



## *iKeepSafe Product Profile Form Publisher*

### 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 Form Publisher complies with COPPA and FERPA. It indicates that FORM PUBLISHER has been assessed for alignment with the iKeepSafe FERPA and COPPA Guidelines.

### Product Overview

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Form Publisher enables users to streamline tedious administrative processes such as leave request approvals through automated document generation workflows.

Form Publisher lets users easily create customized documents from Google Forms by turning form submissions into beautifully designed PDFs, Google Workspace, or Microsoft Office documents. It can then automatically send them via email to be approved and signed online. All generated documents are stored on Google Drive.

Form Publisher is used in schools to automate tasks such as taking class attendance and creating certificates. Furthermore, many teachers use it to collect feedback and create progress reports.

## Agreement

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

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

1. FORM PUBLISHER 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. FORM PUBLISHER 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. FORM PUBLISHER 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. FORM PUBLISHER 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. FORM PUBLISHER 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. FORM PUBLISHER 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. FORM PUBLISHER 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. FORM PUBLISHER 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. FORM PUBLISHER 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. FORM PUBLISHER 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

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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](mailto: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](mailto:sdv@revevol.eu)

## Security Protocols

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FORM PUBLISHER 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:

FORM PUBLISHER uses Google Cloud Platform to encrypt data at rest.

### Data Center Security:

FORM PUBLISHER stores data in Firebase Real Time Database.

### Personnel:

Training: Employees of FORM PUBLISHER will receive annual privacy and security training.

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, FORM PUBLISHER will provide schools with:



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

## Data Breach

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

## Data Deletion

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FORM PUBLISHER 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 FORM PUBLISHER 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](mailto:sdv@revevol.eu)

## Research

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FORM PUBLISHER does not do research.

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

## Third Parties

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FORM PUBLISHER 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.

FORM PUBLISHER 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. FORM PUBLISHER 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 FORM PUBLISHER's data privacy and security policies and expectations.

FORM PUBLISHER utilizes the following third-party vendors:

Third Party	Purpose	Information Shared
Google LLC	Hosting (Google Cloud Platform)	<p>Google is a subprocessor. The GCP contract (online terms) includes a Data Processing Agreement.</p> <p>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.</p> <p>Schools already have agreements in place with Google anyway for usage of Forms, emails and spreadsheets.</p>
Stripe, Paypal	Payment processing provider	Client (school) payment info
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

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<b>Data element</b>	<b>Purpose of Data Collected</b>
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

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## Accuracy Statement

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

Signed and agreed:

DocuSigned by:  
*alain Renard*

51CF01969AFD4B1...  
\_\_\_\_\_  
(Signature) Authorized Representative  
alain Renard

DocuSigned by:  
*Stanislas de Villoutreys*

F6799073A8774F7...  
Stanislas de villoutreys

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

DocuSigned by:  
*Amber Lindsay*

4936610B3823488...  
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(Signature)

Amber Lindsay iKeepSafe Vice President phone: 801.472.6175  
website: [ikeepSAFE.org/](http://ikeepSAFE.org/)

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