

SIMPLYR CHILDREN'S PRIVACY POLICY

COPPA Notice | Version 1.1 | Final | Effective August 31, 2026

Age restriction

Simplyr is designed for college and university students. The Service is not directed to children under 13, and a child under 13 may not create or use a personal Simplyr account. This Children's Privacy Policy describes Simplyr's procedures upon obtaining actual knowledge that it has collected personal information from a child and the requirements applicable to any separately authorized school deployment.

1. Scope of COPPA

The Children's Online Privacy Protection Act and the COPPA Rule apply to operators of child-directed online services and to general-audience operators with actual knowledge that they collect personal information online from a child under 13. COPPA generally requires notice, verifiable parental consent, parental access and deletion rights, data minimization, reasonable security, and limited retention.

The general Simplyr Service is intended for college and university students and is not directed to children under 13. Nothing in this Policy authorizes a child under 13 to use the general Service or constitutes an invitation or encouragement for such use.

2. Age eligibility and prevention

Users must satisfy the eligibility requirements in the Simplyr Terms of Service. Simplyr will not knowingly permit an under-13 user to maintain a personal account. Simplyr may use age-screening or other proportionate measures to enforce this restriction. Information collected solely to determine age will be used and retained only for that purpose, consistent with applicable law.

If Simplyr obtains actual knowledge that a personal account belongs to a child under 13, Simplyr will promptly suspend the account, cease nonessential processing, and take reasonable measures to delete the child's personal information, except to the extent retention is required by applicable law. Simplyr may collect limited information necessary to authenticate a deletion request or determine whether valid parental consent or school authorization applies.

3. What Simplyr's service may collect

The general Simplyr Privacy Policy describes the service's categories of information. They may include account identifiers; school, course, assignment, calendar, grade, attendance, habit, and study information; notes, journals, flashcards, drafts, images, recordings, and files; communications; subscription status; and device, log, crash, and usage data.

Simplyr does not intend to collect these categories from a child under 13 through a personal account. If an authorized school deployment includes children under 13, the school-specific notice and agreement must identify the exact categories collected, their purposes, all disclosures, and the responsible operator contact information.

4. No personal accounts for children under 13

- A parent or guardian should not create a personal Simplyr account for a child under 13.
- A child under 13 should not submit a name, email address, image, recording, schoolwork, persistent identifier, precise location, or other personal information to Simplyr.

- If a parent believes a child submitted information, the parent should email team@simplyr.app with the subject 'COPPA Request.'
- Simplyr will take reasonable steps to verify that the requester is the child's parent or guardian before disclosing or deleting personal information.

5. Parent and guardian choices

After appropriate verification, a parent or guardian may ask Simplyr to describe the personal information collected from their child, identify how it has been used or disclosed, review the child's personal information, revoke consent where consent was the basis for processing, refuse further collection or use, and request deletion. Refusing or revoking consent may make a service unavailable to the child.

Simplyr will not require a child to disclose more personal information than is reasonably necessary to participate in an authorized activity.

6. Limited school-authorized use

A school may, in limited circumstances, act as a parent's agent and authorize collection from a child under 13 when Simplyr is used solely for the school's educational purpose and for no other commercial purpose. Simplyr will rely on school authorization only under a written school agreement and after providing the school the notice COPPA otherwise requires for a parent.

- The school must identify the educational purpose and users covered by its authorization.
- Child personal information may be used only to provide the school-authorized educational service, maintain security, comply with law, and follow the school's lawful directions.
- Simplyr will not use school-authorized child data for targeted advertising, profiling for unrelated commercial purposes, or another independent commercial purpose.
- If Simplyr seeks to use or disclose a child's information beyond the school-authorized educational context, it must first obtain any separate verifiable parental consent required by COPPA.
- The school and Simplyr should make the applicable notice available to parents and provide a practical process for parent review and deletion requests.

School-authorized deployments

The Simplyr Terms of Service and Privacy Policy describe a college and university service and do not, standing alone, establish an under-13 school program. Simplyr will not knowingly enable an under-13 deployment unless an applicable school agreement, direct notice, consent or authorization record, and appropriate technical and administrative controls are in effect.

7. Sharing and advertising

Simplyr states that it does not sell personal information or share it for cross-context behavioral advertising, and does not use private journals, notes, grades, or uploaded course materials to advertise. For any COPPA-covered service, Simplyr will obtain separate verifiable parental consent before disclosing a child's personal information to third parties unless the disclosure is integral to the service or another COPPA exception applies.

Service providers may process information only to perform services for Simplyr under contractual restrictions. Simplyr currently identifies Supabase for authentication, database hosting, and file storage. A school-specific COPPA notice must list the actual operator and provider practices in effect before collection begins.

8. Security, minimization, and retention

For COPPA-covered information, Simplyr will maintain reasonable procedures to protect confidentiality, security, and integrity; collect only information reasonably necessary for the authorized purpose; release information only to providers capable of maintaining it securely; and maintain a written security program appropriate to the sensitivity of children's information.

Simplyr will retain a child's personal information only as long as reasonably necessary for the specific purpose for which it was collected, and not for a secondary purpose. It will maintain and follow a written retention schedule and securely delete the information when it is no longer needed, subject to legal requirements.

9. Direct notice and consent

If Simplyr offers a COPPA-covered service that requires parental consent, it will give the parent a direct notice describing its collection, use, and disclosure practices and obtain verifiable parental consent before collection, except where a narrow Rule exception permits limited collection. The consent method will be reasonably designed, in light of available technology, to ensure that the person consenting is the child's parent.

A consent record will identify the notice presented, the authorized processing, the consenting party, the method used, and the date. Material changes to covered collection, use, or disclosure may require a new notice and consent.

10. Contact and requests

Parents, guardians, and schools may contact:

Simplyr

Website: simplyr.app

Privacy and support: team@simplyr.app

Suggested subject: COPPA Request

11. Changes

Simplyr may update this notice as its services, practices, or legal requirements change. It will provide a new last-updated date and any direct notice or renewed consent required for material changes to COPPA-covered practices.

Legal references

Children's Online Privacy Protection Act, 15 U.S.C. Sections 6501-6506; Children's Online Privacy Protection Rule, 16 C.F.R. Part 312, as amended in 2025; Federal Trade Commission COPPA compliance guidance. Sources: FTC COPPA Rule, FTC COPPA FAQs, and FTC parental consent guidance.

This Policy supplements the Simplyr Privacy Policy and Terms of Service. If a school-specific notice or executed agreement imposes additional protections, those additional protections apply to the covered school deployment.