

Modified: January 9th 2023

Kahoot! Privacy Policy

1. The Basics

About this Privacy Policy

Kahoot! is committed to protecting the privacy and security of our users and being transparent about how we process information about you. This Privacy Policy describes how we process your Personal Information and how you can exercise your privacy rights. Capitalized terms have the meaning given to them in Annex A “Definitions”.

Kahoot!’s services allow our users to create and upload content, play and host games and invite others to join a game. Kahoot! acts as a data processor for Personal Information in user content, and for Personal Information that we may otherwise collect and process on behalf of our Users on the platform. Such processing is not covered by this Privacy Policy.

Please note that, to the extent we provide you with notice of different or additional privacy policies, those policies will govern such interactions. For details about Kahoot!’s processing of Student Data please read our [Student Privacy Policy](#). Please see below for details regarding our collection of information from Children.

About Us

Kahoot! is a global educational technology and software-as-a-service group providing a learning platform for the global educational technology market. We focus on developing a comprehensive offering of engaging learning tools for enterprises, the educational sector as well as for personal users. The Kahoot! platform enables everyone who uses it to unlock their full potential through learning. More information about our services and how you can use them can be found in our [T&Cs](#) and on our [webpage](#).

2. Personal Information we process

The Personal Information we process depends on the context of your interactions with Kahoot!, your Kahoot! account settings, the products and features you use, your location, and applicable law. However, the Personal Information we collect broadly falls into the following categories:

Information you provide to us: You may provide certain Personal Information to us when you sign up for a Kahoot! account and use the Services, consult with our customer service team, send us an email, integrate the Services with another website or service (for example, when you choose to connect your Google account with Kahoot!), or communicate with us in any other way. This information may include:

- Contact details such as your name, e-mail address, mailing address, telephone number and job title of the contact person of Users (for example businesses or educational institutions);
- Account log-in credentials such as your email address or username and password when you sign up for an account with us;
- Account holder information such as your location (city and country only), interests, picture, organization, title/position, age, what Kahoot! groups you are part of and who you interact with by using the Services.
- Troubleshooting and support data, which is data you provide, or we otherwise collect in connection with support queries we receive from you. This may include contact or authentication data, the content of your chats and other communications with us, and the product or service you are using related to your help inquiry; and
- Payment information and other financial information that we/our payment processors need in order to provide the Services.
- Communication data. Several of our Services let you share information with other people, and you have the control over what you share and with whom you share. For example, when signed in and interacting with certain Kahoot!

Services, such as leaving comments on the Websites, you may disclose Personal Information to us and the general public. We strongly advise that you limit the disclosure of Personal Information through, for example, comments. Remember, when you share Personal Information publicly, for example through the comment section on our Website, the information you disclose may become publicly available and accessible through search engines. If you disclose Personal Information through comments within a Kahoot! group participation, i.e. not the general public, please note that the information you disclose will be available to other group participants. Personal Information disclosed through comments is processed by Kahoot! as a data processor.

Information we collect automatically: In some (but not all) countries, including countries within the EEA, this information is considered Personal Information under applicable data protection laws. Service Usage Data may include:

- Browser or device information which is collected through your device, such as Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and version of the Services (such as the App) you are using.
- Usage data which is collected whenever you interact with our Service. This may include the dates and times you access the Services and your browsing activities (such as what portions of the Service you used). We also collect information regarding the performance of the Services, including metrics related to the deliverability of emails and other communications you send through the Service. If you are using our App, we may collect information about how often you use the App and other performance data. This information allows us to improve the content and operation of the Service and facilitate research and analysis of the Service.
- Log data whereby our web servers keep log files that record data each time a device accesses those servers and the nature of each access, including originating IP-addresses and your activity in the Services (such as the

date/time stamps associated with your usage, participation in Kahoot! games, results, pages and files viewed, searches and other actions you take (for example, which features you used)). We may also access metadata and other information associated with files that you upload into our Service.

- Cookies which allow us to collect information such as browser type and other anonymous traffic data. Please see our [Cookie Notice](#) for more information on our use of cookies.
- Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Services to, among other things, track the actions of our Users, measure the success of marketing campaigns and compile statistics about usage of the Services and response rates.

Information we collect from other sources: From time to time, we may collect Personal Information about you from other sources, such as our Partners, integrations or other third parties, for example where you have given permission to the third party to share your information with us.

3. Use of Personal Information

We may use your Personal Information which we collect for the purposes and on the legal bases identified below:

Provide the Services. This means using your Personal Information in order to provide the Services' functionality to you, such as arranging access to an account, responding to your inquiries, and to allow you to utilize our various Service features, such as notifying you when a kahoot is shared with you or when you have been invited to join a challenge. We engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

Enable you to use certain features. We may automatically process your Personal Information, in reliance on our legitimate interests, in order to enable you to use certain features of our Services, for example to publish a kahoot, make a comment,

join a group or “follow” a specific Kahoot! user. Note that some of these features are only available as part of a subscription plan. If you want to remove your Personal Information in these cases, you can normally do this yourself through your account.

Communicate with you. We may need to communicate with you about your account and provide you with customer support to perform our contract with you for the use of the Service or where we have not entered into a contract with you, in reliance on our legitimate interests in administering and supporting our Services. For example, if you use our App, we may ask you if you want to receive push notifications about activity in your account. If you have opted in to these push notifications and no longer want to receive them, you may turn them off through your operating system. We may also send you system alert messages in reliance on our legitimate interests in administering the Services and providing certain features. For example, we may inform you about temporary or permanent changes to our Service, such as planned outages, security or compliance notifications, information about new features, version updates, releases, abuse warnings, and changes to this Privacy Policy.

Support and improve the Service. Your Personal Information may be used to provide, support and improve the Services in order to perform our contract with you for the use of the Service or where we have not entered into a contract with you, in reliance on our legitimate interests in administering and improving the Service and providing certain features. For example, this may include sharing your information with third parties in order to provide and support our Service or to make certain features of the Service available to you. When we share your Personal Information with third parties, we take steps to protect your information in a manner that is consistent with our obligations under applicable privacy laws. For further information about how we share your information, refer to the “Sharing your Personal Information” section below.

Purchase and payment. Your Personal Information may be used to bill and collect money owed to us by you to perform our contract with you for the use of the Services

or where we have not entered into a contract with you, in accordance with our legitimate interests to operate and administer our Service. This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if we need a different credit card number. We use third parties for secure credit card transaction processing, and those third parties collect billing information to process your orders and credit card payments. To learn more about the steps we take to safeguard that data, see the “Our Security” section of this Privacy Policy.

Prevent abuse and misuse of the Service. In order to protect against misuse or abuse of our Services, protect the rights of our Users, ensure compliance with our T&Cs and applicable law, and to pursue available remedies, we may use your Personal Information as is reasonably necessary. For example, we may periodically review the content which our Users submit or display in order to ensure that such content complies with our T&Cs, including through automated filtering mechanisms. This benefits all Users who comply with our T&Cs, as it reduces abuse and helps us maintain a reliable platform. We use your Personal Information for this purpose in reliance on our legitimate interest to safeguard from abuse and misuse of the Service.

Comply with legal obligations. We may use your Personal Information in order to comply with requests by public authorities, court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms. This includes Personal Information necessary to provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements in reliance on our legitimate interests, and Personal Information necessary to prosecute and defend a court, arbitration, or similar legal proceeding.

Optimization and personalization of the Service. Personal Information may be used to provide you with suggestions and provide you with tailored features within our Services that optimize and personalize your experience. For example, on the

Websites, we may display certain categories of kahoots on the basis of kahoots you have previously played, your location (city and country only), district or preferences. Such use of your Personal Information is in reliance on our legitimate interests in administering the Service and providing certain features.

Data analytics. Your Personal Information may be used to perform data analytics in reliance on our legitimate business interests in improving and enhancing our products and services for our Users. For example, we use analytics data to enable product recommendation, audience segmentation, and predicted demographics features for our Users.

Marketing. We may use your Personal Information to serve you marketing information, product recommendations and non-transactional communications (such as email, telemarketing calls, SMS, or push notifications) about us, in accordance with your marketing preferences and this Privacy Policy. **We will not send you unsolicited or third party marketing.**

Allowing you to participate in sweepstakes, contests and similar promotions. We may offer you the opportunity to participate in sweepstakes, contests and similar promotions. Some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Information. Participation in these activities is fully optional, and subject to separate `just in-time´ notice as required. We engage in these activities to manage our contractual relationship with you.

Aggregated and anonymized data. User's Personal Information may be used to combine and anonymize data about our Users and our User's use of the Service in order to create aggregate, anonymized statistics which we may use to provide certain features within the Service and for promoting and improving the Service in reliance on our legitimate interests.

We do not sell Personal Information and we do not share Personal Information with third parties for marketing purposes. For purposes of the CCPA, and in section 12 below, ‘sale’ means the disclosure of Personal Information for monetary or other valuable consideration but does not include, for example, the transfer of Personal Information as an asset that is part of a merger, bankruptcy, or other disposition of all or any portion of our business.

4. Third-Party Applications and websites

We may use the Personal Information we collect or receive through the Service, as a processor and as otherwise stated in this Privacy Policy, to enable your use of the integrations and plugins you choose to connect to your Kahoot! account. For instance, if you choose to connect a Google integration to your Kahoot! account, we’ll ask you to grant us permission to view and/or download, as applicable, your Google Sheets, Google Contacts and Google Drive. This allows us to configure your Google integration(s) in accordance with your preferences.

We also integrate with third parties that make available content, products, and/or services to you, such as the YouTube API for videos. Use of these Third Party Applications is optional. The Third Party Applications may have their own privacy policies that apply to you when you choose to use these Third Party Applications, including but not limited to YouTube whose privacy notice is located at <https://www.youtube.com/t/privacy>.

The Third Party Applications may collect Personal Information about you but we do not share Personal Information with them.

The Services and Websites include social media features, such as social media plug-ins with Twitter, LinkedIn, Instagram, TikTok and Facebook. Your interactions with those features and platforms are governed by the privacy policies of the companies that provide them.

The Websites include links to other websites, whose privacy practices may be different from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

6. Your Data Protection Rights

Know your rights

Depending on the jurisdiction in which you reside, you may have the following data protection rights:

- To access; correct; update; port; delete; restrict; or object to our processing of your Personal Information.
- You may have the right to lodge a complaint with your applicable data protection authority regarding our collection and use of your Personal Information. Please contact your local data protection authority for more information. Contact details for data protection authorities within the EEA and UK are available [here](#) and Switzerland are available [here](#).
- If Personal Information is collected or processed on the basis of consent, or if you have, for example, consented to receiving marketing emails from Kahoot!, you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.
- Kahoot! supports our school customers in providing parents and eligible students with access to their Personal Information and in fulfilling other requests that parents and eligible students may make to access their data. Please also see the section about our processing of Personal Data about Children below.

Please note that the above rights may be subject to exceptions and limitations. We cannot, for example, provide Personal Information if it would violate our duty of

confidentiality or if we have a legal obligation to retain such data. Kahoot! will respond to your request to exercise your data protection rights consistent with applicable law.

Exercise your rights

You can manage your individual account and profile settings through your Kahoot! account, including contact information, payment details, preferences, or you can contact us directly by emailing us at privacy@kahoot.com. Kahoot! takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete and up to date.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request.

7. Sharing your Personal Information

We do not share Personal Information with third parties except in the limited circumstances outlined below.

- **Affiliates.** We may share and disclose your Personal Information with the companies in the Kahoot! Group, for our legitimate business purposes or to provide services that may include one or more of our Group Companies.
- **Service providers.** We may share Personal Information with our trusted service providers who perform services on our behalf (e.g. web hosting, technical support, processing of payment, analytics services and content provision), but strictly for the purpose of carrying out work on our behalf as described in this Privacy Policy. For example, companies we've hired to help us provide and support our Service or assist in protecting and securing our systems and services and other business-related functions.
- **Social media partners:** Kahoot! may cooperate with social media channels to promote our Services, both on our Websites and third-party websites.

Notwithstanding the above, we never share information about Children for the purposes or with the parties described in this section.

- Public institution(s). Any competent law enforcement body, regulatory body, government agency, court or other third party where we believe disclosure is necessary (a) as a matter of applicable law or regulation, (b) to exercise, establish, or defend our legal rights, or (c) to protect your vital interests or those of any other person.
- A potential buyer (and its agents and advisors) in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition. In that event, any acquirer will be subject to our obligations under this Privacy Policy, including your rights to access and choice. We will notify you of the change either by sending you an email or posting a notice on our Website.
- Any other person with your consent.

Regardless of the above, Kahoot does not sell Personal Information and we will never share or sell Student Data for marketing purposes.

We may also share anonymized, aggregated information with selected third parties for statistical purposes.

We are responsible for the data privacy of the service providers we may share Personal Information with. Kahoot! only uses service providers that have data protection and security standards consistent with our own. Our service providers are not permitted to use Personal Information they process on our behalf for any other purposes than as needed to carry out their work for us. We enter into written agreements with all of our service providers restricting the use of Personal Information and imposing the same level of privacy, confidentiality and information security that apply to Kahoot!.

9. Our Security

Kahoot! maintains a comprehensive security program designed to protect the security, privacy, confidentiality and integrity of Personal Information within our organization. We have in place appropriate and reasonable technical and organizational measures designed to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. Our security measures include data encryption, firewalls, data use, and access limitations for our personnel and service providers, and physical access controls to our facilities. Our service providers that process payment data, maintain the applicable Payment Card Industry (PCI) compliance levels.

Details about our security program can be found [here](#). If you have any questions about the security of your Personal Information, you may contact us at privacy@kahoot.com.

10. International Transfers

We collect information globally and may transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Services. This may involve countries where the data protection, privacy rights and other laws may not be as comprehensive as in your country. Whenever we transfer your information, we take steps, including preventive measures, designed to protect your Personal Information.

For all international transfers, both within the Kahoot! Group or to our sub-processors, we ensure that the recipient of your Personal Information offers an adequate level of protection by entering into appropriate agreements. All international transfers to a Third Country are made based on an appropriate legal basis, including to a country who has received a finding of adequacy by the European Commission under Article 45 of the GDPR, or on the basis of executed standard contractual clauses approved by the European Commission (“SCCs”).

Kahoot! maintains strict organizational and technical measures to protect Personal Information stored on our, and our trusted third parties', servers. Access to any Personal Information we process in order to provision the Services is limited through login credentials, multi-factor authentication, access on a need-to-know basis and restricted access to administrative accounts for the employees who require access in order to perform their duties towards you, such as providing support services.

If you want to know more about Kahoot's international transfers and the measures we take to keep your Personal Information safe, please reach out to us on privacy@kahoot.com.

11. Retention of Personal Information

We do not retain Personal Information longer than necessary for the purposes for which Personal Information was collected. We retain Personal Information where we have an ongoing legitimate business or legal obligation to do so. Our retention periods will vary depending on the type of data involved, but, generally, we refer to these criteria in order to determine retention period:

- Whether we have a legal or contractual need to retain the data;
- Whether the data is necessary to provide our Service;
- Whether our Users have the ability to access and delete the data within their Kahoot! accounts; and
- Whether our Users would reasonably expect that we would retain the data until they remove it or until their Kahoot! accounts are closed or terminated.

When we have no ongoing legitimate business need to process your Personal Information, it will be deleted or anonymized as soon as possible and in accordance with applicable law.

12. California Consumers

We do not sell Personal Information.

The CCPA provides consumers with specific rights regarding their Personal Information. You have the right to request that businesses subject to the CCPA (which may include our Users with whom you have a relationship) disclose certain information to you about their collection and use of your Personal Information over the past 12 months. In addition, you have the right to ask such businesses to delete Personal Information collected from you, subject to certain exceptions. If the business sells Personal Information, you have a right to opt-out of that sale. Finally, a business cannot discriminate against you for exercising a CCPA right. Please see the information collection, use, disclosure, and individual rights sections above to learn about Kahoot’s practices when Kahoot acts as a “business” subject to the CCPA.

When offering services to its Users, Kahoot! acts as a “service provider” under the CCPA and our receipt and collection of any consumer Personal Information is completed on behalf of our Users in order for us to provide the Service. Please direct any requests for access or deletion of your Personal Information under the CCPA to the User with whom you have a direct relationship.

13. Do Not Track

Certain US state laws require us to indicate whether we honor “Do Not Track” settings in your browser. Kahoot! adheres to the standards set out in this Privacy Policy and does not monitor or follow any Do Not Track browser requests.

14. Changes to this Policy

We may change this Privacy Policy at any time and from time to time. If we make material changes in the Privacy Policy, for example if we seek to use Personal Information in a materially different way than we had previously, we will provide prior notice to you for example by email or a pop-up. You can always delete your account and stop using our Services if you do not accept the change.

15. Our collection of Personal Information from Children

We do not collect any Personal Information from a person who merely plays a kahoot.

When a Child creates an account, we collect his or her email address only for the purpose of providing password reminders to him or her, but we do not collect any other Personal Information. We immediately and permanently alter the email address such that it can only be used as a password reminder and cannot be reconstructed into its original form or used to contact the Child. We do collect certain Personal Information from Children through our products for parents or teachers/schools, but we do so in our capacity as a data processor or on their direction. Please see our [Student Privacy Policy for more information](#).

We also collect a username and password from Child account holders, which are used for login purposes only, to permit the Child account holder to use the Services.

We and our service providers also collect the information described above, under “information we collect automatically,” from Children.

If you are a parent or guardian, you may review the information we have collected from your Child or ask us to make no further use of, or delete, such information. In your request, please include your name and your Child’s Kahoot username, and specify the action you would like us to take. For your Child’s protection, we may need to verify your identity before implementing your request. If your child uses our Services through his or her school, please contact the school or school district with any such request.

16. Questions & Concerns

If you have any questions or comments, or if you have a concern about the way in which we have handled any privacy matter, you may contact us on privacy@kahoot.com.

Annex A – Definitions

The following definitions applies to this Privacy Policy:

“**Affiliate**” means an entity that directly or indirectly Controls, is Controlled by or is under common Control with an entity.

“**App**” means Kahoot!’s software/mobile applications.

“**CCPA**” means the California Consumer Privacy Act of 2018.

“**Child**” or “**Children**” means children under age 13 in the U.S. and children under age 16 outside the U.S.

“**Control**” means an ownership, voting or similar interest representing fifty percent (50%) or more of the total interests then outstanding of the entity in question. The term “Controlled” shall be construed accordingly.

“**EEA**” means the European Economic Area.

“**EU**” means the European Union.

“**Kahoot!**” means Kahoot! ASA, organization number 997 770 234, located at Fridtjof Nansens plass 7, 0160 Oslo, Norway.

“**Personal Information**” means any information that identifies or can be used to identify an individual directly or indirectly. Examples of Personal Information include,

but are not limited to, first and last name, date of birth, email address, gender, occupation, or other demographic information.

“Privacy Policy” means this Kahoot! privacy policy.

“School Services” means the products that are offered to schools and teachers in Kahoot! EDU and Kahoot! for Teachers.

“Services” means the Kahoot! services, including any software, that are available on our platform.

“Service Usage Data” means information we gather automatically through your use of the Services and as further detailed in the “Personal Information we process” section below.

“Student Data” means Personal Information that Kahoot! processes about students on a school or teacher’s behalf as authorized by the school for the provision of the School Services.

“T&C” means the Kahoot! terms and conditions available [here](#).

“Third Country” means any non-EU/EEA country.

“Third Party Applications” means websites and services delivered by third parties that are integrated in the Services and Resources in order to make certain features, content, products and/or services available to you.

“User”, “you” and “your” means any person or entity that uses our Service(s).

“Visitor” means, depending on the context, any person who visits any of our Kahoot! Websites, offices, or otherwise engage with us at our events or in connection with our marketing or recruitment activities.

