Privacy Policy

Last Updated: November 19th, 2026
Link to Prior Privacy Policy

At Snorkl, we take your K12 Organization's privacy seriously. Please read this Privacy Policy (this "**Policy**") to learn how we treat personal data. **By using or accessing the Platform in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Policy.**

Remember that your use of Snorkl's Platform is at all times subject to our Terms and Conditions, which incorporates this Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms and Conditions.
You may print a copy of this Privacy Policy by clicking here.

What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we directly gather or collect when Organizations and their Authorized Users access and use the Platform. For details about how (and with whom) users may interact inside Snorkl, and whether any personal data is ever publicly visible, see 'User Interactions & Visibility of Personal Data' below. "**Personal Data**" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations. Keep in mind that Snorkl services schools, districts, companies, and other organizations. This Policy covers Personal Data we collect as a controller with those Organizations, which comprises Business Contact Data. ***If you are a student, teacher, administrator, or other individual for whom access to the Platform has been enabled by one of our Organizations please contact the applicable organization signed up for access to Snorkl on your behalf to learn more about Personal Data of yours that organization collects. Please refer to the Organization Data rights and ownership language outlined in our Organization Terms and Conditions, and our Data Processing Addendum for more information on our role as a processor of Personal Data. Specifically, parents wishing to retain more information about their child's student records or other personal information processed by Snorkl should contact the educational institution-Organization which purchased Snorkl access for their student to review, update, access, and otherwise delete any personal information about their child. Note that students may not directly access the material features and functionality of our Platform without a school-provided code.***

As we continually work to improve our Platform, we may need to change this Policy from time to time. Upon such changes, we will alert you to any such changes by placing a notice on the Snorkl website or Platform, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Platform, and you are still responsible for reading and understanding them.

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Personal Data

Categories of Personal Data We Collect

SNORKL WILL ONLY COLLECT AND PROCESS PERSONAL DATA TO PROVIDE THE PLATFORM, AND WILL NOT SHARE IDENTIFIABLE, ORGANIZATION DATA CONSTITUTING OF PERSONAL DATA TO THIRD PARTIES, EXCEPT FOR AUTHORIZED SUBPROCESSORS WHO HELP US PROVIDE THE PLATFORM AND WHO ENTER INTO AGREEMENTS WITH US TO PROTECT THAT PERSONAL DATA IN SUBSTANTIALLY THE SAME MANNER AS WE AGREE TO PROTECT IT IN OUR TERMS AND CONDITIONS.

This chart details the categories of Personal Data that we collect and have collected over the past 12 months from our Organizations:

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties With Whom We Share this Personal Data:
Profile or Contact Data	• Business Contact Data for administrative contacts • First and last names • Email addresses	• Service Providers • Analytics Partners
Online Identifiers	• Unique identifiers such as account names and the identifiers provided by your school's sign-in service (for example, Google, Microsoft, Clever, ClassLink, or NYC DOE)	• Service Providers
Device/IP Data	• Type of device/operating system/browser used to access the Platform	• Analytics Partners
Web Analytics	• Referring webpage/source through which you accessed the Platform • Statistics associated with the interaction between device or browser and the Platform	• Analytics Partners
Consumer Demographic Data	• School name • Country	• Service Providers • Analytics Partners
Photos, Videos and Recordings	• Recordings of verbal explanations of your work • Whiteboard images and recordings of your work on the Platform's digital whiteboard	• Service Providers
	• Typed responses, transcripts, and AI-generated feedback on student work	
Other Identifying Information that You Voluntarily Choose to Provide	• Identifying information in emails, letters, texts, or other communications you send us	• Service Providers • Analytics Partners

Please note the above categories of third parties we share Personal Data with are detailed below, and constitute Snorkl's subprocessors. Personal Data is solely processed and shared with authorized subprocessors to provide and improve the Platform.

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**

- When you provide such information directly to us.
    - When you create an account or use our interactive tools and Platform.
    - When you voluntarily provide information in free-form text boxes through the Platform or through responses to surveys or questionnaires.
    - When you send us an email or otherwise contact us.
- When you use the Platform and such information is collected automatically.
    - Through Cookies (defined in the "Tracking Tools and Opt-Out" section below).
    - We may infer your approximate location (such as your country) from your IP address.

Our Commercial or Business Purposes for Collecting or Disclosing Personal Data

- **Providing, Customizing and Improving the Platform**
    - Creating and managing your account or other user profiles.
    - Providing you with the products, services or information you request.
    - Meeting or fulfilling the reason you provided the information to us.
    - Providing support and assistance for the Platform.
    - Improving the Platform, including testing, research, and tracking internal analytics
    - Personalizing the Platform, website content and communications based on your preferences.
    - Doing fraud protection, security and debugging.
    - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws.
- **Corresponding with You**
    - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Snorkl or the Platform.
    - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
    - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
    - Protecting the rights, property or safety of you, Snorkl or another party.
    - Enforcing any agreements with you.
    - Responding to claims that any posting or other content violates third-party rights.
    - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

How We Disclose Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. For more information, please refer to the state-specific sections below. For the avoidance of doubt, Snorkl does not share your personal data with any advertisers, does not allow for creation of automated profiling by any advertisers, and does not allow for the placement of targeted advertising on its Platform more generally.

- **Service Providers.** These parties help us provide the Platform or perform business functions on our behalf. They include:
    - Hosting, technology and communication providers.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Platform. They include:
    - Companies that track how users found or were referred to the Platform.
    - Companies that track how users interact with the Platform.
- **Parties You Authorize, Access or Authenticate**
    - Third parties you access or authorize to access through the Platform.

For more information about specific subprocessors of your Personal Data that may fall under each of these categories, please visit our List of Subprocessors.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under "Meeting Legal Requirements and Enforcing Legal Terms" in the "Our Commercial or Business Purposes for Collecting Personal Data" section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will provide you with reasonable notice of the transfer where required by applicable law. Please note that any Personal Data we collect that is subject to the Family Educational Rights and Privacy Act ("FERPA"), the Children's Online Privacy Protection Act ("COPPA") or other laws or regulations relating to the protection of students' and/or childrens' Personal Data will remain subject to such laws or regulations in the event that a third party assumes control of our business. To the extent that we are required to enter into a contract with a School under such laws or regulations, the contract will specify that any successor entity to Snorkl will be bound by the terms of such contract.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Platform and promote our business, provided that we will not share such data in a manner that could identify you.

AI Features

Snorkl uses artificial intelligence (AI) to transcribe students' recorded explanations and to give students and teachers feedback and coaching on student work. To provide these features, we send recordings, transcripts, whiteboard images, and messages to the AI providers listed on our List of Subprocessors.

These providers process this data only to return results to Snorkl. Under our agreements with them, they do not keep this data after processing it and do not use it to train AI models. Snorkl does not use students' Personal Data to train AI models.

Tracking Tools and Opt-Out

The Platform use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, "**Cookies**") to enable our servers to recognize your web browser, tell us how and when you visit and use our Platform, analyze trends, learn about our user base and operate and improve our Platform. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Platform. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Platform does not support "Do Not Track" requests sent from a browser at this time. Snorkl does not track users across third-party websites or allow third-party tracking technologies to do so on our behalf. Additionally, Snorkl does not allow third-party service providers to use your personal information for their own purposes and will not share your personal information except for the purposes outlined in this Policy.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Platform. Disabling these Cookies may make certain features and services unavailable.
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Platform. They do this by collecting information about the number of visitors to the Platform, what pages visitors view on our Platform and how long visitors are viewing pages on the Platform.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on

the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Platform and functionalities may not work.

To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit http://www.allaboutcookies.org/ or https://ico.org.uk/for-the-public/online/cookies/ if you are located in the European Union or United Kingdom.

Data Security

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. Personal Data is stored and processed in the United States. It is encrypted in transit using TLS 1.2 or higher and at rest using AES-256, and Snorkl's security controls have been examined by an independent auditor in a SOC 2 Type 2 examination. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

Data Retention

We retain Personal Data about you for as long as necessary to provide you with our Platform or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

For example:

- We retain your profile information and credentials for as long as you have an account with us.
- We retain student recordings, whiteboard work, transcripts, and feedback while the Organization's account is active. When the Organization asks, or when its agreement with Snorkl ends, we return or delete this data at the Organization's direction within 30 days, and backups containing it are overwritten within 30 days.
- We retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.

Personal Data of Children

As noted in the Organization Terms and Conditions and in accordance with COPPA guidelines, Snorkl only collects personal information of children from an Organization (after obtaining School Consent or proof of verifiable parental consent) reasonably necessary to provide the Platform so that children may receive our educational services, and will not collect personal information of children under 13 for any extraneous purposes.

User Interactions & Visibility of Personal Data

Safe interactions (trusted users).

Snorkl is an invite-only platform. Authorized Users with teachers and administrator accounts create or import classes and may assign activities to students in those classes. Interactions are limited to members of the same class or Organization as determined by the account administrator.

Unsafe interactions (un-trusted users).

Snorkl does not permit students or other Authorized Users to interact with unverified, public, or otherwise un-trusted users. The Platform has no messaging, posting, or discovery mechanisms that connect users across different Organizations or the general public.

Visibility of personal data.

All Customer Content, inclusive of any student work product and profile information, are private by default in any Organization's Platform access. No student or teacher profile, submission, or recording is publicly accessible or indexed by search engines. Only (i) the student, (ii) teachers assigned to that student's class, (iii) the relevant Organization administrators, and (iv) authorized Snorkl staff, when needed to provide support or operate the Platform, can view the content. Snorkl never displays personal information for marketing or public-facing purposes.

External sharing.

Snorkl does not offer a "public link" or "share to web" option. Any export of Customer Content and personal data included therein, if enabled by the Organization, is limited to secure, organization-controlled channels (e.g., download by the teacher of record) and remains subject to the data-use restrictions in this Policy and the Organization's agreement with Snorkl.

State Law Privacy Rights

California Resident Rights

- Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes. SNORKL DOES NOT AND WILL NOT EVER DISCLOSE PERSONAL DATA TO THIRD PARTIES FOR DIRECT MARKETING PURPOSES.

Nevada Resident Rights

- If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. SNORKL DOES NOT AND WILL NOT EVER SELL PERSONAL DATA TO THIRD PARTIES.

Utah, Colorado, Connecticut, and Virginia Resident Rights

- If you are a resident of any of these states, you may contact us at any time to exercise your access, correction, deletion, or portability rights. Snorkl does not collect nor process any categories of "Sensitive Data" under these laws, and does not sell Personal Data to third parties. Individuals who want to exercise these rights should contact the applicable school, district, or other organization that controls this Personal Data. As noted earlier in the Policy, Snorkl is only a controller of Business Contact Data and all forms of student data are solely processed by Snorkl to provide the Platform. The applicable Organization is the controller of all student Personal Data, and students should contact their school for questions about exercising these rights.

iKeepSafe Safe Harbor Program

Snorkl participates in the iKeepSafe Safe Harbor program. If you have any questions or need to file a complaint related to our privacy policy and practices, please do not hesitate to contact the iKeepSafe Safe Harbor program at COPPAprivacy@ikeepsafe.org

UK & EU Representative

We value your privacy and your rights as a data subject and have therefore appointed Prighter Group with its local partners as our privacy representative and your point of contact for the following regions:

- United Kingdom (UK)
- European Union (EU)

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative, Prighter or make use of your data subject rights, please visit the following website: https://prighter.com/q/16125286082

Region-Specific Privacy Rights

Republic of Korea

If you are a resident of the Republic of Korea, please refer to our Korean Privacy Addendum for additional information on how your personal data is processed in accordance with applicable Korean laws.

Contact Information:

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data, process Personal Data of your end-users, or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- support@snorkl.app
- 5383 Balboa Avenue, San Diego, CA 92117