

## 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 Toddle complies with COPPA and FERPA. It indicates that Toddle has been assessed for alignment with the iKeepSafe FERPA and COPPA Guidelines.

## Product Overview

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Toddle is a web and mobile app for providing end- to- end solution to schools for their academic needs. Following are the key functionalities of Toddle:

- **Planning:** Teachers and School Administrators can use this for planning their units and lessons. They can create their own plans. The IP for this belongs to the schools. They can also attach plans and other resources from the internet (PDFs, Documents, Images, Videos etc.) to use in their class.
- **Documentation:** Teachers, School Administrators and Children can use this to document the learning process in the classes. The documentation can be in the form of photos, videos and notes. These photos/ videos may be clicked/ recorded by the teachers or by children themselves. The photos/ videos appear like a facebook feed where users (teachers, parents, students) can comment, like the posts.
- **Insights and Reporting:** Teachers can tag students to different skills and objectives to generate automated reports for parents to consume. The system, based on usage, also generates insights for teachers to use while planning their lessons.
- **Communicate:** Teachers and administrators can communicate with parents and students. The communication is not real time but through messages/ emails. Teachers can communicate with students by sending out assignments. Children can submit the assignments back to the teachers through the app and can get in a feedback loop with teachers through a comment based system.

[www.toddleapp.com](http://www.toddleapp.com)

*Deepanshu*

*Amber Lindsay*

## Agreement

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

1. Student records obtained by Toddle 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 Toddle.
2. Toddle users may retain possession and control of their own generated content.
3. Toddle will not use any information in a student record for any purpose other than those required or specifically permitted by the Toddle 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. Additionally, Toddle users may access, correct, update, or delete personal information in their profile by signing into Toddle, accessing their Toddle account, and making the appropriate changes.
5. Toddle 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, Toddle will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.
7. Toddle 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. Toddle 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. Toddle prohibits using personally identifiable information in student records to engage in targeted advertising.
10. Toddle 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 prior notice to the educational user.

*Deepanshu*

*Amber Lindsay*

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

1. Toddle contracts 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. Toddle 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. Toddle makes available a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. Toddle 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. Toddle 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. Toddle 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. Toddle 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. Toddle 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. Toddle 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. Toddle 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 prior notice to the school, separate from any notice in a "click wrap" agreement. It will notify schools and obtain the prior verifiable consent for any material changes to its privacy policy that affect the collection or use of personal information from students.

*Deepanshu*

*Amber Lindsay*

## Data Review Process

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Parents are encouraged to work directly with teachers and school to make any changes in your data. If however, you need to get in touch with us, you can write to [privacy@toddleapp.com](mailto:privacy@toddleapp.com) and we will work with the school and do our best to make the required changes.

Teachers, administrators and parents can directly edit their information in their Toddle profiles. Schools also have a right to use any other similar service and can place a request to get all of their data. We will do our best to comply to such requests.

General inquiries related to privacy may be directed to:

*Attn: Privacy Director  
Ahmedabad  
India  
Phone:+919999158550  
24AAPCA7864E1ZF  
privacy@toddleapp.com*

## Security Protocols

Toddle 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:

HTTPS encrypted

Securing data in transit

Data is vulnerable to unauthorized access as it travels across the Internet or within networks. For this reason, securing data in transit is a high priority for Google. The Google Front End (GFE) servers support strong encryption protocols such as TLS to secure the connections between customer devices and Google's web services and APIs. Cloud customers can take advantage of this encryption for their services running on Google Cloud Platform by using the Google Cloud Load Balancer. The Cloud Platform also offers customers additional transport encryption options, including Google Cloud VPN for establishing IPsec virtual private networks.

*Deepanshu*

*Amber Lindsay*

## Data at Rest:

Toddle' 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:

Toddle uses AWS for all Data Storage.

*AWS has certification for compliance with ISO/IEC 27001:2013, 27017:2015, and 27018:2014.*

<https://aws.amazon.com/compliance/iso-27001-faqs/>

<https://aws.amazon.com/about-aws/whats-new/2011/11/11/aws-publishes-new-service-organization-controls-1-report/>

*AWS aligns with the CSA STAR Attestation and Certification based on the determinations in our third-party audits for System and Organization Controls (SOC) 2 Reports and ISO 27001:*

<https://aws.amazon.com/compliance/csa/>

## Personnel:

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

Training: Employees of Toddle will receive annual privacy and security training that includes FERPA, COPPA and CSPC.

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

Once per year, Toddle will provide schools with:

audit rights to the school's data

access to the results of Toddle or its third-party security audit

*Deepanshu*

*Amber Lindsay*

## Data Breach

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

- a. the date and nature of the unauthorized use or disclosure;
- b. the Private Data used or disclosed;
- c. general description of what occurred, including who made the unauthorized use or received the unauthorized disclosure;
- d. what Toddle has done or shall do to mitigate any effect of the unauthorized use or disclosure;
- e. advice to the impacted user on how they can best protect themselves.
- f. what corrective action Toddle has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at Toddle the user can contact. Toddle will keep the user fully informed until the incident is resolved.

Toddle will notify impacted user (s) within 72 hours upon the discovery of a breach of security that results in the unauthorized release, disclosure or acquisition of student information,

## Data Deletion

You have the right to "forget ability", i.e., we will remove all your information from our systems if you so wish. If you would like to delete your Toddle account or any content submitted to Toddle, please send an email to [privacy@toddleapp.com](mailto:privacy@toddleapp.com). We will notify you by email before deleting your account from our database. After receiving your request, we may still retain information for up to 365 days to provide customer support and prevent accidental deletion.

For users in the USA, please note that to comply with FERPA, we may need to retain certain student education records once a valid request to inspect those records has been made and we may retain your data to comply with FERPA requirements.

*Deepanshu*

*Amber Lindsay*

## Research

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Toddle stated they use Log Rocket and Sentry to create personalized and aggregate usage patterns to improve user experience and to correct anomalies as part of product support.

## Third Parties

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Toddle 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.

Toddle contracts with other third-party companies to perform business functions or services on their behalf and may share PII with such third parties as required to perform their functions. Toddle 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 Toddle' data privacy and security policies and expectations.

Toddle utilizes the following third-party vendors:

**Log Rocket**

**Sentry**

**Amazon Web Services:**

**Intercom**

**One Signal:**

**Pusher**

**Google Analytics:**

**Facebook, YouTube & LinkedIn Ads:**

**Dreamhost**

*Deepanshu*

*Amber Lindsay*

## Product Data List

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Data Collection:

<b>Data element</b>	<b>Purpose of Data Collected</b>
Student First and Last Name	Product Functionality
Student Email Address	Product Functionality
Student Password	Product Functionality
Student Age/DOB	Product Functionality
Student Gender	Product Functionality
Parent First and Last Name	Product Functionality
Parent Mobile/Phone Number	Product Functionality
Parent Email Address	Product Functionality
School Name	Product Functionality
Photograph, Video File	Product Functionality
Grades	Product Functionality
Browser Type	Product Functionality
Access Time	Statistics
Time spent on Site	Statistics
Page Views	Statistics
Referring URL's	Statistics

*Deepanshu*

*Amber Lindsay*



## Accuracy Statement

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

Signed and agreed:

*Deepanshu*

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(Signature)

Deepanshu Arora (Data Protection Officer)  
Adastra Learning Private Limited,  
Nr.Kotak House, B/h Kensville Golf Course,  
Bodakdev Ahmedabad GJ IN 380059  
Phone:+919999158550  
Direct Mail: deepanshu@toddleapp.com

06/20/19

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

*Amber Lindsay*

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(Signature)

Holly Hawkins  
President & CEO  
iKeepSafe

06/20/2019

*Deepanshu*

*Amber Lindsay*

## Copyright

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## Disclaimer

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By using the California Privacy Assessment Program or accepting any materials related to the California Assessment Program, you expressly acknowledge and agree that neither Internet Keep Safe Coalition, their affiliates, subsidiaries, or designees nor each of their respective officers, directors, employees or agents (collectively, Associates), can guarantee, certify or ensure that you are in compliance with FERPA, SOPIPA, California AB 1584, or any other state or federal laws. You understand that the California Privacy Program does not constitute legal or any other type of professional advice and the California Privacy Seal is not a legal determination.

*Deepanshu*

*Amber Lindsay*

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