COPPA Direct Notice to Schools and Parents

What Amira collects from children under 13, what it is used for, and how a school or a parent can ask for it to be removed.

AMIRA LEARNING

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Effective Date: August 31st, 2026

1. Introduction

Amira Learning Inc. ("Amira," "we," or "us") provides this Direct Notice to schools, school districts ("Schools"), and parents or legal guardians ("Parents") regarding Amira's collection, use, and disclosure of personal information from children under 13 in connection with the Amira Learning platform.

Amira Learning is an educational technology platform that supports reading instruction, instructional feedback, and assessment, helping children become stronger readers. The platform serves students in grades K–8 and is deployed through school and district partnerships.

2. Purpose of This Notice

The Children's Online Privacy Protection Act ("COPPA") requires operators to obtain verifiable parental consent before collecting, using, or disclosing personal information from children under 13. COPPA permits schools to consent on behalf of parents when contracting with operators like Amira for educational services. Amira will not collect, use, or disclose personal information from a child unless the child's school or district ("Education Provider"), acting as the parent's agent, has consented. If consent is not provided, Amira will not collect, use, or disclose any personal information from that child.

Schools may provide consent by: (a) executing a Data Services Agreement; (b) accepting a service order incorporating Amira's relevant Terms and Policies; or (c) accepting Amira's relevant Terms and Policies through the platform. For more information about our children's privacy practices, please read our online notice of information practices in our Privacy Policy.

3. Information We Collect from Children

When Schools deploy the Amira Learning platform, the following personal information may be collected from or about a child:

Information Collected	Source	How Used
Student name	School/district rostering	Account creation; identifying student to teacher
Student ID number	School/district rostering	Unique identification within the platform
Voice recordings	Collected during student reading sessions	Providing instructional feedback and reading assessment; enabling teacher review of student reading
Educational records and work products	Generated through platform use and district sharing	Supporting reading instruction, assessment, and feedback
Grade level and class name	School/district rostering	Grouping students for educational purposes; personalizing reading instruction
Device and log information	Automatically collected during platform use	Platform functionality, analytics, and security
App activity information	Automatically collected during Student User interaction with the platform	Supporting internal operations of the Services; improving the platform
Demographic information (such as gender or ethnicity)	School/district rostering (accepted if provided; not required or actively collected by Amira)	Supporting reporting by subgroup as directed by Schools
First-party cookies	Automatically collected through the platform	Supporting internal operations of the Services

Amira does not enable children to make personal information publicly available. Students do not encounter open forums or unmoderated user-generated content on the Amira platform.

4. How We Use Children's Information

4.1. Educational Service Uses

Amira uses children's personal information solely to:

- Provide reading instruction, instructional feedback, and assessment;
- Enable teachers and school administrators to review student reading progress and work products;
- Support students in becoming stronger readers; and
- Maintain and improve the Amira Learning platform's ability to serve learners.

4.2. Voice Recordings

Voice recordings are used solely to provide instructional feedback and reading assessments. Amira does not create or store biometric templates or voiceprints for identification purposes. No automated recognition or authentication using biometric characteristics occurs. Voice recordings are stored in a de-identified and encrypted manner. Districts may request that audio storage be disabled, though doing so limits teachers' ability to review student reading.

4.3. Model Improvement (De-identified Only)

All use of student recordings for model improvement is de-identified. Only derivative features of the student audio are used. Amira never contributes any student data to public AI models. Each district controls whether to participate in model-improvement activities.

5. Disclosure of Children's Personal Information

Amira does not sell children's personal information. Amira does not use children's personal information for commercial purposes unrelated to the educational services provided. Amira never contributes student data to public AI models.

Schools' Access. Amira provides school and district administrators and authorized teachers with access to student information (including reading performance data and, where enabled, voice recordings) for educational purposes.

No Other Third-Party Disclosure. Amira does not disclose children's personal information to third parties for advertising, marketing, or any purpose unrelated to the educational services described in this Notice, except as required by law.

6. Data Retention

Amira shall retain Student Data as follows:

(a) Audio Data. Amira shall retain Audio Data only until the end of the school year in which it was collected, after which it shall be securely disposed of. Amira will consider reasonable requests from the student's local education agency ("LEA") for alternative Audio Data retention periods. For the avoidance of doubt, this subsection does not apply to De-Identified Data derived from Audio Data.

(b) Other Student Data. Amira shall retain Student Data (other than Audio Data) for the lesser of (i) the duration of the Agreement with the student's LEA, or (ii) as long as necessary to fulfill Amira's obligations under any Agreement with the LEA.

7. Parental Rights

Parents have the right, pursuant to 16 CFR Part 312, to review and request deletion of their child's personal information that Amira has collected, and to refuse to permit Amira's further collection or use of such information; because such information constitutes education records maintained on behalf of the LEA, Amira will coordinate with the LEA to process any such parental request in accordance with Family

Educational Rights and Privacy Act and applicable state law. If a Parent wishes to refuse or withdraw consent for the collection, use, or disclosure of their child's personal information, the Parent must notify the child's school or district, and the child must immediately cease all use of the Amira platform. Parents may also contact Amira directly at trust@amiralearning.com, in which case Amira will coordinate with the school to verify the parent's identity and relationship to the student before acting on the request.

8. Contact Amira

If you have questions about this Notice or Amira's children's privacy practices, please contact us:

Amira Learning

490. Post St, Suite 500 PMB 2538

San Francisco, CA 94102

Phone: 1-866-883-READ (7323)

Email: trust@amiralearning.com

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Note to Schools: Amira recommends that schools make this Direct Notice available to parents of children whose personal information will be collected through the Amira Learning platform.