



*iKeepSafe Product Profile*  
*Pixton Comics Inc.*  
*Pixton Comics*

## Introduction

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The *iKeepSafe* FERPA, CSPC (California) and COPPA 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 *iKeepSafe* Product Profile is intended to assist you in determining whether [Pixton Comics](#) complies with FERPA, COPPA and CSPC (California). It indicates that [Pixton Comics](#) has been assessed for alignment with the *iKeepSafe* FERPA, CSPC (California) and COPPA Guidelines.

## Product Overview

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Pixton Comics Inc.

<https://edu.pixton.com/parents>

<https://edu.pixton.com/educators>

<https://edu.pixton.com/solo>

A web app for students (and teachers) to make comics; a versatile writing tool that can be applied to practically any subject area, grades 3 and up. We also have versions of the product tailored for individual (“solo”) users, and parents / children.

## Agreement

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

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

targeted advertising.

10. Pixton Comics 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.

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

1. Pixton Comics 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. Pixton Comics 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. Pixton Comics makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. Pixton Comics 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. Pixton Comics 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. Pixton Comics does not and 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. Pixton Comics 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. Pixton Comics 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. Pixton Comics 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. Pixton Comics 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 the prior verifiable consent for any material changes to its privacy policy that

affect the collection or use of personal information from students.

### C. . As related to Student Online Personal Information Protection Act (SB 1177 -“SOPIPA”), Pixton Comics agrees:

Prohibitions:

1. Pixton Comics does not target advertising via its website or on any other website using information about a K-12 student acquired from a use of the technology.
2. Pixton Comics does not use information, including persistent unique identifiers, created or gathered by the site to amass a profile about a K–12 student except in furtherance of K–12 school purposes.
3. Pixton Comics does not and will not sell, rent, or otherwise provide personally identifiable information to any third party for monetary gain.
4. Pixton Comics does not disclose student information unless for legal, regulatory, judicial, safety or operational improvement reasons.

Obligations:

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

### Data Access and Review Process

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Any party wishing for Pixton Comics to provide or correct their personal information can make a request either via their school or directly to Pixton Comics and they will provide or correct the information as instructed.

A data access request which asks Pixton Comics to provide, correct or delete personal information is lodged via an email to [privacy@pixton.com](mailto:privacy@pixton.com). Depending on the nature of the request they may require the requestor to provide information to verify their identity, and/or be an authorised agent of their school.

Pixton Comics collects data on behalf of schools. Any party wishing for Pixton Comics to provide, correct or delete their personal information can make a request via their school, and they will fulfill the data request in a timely manner.

## Security Protocols

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Pixton Comics 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

Pixton Comics uses secure socket layer technology (SSL) when a user enters any information anywhere on the Service as a default and this technology enables the encryption of that information during server transmission.

### Data at Rest

Pixton Comics database is encrypted **at rest**, where they store a user's personal information, which converts all personal information stored in the database to an unintelligible form.

### Data Center Security

Pixton Comics uses AWS Data Centers and these centers conform to the following:

AWS is a secure, durable technology platform with industry-recognized certifications and audits: PCI DSS Level 1, ISO 27001, FISMA Moderate, FedRAMP, HIPAA, and SOC 1 (formerly referred to as SAS 70 and/or SSAE 16) and SOC 2 audit reports. Their services and data centers have multiple layers of operational and physical security to ensure the integrity and safety of your data.

Please see more information below in the available link:

**Amazon Web Services (AWS)** <https://aws.amazon.com/security/>

### Personnel

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

Training: Employees of Pixton Comics, Inc. will receive annual privacy and security training that includes FERPA and COPPA.

Access: Access to student data is role-based; limited to those employees who need access to perform job responsibilities.

## Access to Audit

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Once per year, Pixton Comics Inc. will provide schools with:

- audit rights to the school's data
- access to the results of Pixton Comics Inc. or its third-party security audit

## Data Breach

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

Pixton Comics Inc. will notify impacted user (s) within a reasonable period of time following the discovery of a breach of security that results in the unauthorized release, disclosure or acquisition of student information, and any acquisition of computerized data that compromises the security, confidentiality, or integrity of personal information maintained by Pixton Comics Inc.

## Data Deletion

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Pixton Comics stores your personal information for as long as it is necessary to provide products and Services to you and others. Personal information associated with the user account will be kept until the account is deleted or until we no longer need the data to provide products and services.

Pixton Comics may have to retain some information after your account is closed, to comply with legal obligations, to protect the safety and security of our community or our Service, or to prevent abuse of our Terms. At Pixton Comics, a user may delete their account at any time by contacting their school directly or by contacting Pixton Comics at [privacy@pixton.com](mailto:privacy@pixton.com).

## Research

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Pixton Comics 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, Pixton Comics 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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Pixton Comics 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.

Pixton Comics 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. Pixton Comics 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 Pixton Comics data privacy and security policies and expectations.

Pixton Comics utilizes the following third-party vendors:

**(a) Google Analytics** (Educators only) collects Non-Personal Information, which we use aggregated and anonymized to track the usage of the Site. No User Generated Content is passed to Google Analytics.

**(b) Hubspot.com** (Educators only) is a customer communication tool that allows us to send email and in-application messages to Educators. We use it to segment Educators for more specific messaging; to organize messages; and to communicate product updates such as feature releases. This service collects limited Personal Information, such as name and email address.

**(c) Stripe.com** (Educators only) is a payment processor, which we use to collect credit card payments from Educators. This service collects limited Personal Information, such as name and credit card information.

**(d) Google, Microsoft, or Facebook** (Educators only) facilitate single sign-on to the Site. We use them to authenticate users and to retrieve the name and/or email address of the user, for the purposes of provisioning and then enabling access to a Pixton account. These services collect and pass to Pixton limited Personal Information (name and email address).

**(e) Amazon Web Services** is a set of cloud-based web hosting services. We use it to host the Site, including the database where user data are stored. This service does not collect Personal Information, although it may store (in an encrypted format) such data as collected and stored by Pixton.

## Product Data List

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Data Collection by Pixton Comics include the following:

	<b>DATA Collected for Operation</b>	<b>General Purpose of Data Collected</b>
1	STUDENT FIRST and LAST NAME	Required to support Product Functionality
2	STUDENT EMAIL ADDRESS	Required to support Product Functionality
3	STUDENT AGE	Required to support Product Functionality
4	STUDENT GENDER	Required to support Product Functionality
5	STUDENT GRADES	Required to support Product Functionality
6	BROWSER TYPE	Required to support Product Functionality
7	OTHER PERSISTENT IDENTIFIER	Required to support Product Functionality/Statistics
8	<b>AVATAR (skin color, hair color, hairstyle)</b>	Required to support Product Functionality

## Accuracy Statement

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

Signed and agreed:



(Signature)

Clive Goodinson  
Pixton Comics Inc., PO Box 123, Qualicum Beach, BC,  
Canada V9K 1S7  
Phone: 1 (331) 234-5774  
Email: [privacy@pixton.com](mailto:privacy@pixton.com)

05/05/2021

The Pixton Comics service has been reviewed and found in alignment with iKeepSafe's FERPA, CSPC and COPPA Privacy Program Guidelines as indicated by this product profile. Pixton Comics has been awarded the iKeepSafe FERPA, CSPC and COPPA Certification.

DocuSigned by:



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(Signature)

Amber Lindsay  
President & CEO  
iKeepSafe

05/05/2021

## Copyright

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