

**LEARNADOODLE INC**  
**PRIVACY POLICY**  
**Effective date: June 1, 2025**

Learnadoodle Inc ("Company," "we," "us," or "our") respects your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our website <https://learnadoodle.com> ("Site") and our mobile application Learnadoodle ("App"), collectively the "Services." By accessing or using our Services, you agree to the practices described in this Privacy Policy. If you do not agree, please do not use the Services.

## 1. Information We Collect

We collect the following categories of information:

### A. Personal Information Provided by You

- Parent name and email
- Child name or nickname (optional)
- Child age (reported in years)
- Educational records (e.g., progress, notes, uploaded documents)
- Account credentials (email, password)
- Payment data (if applicable, via Stripe or platform stores)

### B. Automatically Collected Data

- Device information (e.g., IP address, browser type, operating system)
- Usage data (e.g., pages visited, actions in the app)
- Via Google Analytics (using cookies to track usage)

### C. Sensitive Information

- Educational history, progress notes, uploaded documents
- We do not collect biometric data, precise geolocation, or browsing history outside our Services.

### D. California-Specific Categories (CCPA/CPRA)

- Identifiers (e.g., name, email, IP address)
- Personal information under Cal. Civ. Code § 1798.80 (e.g., payment data, if collected)
- Characteristics of protected classifications (e.g., child's age)
- Internet or electronic network activity (e.g., usage data)
- Professional or employment-related information (e.g., educational records)

## E. AI Interaction

Our Services include an AI-powered assistant that provides educational support. When you use this feature, you are interacting with an AI system, not a human.

## 2. How We Use Your Information

We use your data to:

- Operate and improve the Services
- Support personalized planning and educational tools
- Respond to inquiries and provide support
- Ensure child safety and compliance (e.g., age gating under COPPA)
- Maintain security and prevent fraud
- Comply with legal obligations (e.g., COPPA, GDPR, CCPA/CPRA)

We do not use your information for advertising or selling. We do not share your data except with core service providers necessary for functionality.

### **Lawful Basis for Processing:**

- Consent: For parental consent under COPPA and for optional features (e.g., newsletter subscriptions).
- Contract: To provide Services as agreed (e.g., account creation, educational tools).
- Legitimate Interests: For security, fraud prevention, and service improvement, balanced against your rights.
- Legal Obligation: To comply with applicable laws (e.g., COPPA, GDPR, CCPA/CPRA).

## 3. Data Sharing and Disclosure

We share your data only with:

- Supabase (database provider for data storage)
- Render (hosting provider for limited data, e.g., IP addresses in logs, if applicable)
- Apple and Google (platform account services)
- Google Analytics (using cookies)
- Stripe (for future payment processing, if applicable)

We do not sell or share your information for advertising, cross-context behavioral advertising (as defined by CCPA/CPRA), or profiling. We do not disclose sensitive personal information for purposes other than those permitted under CCPA/CPRA (e.g., providing Services, ensuring security).

### **Third-Party Processors:**

- All processors are bound by data protection agreements ensuring GDPR compliance.
- We ensure processors implement appropriate technical and organizational measures.

## 4. Children's Privacy

Learnadoodle is designed for use by parents, with limited features accessible to children under 13 via parent-managed accounts. To comply with COPPA:

- We collect minimal child data (name or nickname, age) only with verifiable parental consent.
- Parental consent is obtained via credit card authentication (for paid plans, when implemented) or email-based confirmation with follow-up verification.
- Child data is not made public or shared with third parties except as required for service functionality.
- Parents may review, delete, or restrict further collection of their child's data by contacting [contact@learnadoodle.com](mailto:contact@learnadoodle.com).
- We provide clear notice about data practices in parent-facing communications
- We moderate AI-generated content to ensure it is safe and appropriate for minors.
- We monitor AI interactions to detect and address safety risks, with reporting options available at [contact@learnadoodle.com](mailto:contact@learnadoodle.com).
- We provide educational resources on safe AI use, accessible on our website or in the App, to guide minors and parents.

## 5. International Users

If you are located outside the United States (e.g., in the EU), your data will be transferred to and stored in the United States. By using our Services, you consent to this transfer. We comply with GDPR by:

- Processing data under a lawful basis (see Section 2).
- Offering data subject rights (access, correction, deletion, restriction, portability, objection).
- Using Standard Contractual Clauses (SCCs) for data transfers to the U.S.
- Conducting Data Protection Impact Assessments (DPIAs) for high-risk processing.

## 6. Your Rights

### GDPR Rights (EU Residents):

- Access and review your data
- Correct inaccuracies
- Request deletion or restriction of processing
- Data portability
- Object to processing based on legitimate interests
- Withdraw consent (where applicable)
- Lodge a complaint with a supervisory authority (e.g., your local EU data protection authority)

## CCPA/CPRA Rights (California Residents):

- Know what personal information we collect, use, or disclose
- Request deletion of your personal information
- Opt-out of the sale or sharing of personal information (not applicable, as we do not sell/share)
- Limit use of sensitive personal information (not applicable, as we use it only for permitted purposes)
- Non-discrimination for exercising your rights

To exercise your rights, contact us at [contact@learnadoodle.com](mailto:contact@learnadoodle.com). We will respond within 30 days (GDPR) or 45 days (CCPA/CPRA), with possible extensions as permitted by law. We may require identity verification to protect your data.

## 7. Data Retention

We retain user data for 30 days after account deletion to allow recovery if deletion was accidental. After 30 days, data is permanently deleted, except where longer retention is required by law (e.g., tax or audit purposes). During the beta phase, no payment data is collected.

## 8. Data Security

We use industry-standard safeguards, including:

- Encryption at rest and in transit
- Access controls and authentication
- Secure infrastructure via Supabase and Render

However, no system is 100% secure. Use the Services at your own risk. We will notify you of any data breach as required by law (e.g., within 72 hours under GDPR).

## 9. Cookies and Tracking

We use cookies, small text files stored on your device, to operate and improve our Services. We use:

- **Essential Cookies:** Required for functionality (e.g., login, session management).
- **Analytics Cookies:** Set by Google Analytics to track usage (e.g., pages visited).

We obtain your consent for analytics cookies via a cookie banner when you visit our site, allowing you to accept or deny these cookies. You can also manage cookies through your browser settings or opt out of Google Analytics at <https://tools.google.com/dlpage/gaoptout>. We do not use cookies for advertising.

## 10. Changes to This Policy

We may update this Privacy Policy. Significant changes will be notified via email or in-app notice at least 30 days before taking effect (or as required by law). Continued use after such notice constitutes acceptance.

## 11. Contact Us

If you have questions or requests, please contact us:

Learnadoodle Inc

Email: [contact@learnadoodle.com](mailto:contact@learnadoodle.com)

Phone: (803) 728-1336 (note: this is not a toll-free number)

**California Residents:** For unresolved complaints, contact the California Department of Consumer Affairs:

Consumer Information Division

1625 North Market Blvd., Suite N 112

Sacramento, CA 95834

Phone: (800) 952-5210 or (916) 445-1254

**EU Residents:** Contact your local data protection authority for complaints.