PRIVACY POLICY

Last updated November 7, 2026

How Tuning Trainer handles school, teacher, and student information—and the commitments we make to protect student data.

1. WHO WE ARE AND WHAT THIS POLICY COVERS

Tuning Trainer is an online music-education service operated by Smith Studios MKE LLC ("Tuning Trainer," "we," "us," or "our"). This policy explains how we collect, use, disclose, retain, and protect information when schools, teachers, students, and families use Tuning Trainer.

When a school provides student access, the school controls the student educational records in Tuning Trainer, and we process those records on the school's behalf to provide the service. The school's agreement and applicable law may provide additional protections.

2. INFORMATION WE COLLECT

Account and school information. We collect information used to create and manage accounts, including name, email address, password credentials, account role, school name or join code, class, grade, instrument, selected built-in profile avatar, login dates, and subscription details. Passwords are handled through our authentication provider and are not visible to teachers.

Educational activity. We collect records needed to deliver instruction and report progress, including lessons viewed or completed, practice sessions and duration, tuner use, audio plays, exercise responses, scores, response times, and saved pitch or instrument-tendency results.

Technical information. Our service providers may process ordinary device, browser, network, security, and diagnostic information needed to operate, secure, and troubleshoot the service.

Optional Google sign-on. If you choose to sign in or create an account with Google, Google and our authentication providers process the sign-in request and return your email address, Google account identifier, verification information, and basic profile information, which may include your display name and profile-picture URL. Our authentication provider may retain these identity details to manage your account. Tuning Trainer does not receive your Google password. Google sign-on does not require a separate Tuning Trainer password; email-and-password sign-in remains available.

Students choose only from Tuning Trainer's built-in profile images. The profile-image feature does not ask students to upload a personal photograph.

3. MICROPHONE AND SOUND ANALYSIS

Some tuner and pitch activities request permission to use a device microphone. Permission is optional, is controlled through the browser or device, and is used only while the feature is active.

Tuning Trainer analyzes microphone input on the user's device. We do not record, upload, or store the raw microphone audio. The service may save derived educational results, such as detected pitch measurements, exercise results, and progress records, so the student and authorized educators can review learning.

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4. HOW WE USE INFORMATION

We use information only to provide and support Tuning Trainer, including to:

- create accounts, connect students with their school, and manage classes;
- deliver lessons, tuner tools, fingering charts, playback, and practice activities;
- save progress and provide student and teacher reports;
- administer subscriptions and respond to support or school requests;
- maintain security, prevent misuse, troubleshoot problems, and improve educational functionality; and
- meet legal obligations and enforce our agreements.

We do not use student personal information to train general-purpose artificial intelligence models.

5. OUR STUDENT-DATA COMMITMENTS

Student information is used for authorized educational purposes. We do not:

- sell or rent student personal information;
- serve targeted or behavioral advertising to students;
- build profiles of students for advertising or other non-educational commercial purposes;
- use student information for marketing unrelated products or services; or
- claim ownership of student educational records.

We will not materially reduce these protections for previously collected student information without appropriate notice and consent where required.

6. SCHOOLS, FERPA, AND CHILDREN UNDER 13

Schools may authorize students, including children under 13, to use Tuning Trainer for a school-directed educational purpose. The school represents that it has authority to provide that authorization and will give parents or guardians any notices and obtain any consents required by the Children's Online Privacy Protection Act (COPPA), the Family Educational Rights and Privacy Act (FERPA), state student-privacy laws, and local policy.

For education records governed by FERPA, Tuning Trainer acts as a service provider to the school and uses the records only for the school-authorized educational purpose. We cooperate with schools in responding to valid parent or eligible-student requests. We do not knowingly collect personal information from a child under 13 outside a school-authorized setting. A parent who believes a child provided information without proper authorization should contact us.

Tuning Trainer is not intended to administer surveys covered by the Protection of Pupil Rights Amendment (PPRA). Schools remain responsible for determining whether their particular use triggers PPRA or other notice and consent requirements.

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7. WHEN INFORMATION IS DISCLOSED

Student records are available to the student and authorized educators and administrators connected with the student's school. We may disclose information:

- to vendors that host, secure, authenticate, or support Tuning Trainer, under obligations to protect the information and use it only for contracted services;
- at the direction of an authorized school or account holder;
- when required by law, subpoena, or valid legal process, or when reasonably necessary to protect safety, rights, and service security; or
- as part of a merger, acquisition, or transfer, subject to continued student-data protections and applicable law.

We do not permit service providers to use student information for their own advertising or unrelated purposes.

When optional Google sign-on is used, Google receives the authentication request and ordinary connection information, such as IP address and browser details, and knows the Google account is signing in to Tuning Trainer. Google provides identity information to Tuning Trainer through our authentication providers. Google sign-on requests basic identity access only, not access to Gmail messages, contacts, Drive files, or Calendar. This integration does not send student rosters, exercise responses, scores, practice history, saved pitch results, or microphone audio to Google.

Google's handling of Google account and sign-in information is governed by the applicable Google terms and privacy policy, including the school's Google Workspace agreement where applicable. Schools should review and authorize this optional sign-on method under their district policies; approval may be required for school-managed accounts. Google sign-on does not authorize exporting student education records to Google Sheets or the operator's Google Drive.

8. ACCESS, CORRECTION, EXPORT, AND DELETION

Teachers can review school-connected student roster and progress information. Students can review their own profile and progress information. Schools, parents, and eligible students may ask the school to access or correct education records through the procedures provided by the school.

An authorized school representative may contact us to request access, correction, export, or deletion of school-controlled data. Parents should generally direct education-record requests to their school first so the school can verify the request and applicable rights. Account holders may also contact us directly for help with their own information.

We may ask for information needed to verify identity and authority before acting on a request.

Google users can manage their Google account and Tuning Trainer sign-on permission through Google's account controls. Removing that permission does not delete the Tuning Trainer account or school records; request deletion through the procedures above. Google password recovery is handled by Google. Tuning Trainer's forgot-password process applies to a Tuning Trainer password, if one has been set.

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9. RETENTION AND DELETION

We retain personal information only while it is reasonably needed to provide the service, maintain school records at the school's direction, meet legal or accounting obligations, resolve disputes, and protect the service. When a school account ends or an authorized school requests deletion, we will delete or return school-controlled student information within a commercially reasonable period, except where retention is legally required or the school directs otherwise.

Backup copies may remain for a limited period before routine deletion and will remain protected from ordinary use. Aggregated or de-identified information that cannot reasonably identify a student may be retained for service improvement and reporting.

10. SECURITY AND INCIDENT RESPONSE

We use reasonable administrative, technical, and organizational safeguards designed to protect personal information, including authenticated access and school-scoped permissions. No online service can guarantee absolute security.

If we learn of unauthorized access to school-controlled personal information, we will investigate, take reasonable corrective action, and notify the affected school without unreasonable delay as required by applicable law and any governing school agreement. Schools are responsible for maintaining secure account credentials and join codes and promptly reporting suspected misuse.

11. PRIVACY CHOICES AND STATE RIGHTS

Depending on where a user lives, privacy law may provide rights to access, correct, delete, or obtain a copy of personal information, or to appeal a decision about a request. We do not discriminate against anyone for exercising a privacy right.

Because student records are generally controlled by the school, we may refer a student or parent request to the school. Submit other privacy requests to info@tuningtrainer.net. We do not sell personal information or share it for cross-context behavioral advertising.

12. CHANGES AND CONTACT

We may update this policy as the service or law changes. We will post the updated policy with a new date and provide additional notice to schools before a material change that reduces student-data protections, when required.

Questions, privacy requests, security reports, and school Data Privacy Agreement requests may be sent to info@tuningtrainer.net or mailed to Smith Studios MKE LLC at the address below.

Contact Smith Studios MKE LLC

info@tuningtrainer.net
1564 N. 117th St., Wauwatosa, WI 53226

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