PRIVACY NOTICE: PROCESSING PUBLIC DATA VIA OFFICIAL APIS (YOUTUBE AND X)
Effective date: July 2, 2025

This Privacy Notice (the "Notice") explains how EDpuzzle, Inc. (including its subsidiaries and affiliates, hereinafter referred to as "Edpuzzle," "we," "us," "our") collects, uses, shares, and safeguards personal data that is publicly available on YouTube and X (formerly Twitter) made accessible to us via their respective official APIs.This processing is conducted in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR) and US privacy laws (collectively, "Applicable Regulations").

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1. DATA CONTROLLER INFORMATION

EDpuzzle, Inc.
833 Market St., Suite 427
San Francisco, CA 94103, USA
Data Protection Officer: privacy@edpuzzle.com

Our EU representative may be reached at the following address:

Av. Pau Casals 16, Pral. 1-A
08021 Barcelona, Spain
privacy@edpuzzle.com
Attention: Data Protection Officer

Residents from the United Kingdom ("UK") may reach out to GDPR Local Ltd., which has been appointed as Edpuzzle's representative in the UK, at the following physical and electronic addresses:

1st Floor Front Suite 27-29 North Street,
Brighton England BN1 1EB
contact@gdprlocal.com
Attention: Adam Brogden

2. SOURCE OF THE PERSONAL DATA

We collect personal data that is publicly available and made accessible by YouTube and X to us through their official API services. This includes content shared by YouTube/X users in accordance with their privacy settings on those platforms.

- from YouTube, via the YouTube data API

- from X, via the X API (formerly Twitter API)

We do not collect or process non-public data or data restricted by users or platform settings.

3. CATEGORIES OF PERSONAL DATA COLLECTED

From YouTube: metadata on channels, playlists, videos, comments and metrics on videos and channels.

From X: metadata on users, tweets, tweets' media, tweets' comments, tweets' metrics, and metadata on Edpuzzle's X account

Edpuzzle does not collect private messages, email addresses, or other restricted information.

4. PURPOSE OF PROCESSING

We process the above data to:

- analyze public discourse, trends, and engagement patterns
- generate aggregate insights related to education, learning, or relevant topics
- support product improvement, marketing, and business decision-making

We do not:

- profile individuals or make automated decisions
- combine with internal customer/user data sets
- sell or share the data for advertising or commercial purposes

If content collected from YouTube or X is later deleted by the original user, restricted in visibility, or removed by the platform, we seize any further processing of that content and make reasonable efforts to delete or deprecate the relevant data from our systems. We use automated checks and periodic refreshes to honor these obligations in line with platform policies and Applicable Regulations.

Note on internal platform usage: we also process Edpuzzle platform usage data from users (limited to teachers) who interact with our services to improve performance and usability of our platform. This internal data is governed by a separate privacy notice (accessible at edpuzzle.com/privacy) and is strictly segregated from the public data obtained via APIs. The two data sets are not combined, cross referenced, or enriched together.

5. LAWFUL BASIS FOR PROCESSING (GDPR)

Our lawful basis for processing this data is article 6(1)(f) of the GDPR (legitimate interest in analyzing publicly available data to enhance our services). We have conducted a Legitimate Interest Assessment (LIA) to confirm that our interests do not override the rights of individuals.

6. CONSUMER RIGHTS (CCPA / CPRA, VCDPA, etc.)

If you are a resident of California, Virginia, Colorado, Connecticut, or Utah, you have the right to:

- know what personal data we collected and how it is used
- request deletion (with exceptions)
- opt out of sale or sharing of personal data (please note that Edpuzzle does neither)
- correct inaccurate information

To exercise your rights, contact us at privacy@edpuzzle.com.

7. INTERNATIONAL DATA TRANSFERS (EEA / UK)

Edpuzzle is headquartered and hosted in the United States, as well as most of our third-party service providers. Hence, personal data we collect from you will be transferred to and processed in the United States. Transfers to the United States are based on GDPR-compliant mechanisms. Please refer to the section “European Economic Area / UK” at our privacy policy accessible at edpuzzle.com/privacy.

8. DATA RETENTION

We retain the data only as long as needed to fulfill the above purposes, and according to our internal data retention policy. Where possible, we anonymize or aggregate the data to minimize risk.

9. SECURITY MEASURES

We Implement appropriate technical and organizational measures including:

- encryption of data in transit and at rest
- role-based access restrictions
- separation from internal data
- monitoring and logging for auditability

10. USE OF OFFICIAL APIs AND PLATFORM TERMS

We only use:

- the YouTube Data API, and in compliance with the YouTube API ServicesTerms of Service and Google API Services: User Data Policy.
- the X API, in compliance with the X Developer Agreement and Policy

We do not use data for:

- advertising or retargeting
- resale or enrichment
- surveillance of creditworthiness decisions

We honor all platform-specific restrictions and do not attempt to bypass or repurpose the data outside the disclosed scope.

11. CONTACT AND COMPLAINTS

Please email privacy@edpuzzle.com if you have any questions or complaints. If you are in the EEA or the UK and believe your data is processed unlawfully, you may file a complaint with your local data protection authority.

12. UPDATES TO THIS PRIVACY NOTICE

We may update this Notice from time to time. Material changes will be communicated by updating the effective date.