

Sparkz.Space Privacy Policy

Effective Date: October 29, 2025

Entity: EdSpan Global, in association with Animated Intelligences (“EdSpan Global,” “we,” “us,” “our”)

Contact: support@sparkz.space

1. Scope and Who We Are

This Policy explains how we process personal information when you use Sparkz, an educational AI guide offering text/voice chat, file uploads for learning tasks, and optional live avatar sessions.

It applies to our sites, apps, and services that link to it. Sparkz is for users ages 13 and older. If you are under 13, you may not use Sparkz.

When Sparkz is provided through a school or district, EdSpan Global acts as a “School Official” under FERPA with a legitimate educational interest and follows the institution’s written directions.

2. Information We Collect

2.1 You Provide

- **Account basics:** name, email (required)
- **Learning interactions:** prompts, chat messages, voice inputs (if enabled), and uploads (documents/images) used for learning tasks
- **Feedback & surveys:** ratings, comments, and optional survey responses

2.2 Automatically Collected

- **Service/device data:** IP address, device/browser type, OS, feature usage, timestamps, crash/performance logs
- **Cookies/SDKs:** necessary cookies for login/security and analytics cookies to understand feature usage

- **Approximate location:** may be inferred from IP by security/analytics tools (e.g., city/region). No precise GPS tracking

2.3 We Do Not Collect

Biometric identifiers, government IDs, or precise geolocation data.

3. How We Use Information

- **Provide & improve Sparkz:** operate features, personalize experiences, fix issues, and maintain security
- **Educational operations:** tutoring support, content recommendations, safety and quality checks
- **Analytics:** de-identified/aggregated metrics to improve experience and learning outcomes
- **Compliance & safety:** detect misuse, protect users, and meet legal or school obligations
- **Communications:** service notices and optional updates (opt-out available)

We do **not** sell personal information or use student data for third-party targeted advertising.

4. Legal Bases

- **Contract:** to provide the service you request
- **Legitimate interests:** security, quality, and internal analytics
- **Consent:** when required (e.g., optional surveys or certain school contexts)

5. Data Retention

- **Chat/voice/uploads:** deleted within 30 days of collection or task completion unless a school contract specifies otherwise.
- **Account basics (name, email):** retained while the account is active; deleted within 30–60 days of a verified deletion request or when accounts are closed, the pilot

concludes, or a school/district submits a written deletion request.

- **Analytics:** stored only in de-identified or aggregated form and never re-identified.

6. Third-Party Processors & Infrastructure

We use vetted vendors under data-processing terms that limit use to our instructions:

Google (authentication & analytics), OpenAI (educational AI responses), AssemblyAI (speech-to-text), ElevenLabs (text-to-speech), Pinecone (vector retrieval), Recall (avatar/Zoom), and DigitalOcean (hosting).

An up-to-date list is available upon request.

7. Children's Privacy (COPPA) & FERPA

Sparkz is 13+ and uses a neutral age gate. If we learn we inadvertently collected information from a child under 13 without verifiable parental consent, we will delete it promptly.

When schools participate in pilot programs, EdSpan Global contacts them directly to coordinate participation. We operate in accordance with each institution's student-data and consent policies and adapt to any additional privacy requirements they specify. Under FERPA agreements, we act as a School Official and process student data only for authorized educational purposes per the school's instructions.

8. International Data Transfers

We process data primarily in the United States. For EEA/UK users, transfers rely on safeguards such as Standard Contractual Clauses, plus technical and organizational measures.

This Policy may be translated for informational purposes. In case of any discrepancy, the English version governs.

9. Your Rights & Choices

Depending on your location or account type, you may have rights to access, correct, delete, port, or object/restrict processing.

- Contact: support@sparkz.space

10. Security

We implement reasonable administrative, technical, and physical safeguards (e.g., encryption in transit, access controls, environment hardening, monitoring).

11. Data Breach / Incident Response

In the unlikely event of a security breach involving personal information, we will take immediate action to investigate, contain, and remediate the issue. We will notify affected schools, users, and regulators (where required) within **24 hours of confirming an incident**. During school partnerships, notification timing and method will align with the school or district's own data-incident policy.

12. Sharing of Information

We do not share personal information for third-party marketing. We may share with:

- **Service providers** (as listed above)
- **Schools/teachers** (per education agreements)
- **Legal/compliance entities** (for valid legal process or safety/rights protection)
- **Business transactions** (e.g., merger/acquisition) with appropriate safeguards and notice

We may publish aggregated/de-identified statistics publicly (never re-identifiable).

13. Cookies & Do Not Track

Manage cookies in your browser; some features require necessary cookies. The industry lacks a uniform standard for Do-Not-Track signals, and we currently do not respond to DNT.

14. Communications

We may send service-related messages. You can opt out of non-essential communications via unsubscribe links or by emailing **support@sparkz.space**.

15. Changes to This Policy

We may update this Policy. Material changes will be posted with a new Effective Date and, where required, additional notice to affected users or schools.