



iKeepSafe Product Profile *ClassFlow*

Introduction

The *iKeepSafe* FERPA, COPPA and CSPC (California) 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 *iKeepSafe* Product Profile is intended to assist you in determining whether ClassFlow complies with FERPA, COPPA and CSPC (California). It indicates that ClassFlow has been assessed for alignment with the iKeepSafe FERPA and COPPA Guidelines.

Product Overview

Designed by teachers for teachers, ClassFlow is a cloud-based lesson creation and delivery software service with advanced collaboration tools for student engagement. ClassFlow can be used to energize the classroom with interactive lessons, activities, quizzes, and resources. In addition, ClassFlow enables teachers and students to access their lessons and other educational resources relevant to their classes 24/7 in school, at home, or on the go.

Agreement

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

1. Student records obtained by ClassFlow 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 ClassFlow.
2. ClassFlow users may retain possession and control of their own generated content.
3. ClassFlow will not use any information in a student record for any purpose other than those required or specifically permitted by the ClassFlow 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, ClassFlow users may access, correct, update, or delete personal information in their profile by signing into ClassFlow, accessing their ClassFlow account, and making the appropriate changes.

AGK

MG

5. ClassFlow 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, ClassFlow will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.
7. ClassFlow 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. ClassFlow 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. ClassFlow prohibits using personally identifiable information in student records to engage in targeted advertising.
10. ClassFlow 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.

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

1. ClassFlow 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. ClassFlow 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. ClassFlow makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. ClassFlow 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. ClassFlow 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. ClassFlow 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.

AGK

MG

7. ClassFlow 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. ClassFlow 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. ClassFlow 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. ClassFlow 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.

C. . As related to Student Online Personal Information Protection Act (SB 1177 -"SOPIPA"), ClassFlow agrees:

Prohibitions:

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

Obligations:

5. ClassFlow is committed to maintaining the security and confidentiality of pupil records as noted herein.
6. ClassFlow will delete student information when requested by the school district.
7. ClassFlow will disclose student information when required by law, for legitimate research purposes and for school purposes to educational agencies.

Data Access and Review Process

Promethean, via its ClassFlow service, collects data on behalf of schools. Any party wishing for Promethean or ClassFlow to provide, correct or delete their personal information can make a request via their school, and they will fulfill the data request in a timely manner.

Users may access, correct, update, or delete the Personal Information in their profile by making the change /on the account profile page or by contacting their school or privacy@ClassFlow.com.

If using the ClassFlow for Schools Service that is integrated with a school SIS, any request to access or make changes to or delete Personal Information including Student Data must be made by the School within the SIS. Once the changes are made within the SIS, the changes will automatically appear within the ClassFlow for Schools Service.

If using the ClassFlow for Schools Service and the School is not integrating its SIS with the Service, any request to access, make changes to or delete Personal Information including Student Data must be made by the School's designated User Administrator. The User Administrator will be provided access to the School's Authorized Users' profile pages in order to update, correct, or delete the information contained therein.

Security Protocols

ClassFlow 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

ClassFlow uses secure socket layer technology (SSL) when a user enters any information anywhere on the Service as a default and this technology enables the encryption of that information during server transmission.

Data at Rest

ClassFlow's database is encrypted **at rest**, where they store a user's personal information, which converts all personal information stored in the database to an unintelligible form.

Data Center Security

ClassFlow uses AWS Data Centers and these centers conform to the following:

AWS is a secure, durable technology platform with industry-recognized certifications and audits: PCI DSS Level 1, ISO 27001, FISMA Moderate, FedRAMP, HIPAA, and SOC 1 (formerly referred to as SAS 70 and/or SSAE 16) and SOC 2 audit reports. Their services and data centers have multiple layers of operational and physical security to ensure the integrity and safety of your data.

Please see more information below in the available link:

Amazon Web Services (AWS) <https://aws.amazon.com/security/>

AGK

ALG

Personnel

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

Training: Employees of Promethean that work with ClassFlow will receive annual privacy and security training that includes FERPA and COPPA.

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

Access to Audit

Once per year, Promethean will provide schools using the ClassFlow service with:

- audit rights to the school's data
- access to the results of Promethean's ClassFlow audit, or a summary of the most recently completed third-party security audit of ClassFlow

Data Breach

In the event of an unauthorized disclosure of a student's records by ClassFlow, Promethean will promptly notify users unless specifically directed not to provide such notification by law enforcement officials or Promethean is required to provide notification to the school pursuant to the terms of a written agreement with a school. Notification shall identify, to the extent such information is available at the time of disclosure:

- 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 , to the extent known, who made the unauthorized use or received the unauthorized disclosure;
- d. what Promethean 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 Promethean has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at Promethean the user can contact with further questions regarding the incident. Promethean will keep the school, and to the extent contractually permitted, the user fully informed until the incident is resolved.

Promethean will notify the appropriate party or parties (which may be the school of the impacted user(s)) within a reasonable period of time following the discovery of a breach of security that results in the unauthorized release, disclosure or acquisition of student information, and any acquisition of computerized data that compromises the security, confidentiality, or integrity of personal information maintained by ClassFlow.

Data Deletion

ClassFlow stores your personal information for as long as it is necessary to provide products and Services to you and others. Personal information associated with the user account will be kept until the account is deleted or until we no longer need the data to provide products and services.

Promethean may have to retain some information after your account is closed, to comply with legal obligations, to protect the safety and security of our community or our Service, or to prevent abuse of our Terms. A ClassFlow user may delete or cancel their account at any time by contacting their school directly or by contacting Promethean at privacy@classflow.com.

Research

Promethean may use data which has been de-identified and/or aggregated for product development, research, analytics and other purposes, including for the purpose of analyzing, improving, or marketing the Services. On certain occasions, Promethean may share this data with business partners to improve the ClassFlow services or offerings. If they disclose information to authorized business partners to conduct research on online education or assist in understanding the usage, viewing, and demographic patterns for certain programs, content, services, promotions, and/or functionality on the ClassFlow Service, such data will be aggregated and/or anonymized to reasonably avoid identification of a specific individual.

Third Parties

Promethean 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.

Promethean 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 and support Promethean's delivery of the ClassFlow service. Promethean 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 the Promethean and ClassFlow data privacy and security policies and expectations.

To find out where our third-party service providers process your Personal Information contact privacy@classflow.com.

Promethean utilizes the following third-party vendors to deliver the ClassFlow service:


Provider	What do they do for us?	What do we give them?
Amazon Web Services (AWS)	AWS hosts all of our databases, web servers, login services, emails sent from our application, and more.	All information we collect from you or your school is stored and processed on AWS web servers. Please see the Data Security section on the various certifications AWS has received.

AGK *LG

Product Data List

Data Collection by ClassFlow include the following:

	DATA Collected for Operation	General Purpose of Data Collected
1	STUDENT FIRST AND LAST NAME	Required to support Product Functionality
2	STUDENT EMAIL ADDRESS	Required to support Product Functionality
3	Username and Password	Required to support Product Functionality
4	SCHOOL NAME	Required to support Product Functionality
5	Student ID	Required to support Product Functionality
6	Parent/Guardian First and Last Name	Required to support Product Functionality
7	Parent/Guardian Email Address	Required to support Product Functionality
8	Parent/Guardian Username and PW	Required to support Product Functionality
9	Assessment Data	Required to support Product Functionality
10	Assignment Data	Required to support Product Functionality
11	Other Classroom Content	Required to support Product Functionality
12	Student School Enrollment	Required to support Product Functionality
13	Teacher Names	Required to support Product Functionality
14	Student Scheduled Courses	Required to support Product Functionality
15	School Course Grades/Score	Required to support Product Functionality
16	IP Address	Required to support Product Functionality
17	GEO Location (course)	Required to support Product Functionality
18	Browser Type	Statistics/Customer Service
19	Browser Language	Statistics/Customer Service
20	Access Time	Statistics/Customer Service
21	Time spent on Site	Statistics/Customer Service
22	Domain name and landing page	Statistics/Customer Service
23	Pages Views	Statistics/Customer Service

AGK 

Accuracy Statement

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

Signed and agreed:

Allyson Krause

(Signature)

Allyson Krause
EVP and General Counsel
Alpharetta, Georgia
O: +1 678-336-8122 | M: +1 470-297-7106
www.PrometheanWorld.com

01/26/2021

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

AL

(Signature)

Amber Lindsay
President & CEO
iKeepSafe

01/26/2021

Copyright

© 2021 Internet Keep Safe Coalition (iKeepSafe). All rights reserved. iKeepSafe's California Privacy Assessment Program™ materials have been developed, copyrighted, and distributed for incidental, classroom use only. iKeepSafe's copyright notice and distribution restrictions must be included on all reproductions whether in electronic or hard copy form. These materials are intended to convey general information only and not to provide legal advice or any other type of professional opinion.









Promethean and iKeepSafe - Product Profile - ClassFlow

Final Audit Report

2021-01-30

Created:	2021-01-30
By:	Judi Reagan (judi.reagan@prometheanworld.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAp6XhaeejCFgn0b45qNjpN71248RsXA91

"Promethean and iKeepSafe - Product Profile - ClassFlow" History

-  Document created by Judi Reagan (judi.reagan@prometheanworld.com)
2021-01-30 - 2:44:49 AM GMT- IP address: 76.111.53.198
-  Document emailed to Allyson Krause (allyson.krause@prometheanworld.com) for signature
2021-01-30 - 2:48:58 AM GMT
-  Email viewed by Allyson Krause (allyson.krause@prometheanworld.com)
2021-01-30 - 4:50:22 AM GMT- IP address: 67.166.251.92
-  Document e-signed by Allyson Krause (allyson.krause@prometheanworld.com)
Signature Date: 2021-01-30 - 4:50:51 AM GMT - Time Source: server- IP address: 67.166.251.92
-  Document emailed to Amber Lindsay (amber@ikeepSAFE.org) for signature
2021-01-30 - 4:50:53 AM GMT
-  Email viewed by Amber Lindsay (amber@ikeepSAFE.org)
2021-01-30 - 11:18:40 AM GMT- IP address: 70.106.198.204
-  Document e-signed by Amber Lindsay (amber@ikeepSAFE.org)
Signature Date: 2021-01-30 - 3:04:08 PM GMT - Time Source: server- IP address: 70.106.198.204
-  Agreement completed.
2021-01-30 - 3:04:08 PM GMT