

# CHILDREN'S PRIVACY POLICY

Dr Anton van Lierop Inc is committed to protecting the privacy of children who use our sites and applications. This Policy explains our information collection, disclosure, and parental consent practices with respect to the information provided by children under the age of 18 ("child" and defined in our general Privacy Policy.

## 1. THE INFORMATION WE COLLECT FROM CHILDREN, HOW WE USE IT AND WHEN WE COMMUNICATE WITH PARENTS

- *Dr Anton van Lierop Inc* offers its patients a range of sites and applications, some of which are primarily targeted at children, and others that are intended for users of all ages and families.
- Our sites and applications offer a variety of activities, including activities that may collect information from children.
- Below we summarise potential instances of collection and outline how and when we will provide parental notice and/or seek parental consent.
- In any instance that we collect personal information from a child, we will retain that information only for as long as reasonably necessary to fulfil the activity requested.
- In the event that we discover we have collected information from a child in a manner inconsistent with legal requirements, **we will either delete the information or immediately seek the parent's consent for that collection.**

## 2. REGISTRATION

- During the registration process, we may ask the child to provide certain information for notification and security purposes, including a parent or guardian's email address, the child's first name and gender, the child's member or account username, and password.
- We will not use parent emails provided for parental consent purposes to market to the parent unless the parent has expressly opted into email marketing.
- **We strongly recommend children never use personal information in their usernames.**
- Please note that children can choose whether to share their information with us, but certain features cannot function without it. As a result, children may not be able to access certain features if required information has not been provided.
- **We will not require a child to provide more information than is reasonably necessary in order to participate in an online activity.**

- Consistent with the requirements of the law, in any instance where we ask for age and determine the **user is aged 18 or under, we will ask for a parent or guardian email address before we collect any personal information from the child.**
- If you believe your child is participating in an activity that collects personal information and you have **NOT received an email providing notice or seeking your consent, please feel free to contact us at 021 872 7472**

### 3. CONTENT GENERATED BY A CHILD

Certain activities on our sites and applications allow children to create or manipulate content and save it. These activities will not require children to give any personal information. **We strongly recommend children never include personal information in their content.**

### 4. VERIFIABLE PARENTAL CONSENT:

In the event that *Dr Anton van Lierop Inc* wishes to collect personal information from a child, POPI requires that we first seek a parent or guardian's consent by email. In the email, we will explain what information we are collecting, how we plan to use it, how the parent can provide consent, and how the parent can revoke consent. **If we do not receive parental consent within a reasonable time, we will delete the parent's contact information and any other information collected from the child in connection with that activity.**

### 5. EMAIL CONTACT WITH A CHILD

- On occasion, in order to respond to a question or request from a child, *Dr Anton van Lierop Inc* may need to ask for the child's online contact information, such as an email address.
- *Dr Anton van Lierop Inc* will delete this information immediately after responding to the question or request.
- In connection with certain activities or services, we may collect a child's online contact information, such as an email address, in order to communicate with the child more than once. In such instances, we will retain the child's online contact information to honour the request and for no other purpose such as marketing.
- **Whenever we collect a child's online contact information for ongoing communications, we will simultaneously require parents' email addresses in order to notify the parent about the**

**collection and use of the child’s information, as well as to provide the parents with an opportunity to prevent further contact with the child.**

- On some occasions, a child may be engaged in more than one ongoing communication, and a parent may be required to “**opt-in**” to each communication individually.

## **6. PUSH NOTIFICATIONS**

- Push notifications are notifications on mobile and other devices that are typically associated with downloaded applications, and which can communicate to the device holder even when the application is not in use.
- We will require a child to provide a parent’s email address before the child can receive push notifications from our child-directed applications that collect a device identifier.
- We will then provide the parent with a notice of our contact with the child and will provide the parent with the opportunity to prevent further notifications.

## **7. WHEN INFORMATION COLLECTED FROM CHILDREN IS**

### **AVAILABLE TO OTHERS**

- In addition to those rare instances where a child’s personal information is posted publicly (after receiving high-level parental consent), we may also share or disclose personal information collected from children in a limited number of instances, including the following:
  - We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law.
  - We may also disclose personal information collected from children (i) in response to a law enforcement or public agency’s (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.

## **8. PARENTAL CHOICES AND CONTROLS**

At any time, parents can refuse to permit us to collect further process personal information from their children in association with a particular account and can request that we delete from our records the personal information we have collected in connection with that account. Please keep in mind that a

request to delete records may lead to a termination of an account, membership, or other services. Please see the Withdrawal of Consent form.

In any correspondence such as e-mail or mail, please include the child's username and the parent's email address and telephone number. To protect a child's privacy and security, we will take reasonable steps to help verify a parent's identity before granting access to any personal information.