# **COPPA Direct Notice to Education Provider**

#### **Updated: September 2024**

Under the United States' Children's Online Privacy Protection Act ("COPPA"), online service providers such as Tinkercad must obtain verifiable parental consent before collecting, using, or disclosing personal information from children under the age of 13.

In cases where education providers contract with online service providers such as Tinkercad to offer programs solely for the benefit of students and schools, COPPA allows for such education providers to act as a parent's agent and to consent under COPPA to the collection of a child's information on the parent's behalf. Autodesk will not collect, use, or disclose personal information from a child under the age of 13 unless that child's teacher, school or school district (hereinafter collectively referred to as "Education Provider"), acting as the parent's agent, has provided the required parental consent.

To rely on consent obtained from a child's Education Provider instead of the parent under COPPA, we must provide the Education Provider with the same type of direct notice regarding its practices as to the collection, use, or disclosure of personal information from children as it would otherwise be required to provide to parents:

- Autodesk intends to collect personal information from students, including children under the age of 13, but only to the extent reasonably necessary to enable students to use Tinkercad.
- Autodesk will use and disclose personal information from students, including children under the age of 13 for educational purposes only.

The Education Provider's acceptance of a service agreement with Autodesk will be deemed to be consent on behalf of parents for Autodesk's collection, use, and disclosure of children's personal data in accordance with this Direct Notice and as further explained in Autodesk's Children's Privacy Statement.

## Information we may collect about children

If consent is provided, we may collect the following information from the children:

- A birthdate
- A unique username and password
- A country
- A parent or guardian's email address
- Avatar
- Reactions (likes)
- Location information but not precise geolocation

- Uploaded files, documents or photos
- Designs or other content generated by a child
- Communication between a child and a teacher
- The type of computer operating system
- The child's IP address or mobile device identifier
- The web browser used
- The frequency with which the child visits various parts of our applications

## Disclosure of Children's Personal Information

We disclose children's information to:

- Parents and teachers
- **Our service providers**, including vendors, consultants, contractors, and other service providers who perform services or functions on our behalf, for business purposes.
- Our affiliates, for any of the purposes and uses of information described in this Direct Notice. You can find a list of Autodesk entities here.
- Law enforcement, legal counsel, or other reasonably necessary parties when we determine that such disclosure is reasonably necessary to: (a) comply with any applicable law, regulation, legal process, or appropriate government request or to enforce or apply our terms and conditions or to establish, exercise or defend the rights of Autodesk, Autodesk personnel, customers or others; (b) prevent or respond to fraud or software piracy; (c) protect the rights, property, or safety of Autodesk, our customers, and the public.
- Persons involved in the consideration, negotiation, completion of a business transaction, including the sale, merger, consolidation, acquisition, change in control, transfer of substantial assets, bankruptcy, or reorganization, and any subsequent integration.

Content created or uploaded by children is not shared publicly, unless their teacher chooses to disable Tinkercad safe mode and enable public posting.

We may also disclose children's personal information to other parties when we have your consent to do so or when you direct us to, for any non-commercial purposes requested or permitted by you.

Please see the "<u>How does Autodesk disclose your personal data?</u>" section of the <u>Autodesk Privacy Statement</u> and <u>Children's Privacy Statement</u> for the ways in which Autodesk generally discloses personal data.

If we discover that we have processed a child's personal information in a manner inconsistent with applicable law, we will promptly delete the data or bring that processing into compliance with applicable law, such as by obtaining appropriate permission for that processing.

Upon request from the Education Provider, Autodesk will provide an opportunity to review the child's personal information and the right to have the information deleted.

For more information about our privacy practices with respect to children, please see Autodesk's <u>Children's Privacy Statement</u>.

We recommend that Education Provider makes this notice available to parents so that they may review the personal information collected about their child.

#### **How to Contact Autodesk**

If you want to contact us, please use the following contact information. When you do so, please tell us the name of the application about which you are contacting us:

By email at: <a href="mailto:privacy.questions@autodesk.com">privacy.questions@autodesk.com</a>

By phone: 415-507-5000

By postal mail to:

Privacy Questions
Autodesk, Inc.
The Landmark @ One Market
Suite 400
San Francisco, CA 94105
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