CALIFORNIA K–12 DISTRICT REVIEW PACKET

ZoodleBug District Student Privacy Readiness Brief

Operational status, verified controls, district response language, and remaining contract items

PREPARED BY	PRIVACY CONTACT
Tim Bedley / ZoodleBug	privacy@zoodlebug.com | 951-878-9140
PUBLIC MAILING ADDRESS	RELEASE STATUS
31165 Temecula Pkwy, Suite G3, Unit #2120 Temecula, CA 92592	Technical privacy release verified live September 4, 2026

Executive status

Current position

ZoodleBug has live, tested technical controls designed to support California AB 1584, SOPIPA, FERPA school-service obligations, and COPPA school-authorized use. A particular district's policy is not fully met until ZoodleBug reviews and signs that district's required agreement and resolves any district-specific security, retention, breach-notice, or subprocessor terms.

The live release now includes privacy notices, a working privacy-request channel, verified-educator student provisioning, restricted student visibility, least-privilege Firestore rules, sponsored-student deletion with a receipt, and documented security, incident, retention, and provider procedures.

What to say to the district

Recommended answer

"ZoodleBug has implemented and tested technical and operational controls designed to support California AB 1584, SOPIPA, FERPA school-service requirements, and COPPA school-authorized use. We do not sell student information or use it for targeted advertising. The school remains in control of its records. We are ready to review and sign your required data privacy agreement and complete your security questionnaire. Please send us the exact district documents and deadlines."

Claims to avoid

- Do not say "AB 1584 certified," "California approved," or "FERPA certified." These are not certifications ZoodleBug currently holds.

- Do not say ZoodleBug meets every district policy before reviewing that district's DPA, security questionnaire, breach-notice deadline, and retention terms.
- Do not promise a contract deadline or technical feature that is not written into the final agreement and operational runbook.

Readiness status at a glance

VERIFIED LIVE Technical control tested in production.	DOCUMENTED PROCESS Operating procedure exists; evidence must be maintained.	DISTRICT-SPECIFIC Requires that district's contract, deadline, or approval.

Requirement area	ZoodleBug control / evidence	Status
Data minimization	Sponsored students use made-up usernames; no student email, birthday, school, phone, or location is requested for account creation.	**Verified live**
School authorization	Only verified educators can provision persistent sponsored-student accounts, with a school-authorization attestation.	**Verified live**
Use limitation	Student-linked data is used to provide account, learning-progress, game, security, and support functions described in the privacy program.	**Verified live + DPA**
Access control	Student self-access, sponsor/admin controls, restricted active games, and deny-by-default unknown collections were exercised in emulator tests.	**Verified live**
Public visibility	Sponsored accounts default to public sharing disabled and are excluded from public leaderboards/content sharing.	**Verified live**
Access/correction requests	Public privacy-request form, private delivery, verification steps, and response runbook are in place.	**Verified live / process**
Deletion	Authorized educator deletion permanently removes the sponsored account and known records, and returns a deletion receipt.	**Verified live**
Advertising/sale	Policy prohibits sale and targeted advertising; no advertising SDK was identified in the reviewed release.	**Verified live / review each release**
Security/incident response	HTTPS, managed authentication, server-side secrets, access rules, backups, and an incident-response plan are documented.	**Documented process**
Retention	A data inventory and schedule are documented. Automated destructive retention remains disabled pending review of dry-run counts and contract requirements.	**District-specific decision**
AB 1584 / FERPA terms	ZoodleBug is prepared to sign required terms addressing school control, limited use, access/correction, security, notice, deletion, and FERPA cooperation.	**District DPA required**
Provider evidence	Google/Firebase, Cloudflare, and Resend are identified; current terms, security materials, and settings should be attached to the district file.	**District review pending**

Verified live controls

- The public Privacy Policy identifies the operator, public contact channels, service providers, data uses, retention approach, and request options.
- The public Privacy Request form uses Cloudflare Turnstile, submits privately, and delivered a live test email successfully.
- Persistent sponsored-student accounts can be created only by verified educators who attest to school authorization.
- Student account creation instructs educators to use made-up usernames and not enter real names, personal emails, birthdays, school names, phone numbers, or locations.
- District student accounts are excluded from public leaderboards and public content sharing by default.
- Firestore authorization behavior was tested for student, educator, administrator, participant, nonparticipant, lobby, username, and unknown-collection cases.
- An authorized educator can delete one sponsored student after a high-friction confirmation. The live test completed successfully after endpoint reachability was corrected.
- Backups and rollback procedures were created before production rule, function, and Hosting changes.

Technical evidence record

Evidence item	Verified result	Date
Privacy release checks	Source/privacy checks and Firestore rule compilation passed before promotion.	Sep. 4, 2026
Firestore authorization	29 general allow/deny tests plus 8 focused friend-game compatibility tests passed in an isolated emulator.	Sep. 3, 2026
Production rules	Validated Firestore rules deployed; Hosting, Functions, and records unchanged during that step.	Sep. 3, 2026
Privacy request	Turnstile succeeded, the live form reported successful delivery, and the email was received.	Sep. 4, 2026
Live Hosting promotion	Exact tested preview version promoted to live after backup, rollback-channel preservation, and origin checks.	Sep. 4, 2026
Sponsored-student deletion	Callable reachability repaired while app authorization/ownership checks remained; live deletion then succeeded.	Sep. 4, 2026

Evidence boundary: the live deletion test confirmed the user-visible deletion workflow. Before answering an unusually detailed audit questionnaire, retain a dated export showing the deleted Authentication identity cannot sign in and every enumerated data path is absent.

Data handling summary

Student account model

- School-authorized sponsored accounts use pseudonymous usernames and a platform-generated synthetic login identifier; student personal email is not required.
- Stored records can include account identifiers, role/sponsor identifiers, learning progress, scores, settings, game/tournament data, and security/request metadata needed to operate the service.
- Public sharing is off for sponsored student accounts unless a future, separately reviewed school-authorized workflow expressly changes that setting.

Retention and disposal

ZoodleBug maintains a written data inventory and default retention schedule. Account-linked records are designed to be removed with verified account deletion. Some operational records have time-based defaults, including short-lived lobby/game data and longer-lived security logs or irreversible deletion receipts.

Important retention control

Automated destructive retention is currently disabled. Keep it in dry-run/inventory mode until counts are reviewed and the district's contract schedule is approved. Enabling it without that review could delete legitimate records prematurely.

Service providers / subprocessors

Provider	Purpose	Data potentially received
Google Firebase / Google Cloud	Hosting, Authentication, Firestore, Storage, Cloud Functions, logging	Account IDs/pseudonyms, educator email, learning/game data, files, request metadata
Cloudflare	DNS/security and Turnstile	IP/device/browser data, anti-abuse token, traffic metadata depending on enabled services
Resend	Contact and privacy-request email delivery	Requester name, reply email, message, and delivery metadata
OpenAI / ChatGPT	Separate external link for optional educator prompt assistance	No data is automatically transmitted by ZoodleBug in the reviewed flow

Before district sign-off, attach the current provider terms, privacy/security documentation, relevant configuration evidence, and any required subprocessor notice language. Re-review the register whenever a provider or data flow changes.

Privacy request and incident operations

Access, correction, export, or deletion request

1. Log the request date, requester, school/district, request type, affected account, contract deadline, and assigned owner.
2. Verify the requester's authority before disclosing, correcting, exporting, or deleting records. Coordinate with the school when the request involves a student.
3. Locate records across the documented data inventory; perform only the verified action and use a secure delivery method for any export.
4. Verify completion, preserve only the allowed evidence/receipt, notify the requester or district, and close the request log.

Security incident

- Contain the incident without destroying evidence; protect credentials and affected services.
- Document discovery time, systems/data involved, affected districts, actions taken, and decision owner.
- Notify affected districts without unreasonable delay and within the specific deadline written in each district agreement.
- Coordinate legally required notices with the district, recover safely, complete root-cause review, and track corrective actions.

What to request from the district

- The district's CA-NDPA, student-data privacy addendum, or other required DPA.
- The current vendor security questionnaire and any evidence checklist.
- Required incident/breach notification timing and designated notice recipients.
- Required retention period, end-of-contract return/deletion instructions, and deletion-verification format.
- Subprocessor approval or notice requirements and any data-location restrictions.
- FERPA school-official criteria, parental-notice/consent expectations, accessibility terms, insurance terms, and record-audit requirements.
- The district decision-maker authorized to approve the service and sign the agreement.

Final sign-off checklist

Step	Required action	Owner/status
1	Receive and review district DPA/security questionnaire	Pending district
2	Confirm contract-specific retention and incident-notice deadlines	Pending district
3	Attach current provider terms/security/configuration evidence	Operator action
4	Run and retain retention dry-run counts; keep destructive mode disabled until approved	Operator action
5	Retain current MFA and privileged-access review evidence	Operator action
6	Capture exhaustive deletion evidence if the district requests it	As requested
7	Sign the agreement through authorized parties and store the final packet	Final approval

Official legal references

California Education Code § 49073.1 (AB 1584 contract requirements):
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=49073.1.

California Business and Professions Code § 22584 (SOPIPA):
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=BPC&sectionNum=22584.

U.S. Department of Education — FERPA guidance for schools and vendors: https://studentprivacy.ed.gov/ferpa

Federal Trade Commission — COPPA guidance: https://www.ftc.gov/legal-library/browse/rules/childrens-online-privacy-protection-rule-coppa

Scope and disclaimer

This brief is an operational readiness record, not a government certification or legal opinion. It does not replace review of a district's actual agreement, applicable law, or advice from qualified counsel. Update it whenever ZoodleBug's data flows, providers, controls, or contractual commitments change.