



GDPR and data privacy

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Modified: November 8th 2023

Kahoot! Privacy Policy

1. The Basics

About this Privacy Policy

Kahoot! is committed to protecting the privacy of our users and being transparent about how we handle information about you. This Privacy Policy describes the types of Personal Information we collect and how you can exercise your rights. Capitalized terms have the meaning defined in Annex A “Definitions”.

Kahoot!’s services allow our users to create and play and host games and invite others to play. Kahoot! acts as a data processor for Personal Information that we collect and for Personal Information that we may receive from third parties on behalf of our Users on the platform. This Privacy Policy does not cover information not covered by this Privacy Policy.

Please note that, to the extent we provide different or additional privacy policies, this Privacy Policy applies to such interactions. For details about Kahoot!’s Student Data please read our [Student Privacy Policy](#) below for details regarding our collection and use of information from Children.

About Us

Kahoot! is a global educational technology service group providing a learning platform for students and teachers.

educational technology market. We focus on a comprehensive offering of engaging learning experiences for the educational sector as well as for personal use. Our platform enables everyone who uses it to reach their potential through learning. More information about our products and how you can use them can be found on our [webpage](#).

2. Personal Information we collect

The Personal Information we process depends on your interactions with Kahoot!, your Kahoot! account, the products and features you use, your location, and your device. However, the Personal Information we collect falls into the following categories:

Information you provide to us: You may provide Personal Information to us when you sign up for a Kahoot! account, use the Services, consult with our customer support, or when we integrate the Services with another service. For example, when you choose to connect your Kahoot! account to another service (e.g., Google or Facebook), or communicate with us in any way, your information may include:

- Contact details such as your name, email address, telephone number and job title (for example business institutions);
- Account log-in credentials such as username and password when you use the Services with us;
- Account holder information such as country (country only), interests, picture, organization, and other information.

age, what Kahoot! groups you are interact with by using the Services.

- Troubleshooting and support data: provide, or we otherwise collect in c queries we receive from you. This r authentication data, the content of communications with us, and the pr using related to your help inquiry; and
- Payment information and other fin we/our payment processors need i Services.
- Communication data. Several of our information with other people, and y what you share and with whom y when signed in and interacting Services, such as leaving comment: may disclose Personal Information public. We strongly advise that you Personal Information through, for Remember, when you share Person for example through the comment : the information you disclose may be and accessible through search er Personal Information through compr group participation, i.e. not the gen that the information you disclose w group participants. Personal Informa: comments is processed by Kahoot! as

Information we collect automatically: In countries, including countries within the E considered Personal Information under a protection laws. Service Usage Data may i

- Browser or device information which your device, such as Media Access computer type (Windows or Macintosh operating system name and version and model, language, internet browser version of the Services (such as the App
- Usage data which is collected when you use our Service. This may include the data you use the Services and your browsing history (including portions of the Service you used). We collect this data regarding the performance of the Services and related to the deliverability of the Services. For example, communications you send through our Service using our App, we may collect information about you use the App and other performance information allows us to improve the performance of the Service and facilitate research and development of our Service.
- Log data whereby our web servers keep a record of data each time a device accesses our Services. The nature of each access, including the IP address and your activity in the Services (including page views, stamps associated with your usage, search results, games, results, pages and files viewed, and actions you take (for example, which may also access metadata and other information associated with files that you upload into our Services).
- Cookies which allow us to collect information about your browser type and other anonymous information. For more information about our cookies, see our [Cookie Notice](#) for more information about our cookies.
- Pixel tags (also known as web beacons) which may be used in connection with some Services to track things, track the actions of our Users,

marketing campaigns and compile s
the Services and response rates.

Information we collect from other sources
may collect Personal Information about y
such as our Partners, integrations or c
example where you have given permissio
share your information with us.

3. Use of Personal Informat

We may use your Personal Information v
purposes and on the legal bases identifiec

Provide the Services. This means
Information in order to provide the Servic
such as arranging access to an accou
inquiries, and to allow you to utilize our v
such as notifying you when a kahoot is sl
you have been invited to join a challeng
activities to manage our contractual relat
to comply with a legal obligation.

Enable you to use certain features.
process your Personal Information, in rel
interests, in order to enable you to use
Services, for example to publish a kahoot,
group or “follow” a specific Kahoot! user. I
features are only available as part of a s
want to remove your Personal Informatio
normally do this yourself through your acc

Communicate with you. We may need to
about your account and provide you wit
perform our contract with you for the use
we have not entered into a contract with

legitimate interests in administering and :
For example, if you use our App, we may receive push notifications about activity have opted in to these push notifications receive them, you may turn them off t system. We may also send you system ale on our legitimate interests in administ providing certain features. For example, w temporary or permanent changes to our 9 outages, security or compliance notificat new features, version updates, releases changes to this Privacy Policy.

Support and improve the Service. You may be used to provide, support and in order to perform our contract with you fo or where we have not entered into a contr on our legitimate interests in administer Service and providing certain features. include sharing your information with tl provide and support our Service or to mak Service available to you. When we Information with third parties, we take information in a manner that is consiste under applicable privacy laws. For further we share your information, refer to the "Information" section below.

Purchase and payment. Your Personal In to bill and collect money owed to us l contract with you for the use of the Service entered into a contract with you, in legitimate interests to operate and adm includes sending you emails, invoices delinquency, and alerting you if we need

number. We use third parties for secure processing, and those third parties collect and process your orders and credit card payments. For more information, see the “Data Security” section of this Privacy Policy.

Prevent abuse and misuse of the Service

We use your Personal Information to prevent and detect abuse against misuse or abuse of our Services, protect the privacy of our Users, ensure compliance with our T&Cs, and to pursue available remedies, we may use your Personal Information as is reasonably necessary. We periodically review the content which our Users post on our Sites in order to ensure that such content complies with our T&Cs, including through automated filtering mechanisms. We do not remove all Users who comply with our T&Cs, as it is necessary for us to maintain a reliable platform. We use your Personal Information for this purpose in reliance on our legitimate interest in protecting our Service from abuse and misuse of the Service.

Comply with legal obligations.

We use your Personal Information in order to comply with applicable laws, court orders, authorities, court orders, valid subpoenas, and other appropriate legal requirements. This includes Personal Information necessary to respond to law enforcement representatives and advisors, including attorneys, accountants, to help us comply with legal requirements in reliance on our legitimate interest in protecting our Service. We use your Personal Information necessary to prosecute criminal offenses, arbitration, or similar legal proceeding.

Optimization and personalization of the Service

Your Personal Information may be used to provide you with tailored features with which we can optimize and personalize your experience on our Websites, we may display certain categories of content on our Websites on the basis of kahoots you have previously played.

and country only), district or preference. Your Personal Information is in reliance on our processing of your Personal Information in administering the Service and providing content.

Data analytics. Your Personal Information is used to perform data analytics in reliance on our processing of your Personal Information in order to better understand our interests in improving and enhancing our Service for our Users. For example, we use analytics to inform our product recommendation, audience targeting, and predicted demographics features for our Users.

Marketing. We may use your Personal Information for marketing information, product recommendations, and transactional communications (such as email, SMS, or push notifications) about us, in accordance with your marketing preferences and this Privacy Policy. If you give your consent, we may process your e-mail address for checking whether a multi-user account exists for your organization (e.g. your employer), and we may share you with options to gain access to your account with your own User. If you consent to this processing activity, we may notify you if another individual is requesting access to the organization's account, sharing the domain name of your email address or organization (i.e. the part which comes after the @ in your email address). **We will not send you unsolicited marketing.**

Allowing you to participate in sweepstakes and similar promotions. We may offer you the opportunity to participate in sweepstakes, contests and other promotions. Some of these activities have additional rules and may contain additional information about how we use your Personal Information. Participation in these activities is optional, and subject to separate rules and terms.

required. We engage in these activities as part of our contractual relationship with you.

Aggregated and anonymized data. User data may be used to combine and anonymize data from our Users' use of the Service in order to generate aggregated and anonymized statistics which we may use to improve features within the Service and for promotional purposes. We use this data for the Service in reliance on our legitimate interests.

We do not sell Personal Information. We do not sell Personal Information with third parties for marketing purposes. For purposes of the CCPA, a "sale" means the disclosure of Personal Information for other valuable consideration but does not include the transfer of Personal Information as a result of a merger, bankruptcy, or other disposition of our business.

4. Third-Party Applications

We may use the Personal Information you provide through the Service, as a processor and as a data controller, as described in our Privacy Policy, to enable your use of the Service if you choose to connect to your Kahoot! account. If you choose to connect a Google+ or Facebook account, we'll ask you to grant us permission to access and download, as applicable, your Google+ profile and Google Drive. This allows us to integrate with your integration(s) in accordance with your preferences.

We also integrate with third parties that provide products, and/or services to you, such as social media videos. Use of these Third Party Applications may have their own privacy policies. Third Party Applications may have their own privacy policies to you when you choose to use these T

including but not limited to YouTube v located at <http://www.google.com/policies>,

The Third Party Applications may collect about you but we do not share Personal In

The Services and Websites include social social media plug-ins with Twitter, Link and Facebook. Your interactions with platforms are governed by the privacy pc that provide them.

The Websites include links to other w practices may be different from ours. I Information to any of those sites, your info their privacy policies. We encourage yo privacy policy of any website you visit.

5. Your Data Protection Rig

Know your rights

Depending on the jurisdiction in which yo the following data protection rights:

- To access; correct; update; port; delete our processing of your Personal Infor
- You may have the right to lodge applicable data protection authority and use of your Personal Informati local data protection authority for mo details for data protection authorities are available [here](#) and Switzerland are

- If Personal Information is collected or of consent, or if you have, for example receiving marketing emails from Kahoot! to withdraw your consent at any time consent will not affect the lawfulness conducted prior to your withdrawal, r processing of your Personal Informat reliance on lawful processing ground
- Kahoot! supports our school custom and eligible students with acce Information and in fulfilling other re eligible students may make to acces see the section about our processing Children below.

Please note that the above rights may b and limitations. We cannot, for exam Information if it would violate our duty of have a legal obligation to retain such data your request to exercise your data prote with applicable law.

Exercise your rights

To exercise your rights pursuant to applica you may contact us on privacy@kahoot.com requests we receive from individuals wishi data protection rights in accordance with protection law. We may ask you to verify yo help us respond efficiently to your request

Note that you can manage your individual settings through your Kahoot! account, inc information, payment details, preferences, directly via our [Support Contact Form](#).

6. Sharing your Personal In

We do not share Personal Information with the limited circumstances outlined below.

- **Affiliates.** We may share and c Information with the companies in our legitimate business purposes or may include one or more of our Grou
- **Service providers.** We may share Pe our trusted service providers who p our behalf (e.g. web hosting, technical payment, analytics services and c strictly for the purpose of carrying ou described in this Privacy Policy. Fo we've hired to help us provide and assist in protecting and securing ou and other business-related functions
- **Social media partners:** Kahoot! may media channels to promote our Websites and third-party websites above, we never share information purposes or with the parties describe
- **Public institution(s).** Any competent regulatory body, government agency party where we believe disclosure is r of applicable law or regulation, (b) t defend our legal rights, or (c) to prote those of any other person.
- **A potential buyer (and its agents and a sale, merger, consolidation, liquidat acquisition.** In that event, any acquir obligations under this Privacy Policy,

access and choice. We will notify you sending you an email or posting a no

- Any other person with your consent.

Regardless of the above, Kahoot! do Information and we will never share or marketing purposes.

We may also share anonymized, aggreg selected third parties for statistical purpos

We are responsible for the data privacy of may share Personal Information with. Ka providers that have data protection a consistent with our own. Our service prov to use Personal Information they proces other purposes than as needed to carry o enter into written agreements with all c restricting the use of Personal Informat same level of privacy, confidentiality and it apply to Kahoot!.

7. Our Security

Kahoot! maintains a comprehensive sect to protect the security, privacy, confider Personal Information within our organiz appropriate and reasonable technical measures designed to protect Personal misuse, unauthorized access, disclo destruction, taking into account the processing and the nature of the Per: security measures include data encrypt and access limitations for our personne and physical access controls to our faciliti

that process payment data, maintain the highest industry standards, and comply with Payment Card Industry (PCI) compliance levels.

Details about our security program can be found in our Security Policy. If you have any questions about the security of your account or data, you may contact us at privacy@kahoot.com

8. International Transfers

We collect information globally and may store your information outside of your country, wherever we or our third-party service providers process your information for the purpose of providing you the Services. The level of data protection, privacy rights, and other legal requirements may not be as comprehensive as in your country. To protect your information, we take steps, including using standard contractual clauses, designed to protect your Personal Information.

For all international transfers, both within our organization and to our sub-processors, we ensure that the recipient of your Personal Information offers an adequate level of protection. We enter into appropriate agreements with our sub-processors. All international transfers to a country who has received a finding of adequacy from the European Commission under Article 45 of the GDPR are made based on an appropriate legal basis. For transfers to a country who has not received a finding of adequacy from the European Commission, we use standard contractual clauses from the European Commission ("SCCs").

Kahoot! maintains strict organizational and technical measures to protect Personal Information stored on our servers. Access to any Personal Information is restricted to those employees who need it in order to provision the Services. We use multi-factor authentication, role-based access control, and other security measures to restrict access to our systems. We also restrict access to our systems to those employees who require access in order to provide the Services to you, such as providing support services.

If you want to know more about Kahoot! and the measures we take to keep your Personal Information safe, please reach out to us on privacy@kahoot.com.

9. Retention of Personal Information

We do not retain Personal Information longer than the purposes for which Personal Information was collected. We retain Personal Information where we have a legitimate business or legal obligation to do so. Our retention periods vary depending on the type of data involved. We refer to these criteria in order to determine:

- Whether we have a legal or contractual obligation to retain the data;
- Whether the data is necessary to provide our services;
- Whether our Users have the ability to delete their data within their Kahoot! accounts; and
- Whether our Users would reasonably expect us to retain the data until they remove it from their accounts are closed or terminated.

When we have no ongoing legitimate business need for your Personal Information, it will be deleted or anonymized as soon as possible and in accordance with applicable law.

10. California, Colorado, Connecticut, Utah, and Virginia Consumer Privacy Laws

This section supplements our Privacy Policy with additional details regarding our collection and disclosure of Personal Information in California, Colorado, Connecticut, Utah, and Virginia.

Collection, Processing, and Disclosure of P

The following chart details the categories we collect and process, as well as the categories we disclose to third parties for c purposes, including within the 12 months preceding the date this Privacy Pc

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
<p>Identifiers, such as:</p> <ul style="list-style-type: none">• Contact information: name, mailing address, email address, and telephone number of account holders	Affiliates; service providers; social media providers; public institutions, including law enforcement, government authorities and other regulatory bodies; potential buyers; other third parties with your

- Identifiers: IP address that can reasonably be linked or associated with a particular device; account name; and cookies used solely to operate the Services, analyze their use, and for other non-marketing internal purposes (see our [Cookie Notice](#) for details)

express consent

Personal information as defined in the California customer records law, such as

- Contact Information:

Affiliates; service providers; social media providers; public institutions, including law enforcement, government authorities

name,
mailing
address,
email
address, and
telephone
number of
account
holders

- Payment information (collected only by our payment processors and not by us)

and other
regulatory
bodies;
potential
buyers; other
third parties
with your
express
consent

**Protected class
information**
under California

Affiliates;
service
providers;
public

or federal law,
such as age

institutions,
including law
enforcement,
government
authorities
and other
regulatory
bodies;
potential
buyers; other
third parties
with your
express
consent

Commercial information, such as transaction information and purchase history for account holders

Affiliates; service providers; public institutions, including law enforcement, government authorities and other regulatory bodies; potential buyers; other third parties with your express consent

Internet or network activity information, such as browsing history, search history, and interactions with our online properties

Affiliates; service providers; social media providers; public institutions, including law enforcement, government authorities and other regulatory bodies; potential buyers; other third parties with your express consent

Geolocation data

at a city-level only, derived from your IP address

Affiliates; service providers; public institutions, including law enforcement, government authorities and other regulatory bodies; potential buyers; other third parties with your express consent

Audio, electronic, visual, and similar information that you choose to upload, such as photographs

Affiliates; service providers; public institutions, including law enforcement, government authorities and other regulatory bodies; potential buyers; other third parties with your express consent

Employment information, such as your current employer, business contact information, and job title

Affiliates; service providers; social media providers; public institutions, including law enforcement, government authorities and other regulatory bodies; potential buyers; other third parties with your express consent

**Sensitive
Personal
Information**

- Kahoot! account credentials Personal Information collected from a known child. With respect to children under age 13, the Personal Information we collect is limited to an email address, which we immediately and

Affiliates; service providers; public institutions, including law enforcement, government authorities and other regulatory bodies; potential buyers; other third parties with your express consent

permanently hash so that it can be used only as a password reminder (and not to contact the child).

Collection, Processing, and Disclosure of Sensitive Personal Information

Subject to your consent where required by law, we may collect, process, and disclose Sensitive Personal Information for the purposes of providing goods or services as required for safety, security, and integrity; countering violations; performing services for our business operations; maintaining and servicing accounts, providing support, processing or fulfilling orders and transacting with customers; customer information, providing analytics and reporting; storage; activities relating to quality and safety; and other collection and processing for the purpose of inferring characteristics about you. We do not use Sensitive Personal Information beyond these purposes.

Rights and Requests

You may, subject to applicable law, make the following requests:

1. To know whether we process your Personal Information and to access such Personal Information. If you are a resident of the European Union, you may also request the following:

- a. The categories of Personal Information about you and the categories of collected such Personal Information
 - b. The business or commercial purposes of the Personal Information about you;
 - c. The categories of Personal Information we disclosed and the categories to whom we disclosed such Personal Information
2. To correct inaccuracies in your Personal Information
 3. To have your Personal Information deleted
 4. To receive the specific pieces of your Personal Information, including a copy of your Personal Information in a portable format.

You have the right not to be unlawfully discriminated against for exercising your privacy rights.

To make a request, please contact us at [privacy@kahoot.com](#). We will verify and respond to your request conforming with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may deny your request where an exception applies. We may request your registered email address, user nickname, and account activity, in order to verify your identity and prevent fraudulent requests. If you maintain a password on your account with us, we may verify your identity through our authentication practices for your account. You may be required to authenticate yourself before disclosing or deleting your Personal Information. If you make a request to delete your Personal Information, we will confirm your request before we delete your Personal Information.

When offering services to its Users, Kahoot! may use third-party service providers, "data processor," and we collect Personal Information on behalf of our Users in order to provide these services.

If applicable, please direct any requests for deletion of your Personal Information to those who have a direct relationship.

We do not sell Personal Information (including Sensitive Personal Information), and we do not “share” Personal Information (including Sensitive Personal Information) for purposes of cross-context targeted advertising, as defined under applicable law. We have not engaged in such activities in the 12 months preceding the date this Privacy Policy was last modified. In the foregoing, we do not sell or “share” Personal Information (including Sensitive Personal Information) to anyone under 13 years of age.

Appeal Process

If you are a Colorado, Connecticut, or Virginia resident and we refuse to take action on your request, you may file an appeal within a reasonable period after you have received our refusal. You may file an appeal by contacting us at privacy@kahoot.com.

Authorized Agents

If an agent would like to make a request on behalf of a user, as permitted under applicable law, the agent must use the submission methods noted in the section “How to Submit Requests.” We will process the agent’s request in accordance with applicable law. As part of our verification process, we require that the agent provide, as applicable, proof of their status as an authorized agent. In addition, we require that you verify your identity as described in the section “How to Submit Requests” or confirm that you provide the necessary information to submit the request.

De-Identified Information

Where we maintain or use de-identified information, we continue to maintain and use the de-identified information in a de-identified fashion and will not attempt to re-identify the information.

11. Do Not Track

Certain US state laws require us to indicate “Do Not Track” settings in your browser. Kahoot! follows the standards set out in this Privacy Policy and will not follow any Do Not Track browser requests.

12. Changes to this Policy

We may change this Privacy Policy at any time. If we make material changes in our Privacy Policy, for example if we seek to use Personal Information in a different way than we had previously, we will notify you to you for example by email or a pop-up window. If you do not agree to our changes, you may delete your account and stop using our Services.

13. Our collection of Personal Information from Children

We do not collect any Personal Information from children who merely play a kahoot.

When a Child creates an account, we collect their email address only for the purpose of providing

him or her, but we do not collect any other information. We immediately and permanently alter the information so that it can only be used as a password reset token and cannot be reconstructed into its original form or used for any other purpose. We do collect certain Personal Information from Children through our products for parents or teachers. We act as a controller so in our capacity as a data processor or controller. For more information, see our [Student Privacy Policy for more information](#).

We also collect a username and password for Child account holders, which are used for login purposes. We do not allow a Child account holder to use the Services.

We and our service providers also collect information as described above, under “information we collect from Children.”

If you are a parent or guardian, you may request access to, use of, or delete, such information. In your request, include your name and your Child’s Kahoot! username and the action you would like us to take. For your request, you may need to verify your identity before we can process your request. If your child uses our Services through a school, please contact the school or school district.

14. Questions & Concerns

If you have any questions or comments, or if you have concerns about the way in which we have handled your information, you may contact us on privacy@kahoot.com.

Annex A – Definitions

The following definitions apply to this Privacy Policy.

“**Affiliate**” means an entity that directly or indirectly controls, is controlled by, or is under common control with Kahoot!

“**App**” means Kahoot!’s software/mobile application.

“**CCPA**” means the California Consumer Privacy Act of 2018.

“**Child**” or “**Children**” means children under the age of 13 in the U.S. and children under age 16 outside the U.S.

“**Control**” means an ownership, voting power, or other right representing fifty percent (50%) or more of the total outstanding of the entity in question. The term shall be construed accordingly.

“**EEA**” means the European Economic Area.

“**EU**” means the European Union.

“**Kahoot!**” means Kahoot! AS, organization located at Fridtjof Nansens plass 7, 0160 Oslo, Norway.

“**Personal Information**” means any information that can be used to identify an individual. Examples of Personal Information include first and last name, date of birth, email address, occupation, or other demographic information.

“**Privacy Policy**” means this Kahoot! privacy policy.

“**School Services**” means the products that are available to students and teachers in Kahoot! EDU and Kahoot! LEARN.

“**Services**” means the Kahoot! services, including Kahoot! LEARN, that are available on our platform.

“Service Usage Data” means info automatically through your use of the S detailed in the “Personal Information we p

“Student Data” means Personal Info processes about students on a school authorized by the school for the provision

“T&C” means the Kahoot! terms and cond

“Third Country” means any non-EU/EEA c

“Third Party Applications” means website by third parties that are integrated in the in order to make certain features, col services available to you.

“User”, “you” and **“your”** means any perso Service(s).

“Visitor” means, depending on the conte any of our Kahoot! Websites, offices, or ot at our events or in connection with our m activities.

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Terms and conditions

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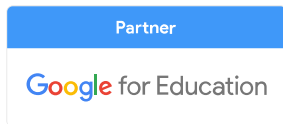
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