Dillon School District 3
Information on External Applications

Date of Application: 5/4/2021

Application: Prodigy

Site: https://www.prodigygame.com

Company Location: Headquarters in Oakville, Canada with offices in Toronto, Canada and Bengaluru, India.

Student Accounts: Yes but presumably the can be created without entering PII.

Any Data Integrations Needed with District: Clever offers integration for SSO (saved passwords) and apparently it can also be linked with Google Classroom.

Data Storage Location: Outside of the United States

Privacy/Security Information: https://prodigygame.zendesk.com/hc/en-us/sections/201846106-Privacy

Key Privacy points:

> **Pros:**
> Prodigy partners with iKeepSage to ensure that they remain compliant with various federal and state legislation. These include compliance with:
> > CT 16-189 (Connecticut Public Act Concerning Student Data Privacy)
> > FERPA (Family Education Rights and Protection Act)
> > COPPA (Children's Online Privacy and Protection Act)
> > SOPIPA (Student Online Personal Information Protection Act)
> > PPRA (Protection of Pupil Rights Amendment)
> > AB 1584 (Privacy of Pupil Records)
> > California Education Code49073.6 (Collection of Student Information from Social Media)
>
> Prodigy does not perform targeted advertising using student data.
> Prodigy does not store or collect student data for anything other than school purposes.
> Prodigy does not sell data to third parties.
> In-game chat only allows predefined phrases.
>
> **Cons:**
> Prodigy uses the "freemium" model where students are encouraged to purchase the paid membership to access better content and rewards. Based on a report by the Campaign for a Commercial Free Childhood, a nonprofit advocacy group, this upselling is quite aggressive and they have filed a complaint against Prodigy to the FTC.

Narrative: "Prodigy is a role-playing game aimed at first through eighth graders where players create customized wizard characters that enter "battles" to earn stars and prizes for solving curriculum-aligned math problems."

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Based on our assessment the data appears to be managed correctly and safely. However, we have two main concerns about the product. First, data appears to be stored outside of the United State. Second, the "freemium" model may conflict with our instructional philosophy.

Status: Pending approval