



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

# 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