



iKeepSafe Product Profile Class Solver

Introduction

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 Class Solver complies with FERPA, SOPIPA, California AB 1584, and other California state laws and district policies. It indicates that Class Solver has been assessed for alignment with the iKeepSafe FERPA, ATLAS and California Privacy Program Guidelines.

Product Overview

Class Solver:

www.classsolver.com

Class Solver is class list creation software primarily used by Elementary and Middle schools. At the end of each school year classes (homerooms) for the new school year need to be created that balance gender and whatever other items are important to the school. Common examples of items that are important to schools are behaviour, academic performance and ELL. The software also takes account of friendships and pairing and separation requests.

Agreement

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

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

Prohibitions:

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

Obligations:

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

Data Review Process

Class Solver encourages users to update their personal information in order to have accurate, current and complete information. Users may correct any errors or request that Class Solver deletes all or some of the personal information. Users may also submit a request not to have any further contact from Class Solver.

If users wish to review any student's or child's personally identifiable information, please email them at support@classsolver.com. Users may also correct, update, or delete any student or child's personal information by making the change directly in the user profile initially created, or by emailing Class Solver. They will respond to your request within thirty (30) days.

To protect personal information held by Class Solver, users may need to confirm their identity before access to any personal information is granted.

To contact Class Solver about any personal information, concerns or complaints, email support@classsolver.com or alternatively, write to Class Solver at PO BOX 2560 Rowville VIC 3178, Australia.

Security Protocols

Class Solver 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 in transit is encrypted via HTTPS

Data at Rest:

Data encryption at rest is provided by Azure Postgresql and Azure Storage - FIPS 140-2 validated cryptographic module using AES 256-bit cipher is used

Data Center Security:

Class Solver uses Microsoft Azure Cloud in the respective geographic locations of the instances – US and Canada within the US, Australian and New Zealand instances within Australia.

<https://azure.microsoft.com/en-us/solutions/#security-and-governance>

Personnel:

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

Training: Employees of Class Solver 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

Once per year, Class Solver will provide schools with:

- audit rights to the school's data
- access to the results of Class Solver' or its third-party security audit

Data Breach

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

Class Solver 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

Class Solver states that:

Under FERPA, parents have the right to refuse Class Solver further contact with their child and to have access to their child's school record information and to have it deleted by contacting the school administrator.

Class Solver will retain and use your information as necessary to comply with our legal obligations only. They will retain your information only for as long as your account is active or as needed to provide services.

Right to Delete; California residents may request that Class Solver delete their personal information that they have collected and retained by us or our service providers. However, as per the CCPA, please bear in mind that this right is limited and we may deny such a request if it is necessary for Class Solver or our service provider to maintain the personal information collected in order to perform certain services, comply with the California Electronic Communications Privacy Act and any other applicable statutes.

As stated in their Privacy Policy, users should direct any access, deletion or correction requests related to education records directly to their educational institutions. Being a service provider, Class Solver cannot delete or modify education records or other records collected or processed for, or on behalf of, an educational institution, unless it is directed to do so by the educational institution directly.

Research

Class Solver stated; We use none of the customer data for research or statistical purposes at this time. If data is used for behavioral or product improvements the data is aggregated and cannot be identified to any particular individual.

Class Solver may also analyze information that does not contain "Personal Information" (or contains "Personal Information" in anonymous or aggregated form) for trends and statistics, such as through the use of Google Analytics or other similar analytics services.

Third Parties

Class Solver 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.

Class Solver 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. Class Solver 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 Class Solver' data privacy and security policies and expectations.

Class Solver utilizes the following third-party vendors:

Provider	How Youth In Government Online uses the Provider	What information we share
MS Azure USA	Data storage	All data
Rollbar	Exception Reporting	Errors in API
Stripe	Payments and Invoices	School details
Auth0	Authentication	User email and logins
Sendgrid	Email Provider	Emails

Product Data List

Data Collection:

Data Collected for Operation	General Purpose of Data Collection
Student First and Last Name	Required to support product functionality
Student AGE/DOB	May be used to support product functionality
Student Ethnicity	May be used to support product functionality
Student Gender	May be used to support product functionality
School Name	Required to support product functionality
School Address	Required to support product functionality
Grades	May be used to support product functionality
Teams/Club	May be used to support product functionality
Browser Type	Analytics
Access time	Analytics
TIME SPENT ON SITE	Analytics
PAGE VIEWS	Analytics

Please note: Class Solver can customize a Schools request for additional information. Here are some examples of the data fields that schools have used to collect information about students to balance their classes;

Academic High, Academic Low, Academic Probation, Age - for kinder, Attendance behaviour, Attended pre school, Attends after school program, Behaviour, Can write their name, Disability, EAL/ESL/ELL, English ability, Favourite sport, Focus, Government funding (504/NCCD), Homeroom House for school sports, Individual learning plan, Maths ability, Medical conditions, Neighbourhood, Oldest/only child - for kinder, Parent is a classroom helper, Parent(s) require extra teacher time, Playground behaviour, Race/Ethnicity, Reading ability, Religion, RTI, Socio economic, Special needs, Toileting needs, Tutoring, Work ethic

Accuracy Statement

Class Solver Pty Ltd, hereby confirms the accuracy and truthfulness of all information contained in the Class Solver profile and has authorized iKeepSafe to make the profile available to any interested schools.

Signed and agreed:




(Signature)

Geoff Craig
Class Solver Pty Ltd
Class Solver Unit Trust
PO BOX 2560
Rowville VIC 3178.
+61 417 508 483

23 October 2020

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

DocuSigned by:

4936610B3823488...

(Signature)

Amber Lindsay
President & CEO
iKeepSafe

23 October 2020

Copyright

© 2020 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.

Disclaimer

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.