



## *iKeepSafe Product Profile Nepris 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 Nepris complies with COPPA, FERPA, California and New Hampshire. It indicates that Nepris has been assessed for alignment with the iKeepSafe FERPA, COPPA, California and New Hampshire Guidelines.

### Product Overview

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The Nepris service at <https://nepris.com> is a cloud-based platform that connects teachers with volunteer industry experts for live, interactive, virtual sessions to make curriculum topics relevant for students every day. They help educators expose students to different career and education paths, and find real world applications to what students are learning.

The main features of their website include the following: (1) live video sessions of an industry expert interacting with a classroom at the request of a teacher (“Live Session”); (2) presentations by a company, organization, or industry expert to one or more classrooms (“Industry Chats”); (3) the on-demand video library in which all recorded Live Sessions and Industry Chats reside (“Video Library”), and (4) access to information from O\*NET Web Services by the U.S. Department of Labor, Employment and Training Administration (USDOL/ETA) aligned with videos.

## Agreement

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

1. Student records obtained by Nepris 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 Nepris.
2. Nepris users may retain possession and control of their own generated content.
3. Nepris will not use any information in a student record for any purpose other than those required or specifically permitted by the Nepris 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.
5. Nepris 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 have 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, Nepris will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.
7. Nepris 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. Nepris 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. Nepris prohibits using personally identifiable information in student records to engage in targeted advertising.
10. Nepris 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”), Nepris agrees:

Prohibitions:

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

Obligations:

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

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

1. Nepris 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. Nepris 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. Nepris 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. Nepris 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. Nepris 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. Nepris 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. Nepris 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. Nepris 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. Nepris 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. Nepris 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 prior verifiable consent for any material changes to its privacy policy that affect the collection or use of personal information from students.

## New Hampshire Student Privacy Laws

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Nepris was determined to be in alignment with several New Hampshire student privacy laws, including RSA 189:1-e and 189:65-69; RSA 186; NH Admin. Code Ed. 300 and NH Admin. Code Ed. 1100.

As related to the Minimum required standards of Privacy and Security Guidelines, Nepris agrees that they have implemented, followed and are in compliance with these guidelines.

Nepris states that it will adhere to the minimum standards (“Standards”) for the privacy and security of student and employee information for Local Education Agencies (“LEA”) that the Department is required to establish according to New Hampshire Revised Statutes Annotated (RSA) 189:66, V.

These Standards apply to “Student Personally-Identifiable Data” and “Teacher Personally-Identifiable Data” (RSA 189:65), as well as “Covered Information” (RSA 189:68) handled by LEAs in both electronic and physical formats.

## Data Review Process

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Parents are encouraged to work directly with teachers and school to make any changes to any data. If however, you need to get in touch with Nepris, you can write to [support@nepris.com](mailto:support@nepris.com) and they will work with the school and do their best to make the required changes.

Nepris may use Personal Information as needed for the purposes for which it was collected or where consent has been granted for their use of your Personal Information. They take reasonable steps to ensure that the Personal Information they store and use is accurate, complete, and up-to-date. If it is discovered that Personal Information or other pertaining data is inaccurate, incomplete, or out-of-date, please update your account information or contact us as outlined below.

General inquiries related to privacy may be directed to:

Email: [nepris@nepris.com](mailto:nepris@nepris.com)

Address below:

Nepris Inc  
7950 Legacy Dr,  
Suite 400, Plano, TX 75024  
Phone: 1-855-472-2567

## Security Protocols

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Nepris 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

### Data at Rest:

Nepris uses a Microsoft Azure SQL DB to store its data. Transparent Data Encryption (TDE) encrypts SQL Server, Azure SQL Database, and Azure SQL Data Warehouse data files, known as encrypting data at rest. At a high level it uses AES encryption and a key.

### Data Center Security:

Nepris uses Microsoft Azure Data Centers for all Data Storage.

Please see the article from Microsoft for details on the Azure datacenters, including physical infrastructure and security.

<https://docs.microsoft.com/en-us/azure/security/fundamentals/physical-security>

### Personnel:

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

Training: Employees of Nepris 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

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Once per year, Nepris will provide schools with:



audit rights to the school's data



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

## Data Breach

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

Nepris 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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If you have questions about specific practices relating to Student Records provided to Nepris by a School, please direct your questions to your School.

The School is responsible for managing Student Records that the School no longer needs for an educational purpose by submitting a deletion request when such data is no longer needed. Schools should contact us at [support@nepris.com](mailto:support@nepris.com) to request deletion of Student Records associated with the School's use of Nepris.

Nepris will keep personal information until it is deleted, or until they no longer need it to provide you with the Service. They will not retain student personal information for any longer than is necessary for education purposes and legal obligations, or to provide the Service for which they receive or collect the student personal information. In addition, they only keep student personal information for as long as the student account is active, unless we are required by law or the student's school to retain, or need it to protect the safety of our users

## Research

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Nepris 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, Nepris may share this data with business partners to improve their 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 our Service, such data will be aggregated and/or anonymized to reasonably avoid identification of a specific individual.

## Third Parties

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Nepris 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.

Nepris 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. Nepris 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 Nepris' data privacy and security policies and expectations.

Nepris utilizes the following third-party vendors:

Third Party	Purpose	Information Shared
Microsoft	Azure cloud hosting, database, and storage, videos, and analytics.	Geo information, IP address and tracking – via analytics gathering.
Zoom	Video Meetings – User accounts created using Names	Names and Nepris Unique Identifier
Vimeo	Video Repository	Videos

Google	Google Analytics, Firebase database	Geo Information, IP Address & Tracking, Firebase stores videos for processing
Olark	Live Chat	Geo Information, IP & Tracking
Dropbox	Document and video project storage	Videos, documents
Digital Ocean	Hosting, Video processing	Videos
iContact	Email Campaign Manager	User List (names, email, profile information, etc.)
LinkedIn	Volunteer Opportunity Listing	Info about Session Requester, District, School, etc.
SalesForce	Customer Relationship Management system.	nepris.com data or sales and marketing leads. Student data is not collected.
Cirrus	Sync email and contact data from Google with Salesforce	Data from business communications. Student data is not collected.
Dataloader	Sync nepris.com data with Salesforce	Data from nepris.com. Student data is not collected.

Validity	Sync nepris.com data with Salesforce	Sync data between nepris.com and Salesforce. Student data is not collected.
Zapier	Transfer data between other tools	Sending and updating calendar invites, notifications for events, etc. Student data not is not collected
ChurnZero	Bring together nepris.com, support, and Salesforce to track health of accounts	Contact for student data (name, email) may be passed to ChurnZero if they use a support channel directly.
Zendesk	Support platform for manage emails, chats and phone calls	Student data (name, email) may be collected if they use a support channel directly. Geo Information, IP & Tracking on chats.

## Product Data List

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<b>Data element</b>	<b>Purpose of Data Collected</b>
Student First and Last Name	Product Functionality
Student Email Address	Product Functionality
Student phone number/mobile	Product Functionality
Student Password	Product Functionality
Student Age/DOB	Product Functionality
Student Gender	Product Functionality
Other Student ID	Product Functionality
Student courses used with Nepris	Product Functionality
Teacher names used with Nepris	Product Functionality
School Name, School District, University	Product Functionality
School Address	Product Functionality
Grade Level	Product Functionality
Industry Professional and Educator Name	Product Functionality
Industry Professional and Educator Address	Product Functionality
Industry Professional and Educator Email Address	Product Functionality
Industry Professional and Educator Work Address	Product Functionality
Industry Professional and Educator Phone/Mobile Number	Product Functionality
Geolocation Data	Product Functionality
Video, Photographs (Industry Professional and Educator)	Product Functionality
Browser Type	Analytics
Access Time	Analytics
Time spent on Site	Analytics
Page Views	Analytics
Referring URL's	Analytics

Headline	Product Functionality
Student Bio	Product Functionality
Affiliations	Product Functionality
Profile Image (Industry Professional and Educator)	Product Functionality
GravatarImage (From Email)	Product Functionality
Subjects Taught (Educator)	Product Functionality
Skills (Industry Professional)	Product Functionality
Industry (Industry Professional)	Product Functionality
Job Title (Industry Professional)	Product Functionality

## Accuracy Statement

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

Signed and agreed:



(Signature)

6/23/2022

Mark D. Fry  
Nepris Inc.  
7950 Legacy Dr,  
Suite 400, Plano, TX 75024

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

DocuSigned by:



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(Signature)

6/23/2022

Amber Lindsay  
iKeepSafe Vice President  
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## Copyright

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