

MANNAHATTA2409.ORG CHILDREN'S PRIVACY POLICY

Last revised: February 10, 2015

The Wildlife Conservation Society (“we” or “WCS”) is committed to protecting the privacy of children who use our Mannahatta2409.org website (“Site”). This children’s privacy policy (“Children’s 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.

WCS takes the privacy of the Site’s users very seriously. Accordingly, this policy aims to comply with requirements of the U.S. Children’s Online Privacy Protection Act (“COPPA”). For more information about COPPA and general tips about protecting children’s online privacy, please visit [OnGuard Online](http://www.onguardonline.gov/articles/0031-protecting-your-childs-privacy-online) (<http://www.onguardonline.gov/articles/0031-protecting-your-childs-privacy-online>). We reserve the right to amend this Children’s Privacy Policy. Please check this page periodically for changes.

The Information We Collect From Children, How We Use It, and How and When We Communicate With Parents

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 Site to create User Visions, to view others’ User Visions, and to create and view associated content. 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 account username, and password. We instruct children under the age of 13 to input their parent or guardian’s email address and to not use their first or last name when creating a username. WCS will not require a child to provide more information than is reasonably necessary in order to participate in the online activity.

The Site also allows users to register by using the password associated with their Google or Facebook accounts. Please review those companies’ terms of use and privacy policies for information about the personal information that they collect when registering for an account with them. The only information required by WCS upon registering, whether in association with Google or Facebook or not, is a username, email, and password. In addition, zipcodes, gender, age, household income, and ethnicity are requested but not required. If a user’s account is

authenticated via Google or Facebook, WCS still requires a username and email address to be entered through the Site.

About the collection of parent email address: We instruct children under the age of 13 to insert their parent's, guardian's or, as explained below, education provider's email address upon registration. An email confirming registration will be sent to the address used. 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 contact us at m2409@themannahattaproject.org to provide us permission or request that we delete the child's account and any associated information. 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.

Teacher Consent in Lieu of a Parent. With regard to school-based activities, COPPA allows teachers and school administrators to act instead of parents to provide consent for the collection of personal information from children. Therefore, when registering with the Site, a teacher's email address may be used in lieu of a parent's. 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](http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html) (<http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>).

Content Generated by a Child

Certain activities and applications on our Site allow children to create or manipulate content and save it with WCS through the Site. None of these activities require children to provide any personal information and therefore do not result in notice to the parent or require parental consent. We strongly advise children to never insert personal information in their created content.

The default viewing setting for User Visions, and any associated User Vision Information, is "private," meaning only the user who created the User Vision may view it. Users are permitted to share their User Visions publicly with other users of the Site. When a user chooses to make his/her User Vision(s) public, an email is automatically sent to the user's registered email address, which, in the case of children, will be the parent or guardian's email address. The email will inform the recipient of the change in status of the User Vision(s), and instruct the recipient on how to change the status of the User Vision(s).

About Verifiable Parental Consent. In the event that WCS wishes to collect additional personal information from a child, we will 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.

Comments Board

Certain activities associated with the use of the Site allow users to communicate directly with other users by means of a comments board. We strongly encourage children who use these interactive features on our Site never to provide personal information about themselves or any third party. However, it is the responsibility of parents to carefully supervise their children when their children participate in online activities. WCS is not responsible or liable for its publication of any user-generated content or information and any harm that flows from the dissemination of such content.

The Site's comments board is operated by Disqus (www.disqus.com). In those instances in which users post comments while logged in, the user's username and email address will be shared with Disqus. Disqus' terms and policies may be found at <http://help.disqus.com/customer/portal/topics/215159-terms-and-policies/articles>.

Anonymous Information

When children interact with us, certain information may automatically be collected, both to make our Site more interesting and useful, and for purposes of statistical analysis and system improvements. Examples include the type of computer operating system, the user's IP address or mobile device identifier, the web browser, the frequency with which the user visits various parts of our Site, and information regarding the online or mobile service provider. This information may be collected by WCS or by a third party. This data is principally used for internal purposes only, in order to:

- determine usage patterns;
- customize content and improve the Site; and
- conduct research and analysis to address the performance of the Site.

In the event we collect (or allow others to collect) such information from children on our Site for purposes other than above, we will notify parents and obtain consent prior to such collection.

When Information Collected From Children Is Available To Others

WCS may share or disclose personal information collected from children in a limited number of instances, including the following:

- WCS may share information with our service providers if necessary for them to perform a business, professional, or technology support function for us.

- WCS 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.

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 we have collected in connection with that account. Please keep in mind that a request to delete information may lead to deletion of an account and associated visions, groups and challenges.

Where a child has registered for an account, we use two methods to allow parents to access, change, or delete the personally identifiable information that we have collected from their children:

- Parents can request access to and delete their child's personal information by logging on to the child's account through the Mannahatta2409.org home page located [here](#). Parents will need their child's username and password. The account login page explains how to recover a password if the child cannot recall it.
- Parents can contact WCS to request access to, change, or delete their child's personal information by sending an email to us at **m2409@themannahattaproject.org**.

In any correspondence such as e-mail or mail, 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.