### **Full Direct Notice**

Before we can provide the students in your classroom with access to the Service, we need to obtain consent. Under the U.S. Children's Online Privacy Protection Act and its implementing regulations under the Children's Online Privacy Protection Rule (collectively, "COPPA"), parental consent is required for the collection, use or disclosure of personal information from children under the age of 13. We require schools to provide this consent if they allow students under the age of 13 to access or use ClassDojo in connection with classroom or school use. Teachers may provide parental consent through "school consent" under COPPA, where teachers have certified that they are acting as the agent of the parent and consenting on the parent's behalf for the student to use ClassDojo for educational purposes<sup>1</sup>. For more information on "school consent" under COPPA, please see the FTC's FAQ Section N as well as the FTC's Policy Statement on Education Technology and COPPA. For clarity, it is ClassDojo's obligation to comply with COPPA as a whole, we rely on schools to provide consent under COPPA by acting as the agent of the parent, but only after providing the school with Direct Notice the required notices set forth below. ClassDojo will not knowingly collect, use, or disclose childrens' personal information unless you've provided this consent.<sup>2</sup>

# **Scope of Direct Notice**

This disclosure for teachers ("Direct Notice") provides important information you should consider when allowing the children in your classroom access to the ClassDojo service (the "Service").

We explain the information we collect for your student's use of ClassDojo below. In order to allow the students in your classroom access to the Service, you must review this Direct Notice of disclosure (including the <u>ClassDojo Privacy Policy</u> and <u>Children's Privacy Policy</u>) and give your consent as indicated within the ClassDojo "just in time" prompt at the time you allow your students access to the Service (e.g. when you provide them access to your class codes or other login methods).

<sup>&</sup>lt;sup>1</sup> ClassDojo must ensure that services made available to students when schools are providing parental consent using "school consent", are used for educational purposes, and are used in compliance with applicable laws and regulations (including FERPA, the Children's Internet Protection Act, and COPPA). Note that some of the restrictions on the use of student's personal information for strictly educational purposes may not apply once ClassDojo additionally obtains verifiable consent directly from parents through the "email plus" or other approved methods.

<sup>&</sup>lt;sup>2</sup> For technological reasons, we may collect IP address and device-specific information (including device tokens used for sending push notifications) prior to obtaining your consent, but will only use this information for the purpose of providing support for the internal operations of our Service prior to receiving your consent. We will also not send out any push notifications until <u>school consent</u> is given and if we do not receive such <u>school consent</u>, we will delete the device tokens within 7 days of collection. Read more in our <u>FAQs</u>.

We will ask for your consent before we make any material changes to the practices described in this Direct Notice of disclosure (including the <a href="ClassDojo Privacy Policy">ClassDojo Privacy Policy</a>). Read more about how ClassDojo protects students in the <a href="Privacy Center">Privacy Center</a>. Please also see our <a href="Short video">short video</a> for students that highlights the most important details in our Privacy Policy that they should know about.

#### **Information Collected**

## We May Collect the Following Information from the Children in your Classroom

- Name
- Birthday or age
- Email address
- Unique student code (if the teacher has chosen to let students log in with a username/password)
- A unique username and password
- QR code login data
- Any SSO passed data (e.g. if a teacher has allowed a student to login to the Service by using a service such as Google for Education)
- Monster Avatars, including the child's customization of their avatar and monster parts unlocked through points or fictional currency your child earns in the Service
- Photos
- Videos, including voice and audio information
- Uploaded files or documents, like a presentation for class
- Written notes, like journal entries
- Responses to teacher comments posted (or activities assigned) on their Portfolios
- "Views", "Likes" or comments on content on Portfolios, <u>Class Stories</u>, and <u>School</u> <u>Stories</u>
- Contents of communications between children such as messaging within the app or the ClassDojo virtual world with their ClassDojo Monster where they can engage in various activities and interact and communicate with other children (including their classmates) ("Class Islands") that includes the ability to share photos and videos with other children
- <u>Class Islands</u> activity, including building activities, fictional virtual currency earned or "spent", inventory, progress, social connections, pre-canned chat, and any virtual items acquired or unlocked.
- IP address
- Cookie and other similar technologies
- Device-specific information, such as platform, device ID, device type and operating system, device token (to send push notifications), and any information their device's camera application may send (e.g. EXIF data which may contain location

information). We strip EXIF information from photos before the photo is viewed by others.

- Mobile application information, such as application version, history, and crash status
- Location information, but not precise geolocation
- Online status
- Server log information and product event data, including from the child's device, such as the last activity a child started or their feedback points earned, or logging in via QR code to their <u>Student Account</u> on the parent's device.

The device and application related data is collected from the device and application being utilized to give the child access to ClassDojo accounts (e.g., the classroom or parent's device if the child is utilizing the teacher's or parent's device, or the child's device if they are logging in separately on their own device). ClassDojo does not require a child to provide more information than is reasonably necessary to participate in the Service. If we discover that we have collected information from a child in a manner inconsistent with COPPA, we will take appropriate steps to either delete the information or immediately seek the <a href="school's consent">school's consent</a> for that collection.

Please see our <u>Information Transparency chart</u> for the detailed categories of information we collect from each user type as well as our <u>Mobile App Permissions chart</u> for more detail on our mobile app permissions.

### <u>Information Collected from Educators or Parents</u>

Parents, teachers and School Leaders may provide the information set forth below about a child which we will link or combine with the information listed above that we collect from the child.

Teachers and <u>School Leaders</u> about students:

- Demographic Information: Your student's first and last names, dates of birth, student grades, class name (or list of all class names), school name and location (which may also be provided through a third party <u>service provider</u> (e.g., Edlink) collecting this information directly from the district or school through the district's Student Information System (SIS) allowed by that district.
- Feedback Points: Feedback Points which may be given by a teacher, School Leader, or authorized ClassDojo Admins to a student (including both points awarded in the classroom or points awarded in school outside the classroom).
  - Classroom feedback points: These points can be awarded to students by their teacher, <u>School Leader</u>, or authorized <u>ClassDojo Admins</u>, and are viewable by the student's teacher, <u>School Leader</u>, or <u>ClassDojo Admins</u> who awarded them, and any connected parent accounts (if the teacher, <u>School</u>

- <u>Leader</u>, or authorized <u>ClassDojo Admins</u> has elected to show them to the parent). Additionally, other teachers or <u>School Leaders</u> the class is shared with can also see these points. If the teacher chooses to display totals to the class, other students in the class may be able to see each other's aggregated totals (but not individual feedback points).
- School-wide feedback points: These points can be awarded by , any <u>School Leader</u>, teacher, or authorized <u>ClassDojo Admins</u> for activities outside of the classroom (such as responsibility, teamwork, respect, compassion). They can be viewed by students, their connected parent accounts, the <u>School Leader</u>, teacher, or authorized <u>ClassDojo Admins</u> who awarded them. Other teachers may see these points if one or more of your students ranks at the top of the rankings in a particular category.

For all feedback points collected in school and the reports generated that show these points, we also collect product events (e.g., the number of points given, skill, which reports are viewed, etc.).

- Content on Portfolios, Class Story and School Story: Content (including photos and videos) added to your student's portfolios or Class Stories or School Stories by their teacher, and any activities assigned by their teacher as well as comments or communications from the student's teachers to their students on these activities. The student's teacher may choose to select certain photos of your children previously posted on their Class Stories to be included in digital photo albums called Dojo Photobooks. We will send these selected photos as well as class details (e.g., class year, grade level) about your students to a <u>service provider</u> to create these <u>Dojo Photobooks</u>. These <u>Dojo Photobooks</u> may include photos of your students' class activities, projects, or school events, and will be made available for teacher and any of your students' parents to print and purchase. We combine Class and School Story posts (which may include your students' names, class details, and photos) into a unified feed for authorized ClassDojo Admins, including School <u>Leaders</u>. This consolidated information is used by <u>School Leaders</u> to track, monitor and engage with school activities effectively. School Leaders can access all Story posts from individual classes and the entire school in chronological order. They can also like and comment on Class or School Stories, and view engagement details on each post, but currently can only add posts to School Stories, not Class Stories.
- Al Tools: A student's teacher may choose to provide text "inputs" (which may include <u>personal information</u> about their students, such as their names, class participation details, or homework responses) and "prompts" to ClassDojo teacher <u>Al tools</u> to generate various school-related content or "outputs", such as <u>Class Story</u> posts, messages, assessments, thank-you notes, and report card comments. For instance, a student's teacher might use a student's name and class participation details to draft an editable <u>Class Story</u> post about a recent project or field trip, or

draft an editable thank-you note or editable report card commentary. The content created through this process, including the Al-generated "outputs" will only be shared with the student, their parents, authorized teachers and <u>ClassDojo Admins</u>. For more information on the "input" and "prompts" used to generate the Al "outputs", as well as the information shared with our Large Language Model ("LLM") <u>Service Provider</u>, please see our <u>Al Transparency Note</u>.

#### Parents about their child:

- Demographic Information: Additionally, if not previously provided by a school or the student, when a parent is creating their childs' <u>Student Accounts</u>, a parent may provide their childrens' names and dates of birth or ages. If a parent creates an <u>Outside School Child Account</u>, we will separately obtain <u>parental consent</u> directly from the child's parent and will not rely on <u>school consent</u>. For more details on how we obtain parental consent directly from parents and what types of verifiable parental consent are used, please see our FAQ. We may pre-populate a child's name if a parent uses their ClassDojo Services account to login to any existing <u>Dojo Tutor</u> account that they have. See the Dojo Tutor <u>Privacy Policy</u> for more details as well as the "Sharing of Student Data for Non-School Use below.
- Content on Portfolios, Class Story and School Story: Content (including photos and videos) your students' parents may add about their children to their child's portfolios or <u>Class Stories or School Stories</u> or any comments mentioning their children on Portfolios, <u>Class Stories or School Stories</u>. Parents may choose to select certain photos previously posted on their child's Class Stories to be included in digital photo albums called <u>Dojo Photobooks</u>. After separately obtaining <u>parental consent</u>, we will send these selected photos as well as class details (e.g., class year, grade level) about their children to a service provider to create these <u>Dojo Photobooks</u>.
- Premium Features and Home Points: If your student's parent allows their child access to use certain Premium Features within the child's <u>Student Accounts</u> or their <u>Outside School Child's Accounts</u>, we will also separately obtain <u>parental consent</u> directly from a parent and will not rely on <u>school consent</u>. For all feedback points collected in school and the reports generated that show these points, we also collect product events (e.g., the number of points given, skill, which reports are viewed, etc.).

## How We Use Information About the Children in Your Classroom

Information collected from the children in your classroom (including <u>personal information</u> and information collected automatically) is never used or disclosed for <u>third-party advertising</u>. We also do not place any third-party advertisements in areas of the Service where children are

logged in. Additionally, personal information collected from children is never used for behaviorally-targeted advertising to children by us or any third-party, and childrens' personal information is never sold or rented to anyone, including marketers and advertisers. We may present contextually relevant educational content (not using a child's personal information) for either our own products (e.g., Premium Features or Home Islands) or third-party products and services that we believe may be of interest to children (e.g., our co-created content with Yale University on Mindfulness and Heart of a Champion series). We also offer a Student Data Privacy Addendum, an agreement we enter into with schools or districts that further describes our duties, responsibilities, and commitments with respect to Student Data that we collect or receive.

Our uses of childrens' personal information are set forth below:

#### Non-Al Uses

In addition to the uses mentioned above, we use the information we collect from children (or about children from parents, teachers, School Leaders, and authorized ClassDojo Admins):

- To provide and improve (as allowed by law) the Service, to send push notifications or other in-app notifications to children (e.g. to encourage them to take certain actions in the Service)
- For internal analytics on product usage and quality
- For <u>educational</u> purposes and as allowed by law
- To identify, fix and troubleshoot bugs and Service errors
- For security and safety purposes, including enforcing our Terms
- To comply with legal process or other laws

### Artificial Intelligence ("AI") Uses

Data obtained from the inputs, prompts and outputs may be accessed, processed and used by ClassDojo to provide, improve (as allowed by law) and maintain the Service (such as generating teaching-related content for <u>Class Story</u> posts, messages, assessments, thank-you notes, and report card comments), perform internal analysis (including to provide metrics and data logs or activity records needed for measuring up/down time and, debugging the tools), and keep our platform safe and secure. To understand more about the specific "prompts" used to generate these AI insights, the information shared with this LLM, and ClassDojo's use of AI, please see our <u>AI Transparency Note</u>. We are currently using OpenAI and Anthropic as our LLM service providers ("LLM Service Provider"). Childrens' data used to provide the "inputs" (e.g., name, school, role, etc.) may be transiently retained by the LLM Service Providers to provide the Service to ClassDojo. ClassDojo has entered into a specific contract with the LLM Service

Providers for "zero data retention" beyond this transient retention for the ClassDojo-provided Al tools mentioned above. This means that the prompts, inputs, and outputs (a) will not be logged for human review by OpenAl and (b) will not be saved to disk or retained by the LLM Service Providers. Note, however, that the LLM Service Providers may perform automated screening of the inputs and prompts for safety purposes (the "Safety Classifiers"), which shall consist solely of metadata (including classifier types, dates, counts, and confidence scores) and shall not include any inputs, prompts, or outputs themselves (including summarizations of prompts, inputs, or outputs) or any portion thereof. The LLM Service Providers may retain Safety Classifiers.

ClassDojo does not use any <u>personal information</u> contained in any inputs, prompts, or output to train any of ClassDojo's artificial intelligence models. Additionally, ClassDojo does not allow OpenAl, Anthropic, or any other LLM or Al third-party <u>service provider</u> it may utilize to use any information (personal information or de-identified) to train, improve or develop their artificial intelligence models. This commitment includes the information contained in the chart detailed in the <u>Al Transparency Note</u>, such as the teacher provided inputs, used to produce the Al outputs. For retention of this information, please see this chart.

## **Disclosure of Childrens' Personal Information**

We do not disclose any <u>personal information</u> about children to third-parties, except to <u>service providers</u> (e.g. AWS) necessary to provide the Service; authorized school personnel (such as teachers, school leaders, <u>ClassDojo Admins</u>, and other authorized <u>ClassDojo Admins</u>); as directed by your school; as directed or approved by your childrens' parents or legal guardians; as required by law; or to protect the security of the Service or other users. For additional information on the limited other circumstances in which we disclose children's <u>personal information</u>, please see the "<u>Will ClassDojo Share any Information it Collects</u>" Section in the Services Privacy Policy.

As allowed by applicable laws, and in compliance with our <u>Student Data Protection</u> <u>Addendum</u>, we may share aggregated or <u>de-identified</u> information, which cannot reasonably be used to identify children, with third parties for various purposes, including compliance with various reporting obligations; to demonstrate how the Service is used; for business purposes; or to assist third parties in understanding our users' interest, habits, and usage patterns for certain programs. If your school or district has entered into a custom <u>Student Data Protection Addendum</u>, any additional restrictions on the disclosure of <u>Student Data</u> or de-identified data will also be set forth there.

# **Visibility of Children's Personal Information**

No <u>Student's Account</u>, or <u>Outside School Child's Account</u>, profile, or <u>Portfolio</u> is made available or visible to the general public through ClassDojo. For a list of what logged in student users' and Outside School Child Users' information can be viewed by other logged in ClassDojo users, please see our FAQ.

#### School Use

When children are using ClassDojo in the classroom (or at home in connection with school use), only the children, their parents (and any connected parent account(s) (which may include other adults your childrens' parents may authorize and invite), you and other connected teachers (including those outside the childrens' school), and School Leaders connected to the class or school can see the content in the childrens' individual Student Accounts and Portfolios. This includes Feedback Points (if a teacher has chosen to share them with parents), Student Activity Responses, and Portfolio Comments. If a teacher displays their teacher account publicly in class, then students may see other students' total Feedback Points. If a child adds content to their Student Account in the classroom, other students can't view that child's individual Student Account or Portfolio unless those other students have intentionally chosen that child's name from the list of names shown to them while logging in, or viewed the camera roll locally on the device that the child used to save the photos and videos taken by them. Teachers have the option to use individual QR codes or links specific to each student for private and individual login purposes to prevent this. Teachers may share their classes, including Feedback Points, Portfolios, and Class Story, with other teachers or **School Leaders** in their school (or outside of their school).

Other logged-in students, parents (which may include other adults they authorize and invite), teachers, School Leaders and authorized ClassDojo Admins connected to the class or school can see likes, comments, childrens' avatars, and first names and last initials on Class Story and School Story posts as well as any content added by any user with access to these Stories. The Stories are not visible to the general public. Students can view or "like" content and comment on these Stories (but can't upload content such as photos or videos) and are only able to do this once either the school or ClassDojo has obtained parental consent, if under 13. Teachers have the ability to turn off the Story commenting feature for students and parents as well and can delete any individual user comment. If any user needs to report any abuse or inappropriate content on a Class Story or School Story that has not been addressed by the connected teacher or school, they may do so by emailing at safety@classdojo.com.

ClassDojo does not knowingly post any childrens' personal information publicly online unless the child's teacher has explicitly chosen to do so (or allow children to) on Class Story or School Story (under "school consent" under COPPA). These Stories are viewable only by those parents, guardians, students, teachers, School Leaders, and authorized ClassDojo Admins connected to a child's school. Any content uploaded by children, the child's teacher (including teacher and student comments) to the Portfolio is viewable by parents once a teacher has approved it. Please note that comments posted by children on Stories are not pre-approved by the child's teacher before being posted, although a teacher must first choose to turn on the commenting feature for students and can delete comments.

If a teacher or school has chosen to allow the use of <u>Class Islands</u> in the classroom, other students in the child's class may view the child's content and interact with the child as set forth <u>here</u>, but still can't view one another's individual <u>Student Accounts</u> or <u>Portfolios</u>. Additionally, the customization of the monster by the child within Premium Features or the Home Island may be viewable within the child's <u>Student Account</u> (and thus viewable by you or other students in the classroom).

## **Retention of Children's Information**

Retention and deletion of <u>Student Data</u> and <u>education records</u> is at the direction of the school. We enter into <u>Student Data Privacy Addendums</u> with schools or districts that further describes our duties, responsibilities, and commitments with respect to <u>Student Data</u> that we collect or receive.

In addition, we will not retain a child's <u>personal information</u> for any longer than is reasonably necessary to fulfill the purpose for which the information was collected, including for <u>educational purposes</u> or legal obligations, or to provide the Service for which we receive or collect the childrens' <u>personal information</u>, including if a child's parent directs us to retain certain content by electing to purchase our <u>Memories</u> or <u>Dojo Photobooks</u> feature.

Additionally, we only keep childrens' personal information for as long as their <u>Student Account</u> is <u>active</u>, unless we are required by law or the child's school to retain it, need it to ensure the security of our community or our Service, or to enforce our Terms. More specifically, ClassDojo operates a data protection policy to protect all students' (not just users under 13) and children's information ("Student Data Protection Policy"):

 One year deletion policy for feedback points: To protect students, ClassDojo sets limits on how long students' <u>feedback points</u> given in the classroom or school setting are retained. For all students, feedback points older than 12 months are

- automatically deleted. This means feedback points cannot exist long-term. Teachers can delete classroom feedback points at any time. <u>School Leaders</u> can also delete feedback points given in the school setting at any time.
- 2. Deleting inactive Student Accounts: If a student's Student Account is inactive for twelve months or more (meaning no student has logged into their account for twelve months), ClassDojo will automatically delete the Student Account. Learn more about how we delete Student Accounts here. Please note that certain content 1) within a Student Account or student portfolio (uploaded by the student, teacher, or their parent), such as photos, videos, Student Activity Responses or Portfolio Comments, or 2) uploaded by a teacher, School Leader, parent, or student through Class Story or School Story may be kept after deletion of a Student Account as we are required to retain these at the direction of the school (e.g., for legal compliance reasons such as maintenance of "education records" under the under the Family Educational Rights and Privacy Act (FERPA) or "Student Data" under state student privacy laws or equivalent laws internationally). This content may also have been selected by the school or the student's parent to be retained by us through your purchase of our Memories or Dojo Photobooks feature. Please see our FAQ about how to request deletion of this content.

Please see our <u>Information Transparency chart</u> and <u>Al Transparency Note</u> for more details on specific retention periods.

We may retain <u>de-identified data</u> for as long as we deem appropriate or as otherwise allowed by law or as further limited by any school or district's <u>Student Data Privacy Addendum</u>.

### **Sharing Student Data for Non-School Use**

If a child is using one of ClassDojo's out of school products, such as "Home Islands", Dojo Tutor, or if one of your children or their parents are using some of our Premium Features or Dojo Photobooks, some of the child's data, including what may be considered Student Data under various state student privacy laws or education records under the Family Educational Rights and Privacy Act (FERPA), will be used and shared between in school and out of school use (use not in connection with a school). For example, if a child is connected to a school, the parent can elect to have the child's data used to fill in the child's name for the Outside School Child Account. Prior to this sharing, the child's parent will have consented to this use and sharing. See our FAQ for more detail on what information is shared between Outside School Child Accounts and Student Accounts. We have also obtained authorization through our Student Data Privacy Addendum and Terms of Service entered into with schools or districts to allow for this limited use and sharing of Student Data or education records. If your school or district has a custom Student Data Privacy Addendum that limits this sharing, we will also honor this.

Additionally, parents who choose to link their <u>ClassDojo Services</u> account with their <u>Dojo Tutor</u> account may elect to optionally share their child's Dojo Tutor tutoring assessments with their child's teacher in the ClassDojo Services. The child's <u>Student Account</u> information on ClassDojo will remain separate, ensuring that school information remains segregated and separate from non-school information. For more information, please see our <u>FAQ</u>.