



Children’s Online Privacy Protection Act (COPPA) Policy

Invstr (“Invstr”) is committed to protecting the privacy of children who use our services. This Children’s Online Privacy Policy explains our information collection, disclosure, and parental consent practices with respect to information provided by children under the age of 13 (“child” or “children”), and uses terms that are defined in our general [Invstr Privacy Policy](#).

This policy is in accordance with the U.S. Children’s Online Privacy Protection Act (“COPPA”), and outlines our practices in the United States regarding children’s personal information. For more information about COPPA and general tips about protecting children’s online privacy, please visit [OnGuard Online](#).

Collection of Children’s Information and How We Use It.

Invstr will only collect and use a child’s personal information that is not subject to an exception under COPPA when we have the consent of the child’s parent or guardian. If we discover that we’ve unintentionally collected personal information from a child in a way that does not meet applicable legal requirements, we will delete the information promptly. This section discusses the types of information we collect directly from children, and the information we collect as children use the Services. Please note that we do not make a child’s participation in the Services contingent on that child’s disclosure of more personal information than is reasonably necessary to participate in the Services.

Information we Collect Directly From Children

In order to collect and use a child’s personal information, we are required by COPPA to obtain verifiable consent from the child’s parent or guardian. Users must provide their age, and children users must provide the email address of their parent or guardian so that we can seek consent. We will retain the parent’s email address to send important communications about the Services and the child’s participation in the Services.

Once consent has been obtained, for the child to open an account, we collect the following information about the child: name and email address. In accordance with applicable legal requirements, we will also collect the child’s or parent’s phone number to communicate about the Services via SMS.

Children have the ability to interact with other users on the Services to share information about. Children also have the ability to participate in private and group discussions. Given the interactive nature of the Services and the various features the child can edit, please review your child’s profile, settings and related activity periodically to review this information together with your child.

Information we Collect as Children Use the Services

When your child uses the Services, we also collect information about the devices used to access the Services, and information about how they interact with the Services.

- Information we collect about the device used to access the Services includes: persistent identifiers such as IP addresses and other device identifiers, and system operating system.
- Information we collect about interactions with the Services includes: the number and frequency of visits to the Services, the parts of the Services used, securities selected and viewed, whether notifications, including email communications we have sent have been viewed and/or content within them clicked, and the frequency and duration of use of the Services.

We use this information for a variety of business operations purposes, such as to recognize users, analyze use of the Services, market the Services, improve the Services, and secure and troubleshoot the Services. In such instances, the only information that will be collected from the child will be persistent identifiers of the associated device and usage data discussed above for use for our own analysis, statistical, and other internal purposes. However, once we have received parental consent, we may link the device and usage information to the child's account. This combined information allows us to further personalize your child's experience on the Services, and the communications we send to your child about the Services. Your child can opt out of any of these communications. Even if an opt out is received, we will continue to send transactional communications about the Services that are not marketing in nature.

Disclosure of Information.

Please note that we do not share or disclose your child's personal information for marketing purposes.

In addition, we may share or disclose personal information collected from your child in the following circumstances:

- With our service providers so they can perform services on our behalf (such as clearing broker, bank, and analytics providers providers)
- As permitted or required by law, including in response to a court order or a subpoena
- To protect the safety of a child, to prevent a crime, or to facilitate a public safety investigation
- To take precautions against liability
- To protect the security or integrity of our Services
- If we are involved in a merger, acquisition, or asset sale, a child's information may be among the information shared, and in such a situation, we will comply with applicable legal requirements

We may share aggregated, non-reverse engineerable de-identified information relating to activity on the Services with third parties or the general public. For example, this may include the provision of reports regarding child engagement with the Services to improve the Services, or analysis of use of the Services or its features. Such aggregated, de-identified data will not contain any personal information from your child and can be freely shared at our discretion.

Parental Controls and Choices.

Parents or guardians may also contact us using the "Contact Us" information below to alter or access the personal information that we have collected about their child, correct factual errors in such information, request to have this information deleted, or request that we no longer collect, use, or maintain such information. To protect the privacy and security of our users, we will take reasonable steps to verify the identity of the parent or guardian before granting the parent or guardian access to the personal information that we collect and maintain about the parent or guardian and his or her child.

Changes to This Policy.

By using the Services, you agree to the practices described in this Policy. On occasion, it may be necessary for us to change the terms of this Policy due to changes in the law, technology, or our practices. We will do so by posting updated text on the Services, and your continued use will constitute acceptance of those changes. To ensure that you are aware of current privacy practices, we recommend that you review the Policy periodically. If required by COPPA or other applicable legal requirements, we will provide additional notice and/or ask for your agreement to certain changes.

Contact Us.

If you have any questions, or would like to express any controls discussed above, please contact us via e-mail at supportplus@invstr.com or via mail at Invstr, attn: Privacy Info, 3201 Cherry Ridge Road, Suite 213B, San Antonio, TX 78230.