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.

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

Privacy Notice for Children

Full Direct Notice

Before your child can use Dojo Sparks, 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. 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 <u>ClassDojo Privacy Policy</u>). Read more about how ClassDojo protects students in the <u>Privacy Center</u>.

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
- Age or 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 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.
- 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
- 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 device 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 <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.

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 <u>Outside School Child Account</u> 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?

 ClassDojo processing: Speech (voice recording) is collected off your child's device by ClassDojo (securely handled and deleted as indicated below). 2. Third party processing: The speech (voice recording) along with <u>de-identified</u> identifiers is then sent by ClassDojo to be processed by a vetted third party service provider (<u>SpeechSuper</u>) for ASR that meets our data privacy and security requirements and has a signed Data Protection Addendum with ClassDojo. The ASR analysis done by <u>SpeechSuper</u> is then sent back to ClassDojo.

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

We would limit ASR data retention by our third party service provider, <u>SpeechSuper</u>, 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.
- 2. We would also want to use the non-audio based ASR analysis data (including associated metadata) sent back from <u>SpeechSuper</u> to improve (on a <u>de-identified</u> basis) our own internal services, including training our own ASR service. We would not allow our third party service provider, <u>SpeechSuper</u>, 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, <u>SpeechSuper</u> and additionally stored on ClassDojo's servers once received back from <u>SpeechSuper</u>.

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, <u>SpeechSuper</u>, the voice recording and the ASR analysis would be deleted from their servers (retained only transiently). ClassDojo would separately retain the initial voice recording collected from your child's device to provide the Service until your child's account is <u>inactive</u>.

We will also retain the ASR analysis and related metadata sent to us by <u>SpeechSuper</u> on a <u>de-identified</u> basis to use to improve our own internal ASR.

How We Use Children's Information

Information collected from your child (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 your child is logged in. Additionally, <u>personal information</u> collected from your child is never used for <u>behaviorally-targeted advertising</u> 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 <u>contextually relevant</u> recommendations for educational content (not using a child's <u>personal information</u>) for either our own products (e.g., <u>Premium Features</u> or <u>Home Islands</u>) 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:

We use the information we collect from children (or about children from parents):

- To provide and improve the Service, including as set forth above for ASR features
- 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

Disclosure of children's information

We do not disclose any personal information about children to third-parties, except to service providers (e.g. SpeechSuper) 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). 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.

As allowed by applicable laws, we may share aggregate or <u>de-identified</u> 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.

<u>Visibility of Children's Information</u>

ClassDojo does not knowingly post any of your child's <u>personal information</u> publicly online. 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.

Retention of Children's Information

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 to provide the Service for which we receive or collect the child's <u>personal information</u>, 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 <u>active</u>, 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 <u>personal information</u> 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 <u>inactive</u>, 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 <u>inactive</u>.

For more information on the deletion of content related to the Sparks Feature or our Services, please see our <u>FAQ</u>. For deletion of ASR data, please see the ASR section above. Please see our <u>Information Transparency chart</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.

Parental Choices and Controls

Parental Choices

At any time you have the right to:

- Access and review your child's <u>personal information</u>;
- Direct us to delete your child's <u>personal information</u>;
- Refuse to permit us to collect further <u>personal information</u> 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 <u>personal information</u>, 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.

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, if your child's teacher has not previously consented on your behalf through "school consent," we may collect IP address and device-specific information

^{*}Note that if your child also has a Student Account, your child's school may have acted as your agent and consented on your behalf prior to you setting up your child's school account or otherwise allowing them access to the Service as is allowed under COPPA- commonly referred to as "school consent." Please read more in our Privacy Center and FAQ. If so, and the teacher is allowing students to use ClassDojo, including to access their portfolio or Class Islands then the information listed above may have been previously collected prior to your consent here. Please contact your child's teacher if you have any additional questions. Any Student Account created by (1) you on your child's behalf; (2) your child's teacher on your child's behalf; or (3) your child, will be linked together as one Student Account (these are not different accounts).

(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 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 <u>FAQs</u>.