

# **Sculoo Privacy Policy**

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## 1. Introduction

**EdTechQuest, LLC** ("**Company**" or "**We**") respects your privacy and is committed to protecting it through our compliance with this policy.

This Privacy Policy ("**Policy**") describes the types of information we may collect from you or that you may provide when you are using the **Sculoo** platform ("**Platform**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy is designed to comply with the Children's Online Privacy Protection Act ("**COPPA**"), the Protection of Pupil Rights Amendment ("**PRRA**"), and applicable state law.

The Platform is designed solely for educational purposes, including the development of employability, critical thinking, leadership, and self-regulation skills. It is not intended to diagnose, treat, or provide therapy or counseling services. Any skill-building or reflection activities are educational in nature and should be guided by a parent, guardian, or educator.

## 2. Children Under the Age of 13

Our Platform is directed to K–12 students and may collect information from children under 13 years of age only with verifiable parental consent or school authorization acting on behalf of a parent, consistent with COPPA requirements.

We do not knowingly collect personal information from children under 13 without such consent. If we learn that we have collected personal information from a child under 13 without proper consent, we will promptly delete that information. Parents or guardians may contact us at [support@sculoo.com](mailto:support@sculoo.com) to review or delete their child's information.

## 3. Parental Rights and Access

Parents and guardians have the right to:

- Review the personal information collected from their child.
- Request deletion of their child's personal information.
- Refuse further collection or use of their child's data.

Requests may be submitted to support@sculoo.com or through the child’s school administrator.

#### 4. Sensitive Data (PPRA Compliance)

We do not collect information concerning a student’s political affiliations, religious practices, family income, mental or psychological state, or other sensitive topics.

#### 5. Use of Information

We use personal information solely to operate, maintain, and improve the Platform; provide educational and support services; communicate with You or Your child as permitted by law; and fulfill our contractual obligations to parents and users. We do not use personal information or Student Data for targeted advertising or behavioral profiling. We may create, use, and own Aggregated Data, De-Identified Data, Platform Data, and Derived Data generated through users’ of the Platform, provided such data cannot reasonably be used to identify an individual. Such data may be used for analytics, research, product development, and other lawful business purposes, including in connection with a merger, acquisition, or other corporate transaction.

The Platform may use automated analytics or adaptive learning algorithms to personalize user experiences and measure skill growth. No automated decisions are made that affect a user’s educational standing or opportunities. All insights are shared with parents and/or educators solely to support educational development.

“**Aggregated Data**” means data that has been combined or summarized so that it cannot reasonably be used to identify any individual, including statistical, analytical, or usage data derived from multiple users.

“**De-Identified Data**” means data that has been stripped of personal identifiers and processed so that it cannot reasonably be linked to a specific individual, household, or device.

“**Platform Data**” means operational, technical, and usage data generated through access to or use of the Services, including logs, telemetry, diagnostics, performance metrics, and analytics, but excluding personal information.

“**Derived Data**” means data created or generated by the Company from processing or analyzing personal information, Platform Data, or Aggregated Data, including insights, metrics, models, predictions, or other outputs that do not reveal personal information.

#### 6. Disclosure of Information

We may disclose student data only:

- To parents or legal guardians associated with a child's account;
- As required by law or valid legal process, including in response to a subpoena, court order, or government inquiry;

To service providers and subprocessors that assist in operating, hosting, securing, or improving the Platform, but only under written agreements that require the protection of student data and prohibit its use for any purpose other than providing services to us;

- In aggregated, de-identified, or otherwise non-identifiable form, which cannot reasonably be used to identify any individual user, and which we may use or disclose for analytics, research, product development, and other lawful business purposes, including in connection with a merger, acquisition, or other corporate transaction.

We do not sell, rent, or trade user data.

#### 7. Data Security and Breach Notification

We employ administrative, technical, and physical safeguards to protect data from unauthorized access or disclosure. In the event of a data breach involving child data, EdTechQuest will promptly notify you to enable it to expeditiously implement its response program.

#### 8. Data Retention and Deletion

We retain child data only for as long as necessary to provide educational services or as required by law. Upon request from the educational institution or parent, we will delete or anonymize such data.

#### 9. Changes to Our Privacy Policy

Material updates will be communicated directly to parents or legal guardians and posted prominently on the Platform. Continued use of the Platform following changes indicates consent to the revised terms.

#### 10. Contact Information

Questions, requests for data access or deletion, or general privacy inquiries may be directed to: support@sculoo.com