We need parental consent to continue

Before you let your child log in to, use, or otherwise access their Dojo Tutor account, you should know what information we will collect from them. Scroll down to view our full Direct Notice disclosure, but here are the highlights:

- You will only give consent once for any child you create an account for (including additional children you later create an account for) or allow access to any part of the Dojo Tutor service (the "Service"). You will not see this notice again for additional children you add.

- We never post or share your child's personal information publicly. Please note though that your child's tutor has access to information you provide about your child. In addition, you may share your child's tutoring session assessment feedback with other family members or teachers.

- If you have given your consent and your child participates in a group tutoring session, some of their information may be seen by other children attending the same session, but not the general public. Please see here for more details on what other children may see about your child while participating in Dojo Tutor. Additionally, you may decide to share your child's tutoring session assessment feedback with other tutors, family members or teachers.

Full Direct Notice

Before we can provide your child with access to the Service, we need your 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. Dojo Tutor will not knowingly collect, use, or disclose your child's personal information unless you've provided this consent.

Scope of Direct Notice (collapsible section)

This disclosure for parents ("Direct Notice") provides important information you should consider when allowing your child (or children) access to certain Dojo Tutor features when choosing to set up your child's Dojo Tutor account or to allow them to otherwise access the Service.

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 Dojo Tutor accounts or the Service after your consent. We explain the information we collect for your child's use of Dojo Tutor below. In order to create an account for your child or otherwise allow your child access to the Service, you must review this Direct Notice of disclosure (including the Children's Privacy Policy) and give your consent by checking the box below.

We will also ask for your consent before we make any material changes to the practices described in this Direct Notice of disclosure (including the Dojo Tutor Privacy Policy). Please also see our short video for children that highlights the most important details in our Privacy Policy that they should know about.

Dojo Tutor may collect the following information from children: (collapsible section)

● Name
● **Zoom Recordings of Tutoring Sessions**. Certain information is captured through your child's participation in a tutoring session, such as your child's:
    ○ image
    ○ voice
    ○ movements
    ○ audio information
    ○ chat logs
    ○ other information provided by your child during the tutoring session.

    Dojo Tutor and Zoom have entered into custom contractual agreements to allow for users under 13 and under which Zoom has also agreed to apply its **Education Account Settings** to Dojo Tutor's use of Zoom. This includes treating Dojo Tutor's use as a Zoom Education Account, applying additional privacy, security and safety features and settings offered to schools to Dojo Tutor's use of Zoom. See Zoom's Children's Educational Privacy Statement found here. The tutoring sessions (including transcripts and Zoom chat logs) are recorded from both learners (your child) and tutors to provide and maintain the Service (such as to create transcripts of the tutoring sessions, or shorter video "clips" as set forth below), conduct internal analysis, and take actions to keep our Service safe and secure.

● **Tutoring Session Information**: Certain tutoring session information is collected from both learners (your child) and tutors, such as tutoring subject areas, tutoring attendance and how long your child stayed in the Zoom tutoring session (as reported from Zoom). The attendance data is shown to both the tutor and learner (your child), to confirm they are following the attendance policy, and may also be shown to parents and other designated third parties with the learner's (your child's) or parent's (your) permission.

● **Tutoring Session Transcripts:** Dojo Tutor uses a service provider to create transcripts from the recorded tutoring sessions ("Tutoring Session Transcripts"). Dojo Tutor shares only the audio portion of the Zoom recordings of tutoring sessions between the learner and tutor with the service provider and ensures that the audio recordings are retained only

transiently and deleted immediately upon creating the Tutoring Session Transcripts. Additionally, we ensure that the audio recordings can not be used by the service provider for any other purpose. Dojo Tutor also ensures that the service provider can't retain the Tutoring Session Transcripts for more than thirty (30) days, unless deleted earlier by Dojo Tutor. Dojo Tutor uses these Tutoring Session Transcripts (to perform certain artificial intelligence ("AI") related tasks as is further described below and in our AI Transparency Note, which includes using for internal trust and safety purposes. In addition, Dojo Tutor will use the AI related tasks performed on the Tutoring Session Transcripts to then create video "highlight" clips from the full Zoom session recordings ("Tutoring Highlight Clips").

- Contents of communications between your child and their tutor(s) - such as messaging within the Service or information the child may communicate with their tutor(s) during a recorded tutoring session
- Location information, but not precise geolocation
- IP address
- Cookie and other similar technologies
- Device-specific information, such as device brand, device ID, unique device ID, device type and device attributes (e.g. operating system and battery level); and a device token (to send push notifications). We may also collect device event information such as crashes, system activity, browser type, browser language, that data and time of the child's request and referral URL. Zoom may also collect the following from the device: information about the speakers, microphone, camera, OS version, hard disk ID, PC name, MAC address, WiFi information, and other device information (like Bluetooth signals). Please see Zoom's Children's Education Privacy Statement for more information.
- Mobile application information, such as application version, history, and crash status.
- Server log information and product event data (e.g., if a child access a tutoring session which are used to track progress, for internal analysis on product usage and quality, or to send push or other notifications to encourage your child to take certain actions in the Dojo Tutor Service)

The device and application related data is collected from the device and application being utilized to give the child access to Dojo Tutor accounts (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). Dojo Tutor does not require a child to provide more information than is reasonably necessary to participate in the Services. If we discover that we have collected information from a child in a manner inconsistent with the COPPA, we will take appropriate steps to either delete the information or immediately seek the parent's consent for that collection.

Please see this chart for the detailed categories of information we collect from each user type as well as our Mobile App Permissions chart.

Additional Zoom Privacy and Safety Features Set by Dojo Tutor:

- **Passcode-protected tutoring session:** We require a passcode when tutors are

scheduling new meetings (all meetings need to be accessed with passcodes). When joining the session through the parent's dashboard, parents would click on the zoom link with the passwords embedded in the URL.

- **Require Registration:** User registration is required: we automatically pass the learner's information through our API integration that inputs the learner's name and parents email registered in Dojo Tutor in the Zoom meeting when accessing the Zoom meeting through our platform. If an external user tries to use the Zoom link to access, they aren't allowed access. We will see the email address of everyone who signed up to join a tutoring session.

- **Require passcode for dial-in:** If a participant is joining via phone, they must have a passcode.

- **Disabled join before host:** Learners cannot join the tutoring session before the tutor joins and will see a pop-up that says, "The meeting is waiting for the host to join."

Information Collected from Tutors or Parents Combined with Children's Data

Parents and tutors 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.

Parents about their child:

- Name, which may be displayed to the tutor either on its own, or in a list with other learners assigned to the same tutor.
- Age or date of birth
- A unique username and password
- Education information you provide about your child, such as what grade level your child is in.
- You may optionally provide your child's school name and location; whether your child was home schooled or went to a private or public school; and graduation year
- Qualitative description of how your child is doing and where they need the most help. This information is used by the tutor to plan their tutoring session.
- Interests of your child (e.g., art, basketball, dance, swimming). Dojo Tutor uses interests you provide about your child to personalize their tutoring experience and provide a more customized service (including, but not limited to tailoring lesson plans to their interests).
- Languages spoken
- Gender pronouns
- Extra support received or student IEP needs. This information is used by the tutor to tailor the lesson plan according to your child's needs.
- Tutoring subject areas
- If logging in or signing up to Dojo Tutor with your ClassDojo account ("ClassDojo Main Services Account") used to access the ClassDojo product located at

https://www.classdojo.com, or the associated mobile applications (collectively, ,the "ClassDojo Main Services "), certain information, which may include Student Data, that you elect to share as noted below

Tutors about learners (i.e. your child):

- Tutor's' assessments of the learner's performance: During the first tutoring session and over the course of additional sessions tutors will provide learners with both positive and constructive feedback that can further their learning (e.g., areas of strength or improvement) as well as recommended activities, resources and a work plan). In making these assessments, tutors may leverage the help of artificial intelligence generated from the Tutoring Session Transcripts, see " AI-Generated Insights on Tutoring Session" section for additional information. Tutors may also edit and provide further human review of various AI Output generated in connection with assessments and the Tutoring Session Transcripts. Please see our AI Transparency Note for more detail. The feedback is shared with the learner and their parents through the Service, and may be shared by the parent to other individuals of the parent's choosing, including their child's teachers, but is not made available to the general public. A tutor's assessment may also be shared automatically by Dojo Tutor (unless a parent opts-out) with new tutors assigned to a learner.
- Contents of communications between your child and their tutors: This communication may include messaging within the Services or information your child may communicate with their tutor during a recorded tutoring session
- Tutoring attendance and how long participants stayed in Zoom (reported from Zoom)

How We Use Children's Information (collapsible section)

Information collected from children and learners (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 children or learners are logged in. Additionally, personal information collected from children or learners is never used for behaviorally-targeted advertising to children or learners 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 educational content (not using learner personal information) for either our own products (*e.g.*, showing a reading course while taking a math course) or third-party products and services ourselves that we believe may be of interest to a learner.

Our uses of your children'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 and tutors):

- To provide and improve (as allowed by law) the Service, including administering our tutoring sessions, 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 and as allowed by law
- To identify, fix and troubleshoot bugs and Service errors
- For security and safety purposes, including enforcing our Terms and assessing and addressing offensive content
- To comply with legal process or other laws

Artificial Intelligence (AI) Uses

AI-Generated Insights on Tutoring Session Transcripts and Non-Identifying Text-Based Information About Learners

Dojo Tutor uses the Tutoring Session Transcripts (text only) as well as on the additional limited text-based non-identifying information indicated in our Tutor AI Transparency chart (e.g. first name only, grade and tutoring subjects) ("Non-Identifying Text-Based Information") as "inputs" to generate AI insights through the use of Large Language Model ("LLM") AI service providers that are integrated within the Dojo Tutor Service to provide this AI service ("LLM Service Providers"). Note we are currently using OpenAI and Anthropic as our LLM Service Providers. At the specific direction and instruction of Dojo Tutor, these LLM Service Providers will process these Tutoring Session Transcripts and Non-Identifying Text-Based Information in order to obtain AI-generated insights on tutoring sessions between our learners and tutors ("AI Outputs"). This processing performed on the Tutoring Session Transcripts and Non-Identifying Text-Based Information is done through the use of Dojo Tutor directed instructions known as "prompts" to the LLM (e.g. "summarize the tutoring session"). To protect the privacy of users, Dojo Tutor does not share any direct identifiers of tutors or learners (except to the extent that any direct identifiers are included within the Tutoring Session Transcripts). Data obtained from the AI Outputs and inputs (e.g. the Tutoring Session Transcripts) may be accessed, processed and used by Dojo Tutor to provide, improve (as allowed by law) and maintain the Service, 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 keep our platform safe and secure. To understand more about the specific "prompts" used to generate these AI insights, the "inputs" or information shared with the LLM Service Providers, and Dojo Tutor's use of AI, please see our AI Transparency Note.

Dojo Tutor does not use any children's personal information contained in any inputs (i.e. the Tutoring Session Transcripts), or AI Outputs to train any Dojo Tutor's AI systems. Dojo Tutor will only train our AI systems with data that has been de-identified in such a way that it is not traceable to any Dojo Tutor user. Additionally, Dojo Tutor does not allow any LLM service provider or other 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 charts detailed in this AI Transparency Note, such as the Tutoring Session Transcripts, used to provide the AI Outputs.   For retention of this information, please see this chart.

Disclosure of Children's Information (collapsible section)

We do not disclose any personal information about children to third-parties, except to service providers (*e.g.*, Zoom, LLM Service Providers) necessary to provide the Service, other users as part of the Service (such as tutors, other learners from your group tutoring session), as directed or approved by 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. For additional information on the limited other circumstances in which we disclose children's personal information, please see the "How Will We Share Your Personal Information" Section in the Services Privacy Policy.

Except as noted above, 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 Personal Information (collapsible section)

Currently, learners access the Services through a parent setting up the learner's account and/or giving their child access to the Services through the parent's device ("Learner Account"). No Learner Account, profile or personal information of a child is made available or visible to the general public through Dojo Tutor. Any content uploaded by you, your child, or your child's tutor (including tutor and learner comments, assessments, or Zoom video recordings of tutoring sessions) through the Service, can be viewed by you, those you choose to share assessments or any other tutoring information with, and your child's tutor. Information generated by AI systems or models will only be shared with you, your child, and your child's tutor. You as the parent, may choose to further share this information.

If you choose to enroll your child in a group tutoring session, any other child or learner in that tutoring session will also be able to see your child's first name as well as any information another learner in that group tutoring session may share during the session (including through

the chat feature). For group tutoring sessions, please note that other children will not be able to view your child's assessment or other tutoring information.

Please see here for more details on what other children and users may see about your child while engaging in Dojo Tutor and how children can interact with each other and other users.

Retention of Children's Personal Information (collapsible section)

Dojo Tutor will not retain a child's personal information for any longer than is reasonably necessary to fulfill the purpose for which the information was collected, including, to provide and maintain the Service for which we collect the child's personal information, perform internal analysis, keep our platform safe and secure, or comply with legal obligations. Additionally, we only keep a child's personal information for as long as their Learner 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 shall 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 child's account or your child's account becoming inactive.

Specifically, we implement the following policies:

1. **Deleting inactive Learner Accounts:** If a child's Learner Account is inactive for twelve months or more (meaning no learner (or their parent on behalf of their child) has logged into the Learner Account within the last 365 days), Dojo Tutor will delete the Learner Account. Learn more about how we delete inactive Learner Accounts here. For more information on the deletion of content related to Learner Accounts, please see our FAQ.
2. **14-day deletion policy for tutoring session recordings on Zoom:** To protect learners, Dojo Tutor sets limits on how long the Zoom recordings of tutoring sessions are maintained. These recordings are automatically deleted after 14 days by Zoom, 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. The Zoom video recordings are stored on Zoom's hosting provider's servers. To learn more, read the Zoom Retention Policy.

3. **Retention policy for tutoring session recordings in the Service.** Separately, within the 14-day period in which Zoom retains these recordings, Dojo Tutor may either download, store and retain the recordings (or elect to have Zoom retain these) for so long as the Learner Account is active to display a library of past sessions to the parent, provide and maintain the service, conduct internal analysis, and keep our platform safe and secure. In addition, the Tutoring Highlight Clips as noted here, will be kept for only so long the Learner Account is active. Unless a parent opts-in (or instructs Dojo Tutor) to further save the tutoring recording, the tutoring session video recording will then be deleted.

4. **Tutoring Session Transcripts:** The audio only portion of Zoom recordings of tutoring sessions are retained only transiently by the service provider and deleted immediately upon creating the Tutoring Session Transcripts. Additionally, Dojo Tutor ensures that its service provider can't retain the Tutoring Session Transcripts for more than thirty (30) days, unless deleted earlier by Dojo Tutor. Dojo Tutor then receives and retains the Tutoring Session Transcripts for only as long as the Learner's Account is active, unless we are required by law to retain them, need them to enforce our policies or to ensure the security of our community.

5. **Artificial Intelligence Input and Output**: Your child's data used to provide the "inputs" (e.g., the Tutoring Session Transcripts) may be transiently retained by the LLM Service Providers to provide the Service to Dojo Tutor. Additionally, any AI Outputs may also be transiently retained by the LLM Service Providers after performing the processing on the "inputs" (*e.g*,. the Tutoring Session Transcripts) to provide the Service to Dojo Tutor. Dojo Tutor has entered into a specific contract with the LLM Service Providers for "zero data retention" beyond this transient retention for the ClassDojo-provided 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. LLM Service Providers may retain data from Safety Classifiers. Dojo Tutor then receives and retains this AI Output for only as long as the Learner'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.

Please see our Information Transparency chart and AI Transparency Note for more details on specific retention periods. Additionally, for more information on the deletion of content related to Learner Accounts, please see our FAQ.

We may retain de-identified information for as long as we deem appropriate or as otherwise allowed by law.

Parental Choices and Controls (collapsible section)

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 refusal to permit disclosure of the information to third parties may affect your child's ability to access the Services or use certain features. To exercise any of these rights, please contact us at tutoringprivacy@classdojo.com or 735 Tehama Street, San Francisco, CA 94103. Please be aware that to protect children's privacy and security, we take reasonable steps to verify a parent or legal guardian's identity before gaining access to any of their child's personal information. For more information about exercising your rights, visit the "Parental Choices" section of the Dojo Tutor Privacy Policy.

Sharing Data (collapsible section)

As a parent, you may choose to associate your account with an existing ClassDojo Main Services Account. For parents, Dojo Tutor may use and share your ClassDojo Main Services Account login credentials (e.g. ClassDojo email address, user name) and child's name (and possibly other limited fields of Student Data or personal information of your child that you as the parent allow) to pre-populate your Dojo Tutor Services sign-up and profile information if you elect to sign-up to Dojo Tutor through the ClassDojo Main Services.

Additionally, certain Dojo Tutor tutoring information, such as tutor assessments, feedback and other session information (e.g. session recordings) ("Dojo Tutor Information") may be shared at the direction of the parent to their child's teacher with the parent's approval to the ClassDojo Main Services ("Dojo Tutor Information Sharing"). When this Dojo Tutor Information Sharing occurs with the ClassDojo Services, a copy of the Dojo Tutor Information will be made to share with teachers or others at their child's school. This is a copy of the assessment and only this copy will become Student Data once the teacher has elected to save and bring this information into either their account or the student's Student Account in the main ClassDojo Services.

Please note that while your child's personal information (e.g., name) and tutoring information (such as tutoring assessments) will be linked and accessed in both your ClassDojo Main Services and Dojo Tutor Services accounts, any information related to your child's Student Account on the ClassDojo Main Services will be stored separately and only viewable through your ClassDojo Main Services login, ensuring that school information remains segregated and separate from non-school information. For more information, please see our FAQ.