



1330 Gemini
P.O. Box 58346
Houston, Texas 77258
(281) 488-7070
wellbyfinancial.com

Children's Privacy Policy

Effective 10.11.2021

Your child's privacy is important to us. This Children's Privacy Policy covers the Wellby Financial Youth Banking Program ("the Program"). It explains how we collect, use, and disclose personal information collected online from children under the age of 13 in compliance with the Children's Online Privacy Protection Act ("COPPA"). For more information on Wellby's privacy and security practices for Wellby online services, please go to our [Privacy Policy](#).

Personal Information We Collect About Your Child

To use the Wellby Youth Banking Program, the parent must first enroll the child. Enrollment requires that the parent consent to our collection, use, and disclosure of the child's personal information in connection with participation in the Program, after reviewing the COPPA Direct Notice to Parents. The information required for disclosure does not extend beyond that which is necessary to interact with the Program.

Your child's name, date of birth, mailing address, and an email address (parent's or child's) are collected during enrollment. The parent is required to create a username/password for the child's online account. When the child accesses their Wellby Youth Banking account, they are able to make changes to their personal information such as:

- Account nickname
- Telephone number(s)
- Physical address (this doesn't change the address on file that the documentation is mailed to)
- Email address
- Username and password

By enrolling your child in the Program, you consent to our collection of the personal information above. You understand that your child may make changes to the above without notice to you. At any time, you have the right to review the personal information we collect online from your child, refuse to allow further use or collection, and/or request deletion of that information.

Usage and Other Information

In addition to the personal information described above, we may collect certain information about your child's use of the Program. For example, we may capture the IP address of the device used to connect to the online service, the type of operating system and browser used, and information about the site they originated, the part(s) of our online service they access, and the site they visit next. We or our partners may also use cookies, web beacons, or other technologies to collect and store other information about their visit or use of our online banking service.

Wellby Mobile

When your child interacts with us through the Wellby Mobile App, we may also collect information such as unique device identifiers for their mobile device, screen resolution and other device settings, information about their location, and analytical information about how they use their mobile device.



Use of Information

We use the above collected information in several ways, such as:

- Processing transactions
- Verifying your child's identity (such as when they access their account information)
- Preventing fraud and enhancing the security of their account or our online services
- Responding to their requests and communicating with them (which will include sending any text or email account alerts that are activated for the account)
- Managing their preferences
- Performing analytics concerning their use of our online services
- Operating, evaluating, and improving our business (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing, and other internal functions)
- Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations, and our policies
- For any other purposes that we may specifically disclose to you during enrollment or in connection with your or your child's use of the Wellby Youth Banking Program
- We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify you or your child) for various business purposes, where permissible under applicable laws and regulations

Disclosure of Information

We may share the information we collect from and about your child with our Affiliates and others. For example, we may share their information with:

- Wellby service providers
- Successors or Affiliates in connection with a corporate transaction, such as a sale, consolidation, or merger of Wellby businesses
- Otherwise, to protect the rights, property, or security of our customers or third parties

Parent or Legal Guardian Rights

As a parent or legal guardian, you have the right to:

- Review the personal information collected online from your child
- Refuse to allow further use or online collection of personal information from your child
- Delete the personal information collected online from your child (unless we are required by law to retain it)

The Wellby Youth Banking Program is an online interactive experience. If you do not want us to continue to collect or use your child's personal information, or if you ask us to delete it, we are required to remove their online profile and close the Wellby Youth Banking account(s).

To exercise any of these rights, please select one of these options:

- Go to your Wellby Youth Banking account and send a secured email
- Visit a local branch or call us at 281-488-7070 or 800-940-0708



Contact Details

If you have any comments, questions, or concerns about any of the information in this Policy or regarding the Program, please contact us at 281-488-7070 or 1-800-940-0708 or visit a local branch.



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COPPA Direct Notice to Parents

Effective 10.11.2021

In order to comply with the federal law known as COPPA (Children’s Online Privacy Protection Act), we are required to obtain prior parental consent to collect personal information (known as “Personally Identifiable Information” or “PII”) from children under the age of 13 who wish to participate in Wellby Financial Youth Banking Program.

As part of your child’s Wellby Early Start account, Wellby may collect personal information from your child online. This information may be collected by Wellby or by a third party to:

- Provide users with access to features and activities on our website and mobile application, customize content and improve our website and mobile application
- Conduct research and analysis to address the performance of our website and mobile application
- Generate anonymous reporting for use by Wellby

Parental consent is required to collect, use, or disclose such information from children under the age of 13. Therefore, we will not collect, use or disclose any PII from children under 13 years of age without parental consent.

Wellby may collect the following personal information from your child once they are able to access the website:

- A home or other physical address including street name and name of a city or town
- Online contact information
- A screen or user name that functions as online contact information
- A telephone number
- Geolocation data
- Persistent identifiers

Collection of Personal Information

With parental consent to our collection of information from your child, Wellby may also share or disclose such information in the following instances:

- We may share information with our service providers, if necessary, to perform a business, professional, or technology support function for us
- We may disclose personal information if permitted or required by law

At any time, you may refuse to permit Wellby to collect further personal information from your child online. You can request that Wellby delete the personal information we have collected in connection with the Youth Account. A request to delete records may lead to your child being unable to access the Wellby Online Banking Program and platform. To revoke your consent, you can either **contact Wellby at 281-488-7070 or 800-940-0708, send a secure message through Online Banking, or visit a branch.**

Once you have reviewed our Wellby’s Children’s Online Privacy Policy, you may provide your consent to our collection, use, or disclosure of your child’s personal information by completing the Parental Consent to the



Collection Use and Disclosure of Personal Information of a Child Consent Form (below). We must receive the form prior to opening the account.

If we change the way we collect, use or disclose your child’s personal information, we will send you a new notice and request another consent.

Making Changes to Personal Information

To request changes to or to delete the personal information that we have collected from your child, parents can contact Wellby directly at 281-488-7070 or 800-940-0708, send a secure message through Online Banking, or visit a branch. Parents will need their child’s username and password.

In all correspondence to Wellby, including a secure message, please include the child’s username, the parent’s email address, and the parent’s telephone number. **Please do not include your account number or personal information.** 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.

Parental Consent to the Collection, Use and Disclosure of Personal Information of a Child

I, _____ (Parent’s Name), the parent or legal guardian of _____ (Child’s Name), have read and understand the *Wellby COPPA Direct Notice to Parents* and *Wellby’s Children’s Online Privacy Policy*. By signing below, I authorize my child to participate in the Wellby Youth Banking Program and platform.

I consent to Wellby’s collection, use, and disclosure of my child’s personal information as set forth in the *Wellby COPPA Direct Notice to Parents and Children’s Online Privacy Policy*.

I understand that I may withdraw my permission at any time, with written notice, as set forth in the Wellby Privacy Policy.

_____	_____	_____
Parent’s Name/Account Number	Parent’s Signature	Date
_____	_____	
Child’s Name/Account Number	Child’s Date of Birth	