



## *iKeepSafe Product Profile* *Caduceus International Publishing Inc.*

### 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 Caduceus International Publishing Inc. complies with FERPA, SOPIPA, California AB 1584, and other California state laws and district policies. It indicates that Caduceus International Publishing Inc. has been assessed for alignment with the iKeepSafe FERPA and California Privacy Program Guidelines.

### Product Overview

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Caduceus International Publishing Inc.:

Caduceus International Publishing Inc. designs and markets innovative e-textbook course materials to universities, professional schools, and health science centers worldwide. Materials are used to:

- Maximize comprehension and long-term retention.
- Improve language skills.
- Increase communication efficiencies between professionals.

They also offer the Caduceus Proctoring service, a complete solution for online exam proctoring.

<https://www.cipcourses.com>

## Agreement

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

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

student records to engage in targeted advertising.

10. Caduceus International Publishing Inc. 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.

As related to the Student Online Personal Information Protection Act (SB 1177 -“SOPIPA”), Caduceus International Publishing Inc. agrees:

1. Caduceus International Publishing Inc. does not target advertising via the Caduceus International Publishing Inc. service or on any other website using information about a K-12 student, their families/guardians or educators acquired from a use of the technology.
2. Caduceus International Publishing Inc. does not use information, including persistent unique identifiers, created or gathered by the Caduceus International Publishing Inc. service to amass a profile about a K–12 student, their families/guardians or educators except in furtherance of K–12 school purposes.
3. Caduceus International Publishing Inc. does not and will not sell, rent, or otherwise provide personally identifiable information to any third party for monetary gain.
4. Caduceus International Publishing Inc. does not disclose student information unless for legal, regulatory, judicial, safety or operational improvement reasons.

## Data Review Process

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

We have added to the CIP TOS:

Choices and Product Support. Should you wish to access, modify, or delete other personal information that you have provided to Caduceus, such as your name, address, or other personal information, please contact us at [support@cipcourses.com](mailto:support@cipcourses.com) for assistance. Caduceus International Publishing will retain your information for as long as your account is active, or as needed to provide you with our services. Please contact us at the email address listed above should you wish to cancel your account or request that we no longer use your information to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

General inquiries related to privacy may be directed to:

Caduceus International Publishing Inc.  
100 SW 75th St Suite 206  
Gainesville, FL 32607

Email support:  
Phone support:  
[support@cipcourses.com](mailto:support@cipcourses.com)  
1 (866) 280-2900

## Security Protocols

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Caduceus International Publishing Inc. 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

Data is transferred using HTTPS.

### Data at Rest

Caduceus International Publishing Inc.' data storage is provided by RackSpace. Encryption methodology is inherent in their data storage systems. And, is replicated in encrypted form for backup and disaster recovery.

### Data Center Security

Caduceus International Publishing Inc. uses Rackspace Data Centers and these centers conform to the following:

#### Physical Security:

- Access is limited to authorized personnel
- Badges and biometric scanning control access
- Security cameras provide video surveillance
- Independent firms perform annual audits

#### Operational Security:

- ISO 27001/2-based policies and annual review
- Documented change management procedures
- Secure document and media destruction policies
- Incident management and business continuity plans
- Continuous monitoring and third-party reviews

### Personnel

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

Training: Employees of Caduceus International Publishing Inc. 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, Caduceus International Publishing Inc. will provide schools with:

- audit rights to the school's data
- access to the results of Caduceus International Publishing Inc.' or its third-party security audit

## Data Breach

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In the event of an unauthorized disclosure of a student's records, Caduceus International Publishing Inc. 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 Caduceus International Publishing Inc. 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 Caduceus International Publishing Inc. has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at Caduceus International Publishing Inc. the user can contact. Caduceus International Publishing Inc. will keep the user fully informed until the incident is resolved.

Caduceus International Publishing Inc. 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

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Caduceus International Publishing states they will retain your information for as long as your account is active, or as needed to provide you with our services. Please contact us at the email address at [support@cipcourses.com](mailto:support@cipcourses.com) should you wish to cancel your account or request that we no longer use your information to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## Research

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Caduceus International Publishing Inc. stated; We use none of the customer data for research or statistical purposes at this time.

## Third Parties

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Caduceus International Publishing Inc. 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.

Caduceus International Publishing Inc. 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. Caduceus International Publishing Inc. 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 Caduceus International Publishing Inc.' data privacy and security policies and expectations.

Caduceus International Publishing Inc. utilizes the following third-party vendors:

DevIQ	Programmer/Developer
Rackspace	Hosting provider
MobileLife	Programmer/Developer

## Product Data List

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Data Collection: This was added and/or modified to the TOS/PP section:

Data Collection. Portions of the Caduceus service and website contain functions for collecting personal information including names and email addresses, as well as an individual's or account's access history. We may also collect and track other personally identifiable and non-personally identifiable information about you, such as: your IP address, the type of browser you use, and the website you visited before visiting our website or Caduceus services.

If you are using the service as an educational institution, student information may be visible during customer support and/or troubleshooting. Personally, identifiable information such as student name, email address, file name, creation dates of files, login dates and times, and third-party applications which students use could be viewed on our service by product support staff.

If you register to use Caduceus services, or express interest in obtaining additional information, we require you provide us with your contact information, including your name, company name, address, and email address. We may also ask for additional personal information such as title, phone number, department name, and additional company information, such as annual revenues, number of employees, or industry. You can opt out of this by not entering the requested information.

## Copyright

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## Disclaimer

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<sup>1</sup> By using the California Privacy Assessment Program or accepting any materials related to the California Privacy 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.

