



### Kahoot! at school product resources

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Modified: August 9<sup>th</sup> 2021

# Kahoot Student Privacy Policy

## 1. Overview

Kahoot! is dedicated to making learning awesome and we take the privacy of our users seriously. Keeping students' personal information safe is a priority at Kahoot!. This Student Privacy Policy explains how we use the personal information we collect from and about students when they engage with Kahoot! in the classroom through the products that are offered to schools and teachers in Kahoot! EDU and our individual plans for teachers (the "School Services"). As set forth below, we use such personal information solely as a service provider or "data processor" to our school and school district customers.

To learn about our practices with respect to other users, including teachers who sign up for Kahoot! and student accountholders who use Kahoot! outside of the school environment, please read our [Privacy Policy](#).

## 2. Our handling of student information

As a trusted provider of tools that help teachers and schools make learning awesome for students, Kahoot! is particularly concerned about the use of students' personal information. We only request the personal information of

students that we need to provide the School Services, and we comply with privacy laws, such as the Family Educational Rights and Privacy Act (“FERPA”) and the Children’s Online Privacy Protection Act (“COPPA”), as applicable.

Kahoot! does not collect, retain, use or share students’ personal information, except as necessary for authorized school purposes, at the direction of our school and school district customers. Without limitation, this means that:

- We do not sell students’ personal information.
- We do not serve targeted ads on our platforms and do not use information we collect to serve targeted ads on other services. Kahoot! does not use or disclose information collected through our services for any targeted advertising purposes.
- We do not build a profile of a student other than in support of authorized school purposes.
- We do not retain students’ personal information beyond the time period required to support the authorized school purposes.

We support our school customers in providing parents and eligible students with access to their personal information and in fulfilling other requests that parents and eligible students may make, such as to request deletion of students’ personal information or to refuse its further collection or use. Kahoot! maintains a comprehensive program designed to protect the security, privacy, confidentiality and integrity of students’ personal information.

### **3. Students’ Personal information**

### 3.1 Personal information we collect from students

**Student players:** Kahoot! collects only a nickname, which is anonymous and not linked to a persistent identifier, from a student who merely plays a Kahoot! game. We use the nickname to permit the student to play.

**Personal information collected at a teacher's direction:** Certain features of the School Services permit a teacher to collect information about the class, as well as about individual students, such as attendance, results, answers submitted when playing Kahoot! games (including in response to open-ended questions) and performance on Kahoot! games. We use such information only to provide the services to the teacher, such as to permit the teacher to interact with students and track their progress over time. A school or teacher may permit students to share information with others, such as with other students in the same class, school, or school district.

### 3.2 Information collected automatically

No personal information is collected automatically from students who engage with Kahoot! through the School Services. Product usage data that is collected by Kahoot! from the School Services is always anonymized or aggregated and cannot be linked to individual students.

### 3.3 Anonymized information

We may anonymize and/or aggregate personal information so that it no longer identifies any student. We may use and disclose such anonymized and/or aggregated information for any purpose, including for analytics

purposes, to help us understand how our products are used and improve upon them.

## 4. Security

Kahoot! maintains a comprehensive security program designed to protect the security, privacy, confidentiality and integrity of Personal Information within our organization. We have in place appropriate and reasonable technical and organizational measures designed to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. Our security measures include data encryption, firewalls, data use, and access limitations for our personnel and service providers, and physical access controls to our facilities. Our service providers that process payment data, maintain the applicable Payment Card Industry (PCI) compliance levels.

Details about our security program can be found here. If you have any questions about the security of your Personal Information, you may contact us at [privacy@kahoot.com](mailto:privacy@kahoot.com).

## 5. Compliance with FERPA and COPPA

We comply with FERPA and COPPA when applicable to us. When FERPA applies, we act as a "school official" to our school or school district customer, which means that we are under the direct control of the school or district and use students' personal information only to provide our services to the school or district and not for our own purposes. To the extent COPPA

applies, the school or district provides us with any necessary consent on behalf of students' parents or guardians to permit use of Kahoot! in the classroom.

## 6. Changes to this Policy

We may change this Student Privacy Policy at any time and from time to time. The most recent version of the Privacy Policy is reflected by the version date located at the top of this Student Privacy Policy. We encourage you to review this Student Privacy Policy often to stay informed of changes that may affect you.

If we make material changes in the Privacy Policy, for example if we seek to use personal information in a materially different way than we had previously, we will provide prior notice by, for example, email or a pop-up so that you have sufficient time to evaluate the change in practice. Of course, you can always opt-out by deleting your account if you do not accept the change.

## 7. About Kahoot!

Kahoot! AS  
Fridtjof Nansens plass 7  
0160 Oslo  
Norway

Kahoot!  
823 Congress Ave.  
Suite 300

Austin, TX 78701

USA

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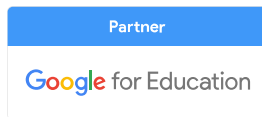
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