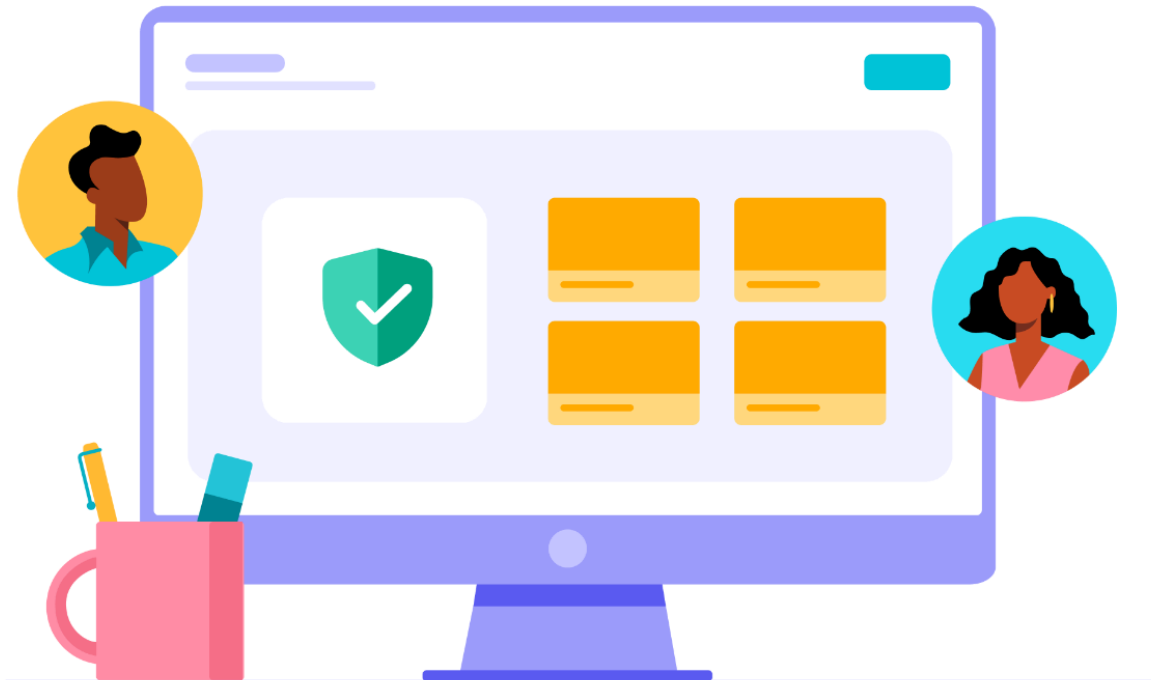




Toddle AI^{✦✦}

Privacy and Security Pack

Last Updated: April 03, 2025



This pack describes the current state of Toddle AI's capabilities, the data it processes, and how Toddle ensures responsible AI deployment. These details are subject to change with future enhancements and product launches. This document is for informational purposes only and does not constitute legal advice, nor should it be interpreted as supplementing or being incorporated into the terms and conditions of any contractual agreements.



Putting students first always starts with putting teachers first, and that is exactly how we think about AI at Toddle. We see AI as a powerful way to help you design lessons, assess learning, and handle day-to-day classroom tasks. But with this power comes a huge responsibility to keep your trust.

That is why our approach to AI is all about being mindful, transparent and fair. We are building AI features that do not just save you time, but also keep data secure and protect every student's privacy. Our big, hairy, audacious goal remains the same: **to give each teacher 10 additional hours every week** while helping you elevate your practice.

We are committed to making AI easy to use and easy to trust. That includes showing you exactly how Toddle AI works, letting you decide when and how to use it, and keeping a close eye on any biases or risks that might pop up. And that is just the start. We're excited to keep sharing how we're embedding responsible AI into everything we do at Toddle.



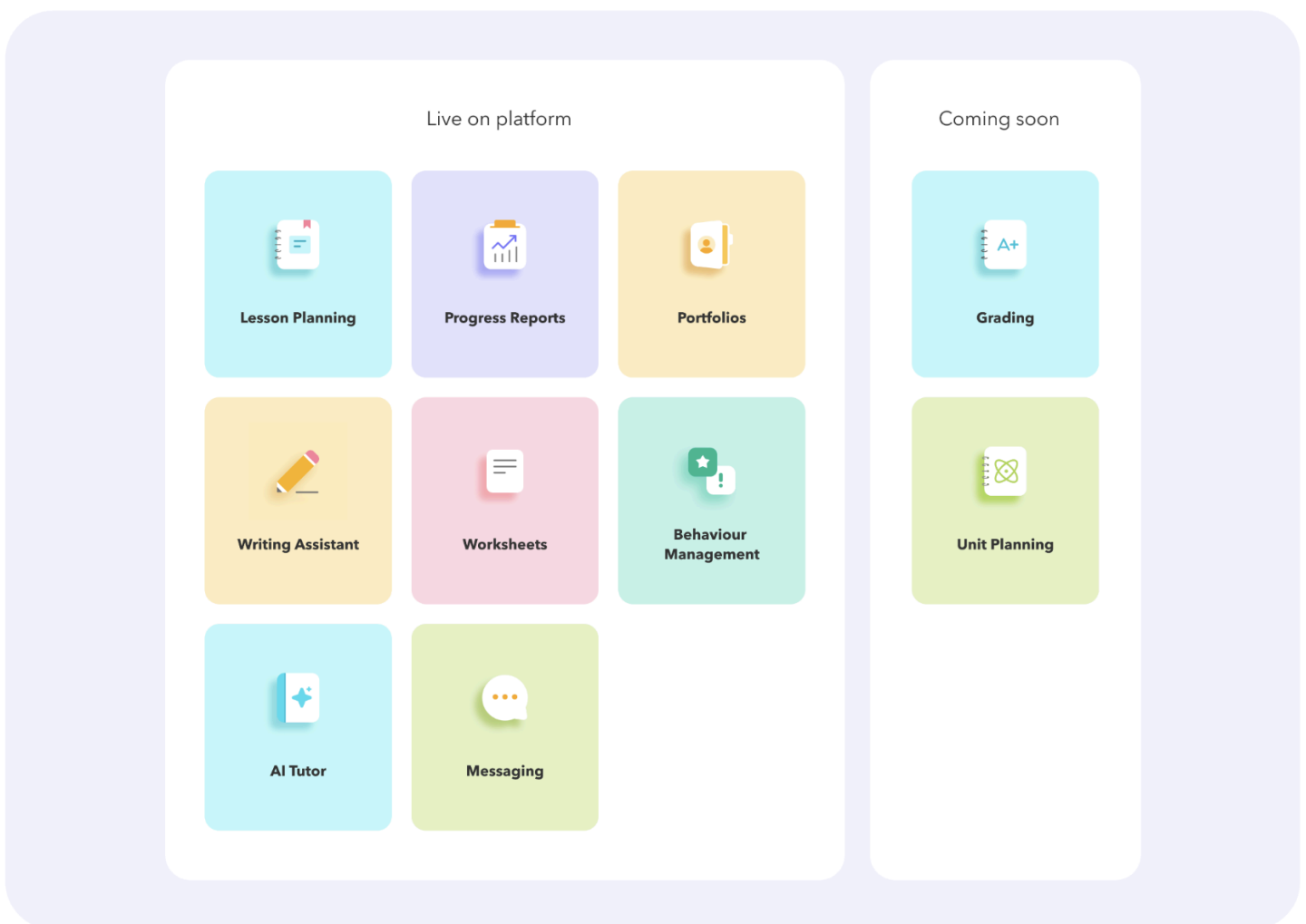
Deepanshu Arora, School Leader, CEO at Toddle

Introduction

AI is changing the way we live, learn, and teach. It has the power to make lessons more engaging, personalize learning at scale, and lighten administrative tasks for educators. But it also comes with a huge responsibility, because we're not just dealing with any data, but the personal journeys of young learners. That's why privacy and security can't be an afterthought when it comes to AI.

At Toddle, we see AI not as a feature, but as a core capability that supports educators every step of the way. From lesson planning and student assessments to communication and personalized learning, our AI tools are built to help teachers save time, spark creativity, and boost engagement, all while keeping student data private and secure.

We currently support educators in **10 essential areas**, ensuring that Toddle AI isn't just smart, but also safe, transparent, and built to keep the best interests of students at the heart of everything we do.



Toddle AI Development Principles

At Toddle, our approach to developing and harnessing AI is driven by our core mission to empower teachers and learners everywhere. Our approach to AI is guided by these principles:

01 | Purpose-Driven Design

We develop AI tools to directly address real classroom challenges, never to replace a teacher's professional judgment. If a feature does not make teaching and learning simpler or more meaningful, we do not build it.

02 | Privacy and Security from the Ground Up

We treat student and educator data with the utmost care, integrating encryption, strict access controls, and regular audits into every phase of our AI development. Your data is used only for educational purposes.

03 | Ethical and Sustainable Innovation

Our AI features are built to serve educators and learners responsibly. This includes regularly assessing our tools for any negative impacts, whether on student well-being or the environment, and making improvements to uphold the highest ethical standards.

04 | Bias Awareness and Fairness

We work to identify and address biases in AI outputs. Whenever we spot potential bias, we fine-tune what we can, refine our approach, and explore additional safeguards to ensure a fair and inclusive experience for every learner.

05 | Human Oversight and Accountability

Educators remain in full control of decision-making. Our AI suggestions, from lesson planning ideas to progress report notes, are just that: suggestions. Teachers always have the final say in what they share with their students.

06 | Transparent and User-Centric

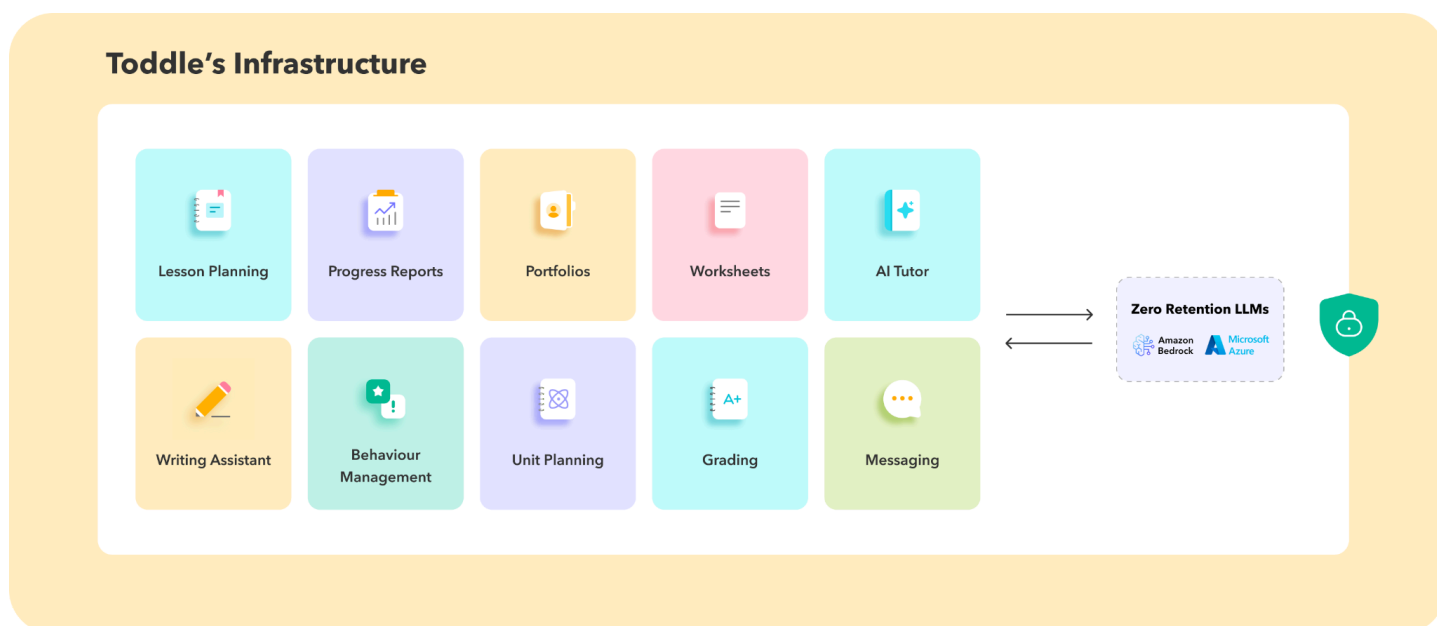
Every AI-powered feature is clearly labeled so you will always know when you are interacting with AI.

07 | Global Compliance and Ongoing Improvement

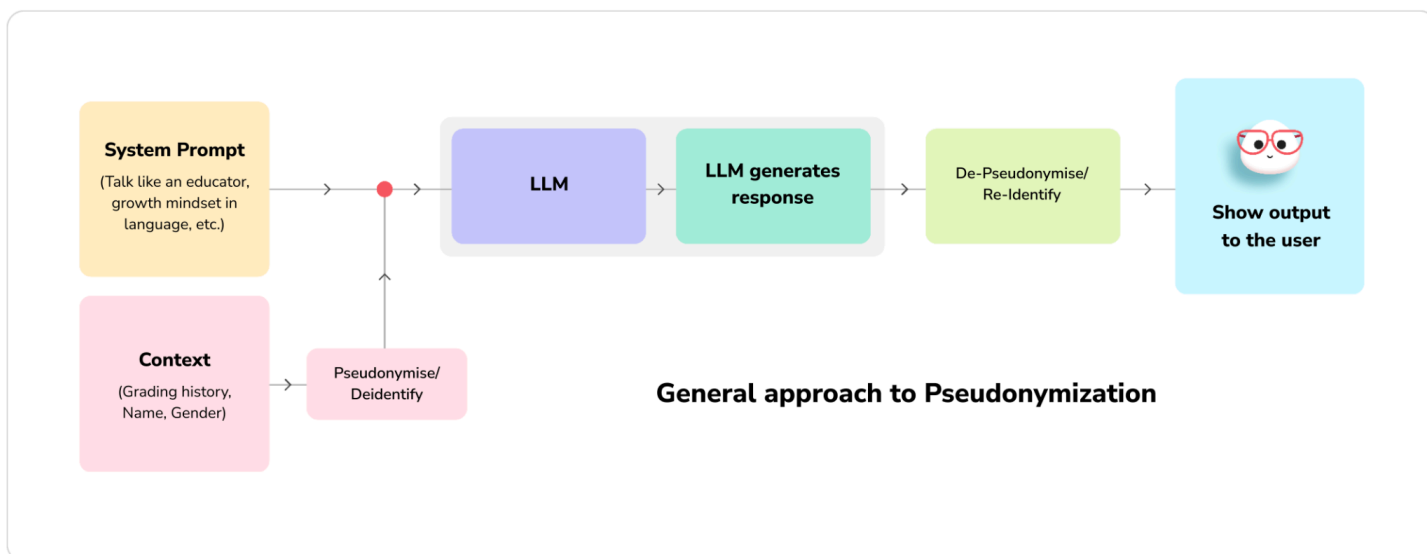
We align our AI development with critical regulations like GDPR, COPPA, FERPA, and the EU AI Act. As we learn from educator feedback, data reviews, and emerging best practices, we continually refine Toddle's AI so it remains safe, reliable, and worthy of your trust.

➤ Responsible Model Deployment Strategy

All of our AI use cases run entirely within Toddle's own infrastructure, this means that instead of relying on external providers to run our AI features, we process them within our own secure infrastructure, ensuring that your data never leaves **Toddle's trust boundaries** and hence is never shared with any third party LLM companies.



Wherever possible, we use **pseudonymization** to remove personal information, this helps us add an extra layer of protection and reduces the risk of accidental data exposure.



Our current LLM providers, which are also listed in our [Subprocessor List](#), include:

Amazon Bedrock (listed as Amazon Web Services, Inc.) – Utilizing Anthropic’s model ‘Claude’ within AWS’s infrastructure, managed under Toddle’s own AWS account, with available locations including USA, Ireland, Singapore, or Australia, ensuring enhanced control and security.

Microsoft’s Azure OpenAI - utilizing OpenAI models within the Microsoft infrastructure in USA/Sweden to deliver certain features.

By **regionally hosting these models within the United States and Europe**, we ensure our customers’ data remains within its designated region. This allows us to maintain strict control over data residency, comply with local regulations, and securely manage all AI use cases end-to-end.

We continuously evaluate our models for resolution accuracy, hallucination rates, and response latency, ensuring an optimal AI experience without compromising privacy, security, or compliance with global regulations.

AI Security, and Safety Measures

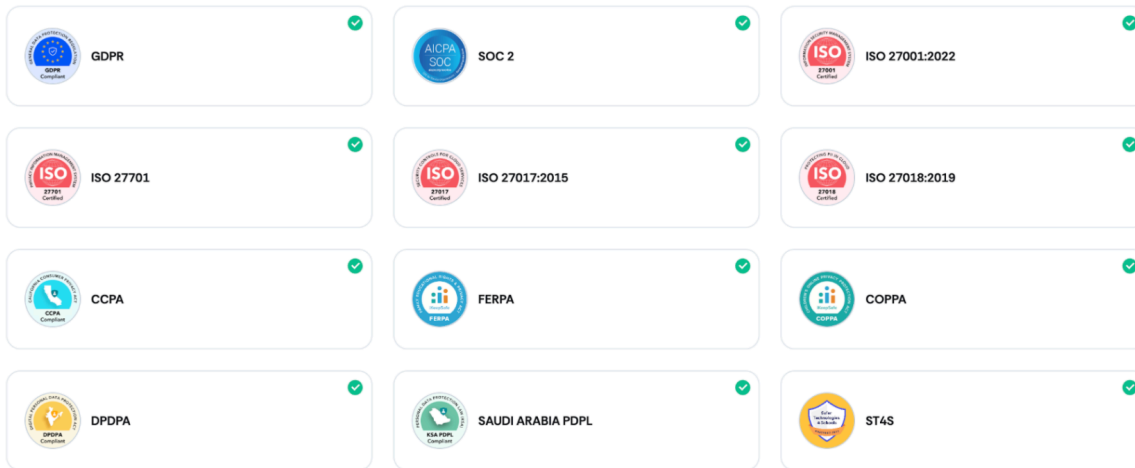
Security Testing

- **Penetration & Jailbreak Testing:** We regularly challenge our AI's security controls to identify any paths bad actors might exploit to alter or misuse the system.
- **Vulnerability Scanning:** Automated scans help us pinpoint and promptly remediate any weaknesses in our AI integrations.
- **Access Control Checks:** We verify that only authorized users can access Toddle AI features and that user-level permissions are being properly enforced.

Safety Testing

- **Bias & Fairness Analysis:** We continuously evaluate AI outputs to ensure they are free from discriminatory patterns.
- **Explainability Verification:** We test whether AI responses are clear, interpretable, and aligned with established educational best practices.
- **Edge Case Validation:** We simulate rare or unpredictable scenarios to ensure Toddle AI behaves responsibly even under unusual conditions.
- **Content & Interaction Integrity Checks:** We confirm that the AI's responses remain appropriate, contextually relevant, and safe.
- **Inappropriate Content Generation Testing:** We actively monitor for and block harmful, misleading, or inappropriate outputs.

✓ Compliance and Privacy Certifications



We adhere to internationally recognized privacy & security standards, holding certifications that include:

- **ISO/IEC 27001:2022:** The most rigorous global security standard for Information Security Management Systems (ISMS).
- **ISO/IEC 27017:2015:** Provides guidelines for information security controls applicable to the provision and use of cloud services.
- **ISO/IEC 27018:2019:** Establishes controls and guidelines for protecting Personally Identifiable Information (PII) in the public cloud.
- **ISO/IEC 27701:2019:** Specifies requirements and guidance for establishing, implementing, maintaining, and continually improving a Privacy Information Management System (PIMS).
- **SOC 2 Type II:** Validates the effectiveness of Toddle's security, availability, and confidentiality controls, ensuring the highest standards of data protection.

Additionally, Toddle has successfully qualified to be part of the Safer Technologies 4 Schools (**ST4S**) Product Badge Program in 2024, covering our entire platform, including Toddle AI. Our platform complies with key

regulations, including **COPPA** (Children’s Online Privacy Protection Act), **FERPA** (Family Educational Rights and Privacy Act), and **GDPR** (General Data Protection Regulation), keeping user privacy strong and secure, no matter where you are.

Schools can access Toddle’s security and privacy certifications via [Toddle’s Trust Vault](#), a centralized hub that offers comprehensive documentation on our attestations, compliance efforts, and security practices.

Leading the Way to a Sustainable AI

Toddle recognizes that responsible AI deployment extends beyond privacy and security, it also includes minimizing our environmental impact. That’s why we’ve carefully assessed emissions from our AI infrastructure and broader business operations, and we’re actively offsetting these by investing in **afforestation projects** and **verified carbon offset programs**.

Our commitment is clear: **Toddle will achieve full carbon neutrality by June 30, 2025**, ensuring that innovation for educators and learners goes hand-in-hand with sustainability and environmental responsibility.

Our **commitment to sustainability**



Become fully carbon neutral by 30th June, 2025

✦ Toddle AI Modules: Features and Functionalities

Lesson Planning

Toddle AI for Lesson Planning is an assistant designed to support teachers in crafting high-quality lesson plans with efficiency and ease. It serves as a creative partner, helping educators brainstorm ideas, customize lesson plans to fit diverse learning needs, and develop effective assessment tools.

With internet browsing capabilities, the assistant ensures access to the latest educational resources, research, and up-to-date content, enriching lesson plans with relevant information. Teachers can also attach media files such as documents, images, and videos, allowing the AI to better understand the context and refine the lesson accordingly. Additionally, Lesson Planning AI supports seamless communication in over 30+ languages, making it an inclusive tool for educators working in multilingual environments. Whether enhancing lesson structures, curating teaching materials, or generating engaging activities, this AI-powered assistant is designed to streamline the planning process and elevate the teaching experience.

Key Features	User
<ul style="list-style-type: none">- Generates differentiated, personalized lesson plans.- Brainstorm ideas, suggest resources- Generate lesson plan focused assessment tools like rubric, checklist	Teacher

Progress Reports

Progress Report AI is an advanced assistant designed to help teachers create high-quality, evidence-based student progress report comments with ease. Whether you need to refine your existing feedback or craft entirely new comments, this tool ensures clarity, professionalism, and personalization. You can define your preferred tone, structure, and style to generate comments that align with your unique teaching approach. Additionally, Progress Report AI supports over 30 languages, making it a versatile solution for multilingual classrooms and diverse educational settings.

Key Features	User
<ul style="list-style-type: none"> - Creates personalized, evidence-backed comment for students - Translates, improves the existing comment content 	Teacher

Communications

Connect AI is an advanced assistant designed to support teachers in managing their conversations efficiently. It helps educators craft well-structured and thoughtful responses, ensuring effective communication. The AI can suggest relevant follow-up replies, making interactions more engaging and seamless. Additionally, it provides conversation summaries, allowing teachers to quickly review discussions without going through lengthy text. With support for over 30 languages, Connect AI enables effortless multilingual communication, helping teachers respond in any language they need.

Key Features	User
<ul style="list-style-type: none"> - Performs sentiment analysis on conversations. - Summarizes communication and suggests responses for improved engagement. 	Teacher

Portfolios

Portfolio AI is an advanced assistant designed to help teachers create high-quality portfolio captions for their posts. Whether you need to craft engaging new captions or refine existing ones, Portfolio AI ensures your content is clear, compelling, and professional. With support for over 30 languages, it enables seamless multilingual communication, making it easier to connect with diverse audiences. Whether you're showcasing student work, highlighting achievements, or sharing educational insights, Portfolio AI enhances your captions to maintain consistency, creativity, and impact.

Key Features	User
<ul style="list-style-type: none"> - Generates captions and reflections summarizing student achievements. - Generate notes based on the tagged learning goals 	Teacher

Announcement

Announcement AI is an intelligent assistant designed to help teachers craft clear, professional, and impactful announcements for their school community. Whether sharing important updates, event details, or general communications, this tool ensures that every message is well-structured and engaging. Teachers can enhance existing announcements by refining tone, clarity, and effectiveness. Additionally, with support for 30+ languages, Announcement AI makes it easy to create multilingual announcements, ensuring seamless communication with diverse audiences.

Key Features	User
<ul style="list-style-type: none">- Drafts professional communications, announcements- Provides structured, clear writing support.	Teacher

Behaviour & Wellbeing

Behavior & Wellbeing AI is an advanced assistant designed to support teachers in managing and documenting student behavior incidents with clarity and efficiency. It helps educators draft well-structured and nuanced reports that accurately capture the details of behavioral events, ensuring consistency and professionalism in incident documentation.

With its intelligent language capabilities, the AI can enhance and refine existing incident descriptions, making them more precise and insightful. Additionally, it offers multilingual support in over 30 languages, enabling teachers to draft announcements and communications for diverse student and parent communities.

Beyond documentation, Behavior & Wellbeing AI can generate concise summaries of student incidents, helping educators track patterns, identify trends, and make informed decisions to foster a positive learning environment.

Key Features	User
<ul style="list-style-type: none">- Generate the behavior incident description- Summarize the behavior incidents of the students	Teacher

Worksheets

Worksheet AI is an advanced assistant designed to help teachers create high-quality worksheets with ease. It enables educators to generate a wide variety of questions, including those that incorporate diagrams, graphs, and other visual elements to enhance student engagement. Additionally, teachers can refine and enhance existing questions using AI-powered suggestions, ensuring clarity, accuracy, and alignment with learning objectives. With Worksheet AI, educators can streamline the worksheet creation process, saving time while delivering effective and visually enriched learning materials.

Key Features	User
<ul style="list-style-type: none">- Generates auto-corrected quizzes and assessments.- Improve, modify	Teacher

AI Tutors

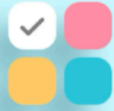
AI Tutor is an intelligent assistant designed to help students master any topic through interactive, goal-driven conversations. Teachers can create and assign AI Tutors tailored to specific learning objectives, enabling students to engage in dynamic discussions.

Students can interact with the tutor using text, images, and audio, while the AI Tutor can respond with text, speech, graphs, and diagrams to enhance understanding. At the end of each session, a detailed real-time analysis is generated, providing personalized feedback to students and comprehensive insights to teachers. Educators can also generate class-wide summaries to track overall progress.

If a student inputs any content that requires attention, it is flagged, and the teacher is notified immediately, ensuring a safe and effective learning environment.

Key Features	User
<ul style="list-style-type: none">- Designs tutor assessment focused on any topic- Student interaction with the tutor with real time follow up questions- Real time student feedback- Class wide student performance analysis	Teacher & Student

Choose What Works for You



All AI modules are optional



You can choose to use AI for any of the modules and not for others

Toddle's Commitment to Transparency & Control

Toddle's commitment to AI compliance and responsible innovation is built on 4 key design principles that guide our approach globally, ensuring alignment with regional regulations and ethical AI standards.

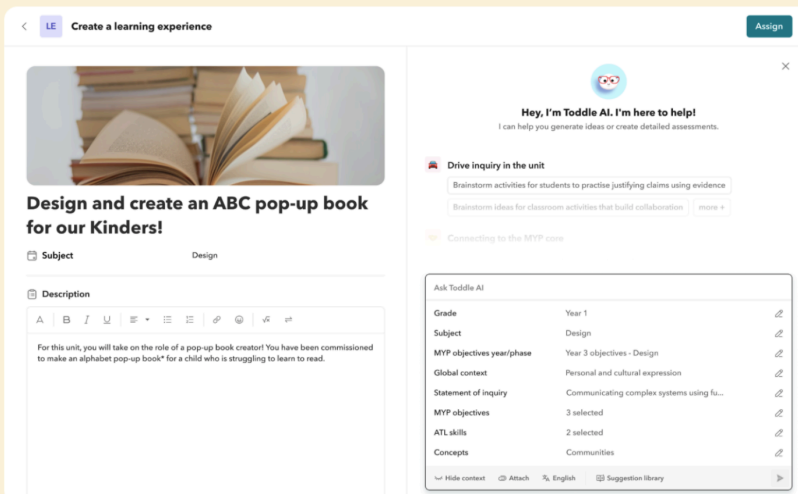
1. Configurable Context and Visibility

Configurable Context:

You have granular control over what pieces of information are included in the AI context.

Context Visibility:

You can always see the exact context that's being passed to our AI models. No black boxes.



Design and create an ABC pop-up book for our Kinders!

Subject: Design

Description

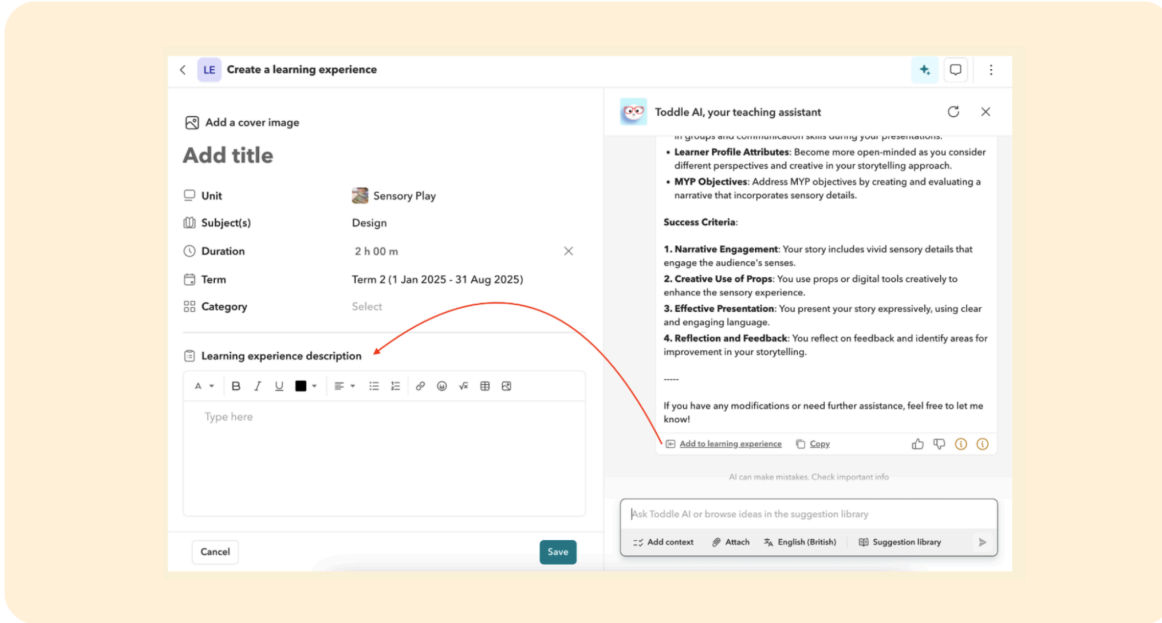
For this unit, you will take on the role of a pop-up book creator! You have been commissioned to make an alphabet pop-up book* for a child who is struggling to learn to read.

Ask Toddle AI	
Grade	Year 1
Subject	Design
MYP objectives year/phase	Year 3 objectives - Design
Global context	Personal and cultural expression
Statement of inquiry	Communicating complex systems using fu...
MYP objectives	3 selected
ATL skills	2 selected
Concepts	Communities

Hide context Attach % English Suggestion library

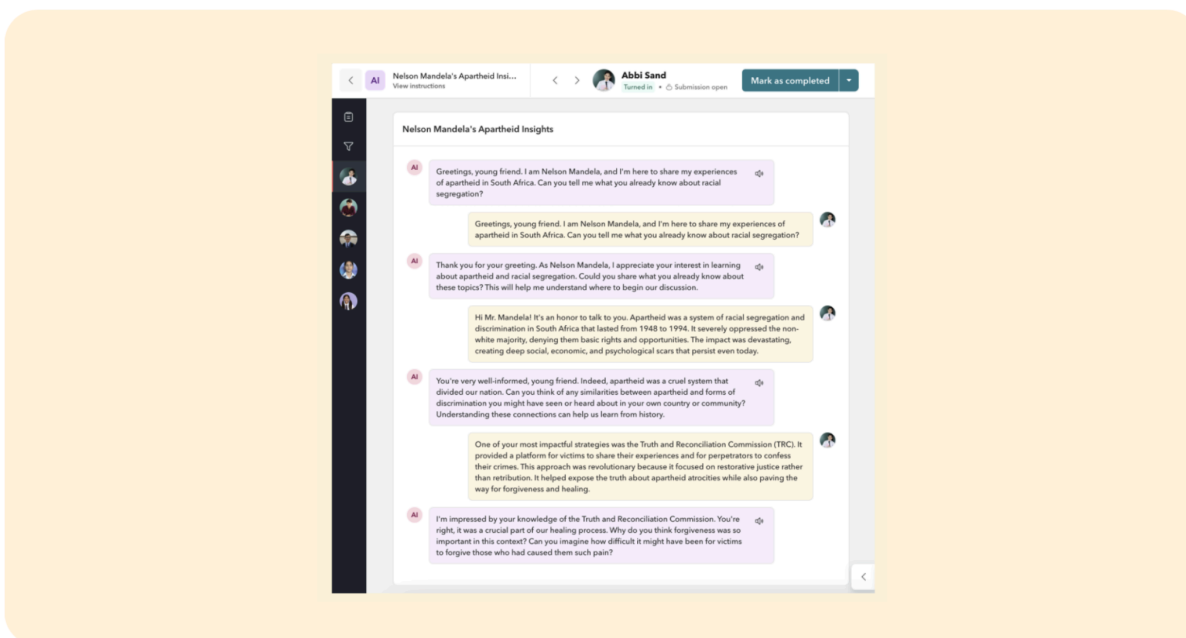
2. Human in the Loop

Educators remain the ultimate decision-makers: Our AI systems assist with lesson planning, resource organization, and content suggestions. The educator decides what to use, adjust, or discard. AI never supersedes professional judgment.



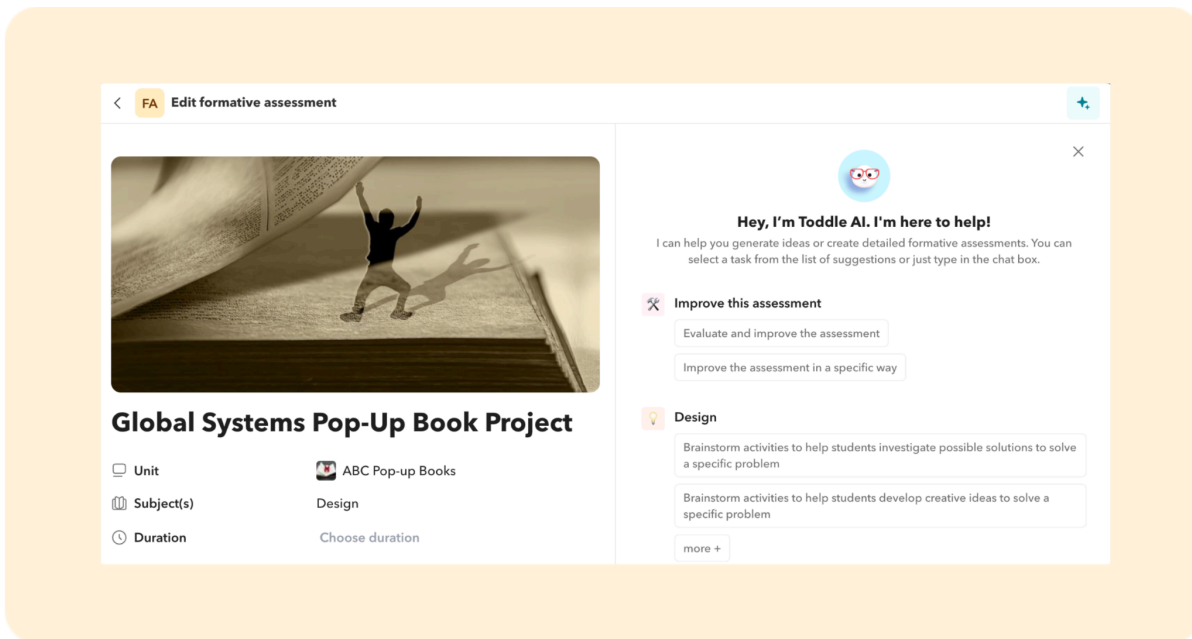
3. Educator Oversight

Educators have full access to student interactions with Toddle AI, ensuring responsible use, transparency, and essential oversight.



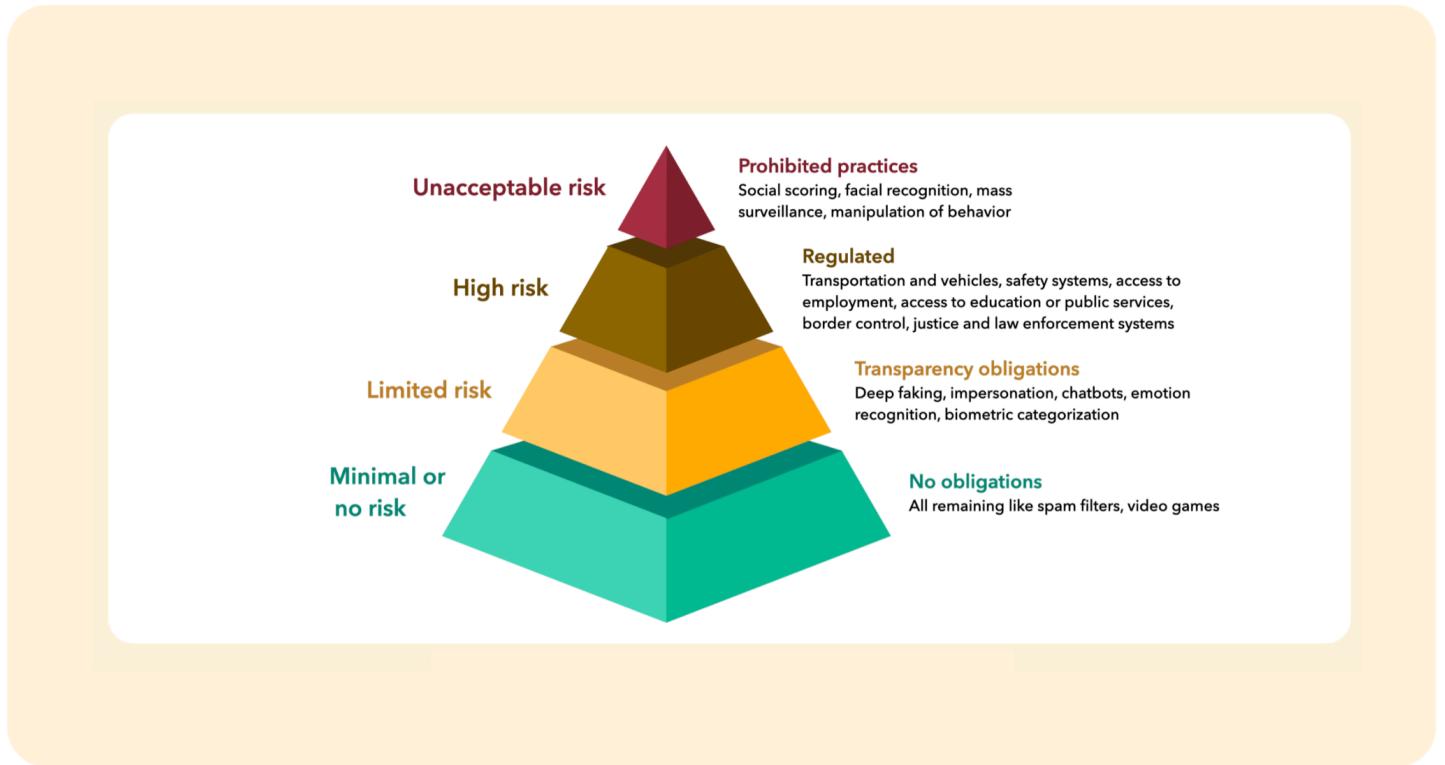
4. AI Feature Labels

All features that use AI are clearly labeled within Toddle, this ensures that users always know when they are interacting with a tool that uses AI.



The EU AI Act

The European Union's Artificial Intelligence Act (EU AI Act) has emerged as the first legal framework for AI globally. It focuses on a risk-based approach and categorises AI systems into **four** risk levels and corresponding obligations.



★ How Toddle AI is classified under the AI Act

We classify Toddle AI as an **AI System** which is defined under the Article 3 of the AI Act.

“A machine-based system designed to operate with varying levels of autonomy, that may exhibit adaptiveness after deployment and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.”

Toddle is the **Provider** of Toddle AI, meaning we develop and offer AI-powered features within our platform.

“provider’ means a natural or legal person, public authority, agency or other body that develops an AI system or a general-purpose AI model or that has an AI system or a general-purpose AI model developed and places it on the market or puts the AI system into service under its own name or trademark, whether for payment or free of charge”; (Art.3(3) AI Act)

However, we rely on third-party General Purpose AI (GPAI) models, such as Amazon Bedrock and Microsoft’s Azure to power these capabilities.

“An AI model, including where such an AI model is trained with a large amount of data using self-supervision at scale, that displays significant generality and is capable of competently performing a wide range of distinct tasks regardless of the way the model is placed on the market and that can be integrated into a variety of downstream systems or applications, except AI models that are used for research, development or before they are placed on the market.”

Toddle’s Role as a Provider

Toddle AI is an AI System that integrates General Purpose AI (GPAI) models to enhance its capabilities. Toddle is the Provider of Toddle AI, meaning we take responsibility for its development, deployment, and compliance under the EU AI Act.

However, we are not the Provider of the GPAI models that power Toddle AI. These models, such as those from Amazon Bedrock, and Microsoft Azure OpenAI, are developed, trained, and maintained by their respective third-party Providers, who hold the Provider obligations under the AI Act for their models.

Toddle’s Status- “Limited Risk”

The Annex III of the EU AI Act classifies AI Systems in **education** as “high-risk”, particularly those that determine access to education, assess students’ performance in a way that affects their future opportunities, or make autonomous decisions about individuals.

However, Toddle AI **does not fall** under this classification because:

- **Article 6 (point 3)** of the AI Act provides exceptions for AI systems that **support, not replace, human judgment**, which is how Toddle AI functions.

- Toddle AI acts as an **assistive tool**, offering insights and recommendations, while **final decisions rest with teachers and administrators**.
- Therefore, Toddle AI falls under the **Limited Risk** category.

What does “Limited Risk” mean for you?

- Educators remain the ultimate decision-makers.
- Our AI suggestions do not impact fundamental rights or high-stakes outcomes.
- We focus on transparency, privacy, and supporting never undermining educational integrity.

Toddle’s Obligations Under the AI Act

As the provider of Toddle AI, we ensure that our AI-powered features meet the **transparency obligation** set out in Article 50 of the AI Act.

In line with this, all features that use AI are clearly labeled within Toddle, ensuring that users always know when they are interacting with a tool that uses AI.

“- The AI system, the provider or the user must inform any person exposed to the system in a timely, clear manner when interacting with an AI system, unless obvious from context.

- Where appropriate and relevant include information on which functions are AI enabled, if there is human oversight, who is responsible for decision-making, and what the rights to object and seek redress are.

- Ensure that the outputs of the AI system are marked in a machine-readable format and detectable as artificially generated or manipulated.”

In accordance with Articles 6(2)(a) and 49(1)(a), we will **register Toddle AI in the EU AI Database** as soon as it becomes operational, which is expected by August 2, 2026.

Our Timeline to Full Compliance

While the EU AI Act entered into force in August 2024, the journey to full compliance involves several stages. Toddle has developed a clear roadmap to ensure we meet all requirements:

- February 2025:** Toddle reaffirms its commitment to not engaging in high-risk or unethical AI practices, ensuring that no manipulative or discriminatory practices are deployed.
- May 2025:** Toddle integrates with the Code of Practice guidelines to enhance transparency measures, feature labeling, and educator guidance.
- August 2025:** Toddle ensures compliance with transparency obligations applicable to its AI features.
- August 2026:** Continuously monitors AI systems to ensure appropriate classification as per the AI Act and completes timely registration in the EU AI Database once it becomes operational.
- August 2027:** Commits to ongoing compliance, adapting as needed to uphold the highest standards of safety, transparency, and trust

We will keep our community informed as we reach these milestones while maintaining open communication.

The Colorado AI Act (CAIA)

The CAIA's goal is to protect individuals from algorithmic discrimination by artificial intelligence systems operating in Colorado. It follows the core principles from the NIST AI Risk Management Framework, including guidance and standards related to design, development, deployment, and testing, and also aligns with the EU AI Act's focus on "high-risk AI systems" and their relationship to "consequential decisions".

★ How Toddle AI is classified

Toddle AI qualifies as an **AI System** under the Colorado Artificial Intelligence Act (CAIA), which defines AI as:

"Any machine-based system that, for any explicit or implicit objective, infers from the inputs the system receives how to generate outputs, including content, decisions, predictions, or recommendations, that can influence physical or virtual environments."

Toddle's role as a Developer of AI

Toddle is classified as a **Developer** under CAIA, meaning we design, modify, and implement AI-powered features for educational institutions.

"A person doing business in this state that develops or intentionally and substantially modifies an artificial intelligence system." (Section 6-1-1701(7))

While Toddle does not build AI models from scratch, it fine-tunes, and adapts AI models (such as those from Amazon Bedrock and Microsoft Azure OpenAI) to create an AI system customized for education.

Toddle's Status – Not High-Risk AI

Under CAIA, **high-risk AI systems** are those that make or contribute to "consequential decisions" in key areas like education.

However, Toddle AI **does not qualify as high-risk** because:

- **CAIA Section 6-1-1701(9)(b) provides exemptions** for systems that assist, rather than replace, human judgment, which is how Toddle AI functions.
- Toddle AI acts as an **assistive tool**, offering insights and recommendations, while **final decisions rest with teachers and administrators**.
- Therefore, Toddle AI does not fall under the high-risk category.

Toddle's Proactive AI Commitments

While CAIA's full enforcement begins in **February 2026**, Toddle has already incorporated several responsible AI practices:

AI Feature Labeling: All AI-powered features within Toddle are clearly labeled, ensuring transparency for its users.

Bias Testing & Fairness Checks: Toddle AI undergoes regular bias assessments to detect and mitigate any unintended discrimination.

Human-in-the-Loop Approach: Teachers remain in control of all AI-generated recommendations, ensuring AI supports human decision-making rather than replacing it.

Risk Awareness & Documentation: Toddle continuously evaluates AI system risks and ensures that AI-powered features align with responsible AI principles.

Frequently Asked Questions (FAQs)

Q: How do global AI regulations impact educators and school administrators?

A: AI regulations worldwide ensure that the AI tools you use are safe, fair, and transparent. You gain confidence that the technology in your classroom respects student privacy, avoids manipulative practices, and supports your professional judgment.

Q: Will Toddle's AI replace teachers or automate decisions about student outcomes?

A: No. Our AI provides suggestions, helps organize content, and generates prompts, but it never replaces the professional expertise and empathy of educators. Teachers remain fully in control.

Q: How do I know my data is secure?

A: Toddle uses advanced encryption, strict data access controls, and meets globally recognized security and privacy standards. Your data is carefully protected at every stage.

Q: Does Toddle engage in social scoring, emotion recognition, or facial identification?

A: Absolutely not. We do not engage in these practices, as they pose unacceptable risks under our ethical guidelines.

Contact Information:

If you have questions about our compliance efforts or need assistance, please reach out to our privacy team at privacy@toddleapp.com.

Stay Updated:

Check back on our website periodically for the latest information on our compliance milestones, best practices, and evolving AI governance strategies.

Essential Reminder:

At Toddle, our commitment to AI regulations goes hand in hand with our commitment to educators. We strive to create a learning environment enriched by AI that respects your professional autonomy, safeguards privacy, and maintains the highest ethical standards. We thank you for trusting us as your partner in delivering high-quality, secure, and transparent educational experiences.