

1. Introduction

- 1.1. We are committed to protecting children's privacy.
- 1.2. The Create-A-Sun app is designed to foster positivity and resilience in children while ensuring data safety and compliance with GDPR, COPPA, and FERPA.

2. Data We Collect

- 2.1. Journal Entries (text provided by the child/student reflections)
- 2.2. AI-Generated Images (created based on entries)
- 2.3. Minimal Account Information (child/student username, parent/teacher email for consent, child's age, heritage)
- 2.4. We do not collect sensitive child-specific data, such as birthday, full name, or any other sensitive child-specific information.
- 2.5. **Reduced Data Collection for Pilot Programs with Schools:** For specific pilot programs with schools where Create-A-Sun sets up accounts separately, we collect less data. In these instances, we do not collect teacher emails or any other school-related or child-related information; we only collect the journal entries and AI-generated images.

3. How We Use Data

- 3.1. To generate personalized AI images for children's journal entries/student reflections.
- 3.2. To track streaks and encourage engagement.
- 3.3. Data is never shared with third parties or used for advertising.

4. Parental & School Use and Controls

- 4.1. Parents or teachers can review, edit, or delete their child's/student's data at any time (unless otherwise specified in pilot program agreements).
- 4.2. We comply with GDPR and COPPA, requiring parental consent before collecting data (unless schools provide consent as permitted by COPPA).
- 4.3. Schools may provide consent for students under 13, in accordance with COPPA.
- 4.4. Schools can sign a Data Processing Agreement (DPA) for additional privacy protections.
- 4.5. Educators and administrators can manage student accounts and data (depending on pilot program structure). *Note: Data management specifics for pilot programs will be outlined in individual agreements with participating schools.*

5. Data Storage & Security

- 5.1. All data is stored securely in Firebase with encryption.
- 5.2. AI-generated content is not used for training AI models.
- 5.3. Data is deleted upon request or automatically after inactivity.
- 5.4. Schools can request bulk deletion of student data at any time.

6. Contact Us

- 6.1. For privacy concerns or to request a Data Processing Agreement, email us at joanna@create-a-sun.com.