

Education Assessment

✓ **Educational value has been assessed**

Comments: (i.e. strengths, limitations, best practice suggestions)

Duolingo is a game-based language learning tool. Beginners can start with "Phrases," or more advanced learners can take a quick placement test to determine the appropriate starting point. Instructional practice activities cover all four skills (reading, writing, speaking, and listening) and require students to go back and forth between the target language and their self-identified native language. When students make an error, they see the correct answer. Students can also practice conversational, situational language skills in the Stories section. Students see their streak count (their number of days in a row spent using the tool) and their hearts (like lives remaining in a video game). Students earn experience points (XP) for their time in the app.

Duolingo offers a consumer and a "for schools" version, and both applications are governed by the same privacy policy.

Preliminary Privacy Impact Assessment

Digital resource	Duolingo https://www.duolingo.com/privacy https://privacy.commonsense.org/evaluation/duolingo
Does a PIA exist? (Vendor, ERAC)	No
Is there a 'data link' (e.g.. Pulling PI data from one source to another)?	No
Describe how PI is (requires examining TOU and Privacy Policy)	
Collected What PI data is collected? List all the PI that could be collected from students, teachers, parents through using the service	In "school" mode <ul style="list-style-type: none"> ● Teacher create students accounts with aliases ● Students can change their name in their profile ● No email needed for student accounts ● Still possible to link to a personal facebook account and to invite friends on facebook or twitter ● Seems to have no add for students ● Not clear if all restrictions for under 13 applies (seems that some do but not all) Individually

Name, e-mail address (or parent's e-mail address), and age or date of birth

Activity Data collected through FullStory possible to [opt out](#)

We do record the following data:

Usage Patterns: Clicks, Mouse movements, Scrolling, Typing,

Tech Specs: Browser, Device type, Operating system, Viewfinder size,

Script errors, IP address

Navigation: Pages visited, Referrers, URL parameters, Session duration

Learning Activity: Session progress, Answers, Voice recordings for Live Speaking Lesson,

Speaking Challenges

Some lessons involve you speaking into the app. To recognize speech your audio may be sent to a third party provider such as Google, Apple, or Amazon Web Services. We may ask you to allow Duolingo to collect and analyze your speech data to help us understand the effectiveness of our lessons, and to improve the product. If you choose not to share your audio with us, or if we haven't asked you yet, then your audio will not be used in this way. Any audio you agree to send to Duolingo is anonymized when it reaches our servers to ensure that no trace of your personal data remains attached to the audio.

To support and enhance the Service, we work with a variety of third party advertising networks, marketing analytics service providers and website analysis firms, such as Google, Facebook, Oath, and Unity (collectively, "Third Party Advertising Service Providers"). These Third Party Advertising Service Providers collect and use personal data about your visits to and use of the Website and mobile Application, as well as other websites in order to serve you with advertisements and content tailored to meet your preferences and likely interests or better understand ad effectiveness. Aggregate demographic and interest data will also be used for market research purposes.

When you take a test in the Duolingo English Test, we will use your computer's camera and microphone throughout the test to collect a Testing Video.

When a user creates a Duolingo account we collect their age and compare it to the local standard of child online consent depending on the country they registered in. We refer to users under this age as "child users". Child users are permitted to create a user account but we ask them to provide their parent's email address instead of their own. We also prevent child users from supplying their own name because we don't need that information.

	<p>After registration we will send an email notifying the parent about Duolingo’s privacy and information practices regarding child users, including what personal data we collect and how we use, share, and protect that personal data. The email also explains how parents can request that Duolingo access, change or delete the personal data about their child.</p> <p>Child users receive the following special treatment (under 13):</p> <ul style="list-style-type: none"> ● Lessons are made age appropriate by removing mature words like “beer” or “wine”. ● Advertisements are set to family safe content. ● The Profile page is hidden, preventing the child from stating their name, location or bio. ● Uploading an avatar photo is disabled. ● Promotional emails are disabled. ● Leaderboards are disabled. ● Discussion forums are disabled. ● The child’s profile is made private and hidden from other users’ searches. ● Other users are unable to follow the child. ● The ability to follow other users or search for other users is disabled. ● The ability to send an invitation email is disabled. ● Finding friends on Facebook is disabled. ● Social logins with Facebook, Google or Apple are disabled. ● Social follow buttons for Twitter, Facebook and Instagram are disabled. <p>In addition, all users under the age of 16 receive the following special treatment:</p> <ul style="list-style-type: none"> ● Advertisements are set to non-personalised. ● Third party behavioral tracking is disabled. ● Third party analytics is disabled.
<p>Used</p> <p>What is the PI used for? Will PI be used to make decisions that directly affect individuals? Does the company use the PI to advertise its services or those of other companies to students, teachers or parents?</p>	<ul style="list-style-type: none"> ● send you reminder notifications to support the Duolingo teaching methodology by reinforcing the learning cadence and help maintain your learning streak. We process your data to help provide you with the Service and offer personalized features, to understand and improve our Service and to keep our Service safe and secure. ● may use or share anonymous data collected through the Service, including Activity Data without limitation. ● When you register with Duolingo, some of your information is made public and available at various locations including duolingo.com/profile/your-username and

	<p>duolingo.com/users/your-username. This will include the data from your Duolingo Profile and Account (Name, Location, Bio, Username, User ID, Profile picture and Duolingo Plus membership status); your followers and the people you follow; and your learning progress (XP, Streak, Lingots, Daily Progress, Languages being learned, progress level, Crowns, Skills, Lessons undertaken, Lexemes and Strength)</p>
<p>Disclosed Who will/can have access (vendor, partners, legal)?</p>	<p>Duolingo shares your personal data only when it is necessary to offer the Service, legally required, or permitted by you.</p> <p>We will provide personal data to hosting providers such as Amazon Web Services, search engine providers such as Google, analytics providers such as Crashlytics, and support providers such as ZenDesk.</p> <p>Duolingo will share aggregate or anonymous data collected through the Service, including Activity Data, for purposes such as understanding or improving the service.</p>
<p>Secured Measures in place to secure – encryption, passwords, software and platform updates, independent testing for security</p>	<p>Duolingo has implemented administrative and technical safeguards it believes are appropriate to protect the confidentiality, integrity and availability of your personal data, Testing ID, User Photo, access credentials, and Duolingo English Test results. However, given sufficient resources, a determined attacker could defeat those safeguards and may, as a result, gain access to the data we seek to protect.</p>
<p>Stored Where is the data being stored?</p> <ul style="list-style-type: none"> - What hosting providers are being used? - What hosting region(s) are data being stored in? 	<p>N/A</p>
<p>Kept Accurate</p>	<p>You can manage your account settings at https://www.duolingo.com/settings/account to update, amend, and correct your information.</p> <p>You also have the following rights in relation to the personal data we hold about you, unless provided otherwise by local law:</p> <ul style="list-style-type: none"> ● To request access to, or erasure of, the personal data we hold about you. ● To request us to restrict the processing of the personal data we hold about you. ● To object to us processing personal data relating to you.

	<ul style="list-style-type: none"> ● Where you have given us consent to process your personal data, you have the right to withdraw that consent at any time. ● To export the personal data you have provided to Duolingo in a format that can be transferred electronically to a third party. ● To delete your account with Duolingo by following the instructions available through the Service.
<p>Retained Expiry, deletion, backup/restore</p> <ul style="list-style-type: none"> - How are requests made by students, teachers, parents, district staff for data to be: Deleted, Downloaded - What are the retention policies (not, e.g., 1 yr retention if PI used to make decisions that affect individuals) 	<p>Duolingo will retain your data until your account is deleted, after which point we will retain anonymous data collected through the Service, including Activity Data, which may be used by Duolingo and shared with third parties in any manner.</p>
<p>RECOMMENDATIONS</p> <p><input type="checkbox"/> Approve the application/extension</p>	<p>COMMENTS</p> <p>Duolingo for schools should be used so teachers can create students accounts with aliases and no email.</p> <p>Students should be informed that they are not allowed to link a personal facebook account or to invite friends via facebook or twitter.</p>
<p>Date submitted to IT/Privacy: 2021-05-17</p>	<p>Decision / Date: June 28, 2021</p>