

Instrux Music – Children’s Education Privacy Policy

Effective Date: 10/1/2025

Last Updated: 10/1/2025

Rivo, Inc., doing business as Instrux Music (“Instrux Music,” “we,” “us,” or “our”), is committed to protecting the privacy of children, parents, educators, and educational institutions. This Children’s Education Privacy Policy (“Policy”) outlines our practices for collecting, using, and protecting information obtained from children under the age of 13 and students under the age of 18 in compliance with applicable laws, including the Children’s Online Privacy Protection Act (COPPA) and the Family Educational Rights and Privacy Act (FERPA).

This Policy supplements our **Privacy Policy** and **Terms of Use** and applies specifically to the use of Instrux Music by children, parents, and educational institutions.

1. Who This Policy Applies To

This Policy applies to:

- Children under 13 using the platform with parental or guardian consent;
- Students under 18 enrolled in a school, district, studio, or organization using Instrux Music;
- Parents, guardians, instructors, and school administrators overseeing student use of the platform.

2. Parental or School Consent Required

Children under 13 cannot create their own account. They may only access Instrux Music if:

- A parent or legal guardian provides verified consent through our consent process; or
- A school, district, or organization has licensed Instrux Music and obtained appropriate parental consent on our behalf, as permitted under COPPA.

When schools or districts license Instrux Music, we act as a “school official” under FERPA and process data solely for educational purposes under their direction.

3. What Information We Collect

Depending on the type of user and account settings, we may collect the following from children and students:

- **Identifiers:** A student's full name, first name with last initial, or another unique identifier as determined by the parent, school, or organization creating the account. This ensures instructors can accurately differentiate between students in lessons and records.
- **Basic profile information:** Age or grade range, music skill level.
- **Educational content:** Audio and video recordings of lessons, assignment uploads, lesson notes, or chat content within the platform.
- **Affiliations:** Instructor, studio, or school name.
- **Parental/guardian contact information:** For children under 13, we require a parent or guardian email address for consent and communication.

We do not request or require unnecessary personal details such as home addresses, phone numbers, or social media information from children. All identifiers are collected and used solely for educational purposes, account management, and compliance with FERPA and COPPA.

4. How We Use Children's Information

Children's information is used exclusively to:

- Provide access to music lessons and platform features;
- Support classroom or instructor-led instruction;
- Track student progress and enable parental/educator review;
- Maintain account functionality and platform security.

Instrux Music does not use children's personal information for advertising, profiling, or marketing.

5. How We Share Children's Information

We only share student data:

- With the child's instructor, school administrator, or guardian;
- With third-party service providers (e.g., video conferencing, storage, or billing providers) as needed to operate the platform, under strict contractual safeguards;
- If legally required (e.g., subpoena, court order, or lawful investigation);
- With parents or guardians upon verified request.

We do not sell, rent, or disclose children's data to third parties for commercial use.

6. Data Retention and Deletion

- **Lesson recordings and associated lesson data (materials, notes, uploads, etc.) are retained for twelve (12) months from the date of the lesson. After this period, they are permanently deleted from our servers.**

- If an account is unsubscribed but not deleted, the ability to schedule or host new lessons is disabled. However, existing lesson recordings and data remain accessible for the 12-month retention period.
- If an account is permanently deleted, all personal data is erased from our servers within thirty (30) days.
- Parents, guardians, or schools may request deletion of a child's data at any time by contacting privacy@instruxmusic.com.

Users are responsible for downloading and storing lesson content they wish to retain beyond the retention period.

7. Parent and Guardian Rights

Parents or guardians may:

- Review personal information collected from their child;
- Request corrections to inaccurate information;
- Revoke consent and request deletion of their child's data.

Requests may be made through the child's instructor, studio, or directly to us at privacy@instruxmusic.com. We will respond within 10 business days of a verified request.

8. FERPA Compliance for Schools

When schools or districts license Instrux Music, we act as a "school official" under FERPA, with a legitimate educational interest in processing data on the school's behalf. We agree to:

- Use student data only for authorized educational purposes;
- Protect data in line with FERPA standards;
- Assist schools with records requests or audits;
- Never redisclose data except as permitted by FERPA.

9. Security of Children's Information

We safeguard student information using:

- Encrypted video conferencing;
- Data encryption in transit and at rest;
- Role-based access controls;
- Vendor security vetting;
- Regular audits and monitoring.

While no system is 100% secure, Instrux maintains industry-standard protections to keep children's data safe.

10. Changes to This Policy

We may update this Policy to reflect legal, regulatory, or operational changes. If updates are material, we will:

- Notify affected schools, instructors, or parents directly;
- Post a revised “Last Updated” date at the top of this Policy;
- Seek renewed parental consent if required.

11. Contact Us

For questions about this Children’s Education Privacy Policy, please contact:

Instrux Music (Rivo, Inc.)

P.O. Box 15015, Evansville, IN 47716

privacy@instruxmusic.com