



## COPPA Guidelines for UNH Events Registration

Revised 12/4/2014

UNH Event Managers or departments collecting personally identifiable event registration or related information online, where there is a reasonable expectation that children under the age of 13 may wish to participate in the event, must comply with the requirements of the Children's Online Privacy Protection Act (COPPA). Events Managers must be familiar with the provisions of the USNH COPPA Notice and USNH Privacy Policy.

The UNH VPFA Office is responsible to ensure that online registration forms for UNH events comply with COPPA and University policy. If you are unsure whether your event and forms must comply with COPPA, contact the UNH VPFA Office or USNH Legal Counsel.

UNH Information Security Services (ISS) must approve any event registration form requesting registrant's Date Of Birth rather than age. Registration information which includes DOB for the purpose of populating data in UNH Banner Student or the university CRM systems is pre-approved. See more on DOB below.

The following guidelines are to be used to construct and manage online registration forms where COPPA applies and inform the handling of the resulting data.

- Online event registration forms must provide links to the USNH COPPA Notice and the USNH Privacy Policy in a prominent position. It is recommended that the registration form includes language such as "If you are under the age of 13, please read the USNH COPPA Notice at [link]"
- If you do not intend to accept event registrations from children under the age of 13, it is recommended that you include a message on your online forms to avoid collecting any such information inadvertently: "[Your Department] does not accept event registrations from persons under the age of 13 in compliance with USNH policy and Federal regulations".
- Data collected via the registration form should be limited to information required to register for and safely participate in the event. Do not request or collect information which is not pertinent to the event or to the safe conduct of the event.
- Event registration forms should ask for the participant's age rather than Date of Birth (DOB) unless DOB is required for a specific business or legal reason. If you elect to use DOB, there may be legal requirements to provide for the protection of such information. Check requirements with UNH ISS.
- Data acquired to register participants for an event should not be used for any other purpose, except as may be authorized or required by law or university policy.
- Each event manager should document and use a record retention policy as required by the USNH OLPM, USY.VI.F.4.4.4. Delete or destroy data that is no longer required for business or legal purposes.
- Collected information must be stored in an approved university system such as the UNH Events Management System. Do not store information on departmental or personally- owned computers or devices.
- If collected data is maintained in hard-copy documents, those documents must be protected from unauthorized access and stored securely. Documents which are no longer required should be shredded, using a cross-cut type shredder, before disposal.