



Cocoa Classroom Main Privacy & Accessibility Policy

1. Introduction

Cocoa Classroom LLC ("Cocoa Classroom," "we," "our," or "us") provides educational technology services designed for families, teachers, and students.

This policy explains how we collect, use, disclose, and protect personal information while ensuring that our digital environments are accessible to all users.

Cocoa Classroom complies with:

- **Accessibility Standards:** WCAG 2.1 AA, ADA Title III, and Section 508
- **Privacy Regulations:** COPPA, FERPA, and GDPR (including the UK GDPR)
- **Applicable State Laws:** including CCPA/CPRA (California) and Nevada SB 220

Our platform embeds both **privacy-by-design** and **accessibility-by-design** principles into every feature we release.

2. Information We Collect

- **Account & Identity Data:** name, email, role (parent, teacher, or student)
- **Learning & Activity Data:** course participation, grades, lesson interactions, feedback logs
- **Accessibility & Preference Data:** font size, contrast mode, text-to-speech settings
- **Technical Data:** device type, browser, and security-related logs

We do **not** sell personal information or track users for advertising purposes.

3. How We Use Information

- Provide and personalize educational services
- Support communication between teachers, parents, and students
- Monitor accessibility performance and improve user experience
- Fulfill legal obligations under applicable privacy laws

4. Legal Bases and Frameworks

COPPA – For users under 13, parental consent is required before account activation.

FERPA – Educational records are accessible to parents/guardians and disclosed only to authorized educational personnel.

GDPR – Processing is based on consent, contract performance, or legitimate interest. Users in the EU/EEA may exercise the rights of access, rectification, portability, and erasure (Arts. 15–20 GDPR).

Accessibility Compliance – Cocoa Classroom conforms to WCAG 2.1 AA standards and maintains equivalent accessibility measures under ADA and Section 508.

5. User Rights and Choices

You may:

- Review, correct, or delete your data
- Withdraw consent at any time
- Export or transfer your information upon request

Requests can be made through our **Privacy & Accessibility Request Form** at
👉 <https://cocoaclassroom.com/privacy-request>
or by emailing info@cocoaclassroom.com.

6. Accessibility & Inclusive Design

We are committed to maintaining a fully inclusive learning environment:

- Semantic HTML and ARIA labeling
- Keyboard and screen-reader compatibility
- Captions and high-contrast visual themes
- Ongoing testing with assistive technologies

Cocoa Classroom conducts **annual accessibility and privacy audits**, or more frequently following major feature releases.

Feedback, accommodation requests, or bug reports may be submitted through our **Accessibility Feedback Form**: <https://cocoaclassroom.com/accessibility-feedback> or emailed to info@cocoaclassroom.com.

7. Data Security and Retention

- Encryption in transit and at rest
- Role-based access control
- Limited data retention tied to educational necessity
- Routine internal audits and staff training

8. International Data Transfers

For users outside the United States, data transfers rely on **Standard Contractual Clauses** or equivalent safeguards approved under GDPR Arts. 44–46.

9. Updates and Review Schedule

This policy is reviewed **annually** and updated when new privacy or accessibility standards apply.

We notify users of material changes via email and in-app announcements.

Effective Date: October 15, 2025

Version: 3.1

10. Contact Information

Privacy & Accessibility Officer

Cocoa Classroom LLC

649 Deer Springs Way, Ste 120-154

North Las Vegas, NV 89086

 (702) 825-0574

 info@cocoaclassroom.com

For EU/EEA users, you may also contact your local **Data Protection Authority (DPA)** or the **European Data Protection Board (EDPB)** if you believe your data has not been handled properly.