

## CHILDREN'S ONLINE PRIVACY NOTICE

Script2Screen LLC ("S2S, [script-2-screen.com](http://script-2-screen.com), Script2Screen LLC") 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 in the United States and Latin America regarding children's personal information. For more information about COPPA and general tips about protecting children's online privacy, please visit [OnGuard Online](#).

If you have questions or concerns regarding our Children's Online Privacy Policy or practices, please contact us at [privacy@script-2-screen.com](mailto:privacy@script-2-screen.com).

**The Information We Collect From Children, How We Use It, and How and When We Communicate With Parents.** Script2Screen offers to its users a range of site applications, some of which are primarily targeted at children, and others that are intended for users of all ages and their families. Our site 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, in many cases, register with our site to view content, participate in activities, 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 first name and gender, the child's member or account username, and password. We also may ask for birth dates from children to validate their 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 12 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 [privacy@script-2-screen.com](mailto:privacy@script-2-screen.com). 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 site applications allow children to create or manipulate content and save it with S2S. 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 either pre-screen the submission to delete any personal information, or we will seek verifiable parental consent by email for the collection. Examples of created content that may include personal information are stories or other open-text fields, and drawings that allow text or free-hand entry of information. If, in addition to collecting content that includes personal information, S2S also plans to post the content publicly or share it with a third party for the third party's own use, we will obtain a higher level of parental consent.

**About Verifiable Parental Consent: Email Consent.** In the event S2S 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 S2S collects personal information from a child that will be posted publicly, we will seek a higher level of consent than email consent. Such "high-level" methods of consent include but are not limited to asking for a credit card or other payment method for verification (with a nominal charge involved), speaking to a trained customer service representative by telephone or video chat, or requiring a signed consent form by mail, email attachment, or fax. After providing high-level consent, a parent may have the opportunity to use a pin or password in future communications as a way to confirm the parent's identity.

**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](#).

**Chat.** Certain activities that are directed to children allow users to communicate directly with other users by means of a chat system. In most cases, these chat systems employ filters that are intended to prevent the communication of both personal information and age-inappropriate words and phrases. In addition to filters, we may employ live moderation and/or encourage other users to flag inappropriate communications. We strongly encourage children who use these interactive features on our site and applications never to provide personal information about themselves or any third party, and certainly never to attempt to circumvent our filters or moderation. We also recommend that parents carefully supervise their children when the children participate in online activities.

Where S2S employs a chat system that does not filter all or nearly all personal information, we will first seek high-level consent from the parent.

**Contests.** For contests, we typically require only the information necessary for a child to participate, such as first name (to distinguish among family members) and parent email address (to notify the parent where required by law). We only contact the parent for more personalized information for prize-fulfillment purposes when the child wins the contest.

Of course, some contests and sweepstakes ask the child to submit their own created content along with the child's entry. In those instances, we may require parental consent prior to submission. Please see Content Generated by a Child above for more information on our collection, notice, and consent policies.

**Email Contact with a Child.** On occasion, in order to respond to a question or request from a child, S2S may need to ask for the child's online contact information, such as an email address. S2S will delete this information immediately after responding to the question or request.

In connection with certain activities or services, we may collect a child's online contact information, such as an email address, in order to communicate with the child more than once. In such instances we will retain the child's online contact information to honor the request and for no other purpose such as marketing. One example would be a newsletter that provides occasional updates about a site, game/activity, television show, personality/character, or feature movie. Whenever we collect a child's online contact information for ongoing communications, we will simultaneously require a parent email address in order to notify the parent about the collection and use of the child's information, as well as to provide the parent an opportunity to prevent further contact with the child. On some occasions a child may be engaged in more than one ongoing communication, and a parent may be required to "opt-out" of each communication individually.

**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 S2S 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 site 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. This information may be collected by S2S 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 site and applications
- customize content and improve our sites and applications
- conduct research and analysis to address the performance of our sites and applications
- generate anonymous reporting for use by S2S.

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

Please contact S2S for a list of third-party operators who collect persistent identifiers on our site and applications.

Please contact us at [privacy@script-2-screen.com](mailto:privacy@script-2-screen.com) with questions about the operators' privacy policies and collection and use practices: