



## Your personal data at Lalilo

- Regarding data collection, we only collect the information a teacher provides when signing up, as well as the students' learning data. We can also collect audio recordings, with the teacher's consent, during specific exercises.
- Data is only collected if we believe that this data allows us to help students in their learning and teachers in their job.
- We are committed to full transparency regarding the collection and use of school, student and teacher data.
- Teachers are held responsible for accepting this privacy policy on behalf of under-age students. They have the obligation to communicate this policy to parents or guardians of students.
- Retained data will never be used or sold for non-educational commercial or marketing purposes.

Lalilo complies with FERPA, COPPA, Ed. Law 2-D, and most privacy regulations. Our *Data Security and Privacy Plan* is available upon request to any Educational Agency willing to contract with Lalilo. This plan includes our response plan in case of a data breach.

### Information to reviewers

In case of a breach, Lalilo would inform users within 48 hours after discovery.

Lalilo supports or will support login through Google Classroom, Clever and other Educational SSO. Lalilo does not support login through social media accounts for students or teachers.

Lalilo does not use user-generated content, whether from students or teachers. There's no social interaction between two users, whether teachers or students.

Lalilo does not display traditional nor contextual advertisements.



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## What is Lalilo?

Lalilo is a teaching tool for primary school teachers. Teachers sign up on the teacher interface by entering their personal information. They can then, from the teacher's dashboard, fill in their student's ID tags on the platform.

Students can log on to their individual student interface, using a 6-letter code specific to the school in which the teacher enrolled. They then have access to a set of exercises, lessons and rewards that allow them to learn how to read at their own pace.

Students can sign in directly to their accounts from home, with an individual code that the teacher can send to parents, if they so wish.

### Which data?

The data collected by Lalilo includes two types: 1) the data provided by the teacher when signing up and adding students, and 2) the data automatically collected by Lalilo. At no time do we ask nor will we ever ask a child to complete a form requesting personal information.

Lalilo also uses third-party applications to provide its services. They include the user support chat, our emailing tools, feedback software... The list of these third-party applications that process personal data or which can use cookies on your computer is available in the appendix.

### What are my rights ? What commitments do you make?

#### Principle of economy

Generally speaking, we only collect data that is necessary for:

- the use of our product;
- the design of our product;
- the understanding of our users (teachers, children, parents).



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One can learn about the details of the data and the treatments carried out on these data by Lalilo in appendix.

#### Principle of information and transparency

We are committed to being as thorough and clear as possible about our data collection and processing. This document will evolve, in its form and in its substance, as our users will ask us for more details about the way we process their data, and also as the features offered by Lalilo evolve.

You will be notified of all changes to the privacy policy by email to the address you provided when signing up on the platform.

We will gladly answer any questions you may have on the data collected, services used, or processing performed. Do not hesitate to contact [dpo@lalilo.com](mailto:dpo@lalilo.com) for any questions regarding these topics. As we answer these questions, we will create a FAQ about our privacy policy, complementary to this document.

Our Data Protection Officer is Laurent Jolie.

#### Access, portability and deletion of data

As a teacher, you can:

- recover the personal data of your students or yours;
- remove the personal data of your students or yours;
- Stop the collection of personal data of your students or yours.
- Send us an email to [dpo@lalilo.com](mailto:dpo@lalilo.com) from your registration email on the platform. A request from another email address will automatically be refused for obvious reasons of data security.

As a teacher, it is your responsibility to send us any request from a parent concerning the personal data of their child. In case of withdrawal of consent from a legal guardian, it is your responsibility to make sure that their child is no longer using Lalilo.

As the legal guardian of a child you can:

- recover the personal data of your child;



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- have your child's personal data deleted
- stop the collection of your child's personal data.

Since you are not directly identified, the teacher will act as an intermediary for your request. You will have to ask them to make this request from the email address they used to sign up onto the platform. We reserve the right to decline any request that we consider unreasonable access to data. Some data is completely anonymized after a given time, and are no longer recoverable.

#### Benefit-risk balance principle

Before taking the decision to collect a new type of data, or to carry out a new treatment, we will study the benefit-risk balance of this new collection or treatment.

#### Speech and Audio Recordings Database

We apply a "data protection by default" and "data protection by design" approach in keeping with the principle of minimizing the processing of personal data to the extent necessary to provide the services and to further develop and enhance the voice recognition system.

We promise never to sell our database of audio recordings. This database will only be used as part of the services operated by Lalilo. This database is regularly anonymised. We will not take any step to re-identify or de-anonymize any end user voice data, and shall not authorize, instruct or encourage any third party to do so. See above the list of treatments, in the section "Audio recordings" and "Audio data processing".

#### Safety

We give great importance to the data security of students, teachers and potential third-party users (parents), and we set standards for safety practice. All access points to our stored data are secure, and we reduce access to data only to people who need that access. All our communications between your terminal and our server are encrypted with standard cryptographic algorithms.

#### Location

Our databases are physically located in France, to comply with current European regulations (RGPD).



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## **What are my duties as a user?**

### Positive consent to registration

As a teacher, when signing up onto platform, you will need to provide your explicit and positive consent to this privacy policy to access the service.

### Default Consent if Use Without a Change Warning Reply

We will notify you by email of changes to the privacy policy, on the email address you provided when signing up. Two choices will be offered: either to accept or to refuse. The rejection will result in the deletion of your account and all related data, including the ones of your students, within two weeks. You will no longer be able to use our platform.

If you do not respond to the change warning email or alert in the platform, and continue to use the Lalilo service, we will consider this as consent.

### Consent of Students

As the vast majority of students are minors below the legal limit of consent, parental consent may be required. The responsibility for obtaining parental consent for the use of Lalilo is left to the care of the teacher and the school.

By signing this privacy policy, you agree to be fully entitled to have your students use Lalilo.

In the case of a child of which you are responsible, who is over the legal limit of your country's consent, you will need to make sure that they consent.

### Applicability Framework



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We disclaim any liability for any use of our platform which does not comply with our terms of use or our privacy policy. Signing up on the platform is reserved exclusively for teachers, homeschooling officers and educational leaders in specialized institutions.

Registration on the platform is PROHIBITED to parents.

The use of the platform by parents is accepted when the access code dedicated to home usage has been communicated by the student's teacher.

No other operator than Lalilo handles children's data. The data is not sold or rented to any third party, including for marketing or advertising purposes.

Lalilo is based in Paris at 96b Boulevard Raspail.

Lalilo is also based in San Francisco, CA 94111, Suite 1100 400 Montgomery Street.

For any question, remark, request for clarification or suggestion on your data, please contact [dpo@lalilo.com](mailto:dpo@lalilo.com).

## **Annex 1: Data processed by Lalilo**

### **What data is communicated by the user?**

*Name, Surname, Email of the teacher*

This information allows us to contact you, to send you information about product developments, events set up within the Lalilo teacher community and any other type of communication.

*Name of your school*

1. This information allows us to bring together teachers from the same school; digital terminals are often shared across the school (mobile classroom, computer room)



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2. We can better know our users and improve the quality of our support (more effectively unblock situations related to districts or boards)

### *Teaching Language*

Language in which the students will learn how to read on Lalilo

### *Level - Class*

1. This is the only information we have on the initial level of children: this allows us to adapt the level of exercises we offer more quickly.

### *Students' ID tags*

The ID tag is the only data communicated on students. We need it so that students can choose their own account when they log in. The choice of the ID tag is left for the teachers to choose:

- first name
- first name + last name
- initials
- other type of ID tags (superheroes, animals ...).

## **Data collected automatically**

### *Learning data*

When students learn how to read at their own pace on Lalilo, they interact with the platform. A number of actions are recorded by Lalilo:

- answer given or composed by the student;
- response time;
- repetition of instruction or phonemes;
- other data related solely to the assessment of student success in an exercise or understanding of a learning sequence.

This data is recorded in its raw format (a list of interaction events with the platform).

This data is kept pseudo-anonymized. Pseudo-anonymization means that learning data is



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not stored in the same place as personal data. A common identifier, however, allows to link them.

The student data is anonymized after one year of inactivity.

Anonymizing these data means that we are unable to tell which student did what action.

They cease to be personal data.

#### *Usage and Processing of learning data*

Data is collected in order to be able to adapt questions in a relevant and individual way at the level of each student. Lalilo assesses the level of students on a number of skills related to literacy, using a statistical model called "IRT" (for Item Response Theory), used by statisticians in psychology.

This paradigm allows, from the raw data of learning, to calculate the prior probability of success of a student to an exercise. From this set of probabilities of success and pedagogical rules, the algorithm determines as a student progresses which are the most relevant exercises for him or her at a given moment. The educational constraints, determined with experts in education science, make it possible to provide a path of high educational quality.

The calculation times being non-negligible, and because teachers need information displayed in their teacher's dashboard, the intermediate success rates of students on various skills are stored in a pseudo-anonymized way in a table. This data is updated regularly (at each child's exercise), and will be totally deleted when the raw data is pseudo-anonymized (see section Learning Data).

#### *Audio recordings*

Lalilo integrates playback feedback and playback tracking features. The student can, in the first case, read a sentence to the machine, which corrects it and identifies mistakes. In the second case, the child can read a sentence or a longer text, and the machine is able to follow where the student is reading this sentence or longer text. Feedback can then be given to the student, so that they become aware of pronunciation and personal difficulties. Other reading exercises allowed in autonomy may be developed by Lalilo in the future.

In order to offer these features, Lalilo can retrieve on its servers the audio recorded



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by the device's microphone at certain times during the session. These records are of two types:

1. Records of "background noise" in the range of a few seconds. These recordings can be made before starting a read-aloud exercise using the microphone. These are analyzed in order to estimate the relevance of giving this type of exercise. Indeed, if the background noise is too important or the equipment is working badly, it is often better not to do exercises using voice recognition. These recordings are not subject to speech recognition analysis, and a fortiori are not subject to semantic analysis. These "background noise" recordings can be randomly stored. They are stored only for the purpose of forming acoustic background noise models, making it possible to improve the pre-processing algorithms. These recordings are completely anonymous.
2. "Exercise" recordings, which are intended to specifically record the child's reading, as part of an exercise on the platform. These records are stored in our databases, in a pseudo-anonymized way for a limited period of time, so the teacher would be able to listen back to it. After this period, the recording is anonymized before being stored in the database. An annual process of total anonymisation is carried out. With each exercise, recordings are stored according to the student's country & city. This allows us to improve our acoustic models, differentiating them according to the peculiarities of the regional accents.

#### *Processing of audio data*

Lalilo's algorithms are not strictly speaking speech recognition algorithms. The purpose of the treatment is not to find which text is pronounced (in fact no semantic analysis is made on the recordings). Lalilo has created a reading evaluation algorithm. Its purpose is to detect the quality of the reading, the mistakes made and to give relevant feedback to students, in order to allow them progress.

Several treatments are done. A pre-processing is used to evaluate whether the recording is exploitable or not (see paragraph "Audio recordings"). If the recording is exploitable, the algorithm will analyze it. It will detect whether the students are hesitating as well as their pronunciation errors. From this analysis, the algorithm will determine the most relevant feedback to give students.



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The result of this algorithm is recorded in the raw learning traces of students mentioned above (see section on learning data) and these are used to estimate the students' probability of success ( see Treatment section on learning data).

Lalilo uses for some exercises a tracking algorithm. This algorithm allows to follow in real time the student who reads a text with the help of a cursor. The purpose of this treatment is to create a motivating experience for students, so as to help them read more. This allows students to overcome the cognitive fatigue related to reading over a long period of time. In addition to real-time tracking, errors made by students are also detected. They will not all be reported to them, the main purpose being to read. Even if they are not reported to students, they are recorded in the raw learning traces.

By accepting this policy, you accept collection of these audio recordings. However, the browsers request permission for Lalilo to access the microphone. So a teacher may use Lalilo without giving access to the audio data by simply refusing to let Lalilo access the microphone when the browser requests to do so. No recording will be made then, and one can use Lalilo normally, with the exception of exercises and features related to the microphone that will not be offered.

### Cookies

We use "Local storage" and the browser's cookies to store session information. In particular, we stock the school code, which allows students to reconnect without entering the class code for each use, and the home use code for the same reason. We do not use it for advertising or marketing purposes.

You can check in your browser the list of cookies installed on your computer after browsing lalilo.com.

## **Appendix 2: Third-party applications**



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### [Google Analytics](#)

Google Analytics is a tool to measure events coming to all sites in {} .lalilo.com (lalilo.com, app.lalilo.com, student.lalilo.com ...). Event sequences are recorded (arrival on the site, click on the registration button, click on the exercise preview button ...). This allows us to understand the use of the site and improve the user experience of our sites / platforms. We do not transmit personal information to Google Analytics. We only transmit the nature of the interaction (which button was clicked).

If preferred, one can use software to prevent the activation of Google Analytics, such as the plugin "Google opt-out".

### [Mixpanel](#)

Mixpanel is a tool dedicated to the statistical analysis of behaviors. It is similar to Google Analytics in the way it works. It allows us to better understand the behaviors of our users, and to detect flaws in the user experience of our website.

Mixpanel also allows us to send emails in reaction to particular events (such as sending a welcoming email when signing up). We do send identifying information to mixpanel, for this communication purpose, including the teacher' email address when we have it.

### [Facebook Pixel](#)

We use [Facebook pixel](#). Its operation is similar to that of Google Analytics. When the user clicks on a button on the Lalilo Facebook page, it is taken into account and allows to track how the user uses the site. We use Facebook pixel to determine the impact of Facebook ads to promote Lalilo. This allows us to know how many users have registered on the platform through Facebook advertising. No identifying data is communicated from us through the Facebook pixel. We only communicate the type of event (the type of button clicked by the user).

### [MailChimp](#)



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MailChimp is a newsletter manager. MailChimp allows a company to manage lists of email addresses and launch email campaigns. One can unsubscribe from the newsletter by clicking the button of each email you are sent ("unsubscribe from this list"). The recipient will continue to receive non-newsletter emails, necessary for the use of the platform (CGU update, privacy policy, or other information essential to the enlightened use of the platform).

#### [AskNicely](#)

AskNicely is a feedback manager. AskNicely allows Lalilo to send to a set of email addresses using a questionnaire format as follows: "From 0 to 10, how much would you recommend Lalilo to another teacher?" - and to ask the recipient for written comments.

Each feedback (note and comment) is associated with the email address from which it comes. Recipients are under no obligation to respond to this solicitation (which can only happen 2 to 4 times a year maximum). One can unsubscribe by clicking on the "Unsubscribe" button at the bottom of the email.

#### [FullStory](#)

Some of the sessions are recorded on FullStory, associated with the email address of the user of the website. The first aim is to solve bugs, being able to observe them. The second purpose is to understand the users' behaviors to ensure the fluidity of use. The recorded session reproduces what the user sees in the tab on one of the subdomains of lalilo.com.

#### [Intercom](#)

We use Intercom as a user support tool. This is a chat, usable from lalilo.com and app.lalilo.com. It is not accessible from the student platform (student.lalilo.com). Intercom automatically retrieves the email address of the user if the teacher is logged



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in. If the user is not logged in, the only information sent to Intercom is the information already provided by the user.

The third party services listed above may place cookies related to browsing history on lalilo.com. These make it possible to ensure the proper functioning of the listed services. One can check the browser to review the list of cookies installed on the computer after browsing lalilo.com.



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