

COPPA Compliance Statement

KFRM LLC d/b/a Fundraising University

Effective date: August 4, 2026

Last updated: August 4, 2026

Source: Section 6 of the Fundraising University Privacy Policy, published separately for schools, groups and organizations that need to distribute it on its own.

Children's Online Privacy Protection Act

6.1 Applicability. The Fundraising University platform may be used by students under the age of 13 as part of fundraising programs supervised by schools, groups, or organizations. We recognize our obligations under the Children's Online Privacy Protection Act (COPPA), 15 U.S.C. §§ 6501–6506, and the FTC's implementing regulations at 16 C.F.R. Part 312.

6.2 School and organization consent mechanism. When students under 13 use the Fundraising University platform as part of a program authorized by a school, group, or organization, we rely on the partnering school, group, or organization to act as the intermediary for obtaining verifiable parental consent on our behalf. This approach is consistent with FTC guidance permitting schools to consent on behalf of parents when an online service is used solely for an educational purpose.

Schools, groups, or organizations that use the Fundraising University platform for students under 13 are responsible for:

- Notifying parents about the use of the Fundraising University platform before student participation
- Obtaining verifiable parental consent before allowing students under 13 to access the platform
- Providing parents with the Fundraising University Privacy Policy (or a link to it)
- Ensuring that parents understand how to exercise their rights under COPPA

Disclosure: The Fundraising University platform does not currently include a built-in automated age verification or parental consent collection mechanism. The responsibility for ensuring that appropriate parental consent has been obtained before a student under 13 accesses the platform rests with the school, group, or organization partnering with Fundraising University. Fundraising University is committed to working with its partners to develop enhanced consent tools and processes.

6.3 Information collected from children under 13. For students under 13 who use our platform, we collect the following information:

- Phone number (used for login and device identification)

- First name and last name
- Opt-in preference for fundraising reminders
- Coach group assignment
- Engagement metrics (share clicks, page visits)
- Donor contact information entered by the student (contact names, phone numbers, relationship designations, and message text)

6.4 Information NOT collected from children under 13.

- Email addresses are not collected through the Student Fundraising Portal
- Social Security numbers are not collected
- Precise geolocation data is not collected from students
- Photographs, video, or audio recordings are not collected
- Biometric data is not collected
- No information is collected for behavioral advertising purposes

6.5 How we use and share children's information. Information collected from children under 13 is used solely to enable the student to participate in their school's fundraising campaign, to allow the student to enter donor contacts and compose fundraising messages, to track progress toward their goal, to enable coach oversight and support, to send fundraising reminders to students who have opted in, and for platform functionality, technical support, and security.

We share children's information only with the student's school and coach (for oversight and support), the Fundraising University franchise owner managing the campaign in that territory (aggregate performance data), Twilio (our SMS provider, for opt-in reminders to students — phone number and message content only), and Amazon Web Services (our cloud host, US-East-1). We do not share children's information with advertising networks, data brokers, social media platforms, or any other third party for commercial purposes.

Student records are explicitly excluded from our Mailchimp email marketing synchronization.

6.6 Parental rights. Parents of children under 13 have the right to:

- Review personal information that Fundraising University has collected from their child
- Request deletion of their child's personal information
- Refuse to allow further collection or use of their child's information, and request that their child's account be deactivated
- Have their child participate without disclosing more personal information than is reasonably necessary to participate

To exercise these rights, parents may contact their child's school — the school can coordinate with us on the parent's behalf — or contact Fundraising University directly at support@fundraisinguniversity.net or (602) 529-8293. We will respond to verified requests within 30 days. To protect the child's privacy, we may require the parent to verify their identity and their relationship to the child before processing the request.

6.7 No behavioral advertising or commercial profiling. We do not use information collected from children under 13 for behavioral advertising, targeted marketing, creating commercial profiles, or any purpose other than providing the fundraising service as described in the Fundraising University Privacy Policy.

6.8 Data retention for children's data. Personal information collected from children under 13 is subject to the same retention practices described in [Section 9](#) of the Fundraising University Privacy Policy. We retain children's personal information only as long as reasonably necessary to fulfill the purpose for which it was collected. Parents may request deletion of their child's data at any time by contacting support@fundraisingu.net; upon a verified deletion request we will delete the child's personal information within 30 days, except where retention is required by law. Upon termination of services with a school, all student data associated with that school's campaigns — including data from students under 13 — will be returned to the school or securely deleted in accordance with the school's instructions.

6.9 Security of children's data. We protect children's personal information using the same security measures we apply to all platform data, including SSL/TLS encryption for data in transit, secure cloud hosting on Amazon Web Services (US-East-1, Virginia), server access restricted to authorized personnel, phone-based verification and JWT authentication for the Student Portal, and no Google Analytics or third-party analytics tracking on the Student Portal. See [Section 12](#).

6.10 Changes to this statement. We may update this COPPA Compliance Statement from time to time. If we make material changes to how we collect, use, or share information from children under 13, we will notify schools and request that they inform parents accordingly. The "Last updated" date at the top of this policy will be revised to reflect the most recent version.

6.11 Operator information. The operator collecting information from children through the Fundraising University platform is:

KFRM LLC d/b/a Fundraising University

Email: support@fundraisingu.net

Phone: (602) 529-8293

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