



## COPPA DIRECT NOTICE TO EDUCATIONAL INSTITUTIONS

Updated on: Jul 1, 2024

At Edpuzzle, safeguarding student's privacy, ensuring compliance with applicable regulations, and upholding the utmost privacy standards in our practices of collecting, using, or disclosing personal information from students are pivotal to our mission.

We hope this Direct Notice to Educational Institutions ("Notice") is drafted in clear and understandable language for you. Our hope is also that providing it in a Q&A format is helpful. If you have any questions or concerns when reviewing this Notice, please feel free to contact us at [privacy@edpuzzle.com](mailto:privacy@edpuzzle.com) or at:

**EDpuzzle, Inc.**

833 Market St., Suite 427  
San Francisco, CA 94103

In our commitment to protecting children's privacy, Edpuzzle participates in the FTC-approved COPPA "Safe Harbor" Program from [iKeepSafe](#), and has been granted the iKeepSafe FERPA, COPPA and CSPC seals signifying that our website and apps have been reviewed and approved for having policies and practices surrounding the collection, use, maintenance and disclosure of personal information from children consistent with the iKeepSafe FERPA, COPPA and CSPC programs guidelines. Additionally, Edpuzzle is also a signatory of the [Student Privacy Pledge](#), agreeing to a set of principles intended to safeguard student privacy, including responsible stewardship, protection, and transparent handling of student personal information.

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### **Why are we providing you with this Notice?**

In the United States, the Children's Online Privacy Protection Act (COPPA) requires online service providers like Edpuzzle, to obtain verifiable parental consent and provide parents with a direct notice before collecting, using, or disclosing personal information from children under the age of 13, except in limited scenarios. Such a limited scenario takes place when using Edpuzzle in an educational context (i.e. using Edpuzzle for the use and benefit of the school and for no other commercial purpose). In this educational context, the Federal Trade Commission (FTC) allows educators, schools, and school districts (collectively "School/s" or "Educational Institution/s") to act as the parent's agent and consent to the collection of students' personal information on the parent's behalf.

In order for Edpuzzle to rely on consent obtained from Educational Institutions instead of parents, Edpuzzle must provide Educational Institutions with the same type of direct notice regarding its practices (as to the collection, use, or disclosure of personal information from children) as it would otherwise provide to the parent. This process ensures that educators are fully informed under COPPA requirements when they use Edpuzzle for educational purposes.

This Direct Notice to Educational Institutions meets the COPPA requirements outlined above and provides you with important information regarding Edpuzzle's practices when collecting, using, and/or disclosing personal information from students.

### **What are some highlights on how Edpuzzle collects, uses and/or discloses student data?**

Here are some key aspects that underpin our commitment to privacy, especially regarding the collection, use, and disclosure of student's personal information:

- Edpuzzle collects the minimal amount of information from students necessary to create accounts in our service.
- Edpuzzle does not sell or rent students' personal information (or of any of its users, for that matter) to any third party for any purpose, including for advertising or marketing purposes.
- No student's profile is made available or visible to the public, or to any other students, through Edpuzzle. Furthermore, student accounts cannot interact with other student accounts, nor can they interact with social media/networks. Interaction of student accounts is limited to interaction with their teacher.



## What student data does Edpuzzle use to provide the service?

Please see the table below, based on the "National Data Privacy Agreement v2" from Access 4 Learning Community / Student Data Privacy Consortium ([A4L/SDPC](#)).

Category of Data	Data Elements	Used by Edpuzzle
Application Technology MetaData	IP addresses, use of cookies, etc.	✓
	Other application technology metadata	
Assessment	Metadata on user interaction with application	✓
	Standardized test scores	
	Observation data	
	Voice recordings	✓
	Other assessment data	
Attendance	Student school (daily) attendance data	
	Student class attendance data	
Communication	Online communication captured (emails, blog entries)	
Demographics	Conduct or behavioral data	✓
	Date of birth	
	Place of birth	
	Gender	
	Ethnicity or race	
Enrollment	Language information (native, or primary language spoken by student)	
	Other demographic information	
	Student school enrollment	✓
	Student grade level	✓
	Homeroom	
Guidance counselor		
	Specific curriculum programs	



	Year of graduation	
	Other enrollment information	✓ (Subject: e.g. mathematics)
	Address	
Parent/Guardian Contact Information	Email	
	Phone	
Parent/Guardian ID	Parent ID (created to link parents to students)	
Parent/Guardian Name	First and/or last	
Schedule	Student scheduled courses	
	Teacher names	✓
	English language learner information	
	Low income status	
	Medical alerts/health data	
Special indicator	Student disability information	
	Specialized education services (IEP or 504)	
	Living situations (homeless/foster care)	
	Other indicator information	
	Address	
Student contact information	Email	✓ (student email is only collected when using Edpuzzle through an LMS integration or Single Sign-On solution)
	Phone	
	Local (School district) ID number	
	State ID number	
Student identifiers	Provider/App assigned student ID number	✓
	Student app username	✓
	Student app passwords	✓



Student name	First and/or last	✓
Student In App Performance	Program/application performance (typing program- student types 60 wpm, reading program-student reads below grade level)	✓
Student Program Membership	Academic or extracurricular activities a student may belong to or participate in	
Student Survey Responses	Student responses to surveys or questionnaires	✓
Student Work	Student generated content; writing, pictures, etc.	✓
	Other student work data	
	Student course grades	✓
	Student course data	✓
Transcript	Student course grades/ performance scores	✓
	Other transcript data	
	Student bus assignment	
Transportation	Student pick up and/or drop off location	
	Student bus card ID number	
	Other transportation data	
Other data collected	For data obtained from LMS integrations please consult Edpuzzle's Privacy Policy at <a href="https://www.edpuzzle.com/privacy">https://www.edpuzzle.com/privacy</a> under the "Information Collected Automatically" section	✓
	Interface language preference (customizable by the user through their account settings page)	✓
None	No Student Data collected at this time. Provider will immediately notify LEA if this designation is no longer applicable.	

Please note that Edpuzzle also offers teachers the possibility to use the "Open Class feature" that allows students to use Edpuzzle without providing personal information.



### **For what purpose(s) does Edpuzzle use student's personal information?**

Personal information is collected to provide the service. More specifically, student data is collected for the following purposes:

- To create the necessary accounts to use the service.
- To provide teachers with analytics on student progress.
- To send in-app and push notifications to users, if applicable (e.g., by letting students know if an assignment is due soon).
- To assess the quality of the service and improve it.
- To secure and safeguard personal information and our community.
- To comply with applicable laws and regulations.

### **Does Edpuzzle disclose student personal information to third parties?**

Disclosure of children's personal information is limited to third-party service providers necessary for delivering our services, as allowed by law, or to ensure the security of the service and its users. For an up-to-date list of our third-party service providers, please consult our Privacy Policy at <https://edpuzzle.com/privacy>.

### **Does Edpuzzle use or share student personal information for commercial purposes not related to the provision of the Edpuzzle service requested by the Educational Institution?**

No.

### **How can an Educational Institution review students' personal information?**

Educational Institutions are in control of student data and as such, Schools may request Edpuzzle to review or edit student data.

### **How can Schools exercise their right to delete students' personal information?**

Edpuzzle will delete student personal information upon written request from the Educational Institution. In the absence of such a request, Edpuzzle will automatically delete student personal information when no longer needed for the purposes for which it was received, which will be deemed to occur upon eighteen (18) months of student-user account inactivity. Please note that deletion will not comprise (i) student data that has been de-identified or (ii) backups of student data that are part of our disaster recovery storage system (we may retain backups for an additional term of six months).

### **What measures does Edpuzzle take to protect the security, confidentiality, and integrity of student personal information collected?**

- Pseudonymization and encryption: TLS v1.2 and v1.3 for all data in transit between clients and server and AES256-CBC (256-bit Advanced Encryption Standard in Cipher Block Chaining mode) for encrypting data at rest.
- Password protection.



- Ensure the ongoing confidentiality, integrity, availability and resilience of our processing systems and services.
- Restore the availability and access to personal data in a timely manner in the event of a technical incident.
- Regularly test, assess and evaluate the effectiveness of technical and organizational measures ensuring the security of the processing.

#### **What are Edpuzzle's data retention and deletion policies for student's personal information?**

We only keep student personal information for as long as the student account is active, unless (i) we are required by law to retain it, (ii) we need it to ensure the security of our community or our service, or (iii) we need it to enforce our Terms of Service.

As mentioned above:

- student data will be deleted upon written request from the School or, in the absence of such a request, when no longer needed for the purposes for which it was received, which will be deemed to occur upon eighteen (18) months of end-user account inactivity.
- deletion will not comprise student data that has been de-identified or backups of student data that is part of our disaster recovery storage system (which we may retain for an additional term of six (6) months).

#### **Do you have to share this Notice with parents?**

As a best practice, Edpuzzle recommends Educational Institutions to provide parents with this Notice so they can review the personal information collected.

#### **Where can you find additional information on our privacy practices?**

Please see our Privacy Policy at <https://edpuzzle.com/privacy>.

#### **How can you contact Edpuzzle with any questions or concerns?**

Please feel free to contact us at EDpuzzle, Inc., 833 Market Street, Suite 427, San Francisco, California 94103, or by email at [privacy@edpuzzle.com](mailto:privacy@edpuzzle.com).

Please note that this Notice does not constitute legal advice, and Edpuzzle recommends you seek guidance from the School's designated legal counsel if you have any concerns or inquiries regarding compliance with COPPA.