

Children's Online Privacy Protection Act (COPPA) Notice

DRAFT — FOR LEGAL REVIEW

Effective Date: July 1, 2026

Operator: [Ednaimo Operator]

Contact: [contact@ednaimo.com]

1. Introduction

Ednaimo (Education for Juniors) is an AI-powered adaptive learning platform designed for Nigerian children ages 5-10. This COPPA Notice explains how [Ednaimo Operator] collects, uses, and protects information from children under 13 in compliance with the Children's Online Privacy Protection Act (COPPA), 15 U.S.C. 6501-6506, and the FTC's COPPA Rule, 16 C.F.R. Part 312.

Although Ednaimo primarily serves families in Nigeria, we voluntarily comply with COPPA as a baseline standard for children's privacy protection regardless of the user's location.

2. What COPPA Means for Ednaimo Users

COPPA is a United States federal law that protects children under 13 by requiring operators of online services directed to children to:

- Provide clear notice about data collection practices involving children
- Obtain verifiable parental consent before collecting personal information from children
- Give parents the right to review, delete, and control the collection of their child's information
- Limit data collection to what is reasonably necessary for the child's participation in the service
- Maintain reasonable security measures to protect children's information

On Ednaimo, **children never create their own accounts**. Parents and guardians manage all child profiles, and parental consent is required before any child-related data is collected.

3. Verifiable Parental Consent

Before any information is collected from or about a child on Ednaimo, we require verifiable parental consent from the child's parent or legal guardian. We offer the following consent methods:

Credit Card Micro-Transaction

A charge of \$0.50 (USD) is placed on the parent's credit card as a verification step. This charge is fully refunded after consent is verified. The micro-transaction serves solely as an identity verification mechanism and is not a fee for using the platform.

Signed Consent Form

Parents may download, print, sign, and return a consent form. The form may be submitted by scanning or photographing the signed document and uploading it through the platform.

No child data is collected until one of these consent methods has been completed and verified.

4. Information We Collect from Children

We collect only the minimum information necessary to deliver the adaptive learning experience:

Information collected:

- **First name** — used to personalize the learning interface (e.g., "Great job, Ade!")
- **Age** — used to calibrate content difficulty and appropriateness
- **Grade level** — used to align content with the child's educational stage
- **Learning progress** — records of completed lessons, quiz scores, and skill mastery levels
- **Engagement telemetry** — COPPA-safe analytics limited to quadrant-level heatmaps indicating which areas of the screen the child interacts with; this data contains no personally identifiable information

Information we do NOT collect from children:

- Email addresses
- Social media identifiers or handles
- Geolocation or GPS data
- Photographs, videos, or audio recordings
- Full name, home address, or phone number
- Persistent identifiers used for behavioral advertising

5. How Children's Information Is Used

Children's information is used **exclusively for adaptive learning purposes**:

- Adjusting lesson difficulty based on the child's demonstrated skill level
- Recommending learning content appropriate for the child's age and grade
- Tracking progress so parents can review their child's educational development
- Improving the effectiveness of the learning experience for the individual child

Children's information is **never** used for:

- Behavioral advertising or ad targeting
- Selling or renting to third parties
- Building marketing profiles
- Any purpose unrelated to the child's educational experience on Ednaimo

6. No Behavioral Advertising

Ednaimo does not serve behavioral advertising to children. We do not use any child data to build advertising profiles, and no third-party advertising networks or tracking technologies operate on the platform. There are no third-party trackers, cookies, or pixels used to monitor children's activity.

7. Data Minimization and Retention

We follow strict data minimization practices:

- We collect only the data elements listed in Section 4 above — nothing more

- Session logs are automatically deleted after **30 days** (30-day TTL)
- Child tokens are anonymized using **SHA-256 hashing**, meaning raw identifiers are not stored in logs
- We regularly review our data collection practices to confirm we are not collecting more than is reasonably necessary

8. AI-Specific Disclosures

Ednaimo uses artificial intelligence to generate and adapt educational content for children:

- **AI models used:** Google Gemini models accessed via Vertex AI
- **How AI is used:** AI generates lesson content, practice questions, explanations, and feedback that children view and interact with during their learning sessions
- **Safety filters:** All AI-generated content passes through safety filters designed to block inappropriate, harmful, or age-inappropriate material before it is presented to a child
- **No direct AI interaction by children:** Children interact with curated, filtered AI-generated content — they do not have open-ended chat access to AI models
- **Human oversight:** AI-generated content is subject to review processes to maintain educational quality and child safety standards

AI systems do not make decisions about children based on personal information beyond what is described in this notice. The AI's role is limited to adapting educational content to the child's learning level.

9. Parental Rights

As a parent or legal guardian, you have the following rights regarding your child's information on Ednaimo:

Right to Review

You may review the personal information we have collected from your child at any time by logging into your parent account and viewing your child's profile, or by contacting us at [contact@ednaimo.com].

Right to Delete

You may request that we delete all personal information collected from your child. Upon receiving a verified request, we will delete the information within a reasonable timeframe and confirm the deletion to you.

Right to Refuse Further Collection

You may refuse to permit any further collection or use of your child's information. If you exercise this right, we will stop collecting data from your child. Please note that this may limit or prevent your child's ability to use the platform, since the adaptive learning features depend on the data described in Section 4.

How to Exercise These Rights

To exercise any of these rights, contact us at:

Email: [contact@ednaimo.com]

Please include your name, your child's first name, and a description of your request. We will verify your identity as the child's parent or guardian before processing the request.

10. Security

We maintain reasonable security measures to protect the confidentiality, integrity, and availability of children's personal information. These measures include encryption of data in transit and at rest, access controls limiting who within our organization can view children's data, and regular security reviews.

11. Changes to This Notice

If we make material changes to this COPPA Notice, we will notify parents by email or through the platform before the changes take effect. We will obtain new verifiable parental consent if any changes involve collecting additional categories of personal information from children or using existing information for materially different purposes.

12. Contact Us

If you have questions or concerns about this COPPA Notice or our children's privacy practices, contact us at:

[Ednaimo Operator] Email: [contact@ednaimo.com]

This document is a draft and has not been reviewed by legal counsel. It should be reviewed and approved by a qualified attorney before publication.