

iKeepSafe Product Profile Awesome Table

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 Awesome Table complies with COPPA and FERPA. It indicates that AWESOME TABLE has been assessed for alignment with the iKeepSafe FERPA and COPPA Guidelines.

Product Overview

Awesome Table enables users to make filterable and searchable catalogs or maps using Google Sheets by making it easy to embed spreadsheet data into a website without any coding skills.

Awesome Table has been used for years by teachers and administrators to improve communication with students. This includes creating digital gradebooks, curriculum maps, course catalogs, project directories, and badge systems that can be easily updated and accessed. Students themselves have used it for their own projects as well.

Agreement

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

- 1. Student records obtained by AWESOME TABLE 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 AWESOME TABLE.
- 2. AWESOME TABLE users may retain possession and control of their own generated content.
- 3. AWESOME TABLE will not use any information in a student record for any purpose other than those required or specifically permitted by the AWESOME TABLE 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, AWESOME TABLE users may access, correct, update, or delete personal information in their profile by signing into AWESOME TABLE, accessing their AWESOME TABLE account, and making the appropriate changes.
- 5. AWESOME TABLE 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 regular employee privacy and data security training and education; and
 - c. 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, AWESOME TABLE will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.
- 7. AWESOME TABLE 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. AWESOME TABLE 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. AWESOME TABLE prohibits using personally identifiable information in student records to engage in targeted advertising.
- 10. AWESOME TABLE will not make material changes to our Privacy Policy, including making significant changes impacting the collection, use, disclosure or retention of data collected without prior notice to the educational user.

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

- AWESOME TABLE engages 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. AWESOME TABLE 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. AWESOME TABLE 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. AWESOME TABLE 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. AWESOME TABLE 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.
- AWESOME TABLE 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. AWESOME TABLE 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.
- AWESOME TABLE 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. AWESOME TABLE 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. AWESOME TABLE will not make material changes to its privacy 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 of any material changes to its privacy policy that affect the collection or use of personal information from students.

Data Review Process

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 legal@talarian.io and we will work with the school and do our best to make the required changes.

General inquiries related to privacy may be directed to:

Data Privacy Officer Stanislas de Villoutreys 30 Bd Grande-Duchesse Charlotte L-1330 Luxembourg Phone: +33 (0)633482408 E-Mail: sdv@revevol.eu

Security Protocols

AWESOME TABLE 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:

AWESOME TABLE uses Google Cloud Platform to encrypt data at rest.

Data Center Security:

AWESOME TABLE stores data in Firebase Real Time Database.

Personnel:

Training: Employees of AWESOME TABLE will receive annual privacy and security training.

<u>Access</u>: 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.

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Access to Audit

Once per year, AWESOME TABLE will provide schools with:

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

Data Breach

In the event of an unauthorized disclosure of a student's records, AWESOME TABLE 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;
- d. what AWESOME TABLE has done or shall do to mitigate any effect of the unauthorized use or disclosure;
- e. what corrective action AWESOME TABLE has taken or shall take to prevent future similar unauthorized use or disclosure; and
- f. who at AWESOME TABLE the user can contact. AWESOME TABLE will keep the user fully informed until the incident is resolved.

Data Deletion

AWESOME TABLE may store your data, including, personal identifiable information, for as long as the account is active and thereafter, unless you have specifically requested deletion of data, including, personal identifiable information, in whole or in part.

You may contact AWESOME TABLE personally and in writing in reference to deleting any of your data, including, personal identifiable information as follows:

Data Privacy Officer Stanislas de Villoutreys 30 Bd Grande-Duchesse Charlotte L-1330 Luxembourg Phone: +33 (0)633482408 E-Mail: sdv@revevol.eu

Research

AWESOME TABLE does not do research.

AWESOME TABLE does not use end user data in any non-production environments including testing, development and training. AWESOME TABLE does not use end user data for production improvement or research.

Third Parties

AWESOME TABLE 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.

AWESOME TABLE 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. AWESOME TABLE 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 AWESOME TABLE's data privacy and security policies and expectations.

AWESOME TABLE utilizes the following third-party vendors:

Third Party	Purpose	Information Shared
Google LLC	Hosting (Google Cloud Platform)	Google is a subprocessor. The GCP contract (online terms) includes a Data Processing Agreement. Information is not "shared" with Google, it is only processed by Google for purpose of rendering the service. Our products do not store any of the end users content and therefore Google (GCP) does not either. Schools already have agreements in place with Google anyway for usage of Forms, emails and
Stripe, Paypal	Payment processing provider	spreadsheets. Client (school) payment info
Sendgrid	Transactional Email notification provider	Subscription info. Never share the content of the underlying data source (spreadsheet).
Beamer	In-app embedded notification push provider	Awesome Table technical user id
Quaderno	VAT compliance provider	None
Z1	Site and app designer	None
Yuri and Neil	Google analytics consultant	None
Badsender	Email deliverability consultant	None

Product Data List

Data element	Purpose of Data Collected
Student First and Last Name	Product Functionality
Student Physical Address	Product Functionality
Parent First Name & Last Name	Billing
Parent Physical Address	Billing
School Name	Product Functionality
School Address	Billing
Persistent Identifiers	Product Functionality
Browser Type	Analytics
Access Time	Analytics
Page Views	Analytics
Referring URL's	Analytics

Accuracy Statement

Accuracy Statement

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

Signed and agreed:

DocuSigned by: alain Renard 51CF01969AFD4B

Docusigned by: Stanislas de Villoutreys F6799073A8774F7...

(Signature) Authorized Representative alain Renard

Stanislas de Villoutreys

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

DocuSigned by: Amber Lindsay 4936610B3823488

(Signature)

Amber Lindsay iKeepSafe Vice President phone: 801.472.6175 website: <u>ikeepsafe.org/</u>

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