

Sudoku-U Privacy Notice

Version 1.0

Effective: August 25, 2026

Sudoku-U is an educational puzzle platform operated by **STEAM Education Research Group, LLC (“STEAMER”)**.

This Privacy Notice explains what information Sudoku-U collects, why it is collected, how it is used, who may have access to it, and how information may be retained.

This Privacy Notice should be read together with the **Sudoku-U End User License and Account Agreement** and, when applicable, the separate **Sudoku-U Publication Permissions** process.

1. Information We Collect

Account information

When you create or use a Sudoku-U account, STEAMER may collect information such as:

- your name;
- your email address;
- your chosen pseudonym;
- information connecting you with a course, instructor, or educational institution;
- semester or instructional-period information;
- account settings;
- publication preferences and permissions; and
- records showing which versions of Sudoku-U agreements or permissions you have accepted.

Puzzle and platform activity

Sudoku-U stores information created through use of the platform, including:

- puzzles you create or submit;
- puzzle titles, rules, solutions, descriptions, artwork, and related metadata;
- puzzle revisions and version histories;
- feedback you give or receive;
- ratings you give or receive;
- average and aggregated puzzle ratings;
- publication and review status;

- co-constructor information;
- publication-permission records;
- timestamps associated with platform activity; and
- other information needed to support puzzle construction, review, revision, publication, search, and related functionality.

Sudoku-U does not currently collect demographic information as part of its puzzle, feedback, or rating records.

Technical and server information

Sudoku-U's application database does not intentionally store IP addresses or authentication logs as part of puzzle, feedback, rating, or other instructional activity records.

Sudoku-U is currently hosted on a virtual private server provided by **Hostinger**. The server and hosting infrastructure automatically generate short-term technical logs that may contain information such as:

- IP addresses;
- timestamps;
- requested pages or endpoints;
- referring pages;
- browser or device information;
- response codes; and
- similar technical information.

Under the current server configuration, these access logs are ordinarily retained for approximately **24 hours**. They are separate from Sudoku-U's instructional and puzzle database and are not intended to become part of the long-term puzzle, feedback, ratings, or research corpus.

2. Pseudonyms and Identity

Sudoku-U is designed so that puzzle construction, feedback, ratings, and related activity can generally occur under a **pseudonym rather than a legal name**.

A limited account record connects a user's real identity with the user's Sudoku-U account or pseudonym when that connection is necessary for purposes such as:

- course administration;
- account management;
- instructor access;

- publication and copyright permissions;
- resolving authorship or account issues; and
- compliance with legal obligations.

Real names are not ordinarily embedded in puzzle-feedback records.

Using a pseudonym does not guarantee anonymity. For example, if you choose a pseudonym that you also use publicly elsewhere, another person may be able to associate that pseudonym with you.

3. How We Use Information

STEAMER may use information collected through Sudoku-U to:

- create and administer accounts;
- provide Sudoku-U’s puzzle-construction, review, rating, revision, publication, and search functions;
- support educational use of Sudoku-U;
- allow instructors to administer courses or learning activities;
- maintain puzzle and revision histories;
- calculate ratings and other aggregate measures;
- manage copyright, attribution, and publication permissions;
- maintain and improve the functionality and usability of Sudoku-U;
- diagnose technical problems;
- protect against misuse, unauthorized access, and security incidents;
- maintain short-term technical logs reasonably necessary for operation and security;
- develop documentation and educational resources;
- understand how the platform and its educational workflows are being used;
- maintain appropriate historical business and platform records; and
- comply with applicable legal obligations.

4. Educational Use and Instructor Access

If you use Sudoku-U as part of a course or other educational program, your instructor and other appropriately authorized persons associated with that instructional use may have access to information reasonably necessary to administer the activity.

Depending on the course, this may include information such as:

- your account identity;
- your pseudonym;
- your puzzles and revisions;
- feedback given or received;
- ratings;
- publication status; and
- related course activity.

STEAMER seeks to limit access to personally identifying information to situations in which that information is reasonably needed.

5. Private and Public Puzzles

A puzzle uploaded to Sudoku-U is **not automatically public**.

Private puzzles may be stored and displayed to users who are authorized to access them for purposes such as construction, review, feedback, revision, or course participation.

Public publication requires the separate permission process described in Sudoku-U's Publication Permissions.

Constructors retain copyright in their puzzles.

The public archive may display information that constructors have authorized for publication, including a puzzle, its associated information, and the constructor pseudonym or pseudonyms recorded for that puzzle.

6. Feedback and Ratings

Sudoku-U stores feedback and ratings because they are fundamental to the platform's puzzle-review and revision process.

Feedback and ratings may be used to:

- provide information to puzzle constructors;
- support revision;
- calculate average or aggregated ratings;
- support instructors and educational activities;
- understand puzzle-review and revision processes;
- improve Sudoku-U; and
- create properly aggregated or de-identified information.

Sudoku-U does not ordinarily publicly associate written student feedback with a student’s legal name.

7. Aggregated and De-Identified Information

STEAMER may create information that has been **aggregated or de-identified** so that it does not reasonably identify an individual.

For example, a future historical dataset might preserve relationships among:

- puzzles;
- puzzle revisions;
- feedback;
- ratings;
- publication outcomes;
- timestamps; and
- non-identifying internal participant codes,

while removing information such as legal names, course identifiers, semesters, or other information that is no longer necessary and that could increase re-identification risk.

STEAMER may retain and use properly aggregated or de-identified information for purposes such as:

- improving Sudoku-U;
- analyzing platform use;
- understanding puzzle construction, review, and revision;
- developing educational resources;
- evaluating platform functionality;
- maintaining historical platform information; and
- legitimate business planning.

Removing a person’s name alone does not necessarily make information de-identified. STEAMER intends to consider the information remaining in a dataset before treating it as de-identified.

8. Research

Use of Sudoku-U does **not**, by itself, constitute consent to participate in a research study.

If information from Sudoku-U is to be used for research that requires informed consent, institutional review, or another form of authorization, that research will be handled separately as required.

This Privacy Notice does not replace an informed-consent document or other research authorization when one is required.

9. Artificial Intelligence and Model Training

STEAMER does **not** use private puzzles, written feedback, or other original user-created content to train generative artificial-intelligence or machine-learning models under this Privacy Notice.

If STEAMER later considers a use requiring additional permission, including AI or model training, it will obtain whatever separate authorization is required before undertaking that use.

This does not prevent ordinary computational functions necessary to operate Sudoku-U, such as:

- searching;
- indexing;
- calculating ratings;
- organizing metadata;
- detecting technical problems;
- generating platform statistics; or
- other ordinary software operations.

10. When Information May Be Shared

STEAMER does not sell users' personally identifying information.

Information may be shared or made accessible in limited circumstances.

With instructors or educational institutions

Information reasonably necessary to administer an instructional use may be made available to the appropriate instructor or authorized educational personnel.

With other Sudoku-U users

Information may be visible to other users when that visibility is part of the intended function of Sudoku-U, such as peer review, feedback, rating, co-construction, or authorized public publication.

With hosting and service providers

Sudoku-U is currently hosted on a virtual private server provided by **Hostinger**. Hostinger provides infrastructure used to store and process Sudoku-U information and may process technical information as necessary to provide, secure, maintain, and troubleshoot its hosting services.

STEAMER may also use other service providers when reasonably necessary for functions such as backup, communications, security, or technical operation.

Access by service providers is limited to what is reasonably necessary to provide those services and is subject to applicable contractual and legal requirements.

When legally required

STEAMER may disclose information when reasonably necessary to comply with applicable law, valid legal process, or an enforceable governmental request, or to protect the rights, safety, or security of STEAMER, Sudoku-U, or its users.

In a future business transaction

If STEAMER or the Sudoku-U business is involved in a merger, acquisition, reorganization, financing, or sale of assets, information associated with the business may be transferred as part of that transaction, subject to applicable law and the rights and limitations governing the information.

A business transaction does not expand the publication rights granted for an individual copyrighted puzzle.

11. Data Retention

STEAMER retains information for as long as it is reasonably needed for purposes such as:

- maintaining active accounts;
- supporting educational use;
- maintaining puzzle and revision histories;
- administering publication permissions and copyright records;
- preserving public-puzzle publication records;
- operating and improving Sudoku-U;
- resolving disputes or correcting errors;
- maintaining appropriate business and technical records; and
- complying with legal obligations.

Different categories of information may appropriately have different retention periods.

Technical server and security logs are intended for short-term operational use. Under the current configuration, NGINX access logs are ordinarily retained for approximately **24 hours** and are then rotated or removed. STEAMER does not intend to preserve those logs as part of the long-term Sudoku-U instructional, puzzle, feedback, ratings, or historical corpus.

STEAMER intends to develop and maintain retention and de-identification practices that reduce unnecessary long-term retention of directly identifying information while preserving legitimate platform, publication, historical, and analytical records.

Properly de-identified or aggregated information may be retained after identifying information is no longer retained.

12. Account Closure and Requests Concerning Information

You may stop using Sudoku-U at any time.

You may contact STEAMER to ask questions about information associated with your account or to request correction of inaccurate account information.

A request to close an account does not necessarily require deletion of all information associated with prior activity. For example, STEAMER may need to retain:

- publication and copyright-permission records;
- records associated with already-published puzzles;
- course or instructional records that must appropriately be retained;
- information necessary to protect other users' records or understand feedback and revision histories;
- records necessary to resolve disputes;
- legal or business records; or
- properly de-identified or aggregated information.

STEAMER will consider deletion or correction requests in light of applicable law, educational obligations, publication rights, and legitimate operational needs.

13. Security

Sudoku-U is hosted on a virtual private server provided by Hostinger.

STEAMER uses reasonable administrative and technical safeguards intended to protect information maintained through Sudoku-U, including appropriate controls on access to the server and application.

No online system or hosting environment can guarantee absolute security.

Users are responsible for keeping account credentials secure and should notify STEAMER if they believe an account has been accessed without authorization.

14. Children Under 13

Sudoku-U is not intended for children under 13.

A person under 13 should not create or use a Sudoku-U account unless STEAMER has first established a legally appropriate process for that use.

If STEAMER learns that personal information has been collected from a child under 13 without required authorization, STEAMER will take appropriate steps consistent with applicable law.

15. Users Under 18 and Puzzle Publication

Some Sudoku-U users may be under 18.

Account use and public puzzle publication are separate matters.

If a user is an unemancipated minor, the separate Sudoku-U Publication Permissions process may require parent or guardian consent before publication permission becomes effective.

16. Changes to This Privacy Notice

STEAMER may update this Privacy Notice as Sudoku-U develops, legal requirements change, or information practices change.

Each version will have an effective date.

STEAMER will preserve historical versions so that it can determine which notice applied during a particular period.

If a change materially affects how existing personally identifying information or user-created content may be used, STEAMER may provide additional notice or request additional agreement where appropriate.

17. Relationship to Other Sudoku-U Agreements

This Privacy Notice describes Sudoku-U's information practices.

The **End User License and Account Agreement** governs general use of the platform.

The **Publication Permissions** process governs authorization to publicly publish individual copy-righted puzzles.

A separate research consent or authorization governs research participation when one is required.

These documents serve different purposes, and acceptance of one should not be interpreted as granting rights that another document specifically requires to be granted separately.

18. Contact

Questions, requests, or concerns about this Privacy Notice or information maintained by Sudoku-U may be directed to:

STEAM Education Research Group, LLC

Sudoku-U

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Charleston, SC, 29406, USA