



iKeepSafe Product Profile Yet Another Mail Merge

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 Yet Another Mail Merge (YAMM) complies with COPPA and FERPA. It indicates that YAMM has been assessed for alignment with the iKeepSafe FERPA and COPPA Guidelines.

Product Overview

Yet Another Mail Merge (YAMM) is a mail merge tool designed to help users send mass personalized emails in bulk directly from Google Sheets and Gmail.

YAMM has many use-cases in education: teacher-student, teacher-parent, administrator-teacher, administrator-student, etc. Sending assignments, sending news and updates, contacting donors, etc.

YAMM enables users to track the effectiveness of campaigns, including email opens, clicks, bounces, and responses. Other features include contact segmentation, personalized subject lines, email body, links, images and attachments, polls, templates, and customization via HTML and CSS.

Agreement

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

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

YAMM 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:

YAMM uses Google Cloud Platform to encrypt data at rest.

Data Center Security:

YAMM stores data in Firebase Real Time Database.

Personnel:

Training: Employees of YAMM 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

Once per year, YAMM will provide schools with:



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

Data Breach

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

Data Deletion

YAMM 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 YAMM 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

YAMM does not do research.

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

Third Parties

YAMM 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.

YAMM 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. YAMM 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 YAMM's data privacy and security policies and expectations.

YAMM 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. 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

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

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

Signed and agreed:

DocuSigned by:
alain Renard
51CF04969AFD4B1...

(Signature) Authorized Representative
alain Renard

DocuSigned by:
Stanislas de Villoutreys
F6799073A8774F7...

Stanislas de Villoutreys

The YAMM service has been reviewed and found in alignment with iKeepSafe's FERPA and COPPA Guidelines as indicated by this product profile. YAMM 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: ikeepSAFE.org/

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