

vFairs COPPA Compliance Policy

Policy Owner: vFairs Head of GRC, Data Protection Officer

Effective Date: 30-May-2022

Last Reviewed: 30-May-2022

1. Policy

This policy applies to all employees, contractors, and vendors while doing business with vFairs LLC and others who have access to data subject information (“personal data”) in connection with vFairs’ operating activities. This policy must be reviewed and followed in conjunction with [vFairs Privacy Policy](#).

2. Note to Parents

vFairs is committed to compliance with the children’s Online Privacy Protection Act (“COPPA”), a federal law designed to protect children online. We take Children’s privacy seriously and encourage parents to take an active role in protecting their Children’s privacy and online experience at all times.

vFairs has developed its services to be an enjoyable experience for users of all ages, including those under 13 (“Children” or “Child”). Please discuss this policy with your children so that they will better understand how to use the Services and the information they may be asked to provide when using the Services. vFairs believes that providing its customers with an accurate and adequate notice about the Services will inform choices and decisions about how to use the Services and will better protect its users’ privacy. If you have any questions or comments about this policy, please contact us using the contact information provided at the end of this document.

3. Children’s Privacy

Children under the age of 13 (or other age as required by local law) are permitted to use the site ONLY as part of an approved agreement with a customer providing for children’s data. Children under 13 years old (or other age as required by local law) are otherwise prohibited from using the site. If you are a parent or guardian and you are aware that your child has provided us with personal data that is not part of an approved customer relationship, please contact us immediately. If we learn that we have collected any personal data in violation of applicable law, we will promptly take steps to delete such information and terminate the child’s account.

For such customer accounts, vFairs involves the collection and maintenance of personal data about children under 13, as well as other personal data of students as applicable, through the site. It is operated by: vFairs LLC, 1510 Randolph St., Carrollton, Texas 75006. Please contact vFairs Data Protection Officer at privacy@vfairs.com with any questions about the collection, use and sharing of children’s personal data.

The information collected about children under 13, as well as other personal data of students, includes: name and email address. Please note that we rely on our client ‘data controller’ when collecting information of users under the age of 13 to receive their parent’s explicit consent and provide them notice of our COPPA-compliant privacy policy.

The information about children under 13, as well as other personal data of students, is or may be used for: account creation, user verification, deliver the products and services, share content between users, user interaction, customer support, user communication, prevent fraud, detect security incidents, analytics, respond to legal inquiries or terminate accounts.

The information about children under 13, as well as other personal data of students, is disclosed to: service providers and vendors (including for the purposes as agreed per T&C, other authorized users with whom the child or student shares and/or communicates, government and/or legal requestors as required by law, and others as necessary (based on the appropriate consent of the school and/or parent / legal guardian).

No child or student personal data is made available to the public by vFairs. Children may make their personal data available to other authorized users as part of the services.

The parent of a child under 13 or a student (subject to an applicable law) can review or request deletion of the personal data held by vFairs and refuse to permit its further collection or use. A parent may do so by notifying the customer (e.g., school) through their designated contact mechanism and/or notifying vFairs Data Protection Officer via privacy@vfairs.com.

4. Data Security

vFairs maintain reasonable security procedures to help protect against the loss, misuse, unauthorized access, disclosure, alteration or destruction of information provided to us. While we strive to protect your information and privacy, please note that no data transmission or storage can be guaranteed to be 100% secure. For more information about vFairs security and compliance posture, please visit [vFairs Trust Centre](#).

5. Enforcement

The vFairs Head of IT and the Data Protection Officer are responsible for the enforcement of this policy. Employees who may have questions should contact vFairs Data Protection Officer as appropriate.

6. Disciplinary Action

Failure to comply with any provision of this policy may result in disciplinary action, including, but not limited to, termination.

7. Reporting

All suspected violations or potential violations of this policy, no matter how seemingly insignificant, must promptly be reported either to vFairs' Data Privacy Officer immediately, or via the incident reporting process at security@vfairs.com.

As long as a report is made honestly and in good faith, vFairs will take no adverse action against any person based on the making of such a report. Failure to report known or suspected wrongdoing of which you have knowledge may subject you to disciplinary action up to and including termination of employment.