



BATTLEFY

USYS and Battlefy's COPPA Compliance

What is COPPA?

COPPA, or the "Children's Online Privacy Protection Act", imposes certain requirements on operators of websites or online services directed to children under 13 years of age, and on operators of other websites or online services that have actual knowledge that they are collecting personal information online from a child under 13 years of age.

What is Verifiable Parental Consent?

The FTC's [Children's Online Privacy Protection Rule: A Six-Step Compliance Plan for Your Business](#) helps you determine if your company is covered by COPPA and explains how to get parents' verifiable consent before collecting, using or disclosing personal information from their kids.

The [COPPA Rule](#) does not mandate the method a company must use to get parental consent. Instead, it says that an operator must choose a method reasonably designed in light of available technology to ensure that the person giving the consent is the child's parent. The Commission, however, has determined that a number of [consent methods meet that standard](#).

Battlefy's COPPA Compliance Implementation

Battlefy's COPPA compliance is implemented in 2 steps: age verification and verifiable parental consent.

Age Verification:

1. Upon starting account creation, users are made aware of our privacy policies listed [here](#) across the various tabs
2. The next step is to ask the user to give us their birth date. This information is not store with Battlefy and is simply used to confirm if the user is under 13 years of age.
3. Upon providing their birth date:
 - a. If the user is 13 or over, they continue with the regular account registration flow
 - b. If the user is under 13, they are given a unique URL specific to them to give to their parents to continue to the Verifiable Parental Consent process

Verifiable Parental Consent:

1. Upon entering the unique URL, parents will be given a brief introduction to Battlefy
2. They will again get a link to Battlefy's privacy policies
3. The parents are asked to create a Battlefy account
 - a. This is the regular registration flow all users that are 13 years or older see
 - b. In this instance, we ask for consent to send marketing emails. With the Age Verification flow, as we do not know if they are under 13 yet, we do not ask for consent for marketing emails and default to a "No" status.
4. The final step to complete the parent and child's registration is to collect \$0.50 from a credit card as this is one of the methods indicated by the FTC for Parental Consent. Our payment processor is Stripe.
 - a. The funds collected from this will be donated to a charity at the end of each year
5. Once this has been done, their child's account will be unlocked and they will be able to start participating in events on Battlefy.