent with the requirements of COPPA, on any child-targeted site or application, or in any instance where we ask for age and determine the user is age 13 or under, we will ask for a parent or guardian email address before we collect any personal information from the child. If you believe your child is participating in an activity that collects personal information and you or another parent/guardian have NOT received an email providing notice or seeking your consent, please feel free to contact us at **866.522.5487**. We will not use parent emails provided for parental consent purposes to market to the parent, unless the parent has expressly opted in to email marketing or has separately participated in an activity that allows for such email contact.

#### Content Generated by a Child

Certain activities on OUR sites and applications allow children to create or manipulate content and save it with PHI. Some of these activities do not require children to provide any personal information and therefore may not result in notice to the parent or require parental consent. If an activity potentially allows a child to insert personal information in their created content, we will seek verifiable parental consent by email for the collection. Examples of created content that may include personal information are open-text fields and free-hand entry of information. If, in addition to collecting content that includes personal information, PHI plans to post the content publicly, we will obtain a higher level of parental consent.

#### About Verifiable Parental Consent:

Email Consent. In the event PHI wishes to collect personal information from a child, COPPA requires that we first seek a parent or guardian's consent by email. In the email, we will explain what information we are collecting, how we plan to use it, how the parent can provide consent, and how the parent can revoke consent. If we do not receive parental consent within a reasonable time, we will delete the parent contact information and any



other information collected from the child in connection with that activity. High-Level Consent. In the event PHI collects personal information from a child that will be posted publicly, we will seek a higher level of consent than email consent.

Teacher consent in lieu of a parent. With regard to school-based activities, COPPA allows teachers and school administrators to act in the stead of parents to provide consent for the collection of personal information from children. Schools should always notify parents about these activities. For more information on parental rights with respect to a child's educational record under the Family Educational Rights and Privacy Act (FERPA), please visit the [FERPA site](#).

### Contests and Sweepstakes

For contests and sweepstakes, we contact the parent for more personalized information for prize-fulfillment purposes when the child wins the contest or sweepstakes.

### Email Contact with a Child

On occasion, in order to respond to a question or request from a child, PHI may need to ask for the child's online contact information, such as an email address. PHI will delete this information immediately after responding to the question or request.

### Push Notifications

Push notifications are notifications on mobile and other devices that are typically associated with downloaded applications, and which can communicate to the device holder even when the application is not in use. We will require a child to provide a parent email address before the child can receive push notifications from our child-directed applications that collect a device identifier. We will then provide the parent with notice of our contact with the child and will provide the parent the opportunity to prevent further notifications. Finally, we will not associate the device identifier with other personal information without contacting the parent to get consent.

### Geolocation Data

If a child-directed PHI site or application collects geolocation information that is specific enough to equate to the collection of a street address, we will first seek parental consent via email.

### Persistent Identifiers

When children interact with us, certain information may automatically be collected, both to make our sites and applications more interesting and useful to children and for various purposes related to our business. Examples include the type of computer operating system, the child's IP address or mobile device identifier, the web browser, the frequency with which the child visits various parts of our sites or applications, and information regarding the online or mobile service provider. This information is collected using technologies such as cookies, flash cookies, web beacons, and other unique identifiers (defined in the Privacy Policy). This information may be collected by PHI or by a third party. This data is principally used for internal purposes only, in order to:

- provide children with access to features and activities on our sites and applications
- customize content and improve our sites and applications
- conduct research and analysis to address the performance of our sites and applications
- generate de-identified reporting for use by PHI

In the event we collect (or allow others to collect) such information from children on our sites and applications for other purposes, we will notify parents and obtain consent prior to such collection. Please contact us at the mailing address, email, or phone number below with questions about the operators' privacy policies and collection and use practices:

Population Health Innovations, LLC  
313 W Liberty Street, Suite 350  
Lancaster, PA 17603  
United States of America  
Phone: (866) 522-5487  
Email: [support@healthetools.com](mailto:support@healthetools.com)

## **2. When Information Collected From Children Is Available To Others**

In addition to those rare instances where a child's personal information is posted publicly (after receiving high-level parental consent), we also may share or disclose personal information collected from children in a limited number of instances, including the following:

- We may share information with our service providers if necessary for



them to perform a business, professional, or technology support function for us.

- We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.

### 3. Parental Choices and Controls

At any time, parents can refuse to permit us to collect further personal information from their children in association with a particular account, and can request that we delete from our records the personal information from our records we have collected in connection with that account. Please keep in mind that a request to delete records may lead to a termination of an account, membership, or other service.

Where a child has registered for a Health Force account, we allow parents to request deletion of personally identifiable information that we have collected from their children. Parents can contact us to request deletion of their child's account. Parents may contact us directly at:

Population Health Innovations, LLC  
313 W Liberty Street, Suite 350  
Lancaster, PA 17603  
Phone: (866) 522-5487  
Email: [support@healthetools.com](mailto:support@healthetools.com)

Please include the child's username and the parent's email address and telephone number. To protect children's privacy and security, we will take reasonable steps to help verify a parent's identity before granting access to any personal information.