

Highlights of Direct Notice

Before you let your child participate in Dojo Sparks, you should know what information we will collect from them. Scroll down to view our full disclosure, but here are the highlights:

Private by Design

We never post or share your child's personal information publicly without your permission.

Single Consent

This consent applies to all your kids who use Dojo Sparks or our outside school products.

ASR & AI Features

Your child may interact with automated speech recognition ("ASR") features. We use artificial intelligence ("AI") to personalize the service for the child. See more below and [here](#).

Learn more about how we protect you and your child's privacy at classdojo.com/privacycenter

Full Direct Notice

Before your child can use Dojo Sparks, we need your consent. Under the U.S. Children's Online Privacy Protection Act at 15 U.S.C. 6501-6506 and its implementing regulations under the Children's Online Privacy Protection Rule (16 C.F.R. Part 312) (collectively "COPPA"), parental consent is required for the collection, use or disclosure of personal information from children under the age of 13. ClassDojo will not knowingly collect, use, or disclose your child's personal information unless you've provided this consent*.

Scope of Direct Notice

This disclosure for parents ("Direct Notice") provides important information you should consider when allowing your child (or children) to use the [Dojo Sparks](#) feature ("Sparks Feature") in connection with the ClassDojo service located at <https://www.classdojo.com> (the "ClassDojo Platform"), our mobile applications (the "ClassDojo Apps") (collectively, the "Service(s)"). Please note that this COPPA consent only applies to your child's participation in the Sparks Feature, not your child's participation in the ClassDojo Services generally - we obtain separate COPPA consent for that use as detailed in our FAQ for [parental consent](#) and [school consent](#). Please note that you will only be giving consent once and that it will also apply to any children that you subsequently allow future access to the Sparks Feature after your consent. We explain the information we collect for your child's participation in the Sparks Feature below. In order to allow your child to participate in the Sparks Feature, you must review this Direct Notice of disclosure (including the [ClassDojo Privacy Policy](#) and [Children's Privacy Policy](#)) and give your consent by checking the boxes below.

We will ask for your consent before we make any material changes to the practices described in this Direct Notice of disclosure (including the [ClassDojo Privacy Policy](#)). Read more about how

ClassDojo protects children in the [Privacy Center](#).

ClassDojo extends the U.S.-based COPPA consent protections in all jurisdictions, even if not legally required to do so to provide these privacy protective measures to children worldwide. If we rely on other legally applicable grounds for processing children’s personal information (e.g. if we rely on legitimate interest in the European Union and the United Kingdom when acting as a Controller), we will still utilize the FTC COPPA consent methods described to provide further transparency and privacy protections for both schools and parents.

Information Collected

We May Collect the Following Information From Your Child

- Name
- Birthday or age
- Grade
- Speech recognition (voice recordings). ClassDojo may collect and process your child’s voice (audio) recordings to provide our automated speech recognition (“ASR”) services. This data will be retained only transiently for processing by our third-party service provider, [SpeechSuper](#), for ASR analysis (e.g. System generated feedback on accuracy, fluency, and pronunciation) and then deleted. ClassDojo would separately retain the voice recordings (“Child Reading Lesson Audio”) for a limited time period as well as the ASR analysis performed by SpeechSuper as set forth below. See below for more on ASR and speech recognition.
- Audio (voice) recordings made by your child through their device’s microphone (e.g. iPad or Chromebook) in connection with certain features of our Service that utilize or integrate AI (“Child Learning Assistant Audio”) to help further coach or guide your child through their activities on ClassDojo (“Child AI Tools”).
- Text-based responses or “clickable” actions taken by your child in order to select a response or play a game while interacting with the Child AI Tools (“Text-Based Child Input”).
- Interactions with the ClassDojo digital animated AI learning assistant “Sparky” (“AI Learning Assistant”)(e.g. which games or lessons have been completed) through the Child AI Tools.
- Inferences from a child’s interaction with the Child AI Tools. These are inferences that either ClassDojo or the [LLM Service Providers](#) draw from the child’s Child Reading Lesson Audio, Child Learning Assistant Audio or Text-Based Child Input (e.g. the child mentioned they like baseball, we feed back to as Input to the [LLM Service Providers](#) to personalize the child’s next interaction with the AI Learning Assistant (“Child AI Inferences”).
- A unique username and password
- IP address
- [Cookies and other similar technologies](#) (*we will never use third party technologies in child logged in areas of the Sparks Features in connection with advertising the Service or third-party services*)

- Mobile application information, such as application version, history, and crash status ●
- Cross-device collection - we may link your child's identifiers on different browsers and environments they are using, such as with our syncing technology, [DojoCast](#) ●
- Location information, but not precise geolocation
- Device-specific information, such as device type, device brand, operating system, hardware version and settings, device settings, file and software names and types, battery and signal strength, device token (to send push notifications) and device identifiers (including unique device IDs). We may also collect device event information such as crashes, system activity, browser type, browser language, the date and time of the child's request and referral URL, and any information the child's 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.
- Server log information, including from the child's device, that is automatically collected such as IP addresses
- Product event data, including from the child's device, about how the Sparks Features are being used and which features are being used. Our product event logs may also include unique IDs and IP addresses

The device and application related data is collected from the device and application being utilized to give the child access to the Sparks Feature (e.g., the parents device if the child is utilizing the 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 Sparks Feature. 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 parent's consent for that collection.

Please see our [Information Transparency chart](#) for the detailed categories of information we collect from each user type as well as our [Mobile App Permissions chart](#) for more detail on our mobile app permissions.

Information Collected from Parents about their child(ren):

Parents may provide the information set forth below about a child (e.g. when setting up your child's [Outside School Child Account](#) for the Sparks Feature) which we will link or combine with the information listed above that we collect from the child.

- Name
- Date of birth or age
- Grade Level

Why Automated Speech Recognition?

Reading aloud is an essential, research-based part of the learning to read process. In order for ClassDojo to build a meaningful, fully self-directed foundational literacy experience, we need the ability to "listen" to learners read, to understand what was said, and to provide feedback. This

allows us to correct, encourage, and teach your child how to read letters, words, and sentences. In the earlier grades (Kinder) this is at the phoneme (“mmm”) and short word (“map”) level. In older grades, we would be trying to understand oral reading fluency (accuracy, automaticity, and prosody/expression) across sentences and paragraphs. It is therefore essential that we have automated speech recognition (“ASR”) in our tool.

What data would we collect in connection with ASR?

We are recording and collecting the speech (voice recording) of the child as indicated above.

How would we collect this ASR data?

We will collect this through the device’s microphone (e.g. through an iPad or Chromebook). If the device shows audio is being recorded the indicator will be on.

How would we incorporate ASR?

1. ClassDojo processing: Speech (voice recording) is collected off your child’s device by ClassDojo (securely handled and deleted as indicated below) - this is the Child Reading Lesson Audio.
2. Third party processing: The speech (voice recording) or Child Reading Audio along with [de-identified](#) identifiers is then sent by ClassDojo to be processed by a vetted third party service provider ([SpeechSuper](#)) for ASR that meets our data privacy and security requirements and has a signed Data Protection Addendum with ClassDojo. The ASR analysis done by [SpeechSuper](#) is then sent back to ClassDojo (“ASR Audio”).
3. Third party processing: In addition, if you provide consent, we will send the Child Reading Lesson Audio and Child Learning Assistant Audio with your child’s first name only to integrated Large Language Model (LLM) [service providers](#) (“LLM Service Providers”) for certain AI uses as further set forth below.

How would we limit the use or processing of this data?

We would limit ASR data retention by our third party service provider, [SpeechSuper](#), to only be retained transiently to provide the ASR service to ClassDojo for your child and would not allow this service provider to use this ASR data to improve their product or train ASR models.

In addition, we would use the ASR data for two purposes:

1. To provide the educational services (to real-time respond to a child using the app) or allow a parent to use the audio files. In addition, we would use the Child Reading Audio (prior to ASR analysis) for the additional AI features within the Child AI Tools as set forth below.
2. We would also want to use the non-audio based ASR analysis data (including associated metadata) sent back from [SpeechSuper](#) to improve (on a [de-identified](#) basis) our own

internal services, including training our own ASR service. We would not allow our third party service provider, [SpeechSuper](#), to use or retain (beyond transiently) either the voice recordings or the ASR analysis except solely to provide the ASR services to ClassDojo.

Current research indicates that the accuracy of existing ASR technology deployed in educational tools suffers when interacting with the speech of students whose accent or dialect deviates from the standard version of the language used to train the ASR system. We would want to use voice recordings to 1) ensure our ASR was not biased against non-native Mainstream American English speakers and 2) that we could improve our responsiveness to dialect and accent over time, to better serve the linguistic diversity of students.

Where would this ASR data be stored?

The ASR data will be transiently stored on our vetted third party service provider, [SpeechSuper](#) and additionally stored on ClassDojo's servers once received back from [SpeechSuper](#).

How long would we retain the voice recording?

Once we receive the ASR analysis of the voice recording back from our third party service provider, [SpeechSuper](#), the voice recording and the ASR analysis would be deleted from their servers (retained only transiently). ClassDojo would separately retain the Child Reading Lesson Audio (e.g. the initial voice recording collected from your child's device) to provide the Service, including to provide the Child AI Tools described below, until your child's account is [inactive](#).

We will also retain the ASR analysis and related metadata sent to us by [SpeechSuper](#) on a [de-identified](#) basis to use to improve our own internal ASR.

How We Use Children's Information

Information collected from your child (including [personal information](#) and information collected automatically) is never used or disclosed for [third-party advertising](#). We also do not place any third-party advertisements in areas of the Service where your child is logged in. Additionally, [personal information](#) collected from your child is never used for [behaviorally-targeted advertising](#) to your child by us or any third-party, and children's personal information is never sold or rented to anyone, including marketers and advertisers. We may present [contextually relevant](#) recommendations for 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 your child (e.g., our co-created content with Yale University on Mindfulness and Heart of a Champion series).

Our uses of your child's personal information are set forth below:

Non-AI Uses

In addition to the uses mentioned above, we use the information we collect from children (or

about children from parents):

- To provide and improve (as allowed by law) the Service, including as set forth above for ASR features and to send push notifications or other in-app notifications to your child (e.g. to encourage them to take certain actions in the Service)
- For internal analytics on product usage and quality
- For [educational purposes](#)
- To identify, fix and troubleshoot bugs and Service errors
- For security and safety purposes, including enforcing our Terms, and assessing and addressing offensive content (including with the information collected through any children's customer service reporting)
- To comply with legal process or other laws
- As allowed by law

AI Uses

Child AI Tools Overview

Children may use certain Child AI Tools that utilize or integrate AI to help personalize their learning activities on the Service and the Child AI Tools may utilize [personal information](#) (e.g. the audio recordings from your child) collected from your child as they engage with Dojo Sparks (also referred to as "Input"). The AI-insights or content produced (or real-time interactions with these Child AI Tools) from the processing of this Input and any ClassDojo provided "instructions" or "Prompts" is called the "Output". The "Output" will only be shared with you (for any applicable features), your child, necessary [service providers](#), (and any ClassDojo internal teams for necessary trust and safety purposes). For more detailed information on the Child AI Tools, including the Input, Prompts and Output used and disclosed to provide the Child AI Tools, please see our [Parent and Child AI Transparency Page](#).

Audio Recordings and Text Input for AI Learning Assistant

ClassDojo may use the Child Reading Lesson Audio collected in connection with the reading lessons (without any ASR analysis or ASR Audio) for certain AI Insights and AI services provided to your child as indicated further in our [Parent and Child AI Transparency Page](#). In addition, while interacting with our AI Learning Assistant throughout our Services, your child may record their audio only responses to Sparky's questions (e.g. "What is your favorite color?" "How are you feeling?") or may respond by choosing certain pre-defined (by ClassDojo) text-based answers. If you provide your consent, ClassDojo will record your child's responses and collect your child's speech (the voice recording known as the Child Learning Assistant Audio) through their device's microphone (e.g. iPad or Chromebook) as well as any Text-Based Child Input. If the device shows audio is being recorded the indicator will be on. ClassDojo will also collect information about your child's interactions with the AI Learning Assistant (e.g. which games or lessons have been completed through the Child AI Tools. In addition, ClassDojo or the [LLM Service Providers](#) collect and use the Child AI Inferences. These are inferences that either ClassDojo or the [LLM Service Providers](#) draw from the child's Child Reading Lesson Audio,

Child Learning Assistant Audio or Text-Based Child Input (e.g. the child mentioned they like baseball, we feed this back to as Input to the [LLM Service Providers](#) to personalize the child's next interaction with the AI Learning Assistant "Sparky").

AI Insights on the Child Reading Lesson Audio, Child Learning Assistant Audio, and Text-Based Child Input.

If you provide the consent set forth below, ClassDojo will utilize integrated [LLM Service Providers](#) to perform certain AI related adaptive learning functions upon the Child Reading Lesson Audio, Child Learning Assistant Audio, Text-Based Child Input, and Child AI Inferences, as well as on the additional limited text-based non-identifying information indicated in the chart in our [Parent and Child AI Transparency Page](#) (e.g. first name only) ("**Non-Identifying Text-Based Information**") in order to obtain AI-generated insights on the reading lessons and your child's interaction with Dojo Sparks. The various AI related adaptive learning functions performed on the Child Reading Lesson Audio, Child Learning Assistant Audio, Text-Based Child Input, Child AI Inferences, and Non-Identifying Text-Based Information are done through the use of ClassDojo-directed instructions or "Prompts" to the LLM Service Providers (e.g., "based on the input, generate the next reading lesson for the child"). ClassDojo creates a connection with the LLM Service Providers to send real-time audio and other data to the LLM Service Providers. The Child Reading Lesson Audio, Learning Assistant Audio, Text-Based Child Input, Child AI Inferences, and Non-Identifying Text-Based Information are sent to the LLM Service Providers so as not to identify the child (unless the child may have said their full name during a recorded reading audio session or included in their Text-Based Child Input). The LLM Service Providers then process the Child Reading Lesson Audio, Learning Assistant Audio, Text-Based Child Input, Child AI Inferences, and Non-Identifying Text-Based Information (Inputs) and Prompts and generate a result or Output based on those Inputs and Prompts. Note we are currently using Open AI and Anthropic as our [LLM Service Providers](#). The LLM Service Providers return the result or Output to ClassDojo who in turn presents the Output to the child real-time (e.g. through our animated AI Learning Assistant "Sparky" presenting additional reading comprehension activities).

Data obtained from the AI Outputs and Inputs (e.g. the Child Reading Lesson Audio, Child Learning Assistant Audio, Text-Based Child Input, Child AI Inferences, and Non-Identifying Text-Based Information) may be accessed, processed and used by ClassDojo to provide, improve (as allowed by law) and maintain the Service (such as generating real-time AI Learning Assistant interactions with your child to better help them learn), enforce our policies, personalize user experiences, perform internal analysis (including to provide metrics and data logs or activity records needed for measuring up/down time and debugging the tools), and to keep our platform safe and secure. To understand more about the specific "Prompts" used to generate the AI Output, the "Inputs" or information shared with the LLM Service Providers, and ClassDojo's use of AI, please see our [Parent and Child AI Transparency Page](#).

We are currently using OpenAI and Anthropic as our LLM Service Providers. Your child's data used to provide the Inputs (e.g. the Child Reading Lesson Audio, Child Learning Assistant Audio, Child AI Inferences, and Text-Based Child Input) as well as the Prompt, and Output data processed by the [LLM Service Providers](#) is retained only transiently to provide the Service to

ClassDojo and for trust and safety purposes; then deleted immediately upon creation of the Outputs. To ensure this, ClassDojo has entered into specific contracts with the LLM Service Providers for “zero data retention” beyond this transient retention for the Child AI Tools mentioned above. This means that the Prompts, Inputs, and Outputs (a) will not be logged for human review by the [LLM Service Providers](#) 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 data from Safety Classifiers. ClassDojo then receives and retains this AI Output for only as long as your child’s account is [active](#), unless we are required by law to retain it, need it to enforce our policies or to ensure the security of our community.

ClassDojo does not use any children’s personal information contained in any Inputs (e.g. the Child Reading Lesson Audio, Child Learning Assistant Audio, Child AI Inferences, or Text-Based Child Input), Prompts, or Output to train any of ClassDojo’s [AI systems](#). ClassDojo will only train our [AI systems](#) with data that has been [de-identified](#) in such a way that it is not traceable to any ClassDojo user. Additionally, ClassDojo does not allow any [LLM Service Provider](#) or any AI third-party [service provider](#) it may utilize to use any information (personal information or de-identified) to train, improve or develop their [AI systems](#). This commitment includes the information contained in the chart detailed in the [Parent and Child AI Transparency Page](#), such as the Inputs collected from your child (e.g. the (e.g. the Child Reading Lesson Audio and Child Learning Assistant Audio), used to produce the AI Outputs. For more information about our retention periods for this information, please see this [chart](#).

Disclosure of children’s information

We do not disclose any [personal information](#) about children to third-parties, except to [service providers](#) (e.g. SpeechSuper, LLM Service Providers) necessary to provide the Service, other users as part of the Service, as directed or approved the child’s parents or legal guardians, as required by law, or to protect the security of the Service or other users. You can visit our [service providers](#) page to see the list and categories of third-party operators collecting or maintaining personal information from children through the Service, the purpose for such disclosure, as well as an indication on whether these service providers are integral to the Service. You may choose to agree to the collection and use of your child’s personal information, but choose not to allow disclosure to certain third parties (unless such disclosure is integral to the Service). For any non-integral third party disclosures, we will provide a separate consent box. Additionally, at any subsequent time, you may agree to the collection and use of your child’s personal information, but choose not to allow disclosure to certain third parties (unless disclosure is integral to the Service). Please contact us as set forth in the section “[How Can I Contact ClassDojo with Questions](#)” with questions about the operators’ privacy policies and collection and use practices. For additional information on the limited other circumstances in which we disclose children's [personal information](#), please see the “[Will ClassDojo Share any Information it Collects](#)” Section

in the Services Privacy Policy.

Except as noted above with respect to AI and ASR, as allowed by applicable laws, we may share aggregated or [de-identified](#) information, which cannot reasonably be used to identify your child, 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.

Visibility of Children's Information

ClassDojo does not knowingly post any of your child's [personal information](#) publicly online and no child's account or profile is made available or visible to the general public through ClassDojo. Only, you, your child and those you choose to share the voice recording, ASR, or ASR analysis or information with can view your child's information in connection with the Sparks Feature. Information generated by the Child AI Tools and Parent AI Tools, will only be shared with you and those you choose to share with (for any applicable features), your child, necessary [service providers](#), (and any ClassDojo internal teams for necessary trust and safety purposes). You, as the parent, may choose to further share this information. For a list of what logged in Outside School Child Users' information can be viewed by other logged in ClassDojo users, please see our [FAQ](#). In addition, please see our [FAQ](#) for Dojo Islands for details on the limited non-personal information of Outside School Child Users that can be viewed by Home Island guest users that play Dojo Islands without logging in.

Retention of Children's Information

We will not retain a child's [personal information](#) for any longer than is reasonably necessary to fulfill the specific purpose for which the information was collected, including to provide the Service for which we receive or collect the child's [personal information](#), or for legal obligations. Additionally, we only keep a child's personal information for as long as his or her Outside School Child Account is [active](#), unless we are required by law to retain it, need it to ensure the security of our community or our Service, or to enforce our Terms (which still does not include retaining indefinitely).

We determine the appropriate retention period for [personal information](#) on the basis of the amount, nature and sensitivity of the personal information being processed, the potential risk of harm from unauthorized use or disclosure of the personal information, whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal requirements (such as applicable statutes of limitations). The time periods for which we retain children's personal information depend on the purposes for which we use it. Personal information associated with your child's account will be kept until your child's account is deleted or is [inactive](#), unless we no longer need the data to provide products and services, in which case we will delete prior to you deleting your account or your account becoming [inactive](#). For more information on the deletion of content related to the Sparks Feature or our Services, please see our [FAQ](#). For deletion of ASR data, please see the ASR section above. For more information on retention related to the Child AI Tools, please see the AI Uses section above. Please see our [Information Transparency chart](#) and [Parent and Child AI Transparency Page](#) for

more details on specific retention periods.

Even if you delete your child's account, keep in mind that the deletion by our [service providers](#) may not be immediate and the deleted information may persist in backup copies for a reasonable period of time. We may retain and use [de-identified data](#) for any purpose and for as long as we deem appropriate or as otherwise allowed by law.

Parental Choices and Controls

Parental Choices

At any time you have the right to:

- Access, review and correct your child's [personal information](#);
- Direct us to delete your child's [personal information](#);
- Refuse to permit us to collect further [personal information](#) from your child online and request that we delete the personal information that we have already collected from your child; and
- Agree to the collection and use of your child's [personal information](#), but choose not to allow disclosure to certain third parties (unless disclosure is integral to the Service)

Please keep in mind that a request to delete information or a refusal to permit disclosure of the information to third parties may affect your child's ability to participate in the Sparks Feature or access the Service. To exercise any of these rights, please contact us at privacy@classdojo.com or 735 Tehama Street, San Francisco, CA 94103, or by contacting us [here](#). For more information on your rights, please see our "[Parental Choices](#)" section of our Children's Privacy Policy.

When you delete your child's [Outside School Child Account](#), we delete the content or personal information uploaded as set forth in our [FAQ](#).

Parental Controls

Parents can disable the Sparks Feature for their child at any time. For additional controls that parents have in connection with the use of the Services please see our [FAQ](#).

*Additionally, 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 (as that term is defined under [COPPA](#)) of our Service prior to receiving your consent. We will ensure that such persistent identifiers are not used for unauthorized purposes outside of providing support for the internal operations

of the Service (as that term is defined under COPPA) and are not used or disclosed to contact a specific individual through training, data access, and data segregation and storage. We will also not send out any push notifications until parental consent is given and if we do not receive parental consent, we will delete the device tokens within 7 days of collection. Read more in our [FAQs](#).