# **Instrux Music – Internet Safety Policy**

Effective Date: 10/1/2025

Instrux Music, operated by Rivo, Inc., is committed to creating a safe and secure online learning environment for all users—especially children and students—while complying with applicable laws, including the **Children's Online Privacy Protection Act (COPPA)** and the **Family Educational Rights and Privacy Act (FERPA)**.

This Internet Safety Policy outlines our expectations, practices, and safeguards to help protect personal information, ensure respectful online interactions, and promote safe participation on our platform.

1. Purpose

This policy exists to:

- Protect student privacy and safety online.
- Establish clear guidelines for using Instrux Music's platform and tools.
- Ensure compliance with FERPA, COPPA, and other applicable laws.
- Support schools, organizations, parents, and instructors in creating safe learning environments.

### 2. Scope

This policy applies to:

- All users of the Instrux Music platform, including students, parents/guardians, instructors, and school/organization administrators.
- All content and communications conducted through the platform.
- Any devices, accounts, or services used to access Instrux Music.

## 3. Privacy & Data Protection

We follow strict data collection, usage, and retention policies, including:

- **Parental Consent:** For students under 13, a parent or legal guardian must register the account or provide verifiable consent before the student can participate.
- **Minimal Data Collection:** We only collect the information necessary for educational purposes (e.g., name, age, skill level, email address for login, SMS for reminders).

- **No Selling of Data:** We do not sell student or instructor data and do not use personal information for targeted advertising.
- **Secure Storage:** Data is encrypted in transit and at rest. Access is restricted to authorized personnel.

See our Privacy Policy and Children's Educational Privacy Policy for full details.

### 4. Lesson Recording Policy

To support safety, transparency, and learning:

- All lessons are automatically recorded by default.
- For students under 18, recording remains enabled unless a parent/guardian opts out in writing.
- For students under 13, recording is mandatory unless disabled by the organization or parent for documented reasons.
- Recordings are stored and retained according to subscription level or contractual terms, then deleted in line with our **Privacy Policy**.
- Schools and organizations with custom agreements may receive lifetime access while their account remains active.

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### 5. Safe Communication Standards

To maintain a safe, respectful environment, the following rules apply to all users:

- No Sharing of Sensitive Information: Users should not share home addresses, personal phone numbers, payment details, or government-issued IDs through the platform.
- Appropriate Conduct: No profanity, harassment, sexual content, or discriminatory remarks based on race, gender, religion, disability, sexual orientation, or any other protected status.
- Professionalism in Lessons: Instructors must maintain professional dress and a neutral or appropriate background.

### 6. Instructor Responsibilities

Instructors agree to:

- Follow all applicable laws and this policy when working with minors.
- Send invitations for students under 13 to parents/guardians, not directly to the student.
- Never solicit personal or payment information from students.
- Cooperate with any safety or compliance investigations initiated by Instrux Music or a school/organization.

## 7. School & Organization Responsibilities

When licensing the platform, schools and organizations agree to:

- Obtain and maintain all necessary parental/guardian consents under COPPA and FERPA.
- Train their staff on proper platform use and online safety standards.
- Monitor student activity where appropriate to ensure compliance.

### 8. Reporting & Response

- How to Report: Users may report unsafe, inappropriate, or unlawful behavior by emailing <u>support@instruxmusic.com</u>.
- **Our Response:** Reports will be reviewed promptly. Accounts may be suspended or terminated, and relevant recordings/data shared with authorities when legally required.
- **No Retaliation:** We prohibit retaliation against anyone who, in good faith, reports concerns.

### 9. Policy Updates

This Internet Safety Policy may be updated to reflect changes in law, technology, or best practices. Users will be notified of material changes, and continued use of the platform after updates take effect constitutes acceptance of the revised policy.