**Policy & Procedures Manual**

**Wisconsin Swimming, Inc.**

**Policy 32: Children’s Online Privacy Protection Act (COPPA) Compliance**

**Effective Date:** October 28, 2014

**Revision:**  March 28, 2023

**Scope:** This policy is to ensure Wisconsin Swimming complies with the Children’s Online Privacy Protection Act.

* 1. **COPPA General Information**
		1. The Children’s Online Privacy Protection Act applies to the online collection of personal information from children under 13.
			1. Originally effective April 21, 2000
			2. Amendments published January 17, 2013
			3. Amended COPPA became effective July 1, 2023
			4. COPPA Link: [www.govinfo.gov](http://www.govinfo.gov)
			5. The Federal Trade Commission (FTC) is the enforcing authority.
		2. COPPA applies to individually identifiable information about a child that is collected online such as full name, address, email address, telephone number or any other information that would allow someone to identify or contact the child.
	2. **COPPA Policy Compliance**
		1. To comply with COPPA, Wisconsin Swimming adheres to the following policies regarding its website. All swim clubs that are members of Wisconsin Swimming should follow the same guidelines.
			1. Wisconsin Swimming does not gather or store personal information about athletes on its website.
			2. Information acquired during registration, including for swim meets, is the property of USA Swimming and its use is within the control of USA Swimming. USA Swimming limits the use of members’ personal information to that information necessary for the conduct of the business of USA Swimming and its LSCs (Local Swimming Committees). Please see USA Swimming’s Privacy and Cookie policies (<https://www.usaswimming.org>)
			3. There is no collection/publication on the website of personal information that includes the athlete’s full name, home address, email address or telephone number or any other type of information that would allow someone to identify or contact a child, other than for those athletes serving on the Board of Directors, where parental consent has been granted.
			4. Access to private information on the website is controlled by limiting staff and Board member access with administrative access to Wisconsin Swimming’s website.
			5. Wisconsin Swimming does not permit advertising on its website for events or causes that charge a fee or require a purchase of membership signup, other than those programs sponsored by USA Swimming, Wisconsin Swimming or external organization events as approved by the Wisconsin Swimming Board of Directors.
			6. Wisconsin Swimming tracks usage statistics on its website through Google Analytics, but does not track information linked to individuals who visit the website.
			7. Wisconsin Swimming does not disclose to any third parties, other than USA Swimming, information regarding athletes, unless specifically authorized by a media release disclosure form. This includes the news media and marketing.
			8. No personal information from a child will be collected, used or disclosed without verifiable parental consent.
			9. Limited pictures of children are allowed on the website and Wisconsin Swimming’s social media sites (Facebook, Instagram and Twitter).
				1. There is no posting of images with more than three identifying bits of information per federal guidelines (example, a cap may show a partial or full first name and team – no other identifiable information is given).
				2. Parents may request that any posted photograph or any other information that they feel is too identifiable be removed from the Wisconsin Swimming website by contacting the Operations Manager or the webmaster.
				3. Wisconsin Swimming obtains a signed release from a parent/guardian if children are singled out in any way or a picture is obtained from a non-public event or setting. Upon receipt of the request for removal, Wisconsin Swimming will remove the requested information within a reasonable time.
			10. Children’s information is never shared with third parties, other than USA Swimming.
		2. Third-Party Sites and Sponsors
			1. The Wisconsin Swimming website contains limited links to other sites whose information practices may be different.
			2. Visitors should consult the other sites’ privacy policies, which may differ from those of Wisconsin Swimming.
		3. Cookies
			1. Wisconsin Swimming does not intentionally use cookies on its website.
			2. The Wisconsin Swimming website is powered by TeamUnify, which does collect some information as identified in their privacy policy. The TeamUnify Privacy Statement link is located at the bottom of the Wisconsin Swimming homepage (www.wisconsinswimming.org).

|  |  |  |
| --- | --- | --- |
| Date of Revision | Policy Section(s) | Changes Made |
| October 24, 2017 | All | Renumbered from Policy 26 to Policy 32 |
| March 28, 2023 | 32.132.2 | Updated and corrected dates and referencesRenamed and added COPPA compliance requirements |