COPPA DIRECT NOTICE TO EDUCATIONAL INSTITUTIONS[1]

Updated on: October 29, 2026

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

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

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

In our commitment to protecting children's privacy, Edpuzzle participates in the FTC-approved COPPA "Safe Harbor" Program from iKeepSafe, and has been granted the iKeepSafe FERPA, COPPA and CSPC seals signifying that our website and apps have been reviewed and approved for having policies and practices surrounding the collection, use, maintenance and disclosure of personal information from children consistent with the iKeepSafe FERPA, COPPA and CSPC programs guidelines.

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- Do you have to share this Notice with parents?
- Where can you find additional information on our privacy practices?
- How can you contact Edpuzzle with any questions or concerns?

[1] This Notice is intended to provide the information required under the Children's Online Privacy Protection Act (COPPA) in the context of educational use of the Edpuzzle service available at https://edpuzzle.com. This Notice should be read together with Edpuzzle's Privacy Policy (last updated May 11, 2026) which provides additional details regarding Edpuzzle's data processing practices. Where applicable, Edpuzzle may provide supplemental feature-specific notices regarding certain advanced analytics or AI-assisted features. In the event of any inconsistencies, this Notice is intended to address the specific requirements of COPPA.

Why are we providing you with this Notice?

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

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

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

Where certain advanced analytics, AI-assisted, or other specialized educational features are enabled by the Educational Institution or authorized teacher, Edpuzzle may provide feature-specific or supplemental notices in order to provide additional information regarding how those features operate, what categories of student information they use, how long such information is retained, and which service providers support them.

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

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

- Edpuzzle collects the minimal amount of information from students necessary to create accounts in our service.
- Certain advanced analytics and AI-assisted teacher-support features are optional and may be enabled or disabled by the school, district, or authorized teacher, depending on the deployment model and controls made available within the Service.
- Edpuzzle does not sell or rent students' personal information (or of any of its users, for that matter) to any third party for any purpose, including for advertising or marketing purposes.
- No student's profile is made available or visible to the public, or to any other students, through Edpuzzle. If the teacher chooses to display Edpuzzle in their classroom, either by utilizing the "live mode" feature of the Service or by projecting via a smartboard or interactive whiteboard, students physically present in that classroom may see other students' names, responses, comments or total scores in a given assignment. Furthermore, student accounts cannot interact with other

student accounts, nor can they interact with social media/networks. Interaction of student accounts is limited to interaction with their teacher.

What student data does Edpuzzle use to provide the service?

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

Category of Data	Data Elements Collected by Product	Used by Edpuzzle (Required R - Optional O)
Application Technology MetaData	IP addresses, use of cookies, etc.	R
	Other application technology metadata	
Application Use Statistics	Metadata on user interaction with application	R
Assessment	Standardized test scores	
	Observation data	
	Voice recordings: student audio responses and automatically generated text transcripts of those responses (generated upon upload; displayed to the student and the student's teacher; used to support teacher review and feedback, and accessibility related functionality).as part of the service)	O
	Other assessment data	
Attendance	Student school (daily) attendance data	
	Student class attendance data	
Communication	Online communication captured (emails, blog entries)	O[2]
Conduct	Conduct or behavioral data	O[3]
Demographics	Date of birth	
	Place of birth	
	Gender	
	Ethnicity or race	

[2] Limited to comments and private messages exchanged between a student and the student's teacher in connection with a lesson, assignment, or response. Edpuzzle does not provide student-to-student messaging, public forums, blogs, or general chat functionality

[3] Only when a school counselor uses the platform for counselor-selected activities.

Category of Data	Data Elements Collected by Product	Used by Edpuzzle (Required R - Optional O)
	Language information (native, or primary language spoken by student)	
	Other demographic information	
Enrollment	Student school enrollment	R
	Student grade level	R
	Homeroom	
	Guidance counselor	
	Specific curriculum programs	
	Year of graduation	
	Other enrollment information	R (Subject: e.g. mathematics)
Parent/Guardian Contact Information	Address	
	Email	
	Phone	
Parent/Guardian ID	Parent ID (created to link parents to students)	
Parent/Guardian Name	First and/or last	
Schedule	Student scheduled courses	
	Teacher names	R
Special indicator	English language learner information	
	Low income status	
	Medical alerts/health data	
	Student disability information	
	Specialized education services (IEP or 504)	
	Living situations (homeless/foster care)	
	Other indicator information	
Student contact information	Address	

Category of Data	Data Elements Collected by Product	Used by Edpuzzle (Required R - Optional O)
	Email	O(student email is only collected when using Edpuzzle through an LMS integration or Single Sign-On solution)
	Phone	
Student identifiers	Local (School district) ID number	
	State ID number	
	Provider/App assigned student ID number	R
	Student app username	R
	Student app passwords	R
Student name	First and/or last	R
Student In App Performance	Program/application performance (typing program- student types 60 wpm, reading program-student reads below grade level)	R
	Assignment responses, grades, attempts, lesson interaction data, and related performance information used for teacher-facing analytics and instructional insights, including class performance patterns and common learning gaps, where such features are enabled by the Educational Institution or authorized teacher.	O
Student Program Membership	Academic or extracurricular activities a student may belong to or participate in	
Student Survey Responses	Student responses to surveys or questionnaires	R
Student Work	Student generated content; writing, pictures, etc.	O
	Other student work data	
Transcript	Student course grades	R
	Student course data	R
	Student course grades/ performance scores	R

Category of Data	Data Elements Collected by Product	Used by Edpuzzle (Required R - Optional O)
	Other transcript data	
Transportation	Student bus assignment	
	Student pick up and/or drop off location	
	Student bus card ID number	
	Other transportation data	
Other data collected	For data obtained from LMS integrations please consult Edpuzzle's Privacy Policy at https://www.edpuzzle.com/privacy under the "Information Collected Automatically" section	O
	Interface language preference (customizable by the user through their account settings page)	R
None	No Student Data collected at this time. Provider will immediately notify LEA if this designation is no longer applicable.	

Please note that Edpuzzle also offers teachers the possibility to use Edpuzzle through its "Open Class" feature that allows students to use Edpuzzle through a student–teacher unique restricted session without providing any personal data.

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

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

Core educational functionality:

- To create the necessary accounts to use the service.
- To provide teachers with analytics on student progress.
- Where certain advanced analytics or AI-assisted teacher-support features are enabled by the school, district, or authorized teacher, to provide AI-assisted teacher-support and advanced analytics features, including features that generate teacher-facing summaries about student progress, class performance patterns, and common learning gaps based on assignment responses, grades, attempts, and related lesson context, in order to support instructional review and follow-up. These features may create derived or inferred information about student progress, understanding patterns, class trends, and common misconceptions for teacher review within the Service. These features are not designed or intended to make solely automated academic, disciplinary, placement, eligibility, or other high-impact decisions about students without meaningful teacher review.

- To support core educational functionality through automated processing of content: where students submit audio responses or teachers upload audio or video content, Edpuzzle may automatically generate text transcriptions of such content. Automated transcription functionality may be provided using internally hosted software or, in limited cases, trusted cloud-based service providers acting solely on Edpuzzle's behalf. These transcripts are used solely to support the provision of the service, including enabling teacher review, facilitating feedback, supporting accessibility, and, where necessary, moderation of content. Transcripts are treated as part of the student's response within the service and are not used for any commercial purpose unrelated to the provision of the service requested by the Educational Institution.
- To send in-app and push notifications to users, if applicable (e.g., by letting students know if an assignment is due soon).

Service improvement and operations:

- To monitor and analyze the functioning and performance of the Service and to personalize content within the Service;
- to assess the quality of the Service, improve it, and develop new educational products or features, using de-identified information only. For these purposes, Edpuzzle may de-identify students' personal information. Edpuzzle does not use students' personal information for these purposes or to train its own artificial intelligence models, does not attempt to re-identify de-identified information, and contractually prohibits recipients from doing so.

Security and compliance:

- To secure and safeguard personal information and our community.
- To ensure our Service is used in accordance with our Terms of Service or as required by law, to enhance its security and performance, and monitor and prevent fraudulent activity
- To comply with applicable laws and regulations.

Does Edpuzzle disclose student personal information to third parties?

Disclosure of children's personal information is limited to third-party service providers that are necessary to deliver our services, as allowed by law, or to ensure the security of the service and its users. This may include providers that support hosting, infrastructure, analytics, security, transcription, and, where certain advanced analytics or AI-assisted teacher-support features are enabled by the school, district, or authorized teacher, providers supporting such features.

For an up-to-date list of our third-party service providers, and additional information regarding the purposes for which they support the Service, please consult our Privacy Policy and Trust Center.

Edpuzzle does not use personal data contained in inputs, prompts, or outputs submitted to AI-assisted features to train third-party AI models. Certain advanced analytics, automated transcription, and AI-assisted teacher-support features may require limited disclosure of student personal information to third-party service providers acting on Edpuzzle's behalf solely for the purpose of providing the requested educational functionality. Such providers are contractually prohibited from using student personal information for their own commercial purposes, including training artificial intelligence models.

Where Edpuzzle uses AI-assisted features, personal information is processed only as necessary to provide the Service and for the purposes described in this Notice and the Privacy Policy.

In the educational context, children's personal information is not disclosed for the purpose of training artificial intelligence models.
Edpuzzle's commitments regarding its own use of students' personal information, including for artificial intelligence training and product development, are stated in the section on purposes of use.
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Does Edpuzzle use or share student personal information for commercial purposes not related to the provision of the Edpuzzle service requested by the Educational Institution?

No.

How can an Educational Institution review students' personal information?

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

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

Edpuzzle will delete student personal information upon written request from the Educational Institution. In the absence of such a request, Edpuzzle will automatically delete student personal information when no longer needed for the purposes for which it was received, which will be deemed to occur upon eighteen (18) months of student-user account inactivity. Please note that deletion will not comprise (i) student data that has been de-Identified or (ii) backups of student data that are part of our disaster recovery storage system (we may retain backups for an additional term of up to three (3) months).

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

- Pseudonymization and encryption: TLS v1.2 and v1.3 for all data in transit between clients and server and AES256-CBC (256-bit Advanced Encryption Standard in Cipher Block Chaining mode) for encrypting data at rest.
- Password protection.
- Ensure the ongoing confidentiality, integrity, availability and resilience of our processing systems and services.
- Restore the availability and access to personal data in a timely manner in the event of a technical incident.
- Regularly test, assess and evaluate the effectiveness of technical and organizational measures ensuring the security of the processing.

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

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

As mentioned above:

- student data will be deleted upon written request from the School or, in the absence of such a request, when no longer needed for the purposes for which it was received, which will be deemed to occur upon eighteen (18) months of end-user account inactivity.
- Where certain advanced analytics or AI-assisted teacher-support features are enabled by the school, district, or authorized teacher, records generated by advanced analytics and AI-assisted teacher-support features, including derived or inferred information generated through such features, are retained in accordance with Edpuzzle's general retention and deletion framework applicable to student information.
- Deletion will not comprise student data that has been de-identified or backups of student data that is part of our disaster recovery storage system (which we may retain for an additional term of three (3) months).

Do you have to share this Notice with parents?

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

Where can you find additional information on our privacy practices?

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

How can you contact Edpuzzle with any questions or concerns?

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

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