Kodland — Privacy Policy (United States)

Effective October 21, 2026

Field	Details
Effective Date	October 21, 2026
Applicable Law	COPPA (Children's Online Privacy Protection Act, 15 U.S.C. §§ 6501–6506, 16 C.F.R. Part 312, as amended 2025) · Applicable U.S. state consumer privacy laws (see Section 16) · CAN-SPAM Act · TCPA and FCC rules on text messaging (47 C.F.R. § 64.1200) · Applicable state telemarketing and text-messaging laws
Scope	United States, including all states and territories
Primary Data Controller / Business	Odreval Limited, Boumpoulinas 1-3, Bouboulina Building, Flat/Office 42, 1060 Nicosia, Republic of Cyprus · Reg. HE 417715
Joint Data Controller / U.S. Payment Entity	Kodland Inc, 30 N Gould St Ste R, Sheridan, WY 82801, USA · Wyoming corporation, Original ID 2024-001468185
Privacy Contact	social@kodland.org

How to use this document

This Privacy Policy applies to parents, guardians, learners aged 5–17, and visitors to our website and platform located in the United States. A plain-language summary for young learners is provided in Appendix B.

This document was prepared with reference to: the Children's Online Privacy Protection Act (COPPA) and its 2025 amendments; the California Consumer Privacy Act as amended by the California Privacy Rights Act (CCPA/CPRA); the Virginia Consumer Data Protection Act (VCDPA), Colorado Privacy Act (CPA), Connecticut Data Privacy Act (CTDPA), and comparable comprehensive privacy laws of other states; state-specific children's online safety laws, including the Maryland Age-Appropriate Design Code Act; the CAN-SPAM Act; and the Telephone Consumer Protection Act (TCPA) and the related rules of the Federal Communications Commission.

1. Who We Are

This Privacy Policy covers the processing of your personal data by two joint controllers: Odreval Limited and Kodland Inc, the latter of which also serves as our U.S. payment entity.

1.1 Odreval Limited — Primary Data Controller

Odreval Limited owns and operates the Kodland registration platform, website, and learner accounts worldwide, including for users located in the United States.

Field	Details
Legal name	Odreval Limited
Address	Boumpoulinas 1-3, Bouboulina Building, Flat/Office 42, 1060 Nicosia, Republic of Cyprus
Registration	HE 417715 · TIN: 10417715N
Privacy email	social@kodland.org
Role	Primary controller — platform, registration, user accounts

1.2 Kodland Inc — Joint Data Controller and U.S. Payment Entity

Kodland Inc designs and organizes the educational curriculum, assigns tutors, and manages the learning experience for learners in the United States. Because it determines the purposes and means of processing learner data, it acts as a joint controller alongside Odreval Limited. Kodland Inc also receives and processes payment and billing information for U.S. customers, and operates our U.S. text messaging (SMS) program described in Section 9.5.

Field	Details
Legal name	Kodland Inc
Registered office (c/o registered agent)	30 N Gould St Ste R, Sheridan, WY 82801, USA — this is the address of Kodland Inc's registered agent, Registered Agents Inc, provided here to satisfy corporate-record transparency. It is also designated as Kodland Inc's correspondence address for this Privacy Policy; because it is a registered-agent address rather than a staffed office, please direct all inquiries to the email address below rather than expecting an in-person response.
State of incorporation	Wyoming
Filing reference	WY Secretary of State, Original ID 2024-001468185, filed June 4, 2024
Email	social@kodland.org
Role	Joint controller — curriculum, tutors, learner progress — and payment receipt and billing for U.S. customers; sender of text messages under our U.S. SMS program

1.3 Joint Responsibility

> **Joint Data Governance**
>
> Odreval Limited and Kodland Inc jointly determine the purposes and means of processing personal data collected through the Kodland platform in the United States. You may direct any privacy request or question under Section 16 or Section 17 to either entity using the contact details in Section 20; both are responsible for responding.

1.4 Privacy Contact

For any question about how we handle your personal data, or to exercise any right described in Section 16 or Section 17, contact:

Method	Details
Privacy email	social@kodland.org
Postal (Odreval Limited)	Boumpoulinas 1-3, Bouboulina Building, Flat/Office 42, 1060 Nicosia, Republic of Cyprus
Postal (Kodland Inc)	30 N Gould St Ste R, Sheridan, WY 82801, USA

2. Scope of This Privacy Policy

This Privacy Policy applies to:

- parents and guardians located in the United States who create accounts or enroll their child in a course
- child learners aged 5–17 in the United States who use our online learning platform
- website visitors located in the United States, including those who request a trial lesson
- parents and guardians who receive our service or marketing communications
- users who contact our customer support team

It applies to our website, landing pages, learning platform, trial lesson forms, online classes, customer support, and communications by email, text message, and other channels used by our team.

This Privacy Policy is the United States version of our privacy notice. Users located in the European Union, EEA, or United Kingdom are covered by our separate EU/UK Privacy Policy, which reflects GDPR and UK GDPR requirements.

3. Children's Privacy

Kodland provides online learning services for children aged 5 to 17. Protecting children's personal data is the central principle of all our data practices. Because our services are offered to children and collect a child's age or date of birth at enrollment, we comply with the Children's Online Privacy Protection Act (COPPA), 15 U.S.C. §§ 6501–6506, and its implementing regulations at 16 C.F.R. Part 312, including the amendments that took full effect on April 22, 2026.

Age-screening mechanism. At enrollment, the parent or guardian enters the student's age or date of birth in the "Student Information" section of our registration form. Every user of the Kodland learning platform is a student aged 5–17; there is no general-audience or adult use of the platform itself. We use the age or date of birth collected at enrollment as our neutral age-screening mechanism under 16 C.F.R. § 312.2: accounts for students identified as under 13 are placed on the COPPA verifiable-parental-consent track described in Section 3.1, and accounts for students identified as 13–17 are placed on the track described in Section 3.2. Because this age information is collected directly and systematically from every enrolling parent — not inferred or assumed — we treat it as actual knowledge of each student's age for COPPA purposes.

Our Key Child Protection Commitments (Privacy by Default), applied to all learners aged 5–17 regardless of state of residence:

- **Highest privacy settings:** All learner accounts are created with the strictest privacy settings by default.
- **No profiling or behavioral advertising:** Tracking and profiling are completely disabled on the learning platform and cannot be activated by the learner.
- **No sale or "sharing" of children's data:** We do not sell or share (as those terms are defined under state law, e.g., Cal. Civ. Code § 1798.140) any child learner's personal information.
- **No precise geolocation:** We do not track or collect the precise location of child learners.
- **No dark patterns:** We design our interfaces so that children are not nudged or manipulated into sharing data.
- **No automated decision-making with legal or similarly significant effects:** We do not use automated decision-making technology (ADMT) to make decisions about a learner — such as course placement, tutor assignment, or account restrictions — that produce a legal or similarly significant effect, without meaningful human review. This applies nationwide, including under California's ADMT regulations effective January 1, 2026.
- **No biometric identification:** We do not collect, use, or store facial recognition data, voiceprints, or any other biometric identifier for any purpose, including attendance verification or lesson feedback. Because we do not process biometric identifiers, the biometric-specific requirements of laws such as the Illinois Biometric Information Privacy Act (BIPA), the Texas Capture or Use of Biometric Identifier Act (CUBI), and Washington's biometric privacy law do not currently apply to our services. If this changes in the future, we will update this Privacy Policy and obtain any additional consent required by law before collecting any biometric identifier.

- **No text messages to children:** Our text messaging program is offered only to parents and legal guardians aged 18 or older. We do not send text messages to child learners (see Section 9.5).

3.1 COPPA — Children Under 13

COPPA applies to every student whose age or date of birth, as entered by the parent at enrollment, identifies them as under 13, and requires us to obtain **verifiable parental consent (VPC)** before collecting, using, or disclosing personal information from that child, subject to limited exceptions (e.g., collection of a persistent identifier solely to support internal operations, such as maintaining a login session, where no other personal information is collected).

What counts as personal information under COPPA (as amended): a child's name; address; online contact information (including a parent's mobile number used solely to obtain consent); screen or user name; telephone number; Social Security number; a persistent identifier (e.g., a cookie, device ID, or IP address) that can be used to recognize a user over time; a photo, video, or audio file containing a child's image or voice; geolocation information; biometric identifiers; and government-issued identifiers.

How we obtain verifiable parental consent. Depending on the processing activity, we use one or more FTC-recognized methods, which may include: a signed consent form returned by mail, fax, or electronic scan; verification through a form of payment that provides notification of each discrete transaction to the primary account holder; a toll-free telephone number staffed by trained personnel; a video-conference confirmation with trained personnel; verified government-issued identification checked against a database; knowledge-based authentication; or, where we do not disclose the child's personal information to third parties, a confirmatory text message to the parent's mobile number ("text-plus").

Separate consent for third-party disclosure. Consistent with the 2025 COPPA amendments, obtaining a parent's consent to collect a child's personal information does not by itself authorize us to disclose that information to third parties. Where disclosure to a third party is not integral to providing the service the parent requested — for example, disclosure for advertising, for monetary consideration, or to develop or train a third party's artificial intelligence models — we obtain **separate, specific verifiable parental consent** before making that disclosure, unless our contract with the third party already excludes that use entirely.

We do not disclose children's personal information for advertising or for monetary consideration. We use a business-tier third-party AI tool (an OpenAI business chat product, under a contract that prohibits OpenAI from using our data to train its models) to help evaluate how a lesson was delivered, as part of the quality-assurance process described in Section 9.2. Only a text transcript of the lesson is shared with this tool — not the underlying audio or video recording, and no photo, video, or voice recording of the child is disclosed to this vendor. This processing is limited to internal tutor-quality evaluation and is covered by the parental consent described in Section 9.2.

Data minimization. We do not condition a child's participation in a game, prize offer, or other activity on the child disclosing more personal information than is reasonably necessary to participate.

Retention and deletion. We retain children's personal information only for as long as reasonably necessary to fulfill the purpose for which it was collected, in accordance with the retention periods set out in Section 14 — which constitutes our written data retention policy for purposes of the COPPA Rule — and we do not retain it indefinitely. We securely delete or de-identify children's personal information once it is no longer needed for that purpose or upon a verified deletion request.

3.2 Learners Aged 13–17

There is no single federal law equivalent to COPPA for teenagers. Students identified as 13–17 by the age-screening mechanism described in Section 3 are not subject to COPPA's verifiable-parental-consent requirement, but several states impose additional requirements on services that are directed to, or reasonably likely to be accessed by, minors under 18 — for example, the Maryland Age-Appropriate Design Code Act and provisions of the Connecticut, California, and other states' comprehensive privacy laws concerning known minors. Rather than tailor our practices state by state, we apply the same enhanced protections described in Section 3 (no profiling, no behavioral advertising, no sale or sharing, strictest default privacy settings, no dark

patterns, no consequential automated decision-making, no biometric identification, no text messages to learners) to every learner aged 13–17, nationwide.

Where a state law requires opt-in consent (rather than opt-out) before we may use a known minor's personal information for targeted advertising, sale, or certain profiling, that requirement is satisfied by our policy of not engaging in those practices with any minor's data in the first place.

3.3 Learners Aged 5–12 — Parental Control

All learners under 13 require verifiable parental consent under COPPA for any collection of personal information, and account creation, enrollment, and account management for this age group must be performed entirely by the parent or guardian. Children in this age group do not access registration forms, checkout pages, or consent interfaces directly.

3.4 How Parental Consent Works, Step by Step

1. **Registration:** A parent or guardian creates the account and provides the child's information (e.g., first name, age or date of birth).
2. **Direct notice:** Before we collect any personal information from the child, we provide the parent with a direct notice describing what information we intend to collect, how it will be used, whether and to which categories of third parties it will be disclosed, and how the parent can provide or revoke consent.
3. **Verifiable parental consent:** The parent provides consent using one of the methods described in Section 3.1.
4. **Consent recorded:** Consent is stored with the date and time, the identity of the consenting parent, the child's age range, and the specific processing purpose. Consent records are retained for the duration of the processing relationship plus 3 years.
5. **Ongoing control:** The parent may review, change, or revoke consent at any time by contacting social@kodland.org; revoking consent will result in deletion of the child's personal information unless we have another basis to retain it (e.g., a legal obligation).

4. Personal Data We Collect

4.1 Parents and Guardians

We may collect: name; email address; phone number (including a mobile number provided for text messages, together with records of your text messaging consents and opt-outs); country or region; preferred language; billing and payment information; course preferences; communication history (including via instant messaging apps and text messages); support requests; marketing preferences; and cookie/tracking choices.

We do not store full payment card details. Payments are processed by secure payment service providers (see Section 12).

4.2 Child Learners

We may collect or generate the following limited information about a child learner:

- first name or display name
- age, date of birth, or age range
- selected course and class schedule
- attendance and learning progress
- tutor feedback and assessments
- homework, projects, or learning outputs
- participation data from online classes, including session recordings where explicitly enabled
- optional profile information, only if separately authorized by the parent or guardian

Most enrollment and account data is provided by a parent or guardian. Some learner data is generated when the child participates in lessons, completes tasks, or uses the platform.

4.3 Technical Data

When you use our website or platform, we may collect: IP address; device and browser type; operating system and language settings; approximate location at country or region level; pages visited; time spent on the website or platform; cookies and similar identifiers; and security logs.

5. Data We Do Not Collect Directly from Children

We do not collect personal data directly from children at the point of registration, enrollment, payment, or consent. All such processes are completed exclusively by the parent or guardian. Children do not access registration forms, checkout pages, or marketing consent interfaces.

When a child participates in a lesson, submits homework, or uses the learning platform, certain data is generated as a natural part of the educational service — for example, attendance, progress records, and session participation. This data is processed under the contract entered into by the parent or guardian and, where applicable, under the verifiable parental consent described in Section 3.

6. We Do Not Sell Children's Personal Data

Absolute Commitment: No Sale or Sharing of Children's Personal Data

We do not sell, rent, trade, license, or otherwise transfer for commercial consideration any personal data relating to child learners to any third party, under any circumstances. We also do not "share" children's personal information, as that term is defined under state law (e.g., for cross-context behavioral advertising).

This prohibition is unconditional. It applies irrespective of the child's age, state of residence, or the nature of the data. No commercial arrangement, partnership, or revenue model of Odreval Limited, Kodland Inc, or any Kodland group company is or will be based on monetizing children's personal data in any form.

We do not use children's personal data for behavioral advertising, cross-context profiling, or the creation of advertising audiences. Tracking tools and advertising pixels are never used within child-facing areas of the platform or during learner sessions.

7. How We Use Personal Data

Purpose	Examples of data used
Creating and managing accounts	Parent contact details, account data
Booking trial lessons and follow-up	Parent contact, child age range, course interest
Providing online learning services	Learner name, course, attendance, progress
Assigning tutors and managing classes	Course level, schedule, progress data
Communicating with parents and guardians	Email, phone, instant messaging, text messages (service messages, with consent — see Section 9.5)
Customer support	Contact details, correspondence, issue history
Payments, billing, and invoicing	Billing data, transaction records
Optional profile features	Profile photo, social links, city, "about me" — only with parental authorization

Purpose	Examples of data used
Platform security and fraud prevention	Technical data, security logs
Service improvement and analytics	Aggregated / de-identified usage data
Session recordings (where enabled)	Audio / video data, only with explicit parental consent
Marketing to parents and guardians	Email, phone, mobile number for marketing text messages (only with separate prior express written consent), marketing preferences
Legal compliance and claims	Billing, correspondence, account data, text messaging consent and opt-out records

Withdrawing consent. Where we rely on consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal. To withdraw consent for marketing: email social@kodland.org or use the unsubscribe link; to stop text messages, reply STOP or use any other method described in Section 9.5. To withdraw consent for optional profile features: the profile data will be deleted within 30 days of withdrawal.

8. Our Approach to Consent and Lawful Processing

Unlike the EU/UK GDPR framework, U.S. federal and state law does not require us to identify a single "legal basis" for every processing activity. Instead:

- **Contract:** We process personal data as necessary to provide the online learning services purchased by the parent or guardian, manage accounts, and handle payments.
- **Verifiable parental consent (COPPA):** Required before collecting personal information from a child under 13, and before any separate disclosure of that information to a third party not integral to the service.
- **Consent (other processing):** For optional features (profile photos, session recordings, non-essential cookies, marketing, text messages), we obtain consent from the parent or guardian.
- **Legitimate business purposes:** Platform security, fraud prevention, and de-identified service-improvement analytics, balanced against the interests of users, with enhanced protection for children.
- **Legal obligation:** Tax, accounting, and other mandatory legal requirements.

9. Online Classes, Recordings, and Communications

9.1 Online Classes and Video Conferencing

Live classes are delivered via video conferencing technology. During a class, the tutor and learner share audio, video, and screen. We use video conferencing providers bound by data processing agreements.

9.2 Class Recordings

Classes and support calls may be recorded for quality assurance, safeguarding, tutor training, dispute resolution, and service improvement. As part of quality assurance, a text transcript of a lesson (not the audio or video recording itself) may be reviewed by a business-tier third-party AI tool, under a contract prohibiting the vendor from using that transcript to train its own models, to help evaluate how the lesson was delivered. That review is used only for internal tutor coaching and is not used for advertising or any other purpose. This transcript review requires parental notice and, where the recording itself is not strictly necessary for safety or legal purposes, explicit parental consent as described below; recordings made solely for safety or legal purposes are not used for this quality-assurance transcript review unless that additional consent has also been obtained. Where a class is recorded:

- we notify the parent or guardian in advance;
- notice is provided at the start of the session;
- for recordings that are not strictly necessary for safety or legal purposes, we obtain explicit parental consent before recording begins, and that consent covers the AI-assisted quality-assurance review described above.

Recordings are retained for the period set out in Section 14, after which they are securely deleted or de-identified, unless a longer retention period is required by applicable law, safeguarding obligations, or ongoing legal proceedings. Recordings are never used for advertising or commercial purposes.

9.3 Technology Tools

We use third-party technology tools to support the delivery and quality of our educational services. Where such tools process personal data, we ensure appropriate contractual and technical safeguards are in place, and we obtain parental consent where required.

9.4 Communications with Parents

We communicate with parents and guardians by email, instant messaging platforms (where opted in), and telephone or text message. We comply with the Telephone Consumer Protection Act (TCPA): before sending a marketing text message or placing a marketing call using an autodialer or a prerecorded or artificial voice message, we obtain the parent's or guardian's prior express written consent, clearly disclosing that consent is not a condition of purchase. Every marketing text includes a way to opt out (e.g., replying "STOP"), and every marketing call discloses how to opt out of future calls. Call recordings may be used for quality assurance and support purposes; we provide advance notice of recording. For details on text messaging, see Section 9.5 and our SMS Terms at kodland.org/us/sms-terms.

Parents and guardians should ensure that children do not share unnecessary sensitive personal information during classes or in communications with our team.

9.5 SMS / Text Messaging

If you provide your US mobile number and agree to receive text messages from Kodland Inc, we use your mobile number and SMS consent to send the types of text messages you agreed to receive: service messages (such as trial lesson and class reminders, booking confirmations, schedule changes, and payment and account notifications) and, only if you separately opted in, marketing messages. Consent to receive marketing messages is not a condition of purchase. Message frequency varies. Message and data rates may apply. Reply STOP to opt out of all text messages or HELP for help; you may also opt out by any other reasonable means, including by emailing social@kodland.org. We do not send text messages to children. See our SMS Terms: kodland.org/us/sms-terms.

No mobile information will be shared with third parties or affiliates for marketing or promotional purposes. Text messaging opt-in data and consent will not be shared with any third parties, except service providers that deliver text messages on our behalf (such as our SMS platform provider and mobile carriers), which receive this information solely to send those messages and are contractually prohibited from using it for any other purpose. This information is stored in systems operated by our group company Kodland Pte. Ltd. (see Section 12). We do not sell mobile numbers or text messaging opt-in data.

10. Cookies and Similar Technologies

We use cookies and similar technologies to operate our website, maintain security, remember preferences, understand website usage, and measure the effectiveness of parent-facing marketing. We comply with the CAN-SPAM Act for email marketing and with applicable state requirements governing the sale/sharing of information collected through tracking technologies and, where applicable, opt-in requirements for known minors.

Category	Purpose	Choice available	Where used
Strictly necessary	Platform and website function: login sessions, security, load balancing. Cannot be disabled without breaking the service.	Not applicable — exempt	All pages
Functional / preference	Remember language, timezone, display settings.	Can be managed via cookie settings	Parent-facing pages
Analytics	Aggregated, de-identified insights into website usage to improve the service.	Can be opted out of via cookie settings	Parent-facing pages
Marketing / targeting	Measure advertising effectiveness, linked to third-party advertising platforms. Applied only to parent-facing pages. Never used in child-facing areas or learner sessions.	Opt-out of "sale"/"sharing" honored via cookie settings and Global Privacy Control	Parent marketing pages only

Cookie Management Module. A cookie management icon is available on our website so you can review or update your choices at any time. We honor the Global Privacy Control (GPC) signal as a valid opt-out request under applicable state law where you browse with GPC enabled.

We do not use children's learning data or learner profiles for behavioral advertising or cookie-based tracking. Advertising cookies and pixels are never used within the learner platform or during online classes.

11. Marketing Communications

We may send marketing communications to parents and guardians where legally permitted under the CAN-SPAM Act, TCPA, and applicable state law. Marketing may include information about courses, trial lessons, promotions, events, or service updates.

We do not send marketing communications to child learners.

You can opt out of marketing communications at any time by clicking the unsubscribe link in any email, replying "STOP" to any text message (which stops all text messages from us, as described in Section 9.5), or contacting social@kodland.org. We process opt-out requests promptly and in any event within the time required by law.

12. Sharing Personal Data

We share personal data only where necessary and lawful. We do not sell or share personal data relating to child learners under any circumstances. We may share personal data with the following categories of recipients:

- **Kodland group companies:** Odreval Limited (Cyprus) and Kodland Inc (United States) jointly operate the platform, curriculum, tutoring, learner accounts, and billing described in Section 1. Data submitted through our website forms, including mobile numbers and text messaging consent records, is stored in systems operated by our group company Kodland Pte. Ltd. (Singapore), which uses it to support the services described in this Privacy Policy. .
- **Tutors and educational contractors:** Independent tutors receive limited learner data (first name, course level, progress) strictly necessary to deliver lessons. Tutors are contractually prohibited from using this data for any other purpose.
- **Cloud hosting and infrastructure providers:** To host our website, platform, and user data, bound by data processing agreements.
- **Video conferencing providers:** Used to deliver live online lessons.
- **Technology service providers:** Third-party tools supporting service delivery, quality assurance, and platform operations, bound by data processing agreements. This includes a business-tier AI tool used to

review lesson transcripts for quality-assurance purposes (see Section 9.2), which is contractually prohibited from using our data to train its own models.

- **Payment processors:** Kodland Inc uses secure third-party payment gateways to process transactions on its behalf. Payment data shared with these gateways is limited to the paying parent's name, email address, billing address, transaction amount, currency, and payment reference. No personal data relating to child learners is shared with any payment gateway.
- **Email and communication providers:** To deliver service emails, marketing (with consent/opt-out honored), and text/instant messaging communications. This includes our SMS platform provider, which receives mobile numbers and text messaging opt-in data solely to deliver text messages on our behalf (see Section 9.5).
- **Analytics providers:** For de-identified website and platform analytics used to improve our services. Advertising analytics tools are restricted to parent-facing contexts and never applied to child learner data.
- **CRM and customer support providers:** To manage parent inquiries and class scheduling.
- **Professional advisers and regulators:** Where required by law, court order, or a competent regulator, such as the Federal Trade Commission or a state Attorney General.

All service providers acting on our behalf are bound by data processing agreements and may process personal data only for the purposes of providing services to Kodland.

13. Data Transfers Outside the United States

Because Kodland operates globally, personal data collected from U.S. users may be transferred to, and processed in, other countries where our group companies and service providers operate,including Cyprus, Singapore, and other jurisdictions where our infrastructure or support providers are located. Kodland Inc, our U.S. joint controller and payment entity, is incorporated in the United States; however, personal data it processes may be stored outside the United States, including in systems operated by our group company Kodland Pte. Ltd. in Singapore..

Country / Region	Entity or category	Safeguard
Cyprus	Odreval Limited (primary controller)	Contractual data processing terms
Singapore	Kodland Pte. Ltd. (group company — website form data, text messaging consent records)	Technical and organizational security measures described in Section 15
Other countries (cloud, analytics, communications providers)	Various infrastructure and service providers	Data processing agreements; access restrictions; encryption

Unlike the EU/UK GDPR framework, U.S. law does not mandate a specific transfer mechanism (such as Standard Contractual Clauses) for data leaving the United States. We nonetheless apply contractual, technical, and organizational safeguards to all cross-border transfers, including data processing agreements, encryption, and access restrictions.

14. How Long We Keep Personal Data

We keep personal data only for as long as needed for the purposes described in this Privacy Policy, taking into account the duration of the customer relationship and applicable legal requirements. The table below is our written data retention policy for purposes of the COPPA Rule and applies to children's personal information as well as other categories of personal data.

Data Category	Retention Period	Basis
Parent account and contact data	Contract duration + 2 years	Re-enrollment, dispute resolution
Child learner progress and course records	Enrollment duration + 12 months	Service delivery; parental access to records
Optional profile data (photo, links, city, "about me")	Until consent withdrawn; deletion within 30 days	Consent — withdrawal triggers deletion
Class and session recordings	For a limited period necessary for quality assurance and safeguarding; longer only where required for legal proceedings or statutory obligations	Parental consent; safeguarding and quality assurance
Financial and billing records (including Kodland Inc records)	For the duration required by applicable U.S. federal and state tax and accounting law	Legal obligation
Parental consent and age verification records	Processing period + 3 years	COPPA recordkeeping
Marketing and SMS consent / opt-out records	5 years from opt-out or the end of the customer relationship, whichever is later	Legal compliance evidence (TCPA and state telemarketing laws)
Customer support correspondence	3 years from last interaction	Legitimate business purpose — legal defense
Server and access logs	90 days	Security and fraud prevention
Cookie consent / opt-out records	3 years	Legal compliance evidence

When personal data is no longer required, we delete it, de-identify it, or securely restrict access to it. We conduct periodic reviews of our data inventory against these retention schedules.

15. Security

We use technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, alteration, or disclosure. Measures include:

- encryption of personal data in transit (TLS 1.2 or higher) and at rest
- role-based access controls ensuring only authorized personnel can access personal data
- regular security assessments and penetration testing
- mandatory data protection training for staff and tutors with access to personal data
- data processing agreements with all processors requiring equivalent security standards
- a risk assessment process for high-risk processing activities, in particular processing of children's personal data
- business continuity and disaster recovery procedures

While no online service can guarantee absolute security, we take robust, risk-proportionate steps to protect personal data, with particular attention to children's data.

In the event of a security incident affecting personal data, we will notify affected individuals and, where required, state Attorneys General or other regulators, in accordance with applicable state data breach notification laws and, where applicable, COPPA.

16. Your Privacy Rights (State Consumer Privacy Laws)

As of 2026, twenty or more U.S. states have enacted comprehensive consumer privacy laws, including (among others) California, Virginia, Colorado, Connecticut, Utah, Iowa, Indiana, Tennessee, Montana, Oregon, Texas, Florida, Delaware, New Hampshire, New Jersey, Kentucky, Nebraska, Minnesota, Maryland, and Rhode Island. These laws differ in detail, but rather than vary our practices state by state, we offer the following core rights to all U.S. users, regardless of state of residence, to the extent the personal data relates to you (or, for a child learner, to the extent exercised by the child's parent or guardian):

Right	What it means	How to exercise
Right to know / access	Confirm whether we process your personal data and receive a copy, together with the categories of data collected, sources, and purposes	Email social@kodland.org
Right to correct	Request correction of inaccurate personal data	Email social@kodland.org
Right to delete	Request deletion of personal data, subject to exceptions such as legal obligations or the completion of the transaction for which the data was collected	Email social@kodland.org
Right to data portability	Receive your data in a portable, readily usable format	Email social@kodland.org
Right to opt out of sale	We do not sell personal data — of children or of parents/guardians — to any third party for monetary consideration	Email social@kodland.org
Right to opt out of sharing / targeted advertising	We never share or target-advertise using a child learner's personal data, under any circumstances. For parents and guardians, our optional parent-facing marketing cookies (Section 10) may constitute "sharing" for cross-context behavioral advertising under some state definitions; you can opt out of this at any time	Cookie settings on our website, Global Privacy Control, or email
Right to limit use of sensitive personal information	We do not use sensitive personal information beyond what is necessary to provide the service	Email social@kodland.org
Right to appeal	If we deny your request, you may appeal the decision	Email social@kodland.org, subject "Privacy Appeal"
Non-discrimination	We will not discriminate against you for exercising any privacy right	Applies automatically

A formal right to appeal a denied request is a statutory requirement in some states (for example, Virginia, Colorado, and Connecticut) but not in others, including California. We offer the appeal process described above to all U.S. users as a matter of policy, whether or not your state's law requires it.

We will respond to verifiable requests within the time required by applicable state law (typically 45 days, with a possible extension). Requests are free of charge unless manifestly unfounded, excessive, or repetitive. Where a request concerns a child learner, we will verify that the requester is the parent or legal guardian of record before responding.

California residents additionally have rights under the CCPA/CPRA, including the right to know the categories of third parties with whom we have disclosed personal information in the preceding 12 months (see Section 12) and the right to non-discrimination for exercising CCPA rights. California residents may also submit requests through an authorized agent.

"Do Not Track" disclosure (California Online Privacy Protection Act). Our website does not currently respond differently to browser "Do Not Track" signals. Where a browser or device sends the Global Privacy Control (GPC) signal, however, we treat it as a valid opt-out request under Section 10 and applicable state law.

Shine the Light (Cal. Civ. Code § 1798.83). We do not disclose personal information to third parties for those third parties' own direct marketing purposes, so there is no information to provide under this statute. California residents may still contact social@kodland.org to confirm this at any time.

Nevada residents. Nevada law (NRS 603A) gives Nevada residents the separate right to opt out of the sale of certain categories of personal information to third parties for those third parties' own direct marketing or resale. As stated above, we do not sell personal information, but Nevada residents may still submit a verified request to social@kodland.org, subject "Nevada Opt-Out Request," and we will confirm our practices in response within the time required by Nevada law.

17. Parents' and Guardians' Rights

Parents and guardians have ultimate authority over their child's personal data processed by Kodland. You may contact us at social@kodland.org to:

- ask what personal data we process about your child
- request correction or deletion of your child's data
- refuse to permit our further use or collection of your child's personal information, or revoke consent already given
- withdraw consent for optional features such as profile photos, AI-assisted features, or session recording
- ask questions about online classes, recordings, or our service providers
- request a copy of the data processing agreements with our service providers, to the extent available

Where applicable state law allows a learner aged 13 or above to exercise certain privacy rights independently, we will assess such requests in the best interests of the learner and, where appropriate, take both the parent's and the learner's views into account.

18. Complaints

If you have a concern about how we handle your personal data, please contact us first at social@kodland.org. We take all privacy concerns seriously and will aim to resolve your concern promptly.

You also have the right to file a complaint with:

Regulator	Contact
Federal Trade Commission (COPPA enforcement)	https://reportfraud.ftc.gov · 1-877-FTC-HELP
Your state Attorney General	See your state Attorney General's website for consumer privacy complaint procedures
California Privacy Protection Agency (California residents)	https://cppa.ca.gov

19. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our services, legal requirements, or data processing practices. If we make material changes, we will:

1. publish the updated Policy on our website with a clear notice and revised effective date;
2. send an email notification to all registered parents and guardians;

3. where required by applicable law (including COPPA's direct-notice requirements for material changes affecting previously collected children's data), seek fresh verifiable parental consent before implementing the change.

Your continued use of our services after the effective date constitutes acknowledgment of the revised Policy, subject to your statutory rights.

20. Contact Us

Type	Details
General privacy inquiries	social@kodland.org
Odreval Limited (postal)	Boumpoulinas 1-3, Bouboulina Building, Flat/Office 42, 1060 Nicosia, Republic of Cyprus · HE 417715
Kodland Inc (joint controller & U.S. billing, registered office c/o registered agent)	30 N Gould St Ste R, Sheridan, WY 82801, USA — for any inquiry, email social@kodland.org rather than writing to this address, as it is not a staffed location
Children's data — urgent	social@kodland.org · subject: URGENT — Children's Data
Text messages (SMS)	Reply STOP to opt out, HELP for help · SMS Terms: kodland.org/us/sms-terms
Cookie Management	Via the Cookie Management module on our website

Appendix A. Glossary

Term	Definition
Controller / Business	The entity that determines the purposes and means of processing personal data.
Joint Controllers	Two or more controllers who jointly determine purposes and means of processing.
Processor / Service Provider	An entity that processes personal data on behalf of, and under the instructions of, a controller or business.
Personal Data / Personal Information	Information that identifies, relates to, or is reasonably capable of being associated with an identified or identifiable individual or household.
Sensitive Personal Information	A category of personal information (e.g., precise geolocation, health data, biometric identifiers) subject to heightened protection under state law.
Sale (state law)	The exchange of personal information for monetary or other valuable consideration to a third party.
Sharing (state law, e.g., CCPA)	Disclosing personal information to a third party for cross-context behavioral advertising.
Verifiable Parental Consent (VPC)	Any reasonable method, recognized under COPPA, for a covered operator to ensure a parent receives notice of the operator's information practices and authorizes the collection, use, and disclosure of the child's personal information.
COPPA	The Children's Online Privacy Protection Act, 15 U.S.C. §§ 6501–6506, and its implementing rule at 16 C.F.R. Part 312.

Term	Definition
CCPA / CPRA	California Consumer Privacy Act, as amended by the California Privacy Rights Act.
Global Privacy Control (GPC)	A browser-based signal that communicates a consumer's opt-out preference regarding the sale or sharing of personal information.
FTC	The Federal Trade Commission — the primary federal regulator responsible for COPPA enforcement.
TCPA	The Telephone Consumer Protection Act, 47 U.S.C. § 227, and the Federal Communications Commission rules implementing it, which govern calls and text messages to mobile numbers.
Text messaging opt-in data	Your mobile number together with the record of your consent to receive text messages from us and of any opt-out.

Appendix B. Your Privacy — Explained Simply

This page is for young learners aged 5–17. Ask a parent or guardian if you have any questions.

What is this about?

When you use Kodland to learn coding, we need to know a few things so your lessons work well. This page explains what we know about you, why we need it, and how we keep it safe.

What do we know about you?

We know your first name and which courses you are in. Your parents or guardians told us these things — you did not have to give us any information yourself.

If you have a profile photo or a short description on your account, that is only there because your parents said it was OK.

Who can see your information?

Your teacher sees your first name and how you are getting on — so they can help you learn. Your parents or guardians can also see your progress and the work you submit on the platform.

We do not give your information to other companies to use for advertising. We will never sell anything about you. We do not send text messages to you — only to your parents or guardians.

What about recordings and AI?

Some lessons might be recorded. Sometimes a computer program reads the words from a lesson to help us check that your teacher explained things well — it does not look at video of you, and it is never used to advertise to you. Your parent has to say it is OK before a lesson can be recorded.

Your rights

You (through your parents or guardians) can ask us to show you what information we have, change it if something is wrong, or delete it. Just email us at social@kodland.org.

Questions?

Ask your parents or guardians, or they can email us at social@kodland.org. We are always happy to help.