# ZenGengo and COPPA

By law, schools in the United States must comply with the Children's Online Privacy Protection Act (COPPA) before using the service. This law requires written parental consent for children under the age of 13 before they can use online services that store any sort of personal information (including assignments, performance data, and so on). This information will be protected as per the ZenGengo Privacy Policy.

ZenGengo collects the following information from students:

- Name (real or nickname)
- Student number (optional)
- E-mail address (optional)
- Voice recordings (if assigned by teacher)
- Video recordings (if assigned by teacher)

N.B. ZenGengo only requires students to disclose what is reasonably necessary. The teacher is able to determine how much and what kind of data they would like to collect from students when they submit assignments. A random number or nickname can be used in lieu of a real name if preferable.

How do we collect student data?

Teachers and students directly provide ZenGengo with most of the data we collect. We collect data and process data from students when:

Students submit assignments that teachers have created

How do we use student data?

ZenGengo collects student data so that we can:

- Help teachers identify which students have submitted assignments
- Determine scores of submitted assignments and attribute scores to the correct student

How do we store student data?

ZenGengo stores student data on secure servers in one of the following locations: Japan (Tokyo), Australia (Sydney), USA (California) or EU (Ireland). ZenGengo will keep student data until the related assignments or submissions are deleted by the teacher.

What third-party operators have access to student data?

The following operators are used by ZenGengo:

Entity name	Entity type	Entity country
Amazon Web Services, Inc.	Cloud service provider	United States
Amazon Web Services Ireland Ltd	Cloud service provider	Ireland
Amazon Web Services Australia Ltd	Cloud service provider	Australia
Amazon Web Services Japan Ltd	Cloud service provider	Japan

# Rights of parents concerning student data

ZenGengo would like to make sure that parents are fully aware of their rights regarding the personal data of their children. Every parent is entitled to the following:

### The right to access

You have the right to request ZenGengo for copies of your child's personal data. We may charge you a small fee for this service.

## The right to rectification

You have the right to request that ZenGengo correct any information you believe is inaccurate. You also have the right to request ZenGengo to complete the information you believe is incomplete.

#### The right to erasure

You have the right to request that ZenGengo erase your child's personal data, under certain conditions.

## The right to restrict processing

You have the right to request that ZenGengo restrict the processing of your child's personal data, under certain conditions.

#### The right to object to processing

You have the right to object to ZenGengo processing of your child's personal data, under certain conditions.

#### The right to data portability

You have the right to request that ZenGengo transfer the data that we have collected to another organization, or directly to you, under certain conditions. If you make a request, we have one month to respond to you.

If you would like to exercise any of these rights, please contact us at our email: support@zengengo.com.

# Note to teachers

If you are a teacher with students under the age of 13, you will need to notify their parents and obtain their consent before using the service with your students.

You can download the ZenGengo / COPPA consent form  $\underline{\text{here}}$ . We recommend keeping these forms on file once they are completed.