ClassDojo Privacy Policy

Last updated: December 30, 2019

ClassDojo's mission is to give teachers, school leaders, parents, and students the power to create incredible classrooms. We're humbled that millions of people like you trust ClassDojo to do that every day. Keeping this trust through your privacy and safety is incredibly important to us.

This Privacy Policy explains:

- What information ClassDojo collects from you (and why we collect it),
- How we use and share that information,
- The choices and rights you have, including how to access, update, delete your information, and take your information out of ClassDojo.

This policy applies to all products and services offered by ClassDojo, Inc. ("ClassDojo," "we," "us," "our," and our subsidiaries or affiliates). This Privacy Policy applies solely to the ClassDojo Services (defined below) and does not apply to the informational website located at https://www.classdojo.com (the "ClassDojo Website"). The ClassDojo Website Privacy Policy is located here. ClassDojo may be acting as both a Controller and a Processor as those terms are defined under the European Union's General Data Protection Regulation ("GDPR"). For more information, please see below.

Our Privacy Policy is designed to provide transparency into our privacy practices and principles. We've done our best to write this policy in simple, clear terms, but if you're not familiar with terms like personal information, cookies, IP address, pixel tags and browsers, then read about these key terms. For students, we have a short video that highlights the most important details in our Privacy Policy that they should know about. We've also added summaries below each section that provide short explanations of the legal language in plain English (it starts with 'Basically...') to aid in understanding, but it isn't legally binding.

Overview

We will only collect, use, and share your <u>personal information</u> in accordance with this Privacy Policy. This policy applies whether you login to use ClassDojo through https://www.classdojo.com (the "ClassDojo Platform"), our mobile applications (the "ClassDojo Apps"), or any of our other products or services that link to this Privacy Policy that ClassDojo may provide now or in the future (collectively, the "Service(s)"). This Privacy Policy applies solely to the ClassDojo Services and does not apply to the informational website located at https://www.classdojo.com (the "ClassDojo Website"). The ClassDojo Website Privacy Policy is located here. In addition, this Privacy Policy also covers ClassDojo's treatment of any personal information about our users that our partners or other services might share with us, for example responses to a teacher survey collected through SurveyMonkey.

This policy does not apply to websites or services or practices of companies that ClassDojo doesn't own or control, such as third-party services you might access through links or other features (e.g., social media buttons or YouTube videos) on the Service. These other services have their own privacy policies, and we encourage you to review them before providing them with personal information.

Whether you are new here (welcome!), or have been using ClassDojo for a long time (welcome back!), please do take the time to get to know our privacy practices. We think they're pretty clear and friendly, but if you have any questions, we're here to help. You can visit the ClassDojo Privacy Center to learn more about how we protect your privacy, or send us an email at privacy@classdojo.com. By using the Service, you acknowledge that you accept and agree to this Privacy Policy.

Protecting your privacy is incredibly important to us. This Privacy Policy is here to help you understand how we treat any <u>personal information</u> that you share with us when you use the ClassDojo Services. This policy applies to every ClassDojo product - other companies that ClassDojo doesn't own or control will have their own privacy policies, and you should read them,

too! This Privacy Policy applies solely to the ClassDojo Services and does not apply to the informational ClassDojo Website - you can find the ClassDojo Website Privacy Policy here.

ClassDojo's Privacy Certifications

ClassDojo participates in the iKeepSafe Safe Harbor program. ClassDojo has been granted the iKeepSafe COPPA Safe Harbor seal signifying its Website, Platform, 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 COPPA Safe Harbor program guidelines.

ClassDojo holds the iKeepSafe FERPA Certification signifying its Website, Platform, and Apps have been reviewed and approved for having policies and practices that are compliant with the federal mandates for FERPA.

ClassDojo is also a signatory to 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. Read more about the Student Privacy Pledge here.

ClassDojo is certified <u>COPPA-compliant</u>, has a certification stating that its policies and practices help schools meet their FERPA obligations, and has also signed the <u>Student Privacy Pledge</u>.

What is ClassDojo?

ClassDojo is a school communication platform that helps teachers encourage students in class and engage parents. Teachers use ClassDojo to give students encouragement (or "feedback points") for showing critical skills or strengths ones like persistence, critical thinking, teamwork, and leadership. Teachers can also post assignments using the Activities feature for students to complete on ClassDojo ("Activities"). They use the ClassDojo Apps or the ClassDojo Platform - if multiple devices are used, they will all sync with each other. Teachers instantly message parents with text-based messages, pictures, videos, and stickers, and also add posts to Class Story and School Story - a private feed of moments from the classroom and school that only students, parents, "verified teachers," and school leaders can see. Teachers may also add posts to individual Portfolios - a private portfolio of content that only the student, their teachers, school leaders, and the student's parents can see.

Parents get to be a part of their child's classroom experiences, and those parents may optionally purchase Premium readures to help encourage their children at home. Parents access and set up an account on ClassDojo using a unique parent code provided by their child's teacher, or through an email/SMS invitation directly from the teacher containing the unique parent code, or by choosing their child's teacher from within the list shown within ClassDojo App or ClassDojo Website (the request to join the class must still be approved by the teacher). Parents can only view their own children's feedback points (if elected to be shown by their child's teacher) and Portfolios, not those of any other students. Parents can also set up an account without using a unique parent code, but the account will not be connected to their child's school (or any activity on their child's account in school), but they can also purchase Premium Features.

Students can have their own account to view feedback given by teachers and parents, and perform additional tasks, such as adding photos and videos of classwork to Portfolios, writing journal entries, creating drawings, responding to their teacher's comments on their portfolio (teacher and student comments collectively "Portfolio Comments"), submitting responses to Activities ("Student Activity Responses"), and customizing their ClassDojo avatar - a cute monster that represents the student on ClassDojo ("Student Account"). In order to have a Student Account created, students will need to either (1) have the Student Account created at school by their teacher (only after the teacher represents to ClassDojo that they have obtained any necessary parental consent) which allows them to then login (such as through the use of a QR code, class text code, or Google Login (as defined below)); or (2) receive a unique code from their teacher to create their own account with a username and password (which will require parental consent); or (3) have their parents create their Student Account at home after we have obtained parental consent. Additionally, a child's parent may create an Outside School Child Account for them to use at home for certain Premium Features. Any at-home feedback points and content uploaded are not viewable by the child's teacher or other students, but the customization of the monster through Premium Features may show up in the child's Student Account and viewable in school (e.g., by teachers, school leaders, and other students).

School leaders also play a meaningful role on ClassDojo. They can share notes, photos, and videos on School Story; only teachers, parents, and students connected to classes in the school can see these posts. School leaders can also create classes, share classes with teachers to give feedback to students, post to Class Story and Portfolios, add Portfolio Comments, message with parents, and see <u>Highlights</u> - a high-level overview of all the feedback and engagement happening within their school.

More information on how the Service operates is located <u>here</u> and your participation and use of the Service is governed by our <u>Terms of Service</u> ("Terms").

ClassDojo is a school communication platform that brings teachers, students, parents together. Learn more **here**.

How does ClassDojo protect children's personal information?

Protecting children's privacy is especially important to us - we're educators and parents ourselves, after all. This is why we've signed the Student Privacy Pledge and received iKeepSafe's Children's Online Privacy Protection Act ("COPPA") Safe Harbor seal, signifying that this Privacy Policy and our practices with respect to the operation of the Service have been reviewed and approved for compliance with iKeepSafe's COPPA Safe Harbor program. COPPA protects the online privacy of children under the age of 13 ("child" or "children"); for more information about COPPA and generally protecting children's online privacy, please visit OnGuard Online. We've also made a short video for students that highlights the most important details in our Privacy Policy that they should know about. We also have a Student Data Protection Addendum, an agreement we enter into with schools, that further describes our duties, responsibilities, and commitments with respect to Student Data that we collect or receive.

What information does ClassDojo collect from children, and how is it used? The statements we make regarding the information we collect from or about students and children using ClassDojo through an Outside School Child Account, such as those using our Premium Features at home who may or may not be connected to a school and how we use this information applies equally to all students and Outside School Child Users regardless of their age. Accordingly, where this Privacy Policy references students or any information collected from or about students (including Outside School Child Users), our Privacy Policy applies to students under 13 years old as well as students 13 years old and above. Please note, however, that for Outside School Child Users, we have different data retention policies as this information would not be retained beyond account deletion as may be required under FERPA or other state student privacy laws for "education records" or "[Student Data]"(https://classdojo.zendesk.com/hc/enus/articles/115004741703#h 63d91d2f-19b7-44bd-8373-649884e75fca).

ClassDojo collects the minimal amount of information from students and Outside School Child Users necessary to register for an account on the Service. This information is necessary to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the Service and for security and safety purposes. Additionally, ClassDojo follows the Federal Trade Commission's (FTC) COPPA rules for parental consent, including, where applicable, the use of which is commonly referred to a "school consent" if a school or teacher elects to utilize ClassDojo in the classroom. For more detail on the categories of personal information collected from students and Outside School Child Users, as well as the sources from which the information was collected, the purposes for which the information was collected and the categories of third parties with whom we share such personal information please see here.

Student Account and Outside School Child Account Creation

Currently Student Accounts are created in the following ways: (1) by the student's parent; (2) by the student's teacher; or (3) by the student themselves if the teacher elects to provide the student with a unique code. A parent may also set up an Outside School Child Account.

(1) By the parent: When a parent sets up a Student Account for their child, they will first need a parent account. In order to set up a parent account and be connected to their child's school, parents must first receive the <u>unique parent</u> <u>code</u> provided to their child by their child's teacher or sent through an email/SMS invitation directly from the teacher containing the unique parent code or choose their child's teacher from the list shown from within the ClassDojo App or ClassDojo Website (the request to join the class must still be approved by the teacher). Parents can also set up their account without this unique access code, but will not be connected to their child's school (or any activity on their child's account in school, such as feedback points or student uploaded content, Portfolio Comments or Student Activity Responses). In accordance with COPPA, we may ask the parent to provide the date of birth or age of their child, and if the child is under 13, we will also then seek to obtain verifiable <u>parental consent</u> in order to proceed with creating their child's account. If a parent is connected to their child's school, we don't ask the child's parent for any additional information regarding their child during the Student Account creation, but link the account to the name and information provided by the child's teacher. If the parent is not connected to their child's school, the parent may provide their child's

first and last name (at the option of the parent) and can create the Outside School Child Account. Once we have obtained parental consent, the child's account will be set up and a QR code will be accessible on the parent's device to allow the child to log in to their Student Account or Outside School Child Account or a parent can let the child log in using Account Switcher. Although not required under COPPA, we may choose to impose parental consent requirements on students and Outside School Child 13 and above at our discretion.

- (2) By the student's teacher: If a student's school or teacher elects to utilize Student Accounts in school or otherwise sets up a student's account, the school will be responsible for obtaining any necessary parental consent under COPPA (including if they choose to act as the agent of the parent and consent on the parent's behalf - commonly referred to as school consent" under COPPA) to create the Student Account on behalf of the student and let students access their accounts. The teacher will provide the student's name to set up the account. After doing so, if the teacher is creating the Student's Account, the teacher will be able to share a QR code unique to each student (or one QR code for the entire class - at the teacher's discretion). Students can scan the QR code and either enter their account directly (if an individual QR code) or tap their name from the list of names shown to them to (if one QR code per class) and log in and start using their student account. Additionally, teachers may choose to allow students to log in on the Service using their Google for Education or other Google Accounts ("Google Login(s)"). Please see here for more information on Google Login, including what we collect through the use of Google Login and how we use that information. We don't ask students to enter any other personal information for their account registration when a teacher sets up their account. Please note that if you, as a parent, provide an email to the school when the school is obtaining parental consent, we may send an email out to you asking you to verify your child's account, but you will not receive any other emails unless you have opted in to email marketing or have separately created an account on our Service. For more information on school consent, please see the FTC's COPPA FAQ's.
- (3) By the student: Alternatively, a teacher may choose to allow students to set up their own Student Account using the unique code provided by the teacher. When students set up their own ClassDojo Student Account, we ask students to provide a unique username (we advise students not to use their real names), a password and the unique code they have been given by their teacher to connect with the class. Consistent with the requirements of COPPA, we also ask for the child's age, and a parent or guardian email address from the child so we can seek verifiable <u>parental consent</u> or provide parental notice (as applicable). We will not use parent emails provided this way to market our Service to the parent, unless the parent has opted in to email marketing or has separately created an account on our Service. **We don't ask students to enter any other personal information when setting up an account.**

Any Student Account (or access to a Student Account) created for the student by the parent, or the student's teacher in class, or the student directly, are linked together (these are not different accounts). Additionally, any Outside School Child Account will also be linked with the Student Account if both exist), but only certain content will be viewable by the child's teacher. Please see our FAQ for more details.

Photos, Videos, Documents, Drawings, Student Activity Responses, and Journal Entries

Once a Student Account is created (whether created by the student's teacher or parent or the student themself) and parental consent is obtained, students will be able to take and upload photos, videos, documents, Student Activity Responses, create drawings, and write journal entries (which may contain personal information) to their Student Account on Portfolios which will be collected by ClassDojo once the content has been actively saved by the child within the Service. Until the content is actively saved by the child, it is temporarily stored locally on the child's device. The portfolio can only be viewed by the student themself, the student's parents, and the student's teachers and school leaders. If the school or teacher elects to utilize Student Accounts in the classroom, the school will be responsible for obtaining any necessary parental consent under COPPA. Additionally, the student's teacher must approve any posts made by students in their Student Account, including any Student Activity Responses, before it is shared with parents on Portfolios. Any content uploaded by a student in their Student Account in the classroom by their teacher, parent or themselves, or by the child or parent in their Outside School Child Account, will appear visible in both accounts. However, certain content uploaded in the Outside School Child's Account will not be viewable by the teacher in the Student Account. Please see our FAQ for more details.

Location Information

We never request precise location data from students and no student location data is available publicly. From students, the primary form of location data is based on IP Address. If students upload photos or videos from their computer, or from their phone's camera roll directly, as opposed to choosing to use ClassDojo's own application camera, we collect what the device send us. If the device sends us Exchangeable Image File Format (EXIF data) (metadata contained within the image file - e.g. camera model, lighting conditions and location (if enabled)) this can contain location data (and may contain precise location data). We strip all EXIF data, including the location information, from the photo before it is viewed by other users (e.g., the parent in Portfolios). If a student accesses and uses our mobile camera within the application itself, the camera has been configured so as to not collect any EXIF data, therefore the EXIF information is not stored (as opposed to if you use your device's own camera roll).

Viewing Stories

Students with Student Accounts may also view or "like" content on the Class Story and School Story, however, they will not be able to post content (such as videos or photos) to either the Class Story or School Story. Currently, students are limited to posting content to just their own portfolio or through access to the Premium Features given to them by their parents.

Portfolio Comments

If a student's teacher has elected to provide Portfolio Comments on their Student Activity Responses or any other content uploaded by students to Portfolios, the student may also respond to these comments. Prior to any student-uploaded content being viewed by the student's parents, the teacher must first approve this content. Additionally, prior to this approval of portfolio content, any Portfolio Comments between the teacher and the student can't be viewed by the student's parent, but any connected parents will receive a notice indicating that Portfolio Comments is being utilized by their child's teacher and can discuss the use of Portfolio Comments with their child's teacher. Once the Student Activity Responses (or other content) has been approved by the student's teacher, the Portfolio Comments will then be viewable by the parent (but may have been previously edited by the student's teacher).

Premium Features

Parents may choose to allow their children to access and use certain Premium Features within the child's Student Account or their Outside School Child's Account. A parent will first need to have their own parent account, and be required to use either their Apple ID, Google Account, or other payment method to purchase the Premium Features. If a parent is purchasing Premium Features from within their child's Student Account or Outside School Child's Account, they will also need to go through a "parental gate" prior to purchasing. Prior to allowing your child (or children) access to their Student Account or Outside School Child's Account in order to access the Premium Features, we will also require parental consent. Once we have obtained parental consent, the children's features will be unlocked for their children to utilize within their Student Account or Outside School Child's Account. Although not required under COPPA, we may choose to impose parental consent requirements on students or children 13 and above at our discretion. A parent can award Points as well as rewards and goals (as defined below) to a child for educational and other learning activities completed at home. This content (or the Points, Rewards, and Goals awarded at home) is then viewable by the parent and child within the Premium Features section of their respective account and is not viewable by the child's teacher or other students. This content can be deleted by the parent or child. In addition, the child can customize their monster, and these changes to their monster may be shown in their Student Account in class. Please see our FAQ for more details.

In addition to the information listed above, we automatically collect some information from any use of our Service as set forth in the "Information collected automatically" section, this includes device data (such as platform, app version and device ID) and product event data (such as the last activity a child started or whether they viewed a certain report) from the child's device, such as for Premium Features or logging in via QR code to their Student Account on the parent's device. These are collected for internal analysis on product usage and quality and we may also use it to track progress in the Service, and for sending <u>push</u> or email notifications to the child (as set forth below) to encourage them to take certain actions in the ClassDojo Service.

We also receive from the child's teacher (and link to the student's account) whatever name he or she has provided for the student, the student's grade, the <u>feedback points</u> given by that teacher, and content uploaded by the teacher to the student's portfolio (such as student responses to activities and Portfolio Comments). Teachers can choose to provide full names for students (e.g., first name and last name) when setting up their class; they can also opt to only provide non-identifying information (e.g., just first name and seat number). <u>This chart</u> details the personal information we collect, how we use it, and where it is stored.

We use the information we collect from students and Outside School Child Users to provide and improve the Service to the child, for educational, security and safety purposes, as required by law, or to enforce our Terms. Additionally, we use the information we collect from Outside School Child Users as set forth here. We will not require children to provide more personal information than is reasonably necessary in order 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 parent's consent for that collection. We do not disclose any personal information about children to third-parties, except to service providers necessary to provide the Service, authorized school personnel (such as school leaders) as directed by the child's school, as directed by the child's parents, as required by <a>law, or to protect the security of the Service or other users. Information collected from students (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 student logged-in areas of the Service. Additionally, personal information collected from students is never used for behaviorally-targeted advertising to students by us or any thirdparty, 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 student personal information) for either our own products (e.g. Premium Features) or third-party products and services ourselves that we believe may be of interest to a student (e.g., our co-created content with Yale University on Mindfulness) or Outside School Child User.

ClassDojo has been certified by iKeepSafe, an FTC-approved COPPA Safe Harbor, for compliance with their COPPA Safe Harbor program. We don't ask for or require children to provide **personal information** beyond that which is reasonably necessary to use ClassDojo. Information collected from students or Outside School Child Users is **never** used or disclosed for **third-party advertising** or any kind of **behaviorally-targeted advertising**, and it is **never** sold or rented to anyone, including marketers or advertisers. Please see **this chart** for the detailed categories of information we collect from each user type and how we use the information, as well as the sources from which the information was collected, the business purpose for which the information was collected and the third parties with whom we share or disclose personal information for a business purpose..

Push Notifications

ClassDojo may send <u>push notifications</u> to students or Outside School ChildUsers- for example, letting them know when their weekly report is ready, or telling them about an achievement milestone they reached! We require children provide a parent's email address before he or she can receive push notifications from ClassDojo (or have a Student Account or Outside School Child's Account previously set up on ClassDojo by their parent or teacher, with any necessary <u>parental consent</u> obtained). We will then provide the parent with notice (if the account was set up by them or their child) and provide the parent the opportunity to prevent further notifications. The device identifier for a child's account will only be associated with other <u>personal information</u> once parental consent is provided. If you are a student or a parent of a child and no longer want these communications to be sent, please either turn off the push notifications on your device, or contact us at <u>privacy@classdojo.com</u>.

Before ever sending a push notification to a child, if the child or the parent sets up the child's account on the Service, we will provide notice to parents, or obtain parental consent. We rely on teachers to obtain any necessary <u>personal information</u> if they set up the child's account. Parents can always opt-out (or withdraw consent) later as well by turning off the push notifications on their child's device or contacting us at <u>privacy@classdojo.com</u>.

What Children's Information is Visible to Others?

No Student's Account, or Outside School Child's Account, profile, or portfolio is made available or visible to the public through ClassDojo. Only the student, the student's parents, and the student's teachers or school leaders can see the student's profile and portfolio. No child can upload content (such as a photo, video, drawing, journal entry, or document) to the Service except through their Student Account, or if their parent has allowed their child access to certain Premium Features in their Student Account or Outside School Child's Account. This can't happen for children without either (1) the parent providing parental consent directly to ClassDojo or (2) the child's teacher representing to ClassDojo that they have obtained any necessary parental consent, including acting as the agent of the parent if their school policy allows. Additionally, the student's teacher must approve any post made by students before it is shared with parents on the student's portfolio. If a student adds content to their account in the classroom, students can't view each other's individual Student Accounts or portfolio unless they have intentionally chosen another student's name from the list of names shown to them while logging in or viewed the camera roll locally on the device that may be saving photos and videos taken by students. Teachers also have the option to use individual QR codes specific to each student for login purposes. Parents are able to view their own child's portfolio (through their own parent account) after the teacher has approved the student-submitted content, including Portfolio Comments and Student Activity Responses. Please note that parents may not see prior drafts of the student-submitted content or Portfolio Comments prior to the final teacher approval that allows parents to access and view and may not see all feedback points awarded by the teacher in school if the teacher has elected not to show these.

Class Story and School Story are visible by students, teachers, parents and school leaders who have logged into their accounts and are associated with that particular class or school. They are not viewable by the general public. Parents, teachers and school leaders can add content or comments to these stories, but students can only view or like content on these stories and are only able to do this once either the school or ClassDojo has obtained parental consent, if under 13.

Teachers may <u>share their classes</u>, including feedback points, Portfolios, and Class Story, with other teachers or school leaders in their school. Please note that if the teacher chooses to project their own ClassDojo teacher account in their classroom, students physically present in that classroom may see other students' names and total <u>feedback points</u> - this is similar to how paper-based sticker charts displayed in a classroom might work. Teachers, however, can choose

to never project or display their own teacher account in class, and therefore keep student feedback points and Portfolios private for each student, their teacher(s), and their parents — and many do!

Content uploaded by children or Points, Rewards, or Goals awarded within Premium Features or the Outside School Child's Account is viewable by the parent and any children accessing such Premium Features within their respective accounts; the content is not viewable by the child's teacher or other students. The customization of the monster by the child within Premium Features may be viewable within the child's Student Account (and thus viewable by the child's teacher or other students in the classroom).

By default, the full set of feedback and content posted, including Portfolio Comments and Student Activity Responses, to a Student's Account is private to the student, their teacher(s), school leader, and their parents (once the content is approved by the teacher). If a teacher displays their teacher account publicly in class, then students may see other students' total feedback points, and potentially classwork on Portfolios. Parents can view all teacher-approved posts, including Portfolio Comments and Student Activity Responses, shared on their child's portfolio, as well as every post shared on Class Story and School Story. Students can view and like, but not upload, content and comments on Class Story and School Story (once parental consent has been obtained by ClassDojo or their school/teacher). Parents may not see all feedback points awarded by the teacher in school if the teacher has elected not to show these. Content uploaded or Points, Rewards, and Goals awarded within Premium Features is viewable by the parent and the children accessing such Premium Features within their respective accounts; the content is not viewable by the child's teacher or other students. The customization of the monster by the child within Premium Features may be viewable within the child's student account (and thus viewable by the child's teacher or other students in the classroom).

How Long Does ClassDojo Keep Children's Information?

We will not retain a child's <u>personal information</u> for any longer than is necessary for <u>educational purposes</u> or legal obligations, or to provide the Service for which we receive or collect the child's personal information. Additionally, we only keep a child's personal information for as long as his or her Student Account or Outside School Child Account is <u>active</u>, unless we are required by law or the child's school (for Student Accounts) 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 3-tier student data protection policy to protect all students' (not just children's) information ("3-Tier Student Data Protection Policy"):

- Minimal information: ClassDojo collects the minimal amount of information from students necessary to use
 the Service. For more information, see <u>above</u>. In addition to the information entered by the child, we
 automatically collect some information from any use of our Service as set forth in the "<u>Information collected</u>
 <u>automatically</u>" section.
- 2. One year deletion policy for feedback points: To protect students, ClassDojo sets limits on how long students' feedback points given in the classroom are retained. For all students, feedback points older than 12 months are automatically deleted. For example, if a teacher sets up a class on ClassDojo on January 1, 2020, on January 1, 2021 any feedback points added in that class on or before January 1, 2010 would be deleted (and will continue to be deleted on an ongoing basis as each point reaches 12 months in age) regardless of whether or not a student has his or her own account (and if that account is active). This means feedback points cannot exist long-term. Teachers can also delete feedback points at any time. For more information on feedback points that parents can award Outside School, please see our FAQ.
- 3. Deleting inactive Student Accounts: If a student's Student Account is inactive for twelve months or more (meaning no teacher has given feedback to the student, added content to a student's portfolio, or messaged with the student's parent(s), and neither the parent(s) nor the student have logged into their accounts), 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 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 FERPA or "Student Data" under state student privacy laws). Please see our FAQ about how to request deletion of this content. For more information on the deletion of content related to our Premium Features (and not school based accounts or content), please see our FAQ.

We only keep a child's <u>personal information</u> for as long as the account is <u>active</u>, unless we are required by law or the child's school (for Student Accounts) to retain it, need it to enforce our

policies, or to ensure the security of our community. Additionally, we protect students with our industry-leading 3-Tier Student Data Protection Policy: (1) we collect only minimal information from students necessary to register for an account on the Service, (2) we automatically delete their <u>feedback points</u> given in the classroom after a year, and (3) we delete Students' Accounts if they're <u>inactive</u> for more than twelve months. Please note that this does not include certain content uploaded by the teacher, parent, or student to the portfolio that maybe considered an "education record" under FERPA or other state student privacy laws as we are required to retain these at the direction of the school. Please see our <u>FAQ</u> about how to request deletion of this content. For more information on the deletion of content related to our Premium Features and Outside School Child Accounts (and not school based accounts or content), please see our <u>FAQ</u>.

Parental Choices

Access, Correction and Deletion Rights

1) If a child, with <u>parental consent</u>, sets up their own Student Account or Outside School Child Account or a parent or guardian sets up their child's Student Account or Outside School Child Account; or a parent allows a child access to Premium Features: If your child's Student Account or Outside School Child Account was set up directly by your child (with your consent) or you as their parent or legal guardian, set up their Student Account or Outside School Child's Account, or you allow them access to Premium Features, and you have a parent account connected to the student, you may access, review, correct, or delete any of your child's personal information in the Service by emailing <u>privacy@classdojo.com</u> with the same email used to create your parent account or by contacting us here once you are signed into your parent account.

Please note however, that any content uploaded (e.g., photos, videos, Student Activity Responses, Portfolio Comments), that is requested as part of a Student Account, class at a school, or otherwise directed by your child's teacher or school, is retained at the direction of the school (e.g., for legal compliance reasons such as maintenance of "education records" under FERPA); to correct or delete this content, please contact the appropriate official at your child's school. If the school determines that the request should be implemented, the school may either make the change themselves or submit the request to ClassDojo by emailing privacy@classdojo.com or by contacting us here

2) If your child's Student Account was set up by your child's school (e.g., to allow the student to login via a QR code, class text code, or Google Login): If your child's school set up their Student Account directly and obtained your consent (or chose to act as an agent and consent on your behalf) and you do not have a parent account connected to your child, please contact the appropriate official at your child's school to access, review, correct or delete any of your child's personal information in the Service. If the school determines that the request should be implemented, the school may either make the change themselves or submit the request to ClassDojo by emailing privacy@classdojo.com or by contacting us here. A parent or legal guardian who has a ClassDojo parent account and is already connected to their child (but did not set up their child's Student Account) may at any time contact ClassDojo directly by emailing privacy@classdojo.com with the same email used to create your parent account or by contacting us here once you are signed into your parent account to access and review their child's personal information in the Service, but correction or deletion requests should still be made to the child's school first.

For either method described above, we will use commercially reasonable efforts to process such requests in a timely manner consistent with applicable law. We will need to verify your identity, for example by requiring that you provide acceptable forms of personal identification as set forth in our FAQ.

Stop Collecting Further Personal Information

Additionally, at any time, for Outside School Children Accounts, or Premium Features, you can refuse to permit us to collect further personal information from your child by emailing privacy@classdojo.com from the same email used to create your parent account or by contacting us here. Please keep in mind that deleting records may require us to terminate the account in question.

We believe parents who have set up their child's Student Account or Outside School Child Account, or allow their child access to Premium Features, should always be able to delete their child's account, request for us to delete their child's personal information, or obtain a copy of their child's personal information. Just email us at privacy@classdojo.com from the same email used to create your parent account and we'll be happy to help or contact us here once you are signed into your parent account. Please note, however, that certain content uploaded by your

child in their Student Account (in the classroom or otherwise directed by their teacher) is retained at the direction of the school for legal compliance reasons and you will need to first contact the appropriate official at your child's school to correct or delete this information and we will have to receive this request from the school. If your child's teacher set up their Student Account directly, and you do not have a ClassDojo parent account, please send your request to your child's school - we will process requests we receive from the school in a timely manner. If your child's teacher set up their Student Account directly and you do have a ClassDojo parent account, we are happy to respond directly for your requests to access and review your child's personal information, but you will need to contact your child's school first for any correction or deletion requests.

What information does ClassDojo collect?

We collect two types of information about you: (1) information that you voluntarily provide us by using the Service (described below under "Information you provide to us") and (2) information collected automatically as result of your use of the Service (described below under "Information collected automatically"). We may also receive information about you from third-party sources (as described below under "Information Received from Third-Party Sources"). The types and amounts of information collected will vary depending on whether the user is a teacher, school leader, parent, student or Outside School Child User (e.g., we collect minimal information from students and Outside School Child User's to register for an account on our Service) and how they use ClassDojo (e.g., if teachers join their school, we may need to collect school address information). We have also created this chart with the detailed categories of personal information we collect from each user type, including the sources from which the information was collected, the business purpose for which the information was collected and the third parties with whom we share or disclose personal information for a business purpose.

ClassDojo asks for some limited information directly from teachers, school leaders, parents, Outside School Child Users and students (such as account information), and also collects some information automatically (such as crash reports when errors occur) in order to provide you with the best possible ClassDojo experience. Please see this chart for the detailed categories of personal information we collect from each user type, including the sources from which the information was collected, the business purpose for which the information was collected and the third parties with whom we share or disclose personal information for a business purpose.

Information you provide to us

We ask for and collect the following <u>personal information</u> about you when you use the Service. This information is necessary for the adequate performance of the contract between you and us, for our legitimate interest in being able to provide and improve the Service, and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested services.

There are currently four categories of users on our Service: teachers, school leaders, parents, and students (including those Outside School Child Users who use the Services outside of school with our Premium Features). Additionally, as a non-logged in visitor to the ClassDojo Website, you may provide personal information to us as set forth in our separate ClassDojo Website Privacy Policy. We describe the information collected from students and Outside School Child Users in the "How We Protect Children's Personal Information" section above; for other users, we collect and store the following types of information from each type of user:

- Account Sign-up and Profile Information: To create a ClassDojo account as a teacher, school leader, or parent, you may be asked to provide some basic information such as your first and last name, email address, telephone number, password and a profile photo. If a student's teacher is creating the Student Account on behalf of the student, they will provide the student's name and grade. This same information is also used to create the Student Account on the parent's behalf (the parent does not currently need to provide any additional personal information of their child if a parent is connected to the school with the unique parent code). If the parent is creating their child's account and is not connected to their child's school, they may provide additional information about their child (such as first and last name). Teacher and school leader profiles may be viewed by other teachers and school leaders in the same school; however, no teacher, parent or student profile is made available or visible to the general public through the functionality of our Service.
- School Information and Collaboration Features: If you are a teacher or school leader, as part of the profile information you provide, you may choose to associate your account with an existing school or may enter a

new school name and possibly your school's address if we do not have it already. If you are using the Service as a teacher, school leader, or parent, we may ask you for permission to collect and store your precise geolocation information to help us identify schools located nearby for you, including to help connect your parent account to your child's school (e.g., our "Find a Teacher" feature). This data is only temporarily captured and not stored beyond the initial search request for schools near the user and is not viewable by other users. By connecting you with your school, the Service may enable and provide additional collaboration features for teachers and school leaders within the same school (and parents of children at that school) such as adding photos, videos, and text updates on Class Story or School Story for parents, students and other verified teachers in that school to see. Learn more about our current collaboration features and what information may be collected and shared from teachers, school leaders, students and parents and who can view these stories here.

- Class Information: As a teacher, you enter the class year (e.g., first grade) and the names of the students in your class. It is the teacher's choice what they enter here: for example, teachers could enter John S or John Smith. Alternatively, teachers can also upload a spreadsheet to the Service with the student's first and last names, or choose students from the School Directory if they are already in a class of a verified teacher within the school. If a teacher opts to share the classes they set up on ClassDojo with other teachers or school leaders in their school, such as teachers they co-teach with, then those teachers can also see that class's information.
- Inviting Others and Sharing Content: As a teacher or school leader, you can invite your students' parents to join the Service, for example by providing their email address or phone number (to invite them via SMS) within ClassDojo. As a parent, school leader, or teacher you can also invite others to join the Service or share certain content (e.g., as a parent within Premium Features) by utilizing your own native mobile application functionality through the ClassDojo App, for example by email or SMS. We will collect and store the email and phone numbers you provide with these requests, and will also treat this as personal information in accordance with this Privacy Policy. We may also ask you for access to the contacts on your mobile device to prevent you having to enter contact information for those invitations you send through our application and may store these contacts from your address book. If these individuals would like to request deletion of their information, they may contact us directly at privacy@classdojo.com.
- Messaging: As a teacher or school leader, you can privately message with individual parents that have signed up for the Service, including through Portfolios, or send broadcast messages to all parents at once, using the <u>ClassDojo Messaging</u>, Class Story, and School Story features.

As a parent, you can also message with your child's teacher through ClassDojo Messaging as well as through comments on Portfolios, Class Story, and School Story posts. As a teacher, school leader, or parent, your name and profile photo may be displayed to the person with whom you are messaging, and if you are a teacher or school leader, you may receive a 'read receipt' showing how many parents have read your message. Please be aware that by using a broadcast messaging feature, such as Class Story or School Story, any messages, photos, videos or other content shared can be viewed by all parents, students (whose parents have provided verifiable parental consent to ClassDojo (or the student's teacher has represented they have obtained any necessary parental consent, and teachers and school leaders that are members of that class or school, respectively. In the case that a photo or video is shared in a broadcast message, Class Story, or School Story showing a student who does not want photos taken of him/her (or whose parent does not want photos taken of him/her), the student or parent can contact us at privacy@classdojo.com to remove it, subject to any photo or record being deemed an "education record" under FERPA. If a photo or video is considered an "education record" you will need to first contact your child's school to request removal. For more information on when photos or videos are considered an "education record" please see the Department of Education's guidance here. We will store messages, including those on Class Story, School Story, and Portfolios, and any content sent with the messages (e.g., photos), to provide the Service, and to help teachers and school leaders keep a log of their communications with parents. For more information on how long these are retained, please see here.

- Portfolio Comments: Teachers can also add Portfolio Comments to their students (e.g., on any student's uploaded content, including Student Activity Responses) within Portfolios (including prior to any content being shown to the student's parent). Once the teacher has approved any student-uploaded content, the Portfolio Comments will then be viewable to the child's parent (but may have been edited by the student or teacher prior to being shown to the parent). Prior to this approval, any Portfolio Comments between the teacher and the student can't be viewed by the student's parent, but any connected parent will receive a notice indicating that Portfolio Comments is being utilized by their child's teacher and can discuss the use of Portfolio Comments with their child's teacher.
- Content: Teachers, school leaders, and parents may upload photos, videos, and other content, including content that may contain personal information and can be viewed by others, for example, on Class Story or School Story. Learn more about what information may be collected and shared from teachers, school leaders, students and parents and who can view these stories here. Additionally, teachers can post Activities on ClassDojo. Such information may include activity title, instructions, and the type of content they expect students to respond with (e..g, photo, video, drawing, or journal entry). Once a teacher publishes such Activities, they can be viewed by their students, other teachers using ClassDojo at that teacher's school, and by other teachers that ClassDojo may share with pursuant to the Terms of Service (unless a teacher optsout), but they will not be viewable by the general public. Parents can also upload photos, videos, and other content, which may contain personal information, through utilizing the Messaging and Premium Features. Parents can also purchase certain content from a Class Story or School Story, but must first confirm that they

- are giving us consent to use any content that might be deemed an "education record" or "Student Data" in this manner. Please see our FAQ for more information.
- Rewards and Goals: Parents are given a certain set of default "rewards" that they can then edit and create within Premium Features ("Rewards"). Additionally, within Premium Features, parents can create goals where they select a specific skill their child is working on and specify a target number of points to achieve the particular goal ("Goals"). Parents can then give points for a specific skill to contribute towards the Goals and once a Goal is completed, a parent may award a Reward. Rewards and Goals given at home can only be accessed through the parent account or the child's Outside School Child's Account, teachers and other students are not able to see these Rewards or Goals or to contribute points to them. We collect product events (e.g. the value of the Rewards or Goals, whether a parent has created a goal, the number of Rewards or Goals given and Reward or Goal name) from the parent. These are collected for internal analysis on product usage and quality. We may also use it to track progress in the app, and for sending push and email notifications to a parent's email or device to encourage them to take actions within the Service (such as creating a goal). Additionally, after giving a Reward a parent may take a photo this photo is saved to the parents camera roll locally on the device, we do not capture or save these photos.
- Purchasing Premium Features: As a parent, when you purchase any Premium Features, you will first need to have your own parent account. You will then be required to use either your Apple ID, Google Account, or other payment method to purchase the Premium Features. Prior to allowing your child (or children) access to the Premium Features within their Outside School Child Account (or if any children's personal information, educational records or Student Data are utilized in the Premium Features that previously relied on "school consent"), we will also require parental consent. Please see our FAQ for more information. We do not collect any credit card information directly from parents to purchase Premium Features, nor is any credit card data passed back to us from any payment method you used to purchase the Premium Features. Please see here for a list of what information we receive from third-parties in connection with your payment method. Parents may also share their Premium Features subscription with other parents through their account settings. Please see here for more information on sharing your Premium Features subscription.
- **Testimonials:** We may collect certain <u>personal information</u> (such as your name, photo, and/or video) if you choose to give us a testimonial. We post testimonials on our Service which may contain this personal information in the testimonial. We obtain the individual's consent in advance to ensure we have permission to post this content publicly. To request removal of your personal information from our testimonials, please contact us at privacy@classdojo.com.
- Contact Information: As a user of the Service, you may choose to provide us with your <u>personal</u> <u>information</u>, such as a name, email address and telephone number. Some examples include when you send us an email asking a question, participate in a video testimonial about our Service, or choose to participate in any research efforts with ClassDojo to improve the Service).

When you send us a message using the "Contact Us" page or via email, the email addresses and phone numbers collected are not further used to market to the individual beyond providing the services requested or responding to the requests.

Our use of the information above is described below in the section "How Does ClassDojo Use the Information it Collects." If you are using the ClassDojo App, we may ask you for certain permissions - please see here for more detail about those permissions. We have also prepared this chart of the personal information we collect, how we use it, and where it is stored.

We ask you for different types of information based on who you are (i.e., teacher, school leader, parent, and student) and which ClassDojo features you use (e.g., sending a message between a teacher and a parent, or helping a teacher or parent join their school). We have also prepared this chart of the personal information we collect, how we use it, and where it is stored.

Information collected automatically

When you use the Service, we (or our <u>service providers</u>) may use various technologies that automatically record or collect certain information, including personal information, from your browser or your device about the services you use and how you use them. This information is necessary for the adequate performance of the contract between you and us, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the Service. For example, this could include the frequency and duration of your visits to ClassDojo (similar to TV ratings that indicate how many people watched a particular show). If you use ClassDojo on different devices, we may link the information we collect from those different devices to help us provide a consistent Service across your different devices. If we do combine any automatically-collected information with personal information, we will treat the combined information as personal information, and it will be protected as per this Privacy Policy.

The technologies and information we automatically collect include:

- Cookies and other similar technologies: We (or our service providers) may use cookies or similar technologies to identify your browser or device. We (or our service providers) may also use these technologies (never in student logged in areas of our Service) in connection with advertising of our Service that may appear on other sites or in connection with advertising their products outside of our Service (e.g., if you view an embedded YouTube video player on our Service, YouTube may place cookies or similar technologies on your browser when you play the video off our site). We don't allow these third-parties to advertise directly on our Service (i.e. such as when an advertiser would bid to place an advertisement directly on a platform such as Facebook), but we may serve contextually relevant advertising for third-party products and services ourselves that we believe may be of interest to you (e.g., our co-created content with Yale University on Mindfulness). Please read our Online Tracking Technologies Policy for more details, including how to modify your cookie settings and a list of the tracking technologies we use.
- Local storage: We may also use, collect, and store information and preferences locally on your device using
 mechanisms such as browser-based web storage (including HTTP cookies and HTML5) and application data
 caches.

Like many services, ClassDojo (or our service providers) uses both local storage and cookies and other similar technologies to analyze trends, gather demographic information about our users, understand your engagement with the Service, administer the Service, tailor the Service for you, and to help the Service work better for you - for example, by remembering your language preferences. Please read our **Online Tracking Technologies Policy** for more details.

- Device information: We collect device-specific information such as your device type, device brand, operating
 system, hardware version, device settings, file and software names and types, battery and signal strength,
 and device identifiers. This helps us measure how the Service is performing, improve ClassDojo for you on
 your particular device, and send you push notifications if you've opted in to receive them.
- Mobile application information: Certain mobile applications or "apps" include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to ClassDojo when you install or uninstall that application, such as when you install the ClassDojo App, when you open the application, or when that application periodically contacts our servers, such as for automatic updates. Additionally, we may receive application state and crash log information which will help us debug and improve the ClassDojo App.
- Server log information: Like most online services, when you use our Service we automatically collect and store certain information in our server logs. Examples include things like:
 - Details of how you used our Service, such as your activity on the Service (including product event data used to track progress or user activity), and the frequency and duration of your visits to the Service (similar to TV ratings that indicate how many people watched a particular show)
 - Telephony log information like your phone number and SMS routing information
 - o IP address
 - Device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.

This information helps us make decisions about what we should work on next - for example, by showing which features are most (or least!) popular and to send notifications to a device (such as push notifications if the user opted in) to encourage the user to finish an activity or start the next activity. We may use your IP address and share it with third parties to help diagnose problems with our servers, for security purposes, to manage the Service, to enhance the Services based on usage pattern data and, for analytics and for advertising. Third party sharing of IP address information for analytics and advertising is not allowed for student and Outside School Child Users.

• Location information: When you use our Service, we may collect and process information about your geographic location, for example based on your IP address. We collect both coarse (i.e., city-level) location data and precise location data. If we request precise geolocation information ("precise" meaning sufficient to identify street name and name of city or town) from you (such as when a teacher or parent is searching for a school), we ask for your explicit opt-in permission. We **never** request precise geolocation data from students. From all users, if they upload photos or videos from their computer, or from their phone's camera roll directly, as opposed to choosing to use ClassDojo's own application camera, we collect what the device send us. If the device sends us Exchangeable Image File Format (EXIF data) (metadata contained within the image file - e.g. camera model, lighting conditions and location (if enabled)) this can contain location data (and may contain precise location data). We strip all EXIF data, including the location information, from the photo before it is viewed by other users (e.g., the parent in Messaging). If a user accesses and uses our mobile camera within the application itself, the camera has been configured so as to not collect any EXIF data, therefore the EXIF information is not stored (as opposed to if you use your device's own camera roll).

We will not store or track your precise device location on an ongoing basis or without your permission. We do not share precise geolocation data with third-parties, other than our <u>service providers</u> as necessary to provide the Service. If you no longer wish to allow us to track your location information, you may opt-out at any time by turning it off at the device level.

• Cross-device collection: To provide users with a seamless online experience, we may link your identifiers on different browsers and environments you are using our syncing technology, DojoCast. With DojoCast, ClassDojo is able to provide a seamless experience across multiple devices and browsers without collecting or processing any additional identifying personal data. We may also work with third party partners to employ technologies, including the application of statistical modeling tools, which permit us to recognize and contact you across multiple devices.

We collect some information from you automatically (and additionally use **cookies** and other similar technologies to collect information) so that we know when things go wrong, or to help us understand what parts of ClassDojo need some improvement. If we need to request street-level ("precise") geolocation data from you as a teacher, school leader, or parent, we'll ask for your explicit, opt-in consent. We never request precise geolocation data from students.

Information received from third-party sources

We may also obtain information, including personal information, from third-party sources to update or supplement the information you provided or we collected automatically. This may include aggregated anonymous information or certain personal information that may be provided to us. If we receive personal information from third-parties, we will handle it in accordance with this Privacy Policy. If we directly combine information we receive from other third-parties with personal information that we collect through the Service, we will treat the combined information as personal information and handle it in accordance with this Privacy Policy. Additionally, we may use any aggregated anonymous information received by third-parties as set forth below under the heading "Aggregated Information and Non-Identifying Information". Local law may require you authorize the third-party to share your information with us before we can acquire it. We do not control, supervise, or respond to how third parties providing your information process your personal information, and any information request regarding the disclosure of your personal information to us should be directed to such third-parties. Please see this chart with the detailed categories of personal information we collect from each user type, including the sources from which the information was collected, the business purpose for which the information was collected and the third parties with whom we share or disclose personal information for a business purpose.

We may collect some information from third-party sources, such as SurveyMonkey when we send questionnaires to teachers and parents. That information will be handled under this Privacy Policy. Please see **this chart** with the detailed categories of personal information we collect from each user type, including the sources from which the information was collected, the business purpose for which the information was collected and the third parties with whom we share or disclose personal information for a business purpose.

How does ClassDojo use the information it collects?

First and foremost, you should know that ClassDojo does not (and will not) sell or rent any of your, or your child's, personal information to any third-party for any purpose - including for advertising or marketing purposes. Third-party advertising is not permitted on areas where users are required to log in to ClassDojo and personal information collected from students is never used for behaviorally-targeted advertising to students (by us or third-parties). We may serve contextually relevant advertising for third-party products and services ourselves that we believe may be of interest to you (e.g., our co-created content with Yale University on Mindfulness).

We use the information we collect from you to provide you with the best ClassDojo experience. Our use of information collected from students and Outside School Child users using the Service outside of school is set forth above in the section "What Information Does ClassDojo Collect from Children, and How Is it Used". More specifically, this information collected from non-students is used to:

- Provide and improve the Service, for example by developing new products and features
- Fulfill your requests and provide any information you request, such as responding to your emails, submissions, questions, comments, requests for information or customer support
- Customize the Service for you, and improve your experience with it
- Send you information about features on our Service or changes to our policies and Service
- Communicate with you about your use of the Service, your account, or transactions with us

- Send you security alerts, and support and administrative messages and otherwise facilitate your use of, and our administration and operation of the Service
- Provide parents and teachers information about events, announcements, offers, promotions, products, including third-party products, and services we think will be of interest to you
- Notify and contact contest and sweepstakes entrants
- For any other purpose for which the information was collected (e.g., fulfilling Premium Features orders)
- Most crucially, to protect our community by making sure the Service remains safe and secure, such as by detecting, investigating and preventing activities that may violate our policies or be illegal

We use automatically collected information (described in the "Information collected automatically" section above) to provide and support our Service, and for the additional uses described in this section of our Privacy Policy. To learn more about how we use your information for personalization and tracking, please see the Online Tracking Technologies Policy.

We process this information given our legitimate interest in improving the Service and our users' experience with it, in protecting the Service, where necessary for the adequate performance of the contract with you, and to comply with applicable laws.

Additionally, we will process your personal information for the purposes listed in this section related to marketing given our legitimate interests in undertaking marketing activities to offer you products and services that may be of your interest. You can opt-out of receiving marketing communications from us by following the unsubscribe instructions included in our marketing communications or changing your notification settings within your ClassDojo account.

ClassDojo doesn't <u>sell</u> (and will not) or rent your information to third-parties, we don't permit <u>third-party advertising</u> on ClassDojo, and personal information collected from students is never used for <u>behaviorally-targeted advertising</u> to students. We use your information to provide and personalize the Service to you, optimize and improve our Service, communicate with you about our Service, and for security and safety reasons. We may also use the information provided by parents and teachers to provide parents and teachers information about events, announcements, offers, promotions, products, including third-party products, and services we think will be of interest to you.

Will ClassDojo share any information it collects?

First and foremost, you should know that ClassDojo **does not (and will not)** <u>sell</u> or rent your (or your child's) <u>personal information</u> to any third-party for any purpose - including for advertising or marketing purposes. <u>Third-party advertising</u> is not permitted on areas where users are required to log in to ClassDojo and personal information collected from students is never used for <u>behaviorally-targeted advertising</u> to students (by us or third-parties). Furthermore, we do not share personal information with any third-parties except in the limited circumstances described in this Privacy Policy and as set forth below:

Other Users You Share and Communicate with on ClassDojo

No teacher, school leader, parent or student profiles are made available to the general public through our Service. Furthermore, students cannot share their <u>account information</u> or portfolio with anyone on ClassDojo, outside of their parents, teachers, or school leaders. If you are a teacher, school leader, or a parent, you may choose to share information or content through the Service with other ClassDojo teachers, school leaders, students, or parents - for example, things like your account information, <u>feedback points</u> awarded to students you teach (if you are a teacher or school leader) or to your children (if you are a parent) or other information you share with teachers, school leaders, or parents you are communicating with through <u>ClassDojo Messaging</u>, Class Story, School Story, Portfolios, or our other collaboration features.

Please keep in mind that information (including personal Information or children's personal information) or content that you voluntarily disclose to others - including to other ClassDojo users you interact with through the Service (such as messages you might send other users or other teachers and school leaders you collaborate with) - can be viewed, copied, stored, and used by the people you share it with. We cannot control the actions of people with whom you choose to share information and we are not responsible for the collection, use or disclosure of such information or content by others.

Third-party integrations on our Service

When, as a teacher, school leader, student, or parent, you use third-party apps, websites or other services that use, or are integrated with, our Service, they may receive information about what you post or share. For example, when you share a <u>Big Ideas activity</u> on Twitter or Facebook, these services receive the information that you share through this functionality, and information that you are sharing from ClassDojo. Please see <u>here</u> for more information on third-party services. Please <u>see here</u> for a list of third-party app integrations on our Service and the ClassDojo Website.

Service Providers

We do work with vendors, service providers, and other partners to help us provide the Service by performing tasks on our behalf - we can't build everything ourselves, after all! These service providers may be located inside or outside of the European Economic Area ("EEA"). We may need to share or provide information (including personal information) to them to help them perform these business functions, for example sending emails on our behalf, database management services, database hosting, providing customer support software, and security. We may also authorize these third-party companies to collect information on our behalf. These providers have limited access to your personal information to perform these tasks on our behalf, and are contractually bound to protect and use it only for the purpose for which it was disclosed. Additionally, these partners and service providers must adhere to confidentiality and security obligations in a way that is consistent with this Privacy Policy. Please see here for a list of the third-parties we work with to provide the Service and the ClassDojo Website.

Social Media Platforms

Where permissible according to applicable law, we may share certain limited personal information with social media platforms (such as Google or Facebook) and other websites, applications or partners, to generate leads, drive traffic to our websites or otherwise market and advertise our products or services on those websites or applications (this will never include personal information of students). These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products and services that may be of your interest. These social media platforms with which we may share your personal information are not controlled or supervised by ClassDojo. Therefore, any questions regarding how your social media platform processes your personal information should be directed to such provider.

Analytics Services

We use analytics services, including mobile analytics software, to help us understand and improve how the Service is being used. These services may collect, store and use information in order to help us understand things like how often you use the Service, the events that occur within the application, usage, performance data, and from where the application was downloaded. A current list of analytics providers that we use is located here.

Aggregated Information and Non-Identifying Information

We may share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other <u>de-identified</u> or non-personally identifiable information (such as statistics about visitors, traffic and usage patterns), including with users, partners or the press in order to, for example, demonstrate how ClassDojo is used, spot industry trends, or to provide marketing materials for ClassDojo. Any aggregated information and non-personalized information shared this way will not contain any personal information.

Legal Requirements

We may disclose information, including personal information, if we have a good faith belief that doing so is necessary to comply with the law, such as complying with a subpoena or other legal process. We may need to disclose personal information where, in good faith, we think it is necessary to protect the rights, property, or safety of ClassDojo, our employees, our community, or others, or to prevent violations of our Terms of Service or other agreements. This includes, without limitation, responding to law enforcement and government requests. Where appropriate, we may notify users about the legal requests, unless (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law; (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon ClassDojo, or its users. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

Fraud and Security Protection

We may share information to assist with security operations for scheduled penetration testing, auditing, and continuous improvement of our security practices, including without limitation, exchanging information with other companies and organizations for fraud protection. Authorized parties of the information would comply with our current privacy and security policies.

Sharing with ClassDojo Companies

Over time, ClassDojo may grow and reorganize. We may share your personal information with affiliates such as a parent company, subsidiaries, joint venture partners or other companies that we control or that are under common control with us, in which case we will require those companies to agree to use your personal information in a way that is consistent with this Privacy Policy.

Change of control

The <u>Student Privacy Pledge</u> requires us (and all pledgers) to commit to how we handle data in the event of a change to our organizations such that all or a portion of ClassDojo or its assets are acquired by or merged with a third-party, or in any other situation where <u>personal information</u> that we have collected from users would be one of the assets transferred to or acquired by that third-party. Consistent with the Student Privacy Pledge and applicable state and federal laws, in connection with such a change to our organization, if any, this Privacy Policy will continue to apply to your information, and any acquirer would only be able to handle your personal information as per this policy (unless you give consent to a new policy). We will provide you with notice of an acquisition within thirty (30) days following the completion of such a transaction, by posting on our homepage, or by email to your email address that you provided to us. If you do not consent to the use of your personal information by such a successor company, subject to applicable law, you may request its deletion from the company. We may also make information, including personal information, available to a potential investor or purchaser (or their advisors) in advance of any such transaction completion.

In the unlikely event that ClassDojo goes out of business, or files for bankruptcy, we will protect your <u>personal</u> <u>information</u>, and will not sell it to any third-party. For more information on our practices regarding your data if we go out of business, please see our <u>FAQ</u>.

With your consent

Other than the cases above, we won't disclose your personal information for any purpose unless you consent to it.

ClassDojo doesn't (and won't) <u>sell</u> or rent your <u>personal information</u> to any third-parties. We believe your information is yours, and you should own it - we think that's the right way to operate. We share some information with <u>service providers</u> who help us provide you with the Service – like companies that help us send emails, for example, or if we have to to comply with the law. Additionally, you may choose to share information with other users of the Service or to third-parties that are integrated on our Service.

And, if ClassDojo is ever acquired or goes out of business, our commitments don't change: we still won't <u>sell</u> or rent your personal information to anyone. Your <u>personal information</u> will continue to be protected by this policy, and any company that acquires ClassDojo will have to abide by this policy, unless you give consent to a new policy.

How does ClassDojo protect and secure my information?

Your ClassDojo account is protected by a password or a QR code. You can help us protect against unauthorized access to your account by keeping your password or QR code secret at all times. The security of your personal information is important to us. We work hard to protect our community, and we maintain administrative, technical and physical safeguards designed to protect against unauthorized use, disclosure of or access to personal information. In particular:

- Our engineering team is dedicated to keeping your personal information secure
- We perform application security testing; penetration testing; conduct risk assessments; and monitor compliance with security policies
- We periodically review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems
- We continually develop and implement features to keep your personal information safe
- When you enter any information anywhere on the Service, we encrypt the transmission of that information using secure socket layer technology (SSL/TLS) by default
- ClassDojo's database where we store your personal information is encrypted at rest, which converts all
 personal information stored in the database to an unintelligible form.
- We ensure passwords are stored and transferred securely using encryption and salted hashing
- The Service is hosted on servers at a third-party facility, with whom we have a contract providing for enhanced security measures. For example, personal information is stored on a server equipped with industry

- standard firewalls. In addition, the hosting facility provides a 24x7 security system, video surveillance, intrusion detection systems and locked cage areas.
- We automatically delete <u>inactive student accounts</u> after a specific period of time, as per our retention policy, described in the "How Long Does ClassDojo Keep Children's Information?" section.
- We also operate a 'bug bounty' security program to encourage an active community of third-party security researchers to report any security bugs to us. More information on this is available by contacting us at privacy@classdojo.com
- We restrict access to personal information to authorized ClassDojo employees, agents or independent contractors who need to know that information in order to process it for us, and who are subject to strict confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations

For additional information on our security practices, please see our <u>Security Whitepaper</u> and our <u>Privacy Center</u>. Although we make concerted good faith efforts to maintain the security of personal information, and we work hard to ensure the integrity and security of our systems, no practices are 100% immune, and we can't guarantee the security of information. Outages, attacks, human error, system failure, unauthorized use or other factors may compromise the security of user information at any time. If we learn of a security breach, we will attempt to notify you electronically (subject to any applicable laws and school reporting requirements) so that you can take appropriate protective steps; for example, we may post a notice on our homepage (<u>www.classdojo.com</u>) or elsewhere on the Service, and may send email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

The security of your information is important to us, and we take it very seriously. We're always adding safeguards to ensure the safety and security of ClassDojo and our community of teachers, school leaders, parents, and students. You can help us out by keeping your password and QR code secret! When you enter information anywhere on the Service or the ClassDojo Website, we encrypt the transmission of that information using SSL by default. Please see our Security Whitepaper for more details.

ClassDojo's commitments to providing Transparency and Your Rights

As you can see, we try to be transparent about what information we collect, so that you can make meaningful choices about how it is used. You control the personal information you share with us. You can access or rectify this information at any time. You can also delete your account. We also provide you tools to object, restrict, or withdraw consent where applicable for the use of personal information you have provided to ClassDojo. We also make the personal information you share through our Service portable and provide easy ways for you to contact us.

You may exercise any of these rights described in this section by sending an email to privacy@classdojo.com from the same email used to create your ClassDojo account or making a request here once you are signed into your ClassDojo account. Please note that we may ask you to verify your identity before taking further action on your request, for example by requiring you to provide acceptable forms of personal identification as set forth here.

- Access or correct your personal information
- Control who you share information with
- Delete your account from ClassDojo;
- Object, restrict, or withdraw consent;
- Take information out of ClassDojo

At ClassDojo, we believe that more transparency is better. We try to give you control, with easy settings and options, so that you can make good choices when it comes to your information and how it is used. We also set forth the ways in which you can exercise your rights to access, correct, and delete your personal information as well as your right to take information out of ClassDojo and object or withdraw consent.

ClassDojo aims to provide you with easy access to any <u>personal information</u> we have collected about you and give you easy ways to update it or delete it, unless we have to keep that information for legitimate business purposes (e.g., we need at least an email address for your account if you maintain an account with us) or legal purposes. You have the right to correct inaccurate or incomplete personal information concerning you (and which you cannot update yourself within your ClassDojo account).

Managing Your Information: If you have registered for an account on ClassDojo, you may update, correct, or delete some of your profile information or your preferences at any time by logging into your account on ClassDojo and accessing your account settings page. You may have to verify your identity before you can do that. You may also, at any time, update, correct, or delete certain personal information that you have provided to us by contacting us at privacy@classdojo.com from the email used to create your ClassDojo account or by following the instructions here once you are signed into your ClassDojo account. We will respond to your request within a reasonable timeframe.

Accessing Your Information: Upon request, ClassDojo will provide you with information about whether we hold any of your personal information, and, If you are a user of ClassDojo, you may request access to all your personal information we have on file by contacting us at privacy@classdojo.com from the email used to create your ClassDojo account or by following the instructions here once you are signed into your ClassDojo account. In some cases, we won't be able to guarantee complete access due to legal restrictions - for example, you will not be allowed to access files that contain information about other users or information that is confidential to us.

Accessing Your Child's Information: Visit our "Parental Choices" section to see how you can obtain copies of your child's personal information.

We may reject requests for access, change or deletion that are unreasonably repetitive (more than two times per year for access rights), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort or if more than two times a year for access rights.

Basically,

You have certain rights to access, update and correct your personal information. You can always access and manage your personal information through your ClassDojo account, or by contacting us or your child's school if they created your child's account. Please see here for more information on accessing your child's information.

How can I delete my account?

We hope you love using ClassDojo now and always. However, if for some reason you ever want to delete your account (or your child's account, if you are his or her parent), you can do that at any time by contacting us at privacy@classdojo.com from the email used to create your ClassDojo account or by following the instructions here once you are signed into your ClassDojo account. If you are a parent, teacher, or school leader using the Service, you may also delete your account by logging into your account and accessing your account settings page.

When you delete your account, we delete your profile information and any other content you provide in your profile (such as your name, username, password, email address, and profile photos) and depending on the category of user you are (i.e., teacher, school leader, parent, or student), feedback points awarded in school, feedback points, Rewards and Goals awarded at home, and information collected through the mobile permissions you've granted. Information that you have shared with others, others have shared about you, or content other users may have copied and stored, is not part of your account and may not be deleted when you delete your account. Additionally, please note, that even if your account is deleted, messages sent between teachers and parents (or Portfolio Comments between teachers and students) are retained to assist schools with various recordkeeping or compliance obligations. This includes, for example, any content uploaded, including photos and videos on Messaging, Portfolios, Class Story, or School Story, which we consider messaging between parents and teachers. Additionally, some content within a Student Account, such as Student Activity Responses and other content uploaded by the student and/or teacher, will be kept after the Student Account is deleted for school legal compliance reasons (e.g., maintenance of "education records" under FERPA or "student records" under various state student privacy laws). If you would like this content deleted, please first put in a request to your (or your child's) school. If the school determines that the request should be implemented, the school may submit the request to ClassDojo by emailing privacy@classdojo.com. For more details, please read "What happens when I delete my account?" in our FAQs.

We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, even after you update or delete personal information you have provided us from our Service, your personal information may be retained in our backup files and archives for a reasonable period of time as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. If you are a California resident, we may also retain personal information as set forth under the California Consumer Privacy Act ("CCPA"). Please see our FAQ for more information if you are a California resident.

For example, if we suspend a ClassDojo account for fraud or safety reasons, we may retain certain information from that account to prevent that user from opening a new account in the future. Also, we may retain and use your personal information to the extent necessary to comply with our legal obligations.

You can always delete your account by visiting your account settings, or simply by **contacting us**. For more details on what happens when you delete your account, click **here**. Please note that some content will not be deleted given various compliance and recordkeeping obligations schools have (e.g., maintenance of "education records" under FERPA or "student records" under various state student privacy laws). Please contact your (or your child's) school if you would like all of this content deleted. If the school determines that the request should be implemented, they may submit a request to us.

Object, Restrict, or Withdraw Consent

Where you have provided your consent to the processing of your personal information by ClassDojo you may withdraw your consent at any time by changing your account settings or by sending a communication to ClassDojo specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. ClassDojo provides parents and teachers with the opportunity to withdrawal consent or 'opt-out' of receiving any future marketing communications from ClassDojo and its partners at any time. Please see the "What communications will I receive from ClassDojo?" section below for more information. Additionally, you can always decline to share personal information with us, or even block all cookies. However, it's important to remember that many of ClassDojo's features may not be accessible, or may not function properly - for example, we may not be able to remember your language preferences for you.

In some jurisdictions, applicable law may entitle you to require ClassDojo not to process your personal information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing ClassDojo will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defence of legal claims. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing as set forth below and pending the verification whether the legitimate grounds of ClassDojo override your own.

You have the right to withdraw consent for the collection of your personal information, and also opt-out of marketing communications from us. You may also be able to limit the ways in which ClassDojo uses your personal information. Just email us at privacy@classdojo.com and we'll help you right away.

Additional Information or Assistance and Article 27 GDPR Local Representative

If you are located in the European Union or the EEA, you have a right to lodge complaints about the data processing activities carried about by ClassDojo with ClassDojo's lead supervisory authority, the Information Commissioner's Office. You can find their contact details here.

Pursuant to Article 27 of the GDPR, ClassDojo, Inc. has appointed European Data Protection Office (EDPO) as its GDPR representative in the EU. You can contact EDPO regarding matters pertaining to the GDPR by sending an email to privacy@edpo.brussels, using EDPO's online request form, or writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium.

If you're located in the EU and would like to make a complaint, contact our local authority here. Additionally, you can contact ClassDojo's appointed local representative in the EU, European Data Protection Office (EDPO) using their online request form.

How long does ClassDojo keep information about me?

Non-Student Users:

We store your <u>personal information</u> for as long as it is necessary to provide the Service to you and others, including those described above. Personal information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide products and services, in which case we will delete prior to you deleting your account.

Please note that we may have to retain some information after your account is closed, to comply with legal obligations, to protect the safety and security of our community or our Service, or to prevent abuse of our Terms. You can, of course, delete your account at any time. Additionally, please note that even if your account is deleted, messages sent between teachers and parents are retained to assist schools with various recordkeeping or compliance obligations. Additionally, some content uploaded by a teacher, school leader, or parent, including photos, videos, and Portfolio Comments on Messaging, Portfolios, Class Story, or School Story, are retained at the direction of the school (e.g., for legal compliance reasons such as maintenance of "education records" under FERPA or "Student Data" under various state student privacy laws) and will not be deleted until we receive direction from the school. For more details, please read "What happens when I delete my account?" in our FAQs.

Student Users (including those who use the Services outside of school or Outside School Child Users):

Please see the "How Long Does ClassDojo Keep Children's Information?" for details on how long we retain data for student users.

We keep teacher, school leader, and parent personal information until your account is deleted, or until we no longer need it to provide you with the Service. We only keep student personal information for as long as the student's account is <u>active</u>, unless we are required by law or the student's school to retain it, or need it to protect the safety of our users. Additionally, for students, we have our 3-Tier Student Data Protection Policy that states how we delete students' information after some time. Note that some content may be kept after an account (student, parent, or teacher) is deleted for school legal compliance reasons (e.g., maintenance of "education records" under FERPA).

What communications will I receive from ClassDojo?

If you registered on ClassDojo, provided an email or phone number to us, or otherwise opted-in to receive communications from us, we may send you messages and updates regarding your account, including privacy and security notices, updates regarding the Service, and information regarding products, features or services from ClassDojo (or third-parties we believe you may be interested in). These communications may include, but are not limited to, social media updates, SMS/MMS messages, push notifications, email, and postal mail. If you have an account with us, we'll also use your email address to contact you for customer service purposes, or for any legal matters that arise in the course of business. We may receive a confirmation when you open an email from us if your device supports it. We use this confirmation to help us understand which emails are most interesting and helpful.

If you invite another person to join you on ClassDojo by providing their email address or phone number, we may contact them regarding the Service using the appropriate form of communication. If they would prefer not to receive our communications, they may opt-out using the "Unsubscribe" or "STOP" instructions contained in those communications. If, as a parent/legal guardian of a student, you provided an email address or phone number to your child's school, ClassDojo, at the direction of the school, may send an invitation to join ClassDojo via the email or phone number your student's teacher provided ClassDojo. The invitation may be sent via email or SMS/MMS text message. If, as a parent/legal guardian, you provide your telephone number to your child's school, you are consenting to ClassDojo (on

behalf of and at the direction of your child's school) sending informational text messages closely related to the school's mission.

You can always unsubscribe from receiving any of our 1) marketing emails or other marketing communications whenever you'd like by clicking the "Unsubscribe" link at the bottom of the email; 2) marketing SMS texts by replying or texting 'STOP' to '23656'; or 3) marketing push notifications by turning off push notifications on your device.

You can further indicate your preferences by contacting us using the information in the "<a href="How can I contact ClassDojo with questions?" section below. Please note that if you do not want to receive legal notices from us, such as this Privacy Policy, those legal notices will still govern your use of the Website, and you are responsible for reviewing those legal notices for changes.

From time to time, we may send you useful messages about updates or new features. You can always opt-out of these messages if you'd rather we didn't contact you.

Third-party Authentication Services

If you decide to register for a ClassDojo account through an authentication service, such as Google Login ("Authentication Service"), ClassDojo may collect personal information that is already associated with your account connected to the Authentication Service. If you choose to provide such information during registration, you are giving ClassDojo the permission to store and use such information already associated with your Authentication Service in a manner consistent with this Privacy Policy. The current list of Authentication Services that we use is listed here. Please note, that when using an Authentication Service for registering a student (or if a student is directly using their own Authentication Service), ClassDojo will not request more information from the Authentication Service than name and email address unless specifically requested or chosen to be passed by the teacher or school to ClassDojo. We will only use the email collected from student users for the purposes of login and account management. The Authentication Service may collect certain other information from you in your use of that particular service (such as G-Suite for Education). You may revoke ClassDojo's access to your account on any Authentication Service at any time by updating the appropriate settings in the account preferences of the respective Authentication Service. You should check your privacy settings on each Authentication Service to understand and change the information sent to us through each Authentication Service. Please review each Authentication Service's terms of use and privacy policies carefully before using their services and connecting to our Service. Your use of Authentication Service is subject to the applicable thirdparty terms and privacy policies. Please see here for more information on what we collect through the use of Authentication Services and how we use that information.

We may allow for users to register on our Service through an authentication service (e.g. with Google Login). If you to choose to do so, we may collect personal information that is already associated with your connected authentication service and you give us permission to use and store this information consistent with this Privacy Policy. You can revoke our access to your account on this authentication service at any time by updating the appropriate settings in the account settings of the authentication service.

Please note, that when using an authentication service for registering a student (or if a student is directly using their own authentication service), ClassDojo will not request more information from the authentication service than name and email address unless specifically requested or chosen to be passed by the teacher or school to ClassDojo

Third-party Services

The Service may contain links to websites, applications, services, or other content provided by third-parties (e.g., video players). Your use of these features may result in the collection, processing and sharing of information about you, depending on the features. Any information, including <u>personal information</u>, you choose to provide or that is collected by these third-parties is subject to that third-party's policies governing privacy and security and is not covered by our Privacy Policy.

These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you, including if you view a video through an embedded video player which is played off our Service, but may appear to still be playing on our Service. The fact that we link to a website or other third-party content is not an endorsement, authorization or representation that we are affiliated with that third-party, nor is it an endorsement of their privacy or information security policies or practices. We are not responsible for the content, features, privacy and

security practices and policies of any third-parties. We encourage you to learn about third-parties' privacy and security policies before providing them with personal information.

Links to other websites and services as well as embedded video players may be found within the Service — this Privacy Policy does not apply to those.

How will ClassDojo notify me of changes to this policy?

We may occasionally update this Privacy Policy as our business practices and legal requirements evolve or to further protect our users. You can see when the last update was by looking at the "Last Updated" date at the top of this page. We won't reduce your rights under this Privacy Policy without your explicit consent. If we make any significant changes, we'll provide prominent notice by posting a notice on the Service and/or notifying you by email (using the email address you provided), so you can review and make sure you know about them.

In addition, if we ever make material changes to the types of <u>personal information</u> we collect from children, or how we use it, we will notify parents in order to obtain <u>parental consent</u> or notice for those new practices and provide schools with the necessary information about these changes where they have obtained <u>parental consent</u> (or acted as the agent of the parent and provided consent on their behalf).

We encourage you to review this Privacy Policy from time to time, to stay informed about our collection, use, and disclosure of personal information through the Service. If you don't agree with any changes to the Privacy Policy, you may terminate your account (although we'll be sad to see you go!). By continuing to use the Service after the revised Privacy Policy has become effective, you acknowledge that you accept and agree to the current version of the Privacy Policy.

We will let you know by email and/or on our website when we make significant changes to our Privacy Policy. If we make material changes to the types of <u>personal information</u> we collect from children, or how we use it, we will notify parents, or ask for their <u>consent</u> and provide schools with the necessary information about these changes where they have obtained <u>parental consent</u> (or acted as the agent of the parent and consent on their behalf).

Is ClassDojo a Controller?

ClassDojo processes personal information both as a Processor and as a Controller, as defined in the GDPR:

When teachers, school leaders, and parents enter information directly into our Service, or when parents or students use our Premium Features outside of the school context, ClassDojo will generally be the Controller for the user data, as outlined above in "What information does ClassDojo collect?" section. However, in certain circumstances, where requested by the student's school, ClassDojo will be the Processor, and will only delete records per the school's specific instructions and will request that you make any requests for access, correction or deletion of personal information through the school. ClassDojo will respond to such requests when received from the school. Please see ClassDojo's policy on data retention and deletion.

What if I'm not in the U.S.?

ClassDojo is hosted and operated in the United States. If you use the Service or the ClassDojo Website from the European Union or the United Kingdom, or any other region with laws governing data collection, protection and use that may differ from United States law, please note that you may be transferring your personal information outside of those jurisdictions to the United States. Where we transfer, store and process your <u>personal information</u> outside of the United Kingdom, European Union or EEA, we have ensured that appropriate safeguards are in place to ensure an adequate level of protection for the rights of data subjects based on the adequacy of the receiving country's data protection laws, or <u>EU-US and Swiss-US Privacy Shield principles</u>.

By using the Service, you consent to the transfer of your personal information outside your home jurisdiction, including to the United States, and to the storage of your personal information in the United States, for the purpose of hosting, using and processing the personal information in accordance with this Privacy Policy. You further acknowledge that

these countries may not have the same data protection laws as the country from which you provided your personal information, and that ClassDojo may be compelled to disclose your personal information to U.S. authorities. You have the right to withdraw your consent at any time by contacting us as described in the "Contacting ClassDojo" section below.

Our servers are located in the U.S., so if you are using the Service from any other country, your data might be transferred to the U.S.

EU - U.S. Privacy Shield and Swiss - U.S. Privacy Shield

ClassDojo complies with the EU – U.S. Privacy Shield Framework and Swiss – U.S. Privacy Shield Framework ("Privacy Shield") as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of <u>personal information</u> transferred from the European Union and the United Kingdom and/or Switzerland as applicable to the United States in reliance on the Privacy Shield. ClassDojo has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. To learn more about the Privacy Shield program, and to view our certification, please visit https://www.privacyshield.gov/.

ClassDojo is responsible for the processing of personal information it receives, under the Privacy Shield Frameworks, and subsequently transfers to third-parties acting as an agent on its behalf. ClassDojo complies with the Privacy Shield Principles for all onward transfers of personal information from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, ClassDojo is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission and other authorized statutory bodies. In certain situations, ClassDojo may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern, please contact our U.S.-based third-party dispute resolution provider, free of charge here.

Under certain conditions, more fully described on the <u>Privacy Shield website</u>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

ClassDojo has certified to the Department of Commerce that it adheres to the Privacy Shield Principles regarding the collection, use and retention of personal information transferred from the European Union and the United Kingdom and/or Switzerland as applicable to the United States. To learn more about the Privacy Shield program, and to view our certification, please visit https://www.privacyshield.gov/.

Canada

We endeavor to provide privacy protection that is consistent with Canada's private sector privacy laws, including the Personal Information Protection and Electronic Documents Act ("PIPEDA"). For any questions regarding how we comply with PIPEDA, please contact us at privacy@classdojo.com.

ClassDojo works hard to provide privacy protections consistent with PIPEDA in Canada.

California Privacy Disclosures

Your Rights and Choices:

If you are a California resident you have the right to request that ClassDojo disclose certain information to you about our collection and use of your <u>personal information</u> over the past twelve (12) months. Please see <u>this chart</u> for the detailed categories of personal information we collect from each user type, including the sources from which the

information was collected, the business purpose for which the information was collected and the third parties with whom we share or disclose personal information for a business purpose.

California consumers also have specific rights of access, deletion and data portability regarding their personal information under the CCPA. If you are a California resident you have the right to request that ClassDojo provide the specific pieces of information that we have collected about you. You also have the right to request deletion of your personal information collected or maintained by ClassDojo. We provide these same rights to all users. Please see the [ClassDojo's commitments to providing Transparency and Your Rights] Section (#classdojo-s-commitments-to-providing-transparency-and-your-rights) for more detail on how to exercise these rights, including how we will verify requests. If you are a California resident, you may also designate a natural person or business entity registered with the California Secretary of State to act on your behalf to exercise these rights.

We will not discriminate against you for exercising any of your rights under CCPA. Unless permitted by the CCPA, we will not: Deny you goods or services. Charge you different prices or rates for goods or services, including granting discounts or other benefits, or imposing penalties.

Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably related to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Basically, If you are a California resident, the CCPA affords you certain rights of access, deletion and data portability - which we also extend to all users. Please see the [ClassDojo's commitments to providing Transparency and Your Rights] Section (#classdojo-s-commitments-to-providing-transparency-and-your-rights) for more detail on how to exercise these rights, including how we will verify requests. We will not discriminate against you for exercising any of your rights under the CCPA. Additionally, if you are a California resident you are entitled to certain disclosures regarding our collection and use of your personal information over the past twelve (12) months - Please see this chart for the detailed categories of personal information we collect from each user type, including the sources from which the information was collected, the business purpose for which the information was collected and the third parties with whom we share or disclose personal information for a business purpose.

Do Not Sell: As stated throughout this Privacy Policy, ClassDojo **does not sell**, and will not sell, <u>personal information</u> of any ClassDojo Services user to any third-party for any purpose - including for advertising or marketing purposes. Furthermore, we do not share or disclose personal information with any third-parties except in the limited circumstances described in this Privacy Policy and as set forth here.

Do Not Track: Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or onlines services. However, we do not recognize or respond to browser-initiated DNT signals, as the Internet industry is still working to determine what DNT means, how to comply with DNT, and how to create a common approach to responding to DNT. For more information on "do not track," please visit www.allaboutdnt.org.

Third-parties that have content embedded on the Service, such as a social feature, or an embedded video player, may set cookies on a user's browser and/or obtain information about the fact that a web browser visited the Service from a certain IP address. Third-parties cannot collect any other personally identifiable information from the Service unless you provide it to them directly.

The ClassDojo Service does not track our users over time across third-party websites to provide **behaviorally-targeted advertising** and thus does not respond to Do Not Track signals.

Notice for Minors (users under 18)

If you are under the age of 18, or the parent of a child using ClassDojo under the age of 18 residing in California, you are entitled to request removal of content or information you (the minor) have publicly posted on our Service. Currently, we do not allow minors to post content to share publicly, but we do still allow minors (or the minor's parents if under 13) the option to delete <u>personal information</u> associated with their user accounts or content that they upload through their student account (which is not shared publicly (only the student's parents, teachers, or school leaders can view). If you are a minor, or the parent of a minor under 13, and would like to delete personal information associated with your account or content you uploaded through your account, please follow the directions set forth in the "ClassDojo's commitments to providing Transparency and Your Rights" section, which may include the need to contact your

school first. Although we offer deletion capabilities on our Service, you should be aware that the removal of content may not ensure complete or comprehensive removal of that content or information posted through the Service, as there may be de-identified or recoverable elements of your content or information on our servers in some form. Additionally, we will not remove content or information that we may be required to retain at the direction of the school or under applicable laws.

If you are a minor or parent of a minor, you may delete information per the "How can I delete my account?" section.

"Shine the Light" Law

Pursuant to California Civil Code Section 1798.83(c)(2), ClassDojo does not share <u>personal information</u> with third parties for their own direct marketing purposes unless you affirmatively agree to such disclosure. California customers can receive more information about our compliance with this law or to make a request under California Civil Code Section 1798.83 by sending us an email at <u>privacy@classdojo.com</u> or by writing to us as set forth in "How Can I Contact ClassDojo with Questions" section below:

How can I contact ClassDojo with questions?

If you have any questions or concerns about this Privacy Policy or how we protect our community, please contact us at privacy@classdojo.com - we'd love to help. If you'd like, you may also write to us at:

ClassDojo, Inc. 735 Tehama Street San Francisco, CA 94103 Attention: Chief Privacy Officer

Questions? We're here to help! Email us any time at privacy@classdojo.com.

Further Privacy and Security Resources

For teachers, school leaders, parents, students, or administrators seeking more information on how we provide safety on ClassDojo, we provide privacy and security related materials on our Privacy Center as well as on our Security Whitepaper.

For Key Terms that are used in this Privacy Policy and our Terms of Service, please visit this Key Terms FAQ.

For our Online Tracking Technologies Policy, please see here.

For our short video for students that highlights the most important details in our Privacy Policy that they should know about, please see here.

For our chart that details the personal information we collect, how we use it, and where it is stored, please see here.

If you'd like some more safety and privacy resources for your school, please visit our <u>Privacy Center</u> or our <u>Security Whitepaper</u>. For definitions of Key Terms used in this policy and our Terms of Service, <u>visit here</u>.