

**CONFIDENTIAL CARU SELF-ASSESSMENT FORM**

*This confidential self-assessment form is being provided to the CARU staff for the sole purpose of this request that the site(s) listed below be accepted into the Children’s Online Privacy Protection Act (COPPA) Safe Harbor program. This document will not be shared or used with anyone outside the CARU staff for any other purpose without the written consent of the applicant.*

Site name(s), URL(s) covered by this request:

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Company Name: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Contact phone and email \_\_\_\_\_

*Please note: If you are seeking Safe Harbor status for multiple sites and information collection practices differ significantly at the sites, it is preferable to submit separate forms to facilitate the review.*

1. Does your site have a privacy policy linked from its home page and at each area where you collect personal information from a child under 13? If yes, please attach a copy of your privacy policy for each site.

- Yes
- No

2. Does the privacy policy: (check all that apply)

- Provide full name and online and offline contact information for the operator(s)  
Explain:
  - What personal information is collected
  - How personal information is used
  - With whom personal information is shared
  - How personal information is collected, e.g., directly, passively?

Exhibit B

3. Does the site collect (please check all that apply):

- First name only
- screen name
- full name (first and last name)
- domain name
- e-mail address of child
- e-mail address of parent
- date of birth/age/grade in school
- full mailing address of parent or child
- phone number
- social security number
- city only
- city and state
- zip code
- credit card number
- name of school
- other. Please specify.

4. By what means is this information collected?

- Site registration
- Contests/sweepstakes
- Order forms
- Surveys/polls
- Newsletters
- Newsgroups, forums, chat rooms and/or bulletin boards
- Other (Please describe)\_\_\_\_\_

5. For which activities do you require verifiable parental consent?

- Chat
- Bulletin boards
- Third party disclosure
- Personal home pages
- Personal profile
- Internal marketing
- E-Mail accounts
- Personalization of Website
- Other. (Please specify)\_\_\_\_\_

6. If your site offers chat, bulletin boards, forums or newsgroups are they monitored or screened in any way?

- Yes
  - No
- If yes, please describe: \_\_\_\_\_

Exhibit B

7. How is the personal information you collect used? Check all applicable boxes.
- Aggregated and discarded
  - To personalize the visitor's web experience
  - To fulfill the consumer's request (e.g., sign them up for a newsletter, enter them into a contest or sweepstakes, fill an order)
  - To contact consumer
  - Shared (with or without payment) with third parties.
  - To notify parents at a separate e-mail address of a request from a child
  - Other (please specify)\_\_\_\_\_

8. Does the site place cookies?
- Yes
  - No
- If so, is it disclosed in the privacy policy?
- Yes
  - No

9. For what purpose(s) are cookies used? Please check all applicable boxes:
- Keep track of shopping cart
  - Keep track of login name/passwords
  - Keep track of click stream data
  - Personalize Web site
  - Other (please specify)\_\_\_\_\_

10. If cookies are used, are they coupled with any personal information?
- Yes
  - No
- If yes, explain:\_\_\_\_\_

11. Does the site allow other companies, such as advertisers, to deliver cookies to users while on the Web site?
- Yes
  - No
- If yes, explain:\_\_\_\_\_

12. Do agreements with Web hosts, advertisers, and others establish limits on their rights to use personal information except to provide technical or fulfillment services to the site?
- Yes
  - No

13. If you use (a) Web host(s), what is/are the name of the host(s)?
- \_\_\_\_\_

Exhibit B

14. Are you supplied with a copy of the Web host's policies and procedures with respect to security?

- Yes
- No

15. If your activities at the site(s) do require you to obtain verifiable parental consent, what methods are used? (Check all applicable boxes):

- Facsimile
- Mail
- Toll free phone registration
- Email
- Email plus credit card number
- Email plus \_\_\_\_\_
- Digital signature
- Other (specify)

16. Can parents request an opportunity to review personal information collected from a child and remove or correct that information, or refuse to permit further use of that information (including transfers to third parties) by:

- Sending an e-mail to:
- Calling this 800 number:
- Writing to:
- Visiting the following URL:
- Other (specify):

17. How do you verify that the person asking to view any personal information of a child is, in fact, the child's parent? Check applicable boxes:

- Personal identification number (PIN)
- Credit card number
- Digital signature
- Other (please specify) \_\_\_\_\_

18. Does your site link to other sites?

- Yes
- No

19. Does your site link to advertisements?

- Yes
- No

## Exhibit B

20. If yes, are they marked as ads?

- Yes
- No

21. Are the ads suitable for children?

- Yes
- No

Provide a few examples.

22. If a user leaves the site to view an advertiser's site, are bumper screens or notices used?

- Yes
- No

## SECURITY

23. Is your server physically secure?

- Yes
- No

If yes, please explain: \_\_\_\_\_

24. Do you encrypt data during transmission?

- Yes
- No

If yes, what kind of information is encrypted?

- Transactional
- Other (describe): \_\_\_\_\_

25. How do you protect data obtained online and stored by you (check all that apply):

- Firewalls
- Encryption
- Password-protected access
- Limits on number, level of employees with access
- Physical security means
- Other

26. Do you (check all that apply):

- Designate an individual responsible for compliance with your privacy policy
- Disable employee access to data upon termination or, when appropriate, a change of responsibilities
- Investigate external or internal complaints about unauthorized access or use should you receive any
- Offer periodic education, training, reminders to appropriate employees
- Conduct internal or third party audits

## Exhibit B

- Review, update, change privacy policies when you materially change data collection activities

27. Are Non-Disclosure Agreements or contractual obligations regarding personal information in place with contractors and third parties?

- Yes
- No

28. Is there any other pertinent information you would like to provide about the site(s) or your privacy policy?