

CHILDREN'S PRIVACY NOTICE

Last Updated: February 14, 2024

Children's privacy is important to us. The Children's Online Privacy Protection Act ("COPPA") requires that we obtain verifiable parental consent before we collect, use, or disclose personal information from a user who is a child under the age of 13 ("Child" and "Child Personal Information").

This Children's Privacy Notice informs parents and guardians ("parent," "parents," "you" or "your") of:

- The types of Child Personal Information we may collect.
- How we use Child Personal Information we collect.
- Our practices for disclosing Child Personal Information.
- Our practices for notifying and obtaining verifiable parental consent when we collect Child Personal Information, including how parents may revoke consent.

This Children's Privacy Notice supplements our online privacy policy available [here](#) (the "Privacy Policy"). Capitalized terms that are not defined in this Children's Privacy Policy have the meanings defined in the [Privacy Policy](#).

1. CHILD PERSONAL INFORMATION WE COLLECT

Personal Information Collected Directly. You can add your Child as an authorized cardholder when you register on our Services. When you initiate the registration process on behalf of your Child, we collect your Child's first name, last name, and date of birth.

If you choose to let your Child use our mobile application (the "App"), we collect your Child's email and telephone number.

If you choose to enable the credit reporting functionality, we collect your Child's Social Security Number and residential address.

For any cardholders with App access, we collect IP addresses and geolocation information sufficient to identify the name of a city or town, the mobile device IDs, and usage stats.

We collect card transaction history.

We may collect other personal information that parents add to the Child's account.

Our [Privacy Policy](#) describes other information we collect that is not a Child's Personal Information.

We request, via digital consent during the registration process, that you represent that you are the parent of any Child for whom you create an account, and that you consent to our collection, use, and disclosure of the Child Personal Information in accordance with this Children’s Privacy Notice.

Automatic Collection. We use technology to automatically collect information from our users, including Children, when they access and navigate through the Services and use certain of its features. For information about our automatic collection practices, including how you can opt out, see the “[Information We Collect Automatically](#)” and “[Your Controls](#)” sections of our Privacy Policy.

2. HOW WE USE CHILD PERSONAL INFORMATION

We use Child Personal Information to provide the Services and for the following purposes:

- We use phone number and email address to allow App access.
- We use name and date of birth to determine what type of authorized user a Child is and what App features the primary cardholder can enable.
- We use the Child’s name to emboss it on the credit card.
- We use the information related to card use (e.g., transaction history) and App use for account monitoring and maintenance.
- If the credit reporting feature is enabled by the parents, we use the Child’s social security number and residential address to report to credit reporting agencies.
- We use the parents’ email address or phone number to communicate messages about the account.

We may also use Child Personal Information for the provision of our Services to your Child, including to verify your Child’s identity, as described in further detail in “[How We Use Your Information](#)” section of our Privacy Policy.

3. DISCLOSURE OF CHILD PERSONAL INFORMATION

We may disclose Child Personal Information to third parties for the following reasons:

- With vendors, consultants, service providers and other unaffiliated third parties that provide certain services on our behalf;
- With your consent;
- We may sell or purchase assets. If another entity acquires us or our assets, Child Personal Information collected through the Services may be disclosed to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization

proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties; and

- We may transfer Child Personal Information to third parties to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our Terms of Use or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety or security of third parties, users of the Services or the public.

We may also disclose to third parties de-identified or aggregated information that does not reasonably identify any Child.

4. PARENTAL RIGHTS AND CONTROLS

You choose whether to permit us to collect Child Personal Information from your Child. If you have not given us permission to collect Child Personal Information, we will not collect it. We do not knowingly collect, use, or disclose Child Personal Information without the parents' permission.

As a parent, you have the following controls over Child Personal Information. At any time, you may:

- review the Child Personal Information that we maintain;
- request that we correct or delete your Child Personal Information; and
- refuse to permit us to further collect or use your Child Personal Information.

You may do so by:

- Logging into your Robinhood Credit Card app, visiting the "Cardholders" tab and clicking the "Remove" button at the bottom of the authorized user's profile page. This will remove your Child as an authorized user and close your Child's account. Or
- Sending us an email at creditcards@robinhood.com. We may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections.

Please note that if you refuse to permit us to further collect or use your Child Personal Information, or if you request deletion of your Child Personal Information, we may terminate our Services we provide to the Child.

If you request that we delete Child Personal Information, we will delete as much information as we are legally permitted. Due to regulatory recordkeeping obligations, we may be required by law to retain some information associated with a closed account.

5. RETENTION OF CHILD PERSONAL INFORMATION

We may retain Child Personal Information as long as it is reasonably needed to provide your Child with the Services, comply with our legal and contractual obligations, or resolve disputes. If you close your Child's account, we may still need to retain some of your Child Personal Information, such as transactional data to comply with our legal obligations. This retention period will be up to 7 years but could be longer if it is required for regulatory reasons. To determine the appropriate retention period for Child Personal Information, we consider the amount, nature, and sensitivity of such information, the potential risk of harm from unauthorized use or disclosure of such information, the purposes for which we process it, and the applicable legal requirements.

6. METHODS FOR PROVIDING VERIFIABLE PARENTAL CONSENT

A parent may provide consent for a Child to use our Services by verifying your identity as the Child's parent through the App. If you fail to verify your identity, then the Child's account will not be created.

If you request for your Child to have App access, you will receive a separate email from us requiring you to affirmatively approve the Child's App access. If you fail to approve App access, your Child will not be able to use the App.