



## *iKeepSafe Product Profile* *GoGuardian*

### Introduction

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The iKeepSafe Privacy Program is available to operators and service providers of websites and online services, data management systems and other technologies that are, in whole or in part, intended for use in and by schools, and which may collect, store, process or otherwise handle student data.

This *iKeepProfile* is intended to assist you in determining whether the GoGuardian complies with FERPA and COPPA. It indicates that GoGuardian has been assessed for alignment with the iKeepSafe Program Guidelines.

### Product Overview

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**Product:** The current GoGuardian Suite offerings include Admin, Teacher, Beacon, Fleet, DNS, and Parent App

**GoGuardian Admin:** GoGuardian Admin enables school administrators to customize filtering policies to any situation and manage them from a unified interface.

**GoGuardian Teacher:** Classroom management software for teachers to help students focus on educational material.

**GoGuardian Fleet:** Chromebook device management tool for schools

#### **GoGuardian Beacon**

Beacon is a machine-learning solution that notifies pre-determined school staff of online activity that indicates when students who are logged into their school-issued accounts may be at risk of suicide, self-harm, or potential harm to others.

#### **GoGuardian DNS**

GoGuardian DNS is an inline web filtering solution (network-level filter) and is designed to support all devices connected to the network. GoGuardian DNS is device agnostic, so as long as a school's users are on school premises and connected to the school network, they're connected to GoGuardian DNS.

## GoGuardian Parent App

GoGuardian Parent App is an application available on devices running iOS and Android designed to enable IT Administrators to share managed user history collected via GoGuardian Admin and GoGuardian Teacher with verified parents and guardians.

## Agreement

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### A. As related to the Family Educational Rights and Privacy Act (“FERPA”) (20 U.S.C. Section 1232g), GoGuardian agrees:

1. Student records obtained by GoGuardian from an educational institution continue to be the property of and under the control of the educational institution. The educational institution retains full ownership rights to the personal information and education records it provides to GoGuardian.
2. GoGuardian users may retain possession and control of their own generated content.
3. GoGuardian will not use any information in a student record for any purpose other than those required or specifically permitted by the GoGuardian Terms and Conditions and Privacy Policy.
4. Parents, legal guardians, or eligible students may review personally identifiable information in the student’s records and correct erroneous information by contacting their educational institution. GoGuardian super users may access, correct, or update personal information in their profile by signing into GoGuardian, accessing their GoGuardian account, and making the appropriate changes. Additionally, super users may request deletion of personal information by contacting GoGuardian through [support@goguardian.com](mailto:support@goguardian.com).
5. GoGuardian is committed to maintaining the security and confidentiality of student records. Towards this end, we take the following actions:
  - a. we limit employee access to student data to only those employees with a need to such access to fulfill their job responsibilities;
  - b. we conduct background checks on our employees that may have access to student data;
  - c. we conduct regular employee privacy and data security training and education; and
  - d. we protect personal information with technical, contractual, administrative, and physical security safeguards in order to protect against unauthorized access, release or use.
6. In the event of an unauthorized disclosure of a student’s records, GoGuardian will promptly notify users in accordance with applicable law, unless specifically directed not to provide such notification by law enforcement officials.
7. GoGuardian will delete or de-identify personal information when it is no longer needed, upon expiration or termination of our agreement with an educational institution with any deletion or de-identification to be completed according to the terms of our agreement with the educational institution, or at the direction or request of the educational institution.
8. GoGuardian agrees to work with educational institutions to ensure compliance with FERPA and the parties will ensure compliance by providing parents, legal guardians or eligible students with the ability to inspect and review student records and to correct any inaccuracies therein as described above.
9. GoGuardian prohibits using personally identifiable information in student records to engage in targeted advertising.
10. GoGuardian will not make material changes to our Terms of Use or Privacy Policy, including making significant changes impacting the collection, use, disclosure or retention of data collected without notice to the educational user.

## B. Children's Online Privacy Protection Act ("COPPA") (15 U.S.C §§ 6501- 6506 )

1. GoGuardian may contract directly with schools and, as such, may rely on consent from the school instead of the parents for collection of personal information from students when data collected is for the use and benefit of the school, and not for any other commercial purposes.
2. GoGuardian makes available clearly written policies explaining what data it collects from users, how such data is used, stored and to whom it may be disclosed.
3. GoGuardian makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. GoGuardian provides the school a description of the types of personal information collected; an opportunity to review the child's personal information and/or have the information deleted; and the opportunity to prevent further use or online collection of a child's personal information.
5. GoGuardian collects limited data from or about children that is reasonably needed to provide users with a feature or activity, or to perform a valid business function that meets the strict definition of support for internal operations.
6. GoGuardian does not/will not condition a child's participation in an activity on the child disclosing more personal information than is reasonably necessary to participate in such activity.
7. GoGuardian maintains reasonable procedures to protect the confidentiality, security, and integrity of personal information collected from children. It takes reasonable steps to release children's personal information only to service providers and third parties who can maintain the confidentiality, security and integrity of such information, and who provide assurances that they will maintain the information in such a manner.
8. GoGuardian will retain personal information collected online from a child only as long as is reasonably necessary to fulfill the purpose for which the information was collected. It must delete such information using reasonable measures to protect against unauthorized access to, or use of, the information in connection with its deletion.
9. GoGuardian will conduct annual training related to data privacy and security, including COPPA requirements, for all employees responsible in whole or in part for design, production, development, operations and marketing of their products. Such training will include all employees who are directly or peripherally involved in collection, use, storage, disclosure or any other handling of data.
10. GoGuardian will not make material changes to its privacy and security policies, including adding practices around new or additional data collection, or changes that may lessen the previously noted protections without notice to the school, separate from any notice in a "click wrap" agreement. It will notify schools of any material changes to its privacy policy that affect the collection or use of personal information from students.

## Data Review Process

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GoGuardian provides users direct access to the personally identifiable information that they provide to GoGuardian through product functionality. Users also have the ability to contact GoGuardian for access to all personal information on file by contacting GoGuardian through [support@goguardian.com](mailto:support@goguardian.com).

The Educational Institution determines the information collected, maintained, and processed using GoGuardian's services. The Educational Institution retains the right to review, modify, and/or refuse to permit further collection or use of student data information at any time. The Educational Institution uses GoGuardian's services to assist with the administration of school-related activities and to provide a streamlined way to collect, organize, access, and report information for educational purposes. These uses are specific to each Educational Institution and are governed by the contract between GoGuardian and the Educational Institution. If there are any questions regarding the collection, storage, and use of the information the Educational Institution shares with GoGuardian, please contact the Educational Institution directly.

General inquiries related to privacy may be directed to:

Liminex, Inc., dba GoGuardian  
Privacy Team  
2030 East Maple Avenue, Suite 100  
El Segundo, California 90245  
Tel: 888-310-0410  
Email: [privacy@goguardian.com](mailto:privacy@goguardian.com)

## Security Protocols

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GoGuardian has a comprehensive Security Program in place designed to protect the confidentiality, integrity and availability of systems, networks and data. The following is a general overview of data security protocols:

### Data in Transit

All data is transmitted securely via HTTPS, specifically the more secure TLS 1.2 protocol.

### Data at Rest

GoGuardian's data storage is provided by AWS. Encryption methodology is inherent in their data storage systems and is replicated in encrypted form for backup and disaster recovery.

### Data Center Security

GoGuardian uses AWS Data Centers

### Personnel

Background Checks: All employees with access to student data have undergone criminal background checks.

Training: Employees of GoGuardian will receive annual privacy and security training that includes FERPA.

Access: Access to student data is role-based; limited to those employees who need access to perform job responsibilities.

Employees are given access to the minimum services that are required for their job function.

## Access to Audit

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Once per year, GoGuardian will provide schools with:

- audit rights to the school's data
- access to the results of its iKeepSafe Technical Vulnerability Assessment

## Data Breach

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In the event of an unauthorized disclosure of a student's records, GoGuardian will promptly notify users in accordance with applicable laws, unless specifically directed not to provide such notification by law enforcement officials. Notification shall identify:

- a. Date of data incident or breach
- b. Types of information that were subject to the incident or breach
- c. General description of the incident or breach
- d. Steps taken to address the incident or breach
- e. Contact Information

## Data Deletion

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GoGuardian states they will retain personal identifiable information for as long as the account is active, or as needed to provide their users with their services. Please contact them at the email address at [support@goguardian.com](mailto:support@goguardian.com) should someone wish to cancel their account or request that they no longer use the information to provide services. They will retain and use the information as necessary to comply with their legal obligations, resolve disputes, and enforce their agreements.

## Research

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GoGuardian stated they use none of the personally identifiable customer data for research or statistical purposes at this time. If they use any customer database for troubleshooting or conducting research, the data is de-identified and no student personally identifiable information is available to view. Additionally, as part of this use of information, GoGuardian may provide aggregate information to partners about how users, collectively, use their products.

## Third Parties

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GoGuardian does not sell, trade, lease or loan the personal information they collect or maintain, in the course of providing the service, to any third party for any reason, including direct marketers, advertisers, or data brokers.

GoGuardian contracts with other third-party companies to perform business functions or services on their behalf and may share personally identifiable information with such third parties as required to perform their functions. GoGuardian has agreements in place with all third parties with access to student personal information to ensure they only use the information for purposes necessary to deliver the authorized service and to ensure they maintain the confidentiality and security of the information. The agreements align with GoGuardian's data privacy and security policies and expectations.

GoGuardian utilizes the following third-party vendors:

Service Partner	Purpose	Information Shared
AWS	For hosting our servers and data analytics	All information in the system
Google Cloud Platform	For hosting our servers and data analytics	API Servers only
MemSQL	For querying speed and reliability (without processing any data)	All information in the system
Pusher	For increasing the speed and stability of our products	All information in the system
SendGrid	For sending product-related emails to school personnel	Customer Information
Tableau	For data analytics	All information in the system
Twilio	For supporting our video conferencing product feature	All information in the system
ZenDesk	For online customer support	Customer Information

## Product Data List

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Data Collected	General Purpose of Data Collection
STUDENT FIRST AND LAST NAME	Required to support product functionality
STUDENT EMAIL ADDRESS	Required to support product functionality
OTHER STUDENT ID	Required to support product functionality
SCHOOL NAME	Required to support product functionality
SCHOOL ADDRESS	Required to support product functionality
GEOLOCATION	Required to support product functionality
OTHER PERSISTENT IDENTIFIER	Required to support product functionality
PHOTOGRAPH, VIDEO OR AUDIO FILE	Required to support product functionality
STUDENT BROWSING ACTIVITY	Required to support product functionality

ACCESS TIME	Analytics
TIME SPENT ON SITE	Analytics
PAGE VIEWS	Analytics
REFERRING URL	Analytics

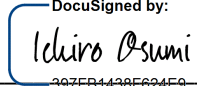
For more information about GoGuardian’s Data Collection, please see the GoGuardian Product Privacy Policy.

## Accuracy Statement

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GoGuardian hereby confirms the accuracy and truthfulness of all information contained in the GoGuardian profile and has authorized iKeepSafe to make the profile available to any interested schools.

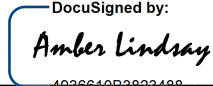
Signed and agreed:

DocuSigned by:  
  
397FB1438F624E9...  
(Signature)

Ichiro Osumi  
Chief Financial Officer  
Liminex, Inc., dba GoGuardian  
2030 East Maple Avenue, Suite 100  
El Segundo, California 90245  
Tel: 888-310-0410  
Email: [privacy@goguardian.com](mailto:privacy@goguardian.com)

10/06/2023

The GoGuardian service has been reviewed and found in alignment with iKeepSafe's FERPA and COPPA Privacy Program Guidelines as indicated by this product profile. GoGuardian has been awarded the iKeepSafe FERPA and COPPA Privacy Program badges.

DocuSigned by:  
  
4936610B3823488...  
(Signature)

Amber Lindsay  
President & CEO  
iKeepSafe

10/06/2023

## Copyright

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## Disclaimer

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