

SONG SPARK STUDIO

PRIVACY POLICY

Effective Date: September 5, 2026

Song Spark LLC ("Song Spark," "we," "us," or "our") operates Song Spark Studio, a private educational app and teaching service for enrolled music students. This Privacy Policy explains how information is collected, used, stored, disclosed, and deleted in connection with the Song Spark Studio app and related educational activities.

Song Spark Studio is designed for students, including children under 13, whose enrollment is arranged with Song Spark Studio outside the app. A parent or legal guardian must create an app account for a child under 13 and provide the required parental authorization before the child uses the service.

This policy is intended to describe our practices clearly, including practices relating to children's personal information under the Children's Online Privacy Protection Act (COPPA). It is not a substitute for individualized legal advice.

1. Who May Use Song Spark Studio

Song Spark Studio is a private educational service. Access to the app requires a class code supplied by the teacher, and the app is intended only for current Song Spark Studio students and their authorized parents or legal guardians. The app is free to download/use for eligible students and does not sell subscriptions, lessons, digital goods, Spark Coins, or other purchases inside the app.

For students under 13, a parent or legal guardian must establish or authorize the child's participation and create the child's account. A parent may also create a linked parent account. A linked parent account may monitor designated educational activity and teacher-student communications, but it does not provide access to the child's private journals, private writings, or private practice recordings.

2. Information We Collect

Depending on how the student uses Song Spark Studio, the service may process the following information:

- Account and contact information: student name, email address, phone number, and mailing/shipping address.
- Account relationships: information used to connect a student account with an authorized parent account.
- Educational progress information: XP, Spark Coins, lesson completion, sidequest completion, attendance-related rewards, and practice HP/progress indicators.
- Lesson submissions: performance videos or other assignment material that a student deliberately submits to the teacher for review, grading, instruction, or feedback.
- Teacher feedback: written, audio, or video feedback provided in response to lesson work.
- Class chat content: posts and messages made in the class chat when that feature is enabled.
- Reward fulfillment information: name, mailing address, selected reward, and information reasonably necessary to send a physical reward.

- Technical/service information: information reasonably generated by the app or its service providers to authenticate accounts, operate the service, maintain security, and troubleshoot technical issues.

3. Private Student Creative and Practice Content

Song Spark Studio includes private tools similar to a personal practice notebook. Students may create practice recordings, song recordings, journals, writings, lyric-bank entries, song ideas, and similar content. This content is stored through the app's cloud infrastructure, currently provided through Base44.

The teacher does not ordinarily access or review this private content, and linked parents do not receive access to it through the parent account. The teacher may see limited progress indicators, such as the student's practice HP bar, showing that practice activity occurred, without seeing the content of the student's practice journal, writing, or recording.

Likewise, the teacher may see that a sidequest was completed without necessarily seeing private recordings, writings, or other underlying material created as part of that activity.

Students should understand that content stored using third-party cloud infrastructure is processed and stored by the service provider as necessary to operate the app. Song Spark LLC cannot guarantee that any electronic storage system is completely secure.

4. Lesson Videos Are Different From Private Practice Content

A lesson submission is not treated as a private practice recording. When a student deliberately submits a performance video or other assignment for teacher review, the student is choosing to send that material to the teacher as part of the educational service.

Submitted lesson videos are stored using Dropbox and may be viewed by the teacher for instruction, evaluation, grading, and feedback. Teacher feedback may be written, audio, or video. Linked parent accounts may view communications and feedback between the teacher and student. Lesson submissions and feedback are not intended to be publicly available.

The app should make the submission action clear so that students can distinguish material they are intentionally submitting to the teacher from material they are keeping in their private practice or creative areas.

5. Children's Privacy and Parental Consent

Song Spark Studio knowingly serves some children under 13. We therefore require a parent or legal guardian to create or authorize an under-13 student's account before the child uses the app. Enrollment and payment arrangements for teaching services occur outside the app and may also be used as part of the process for confirming the parent or guardian relationship.

Before collecting personal information online from a child under 13, Song Spark Studio will provide the parent or guardian with notice of the information practices applicable to the child and obtain verifiable parental consent using a method reasonably designed to confirm that the person providing consent is the child's parent or legal guardian.

For a child under 13, a parent or legal guardian may contact us at any time to:

- review the personal information maintained about the child, subject to reasonable identity/relationship verification;

- request correction or deletion of the child's personal information;
- revoke consent and prevent further collection or use of the child's personal information; or
- request deletion of the child's account.

We do not require a child to provide more personal information than is reasonably necessary to participate in the applicable educational activity. If a parent withdraws consent, features that require the affected information may no longer be available.

6. How We Use Information

We use information for educational and operational purposes, including to:

- create, authenticate, maintain, and secure student and parent accounts;
- provide lessons, assignments, teacher feedback, sidequests, practice tools, and other educational features;
- track XP, Spark Coins, practice HP, participation, and completion of educational activities;
- help the teacher understand student participation and improve the educational experience;
- communicate with students and authorized parents about lessons, accounts, safety, scheduling, support, or service matters;
- fulfill physical rewards selected with Spark Coins;
- prevent misuse, maintain security, troubleshoot problems, and comply with legal obligations.

Song Spark LLC does not use student information for targeted advertising, does not sell student personal information, and does not use advertising trackers in the app.

7. Educational Activity Statistics

The teacher can view limited educational activity information, including practice HP/progress, whether a student completed a sidequest, lesson progress, XP, Spark Coins, and similar participation information. These statistics are used to support teaching, motivate practice, administer rewards, and improve the educational experience. They are not used for advertising.

8. Spark Coins and Physical Rewards

Spark Coins are in-app educational reward points. They have no cash value, cannot be purchased with money, cannot be redeemed for cash, and are not intended to be sold or transferred. Students earn Spark Coins through educational activities such as completing lessons, practicing, completing sidequests, and participating in eligible group lessons or activities.

Students may use Spark Coins for eligible physical rewards. To fulfill a physical reward, Song Spark Studio may use the student's stored mailing address and may provide necessary recipient and shipping information to Amazon or another fulfillment provider. The fulfillment provider may process that information to ship the selected item directly to the recipient.

Because the mailing address may be used for future rewards, it may remain associated with the student's account until it is changed, no longer reasonably necessary, or the account is deleted, subject to any legal retention requirement.

9. Class Chat

Song Spark Studio may offer a class chat. The teacher may enable or disable this feature. When enabled, posts are not private: class chat content may be visible to participating students, linked parents, and the teacher, and the teacher may monitor or moderate the chat.

Students should not post a home address, personal phone number, personal email address, password, precise location, financial information, or other sensitive personal information in the class chat. Inappropriate content may be removed and chat privileges may be limited or disabled when reasonably necessary for safety or classroom management.

10. Zoom Group Lessons

Some group lessons are conducted using the teacher's Zoom link outside the Song Spark Studio app. Song Spark Studio does not record these sessions. Students may be able to see or hear other participants when those participants choose to enable their camera or microphone. Students are not required to turn on their camera or microphone, although appropriate participation is encouraged.

Zoom is a separate service with its own privacy and security practices. Information processed directly by Zoom is subject to Zoom's applicable terms and privacy practices.

11. Service Providers and Disclosures

We use service providers where reasonably necessary to operate Song Spark Studio and the related teaching service. Depending on the feature used, these may include:

- Base44 - account authentication, app functionality, cloud storage, and storage/processing of private in-app content.
- Dropbox - storage and handling of lesson videos deliberately submitted for teacher review.
- Zoom - live group music lessons conducted outside the app.
- Amazon or another fulfillment provider - shipment of physical rewards, including processing necessary recipient and mailing information.

We may also disclose information when reasonably necessary to comply with law, protect the safety or rights of students or others, investigate fraud or misuse, or protect the security and integrity of the service.

We seek to limit disclosures of children's information to what is reasonably necessary for the applicable educational, operational, safety, or fulfillment purpose.

12. No In-App Payments

Song Spark Studio does not process payments or sell access inside the app. Teaching fees and enrollment arrangements, if any, are handled separately outside the app between Song Spark Studio and the student or the student's parent or guardian. Spark Coins cannot be purchased.

13. Data Retention

We retain personal information only for as long as reasonably necessary for the specific purposes for which it was collected, including providing ongoing instruction, maintaining an active account, administering educational progress and rewards, fulfilling requested physical rewards, maintaining appropriate educational records, resolving disputes, protecting the service, or meeting legal obligations.

Children's personal information is not intended to be retained indefinitely. We maintain or will maintain retention and deletion procedures appropriate to the categories of children's information we process. When information is no longer reasonably necessary for its documented purpose, we will delete it using reasonable measures, subject to legitimate legal retention requirements.

Because lesson submissions may be stored separately in Dropbox, deletion of a student's account may require deletion from more than one system. Song Spark Studio will process those associated deletion steps as part of the account-deletion process.

14. Account Deletion

Users may initiate account deletion through the app's account/settings area. A parent may also contact Song Spark Studio to request deletion of a child's account or information. We may take reasonable steps to verify the identity and authority of a person making a deletion request.

When an account is deleted, we will delete or arrange deletion of personal information associated with the account that we are not legally required to retain. This may include profile/contact information, shipping address, educational progress data, XP, Spark Coins, practice HP/activity records, private in-app writings and recordings, lesson submissions, teacher feedback, and other account-associated content.

Some limited information may be retained when required by law or reasonably necessary for matters such as fraud prevention, security, tax/accounting obligations, dispute resolution, or enforcement of legal rights. Where deletion requires processing by a service provider or manual action, completion may not be instantaneous.

15. Security

We use reasonable administrative, technical, and organizational measures appropriate to the nature of the information we handle. We also rely on third-party service providers to maintain security for information processed on their systems. No method of electronic transmission or storage is completely secure, so absolute security cannot be guaranteed.

Parents and students should protect account credentials, avoid sharing passwords, and contact us promptly if they believe an account or student information has been accessed without authorization.

16. Parent Accounts and Parent Visibility

A parent account is optional after the parent has established the child's eligibility/account. When linked, the parent may monitor designated educational activity and communications between the teacher and student, including teacher feedback. Parent visibility is intended to support supervision of the teaching relationship.

A linked parent does not receive access through the parent account to the student's private journals, private writings, lyric-bank entries, private practice recordings, or similar private creative content. The parent may see progress indicators such as practice HP without seeing the underlying private content.

17. Changes to This Privacy Policy

We may update this Privacy Policy when the app, teaching service, legal requirements, or our information practices change. If a change materially affects the collection, use, or disclosure of personal information from children in a way that requires new parental notice or consent, we will provide the required notice

and obtain consent before applying the new practice to the child.

The effective date at the top of this policy indicates when this version became effective.

18. Contact Us

Questions, parental requests, privacy inquiries, and requests to review, correct, or delete a child's information may be directed to:

Song Spark LLC
Song Spark Studio
1245 Farmington Ave. #1087
West Hartford, CT 06107
Email: SongSparkXP@gmail.com

Important implementation note: This Privacy Policy should be used together with a separate direct parental notice and verifiable parental-consent flow for under-13 students. Publishing a privacy policy or using an ordinary terms checkbox by itself does not necessarily establish verifiable parental consent.