



iKeepSafe Product Profile Campus Suite

Introduction

The iKeepSafe FERPA 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 Campus Suite complies with FERPA. It indicates that the Campus Suite has been assessed for alignment with the iKeepSafe FERPA Privacy Program Guidelines.

The iKeepProfile is not legal guidance, nor does it guarantee or otherwise assure compliance with any federal or state laws. If you have questions on how to use the iKeepProfile to support your school's compliance efforts, please contact your school attorney.¹

Product Overview

Campus Suite: www.campussuite.com/school-websites

Campus Suite is a cloud-hosted Software as a Service (SaaS) enabling our customers to build and manage their websites. We provide complete onboarding and support services to get customers up and running and support them via email, instant chat and phone. We provide these services to Higher Education, Private and charter schools, but our main focus is K-12 school districts. From the site administrator managing it, to principals and staff members contributing content, to the parents, students and community using it, we provide WCAG 2.1 ADA compliant websites so that everyone has instant and easy access to daily changing information.

Agreement

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

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

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 helpdesk@campussuite.com and we will work with the school and do our best to make the required changes.

Teachers, administrators and Students can directly edit their information in their Campus Suite profiles. Schools also have a right to use any other similar service and can place a request to get all of their data. We will do our best to comply with such requests.

You may also send requests about your Personal Information, including changes to your contact preferences, and changes to or deletions of your information or content you post, by emailing helpdesk@campussuite.com

General inquiries related to privacy may be directed to:

Please contact us at the following with any questions about this Privacy Policy:

Owner and Data Controller
Innersync Studio, Ltd.
752 Dunwoodie Dr.
Cincinnati, OH 45230

Owner contact email: helpdesk@campussuite.com

Security Protocols

Campus Suite has a comprehensive Information Security Program in place that ensures the confidentiality, integrity and availability of systems, networks and data. The following is a general overview of data security protocols:

Data In Transit:

All sensitive web traffic (such as API requests, dashboard logins, and dashboard interactions) is sent over HTTPS. Public-facing websites hosted by our CMS enforce HTTPS as we provide it free with all subscriptions..

- a. SSL certificates are provisioned through Let's Encrypt.
- b. Campus Suite can also host an SSL certificate that is provided by the customer if they choose

Data at Rest:

Campus Suite uses AWS block-level encryption using their own managed keys.

Data Storage:

Data is stored in AWS RDS Database, which is encrypted.

Data Center Security:

Campus Suite utilizes data centers operated by Amazon Web Services (AWS) which has extensive experience in designing, construction, and operation large-scale data centers. AWS data centers are housed in nondescript facilities. Physical access is strictly controlled both at the perimeter and at the building ingress points by professional security staff utilizing video surveillance, intrusion detection system and other electronic means. Authorized staff must pass a two-factor authentication a minimum of two times to access data center floors. AWS only provides data center access and information to employees and contractors who have a legitimate business need.

Please see more details here: <https://aws.amazon.com/compliance/data-center/controls/>

Personnel :

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

Training: Employees of Campus Suite will receive annual privacy and security training that includes FERPA.

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

Access to Audit

Once per year, Campus Suite will provide schools with:

- audit rights to the school's data
- access to the results of Campus Suite or its third-party security audit

Data Breach

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

Campus Suite 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

Campus Suite states they will retain your information for as long as your account is active, or as needed to provide you with our services. Please contact us at the email address at helpdesk@campussuite.com should you wish to cancel your account or request that we no longer use your information to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Research

Campus Suite does not use end user data in any non-production environments including testing, development and training. Campus Suite does not use end user data for production improvement or research. Campus Suite only uses end user data to debug customer specific issues.

Campus Suite may actively poll their customers typically by an email sent to them asking them to complete a survey in return for an Amazon gift card. This campaign is designed for Administrators and Teachers of the School District. None of this data is sold, or shared outside Campus Suite.

Third Parties

Campus Suite 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.

Campus Suite 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. Campus Suite 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. Campus Suite utilizes the following third party vendors as indicated below

Third Party	Purpose	Information Shared
MachForm	Alternative method of forms from Google forms. In this case, the user has the OPTION of storing the form submissions that would be stored on MachForms cloud server.	All contents submitted via the form.
HubSpot	Used on our marketing site to serve relevant information to prospects and turn them to customers. Used in the Campus Suite product to understand how people are using the system and allow us to provide relevant help tools, etc.	For public site visitors, data such as pages visited, how long on page, links clicked, etc. For logged in publishers in Campus Suite, name and email address so that we can address them by name and be able to email them more details when they need additional support.
Chameleon	Extension used with Hubspot.	Name and email address, web requests, login activity, and behavior activity (what users are making, what changes in the system, etc.)

Google Analytics	For tracking both logged in administrators and the public visitors at large to show site utilization.	No personally identifiable data. Data examples might be IP address, browser, platform, screen resolution, country, etc.
Google Forms	For the creation of forms and collecting and sending of data to the school. In this case, the stored data is at Google and a Google spreadsheet.	All contents submitted via the form.

Product Data List

#	Data Collected for Operation	General Purpose of Data Collection
1	Student, Faculty, Admin: First and Last Name	Required to support product functionality
2	Student, Faculty, Admin: Email Address	Required to support product functionality
3	Student, Faculty, Admin: Mobile Phone Number	Required to support product functionality Used for email, text and voice communications.
	Parent's Full Name, Email Address, phone number	Required to support product functionality Used for email, text and voice communications.
	School's Name, Address,	Required to support product functionality
	Teams/Club, Grades, Photograph, Video/Audio File	Required to support product functionality
	Browser Type	Business Intelligence
	Device UDID	Required to support product functionality Mobile APP to allow the device to adjust and store its notification delivery preferences.
4	Access Time	Business Intelligence
5	Time Spent on Site	Business Intelligence
6	Page Views	Business Intelligence
7	Referring URLS	Business Intelligence

Accuracy Statement

Campus Suite, Inc. hereby confirms the accuracy and truthfulness of all information contained in the Campus Suite Service profile, and has authorized iKeepSafe to make the profile available to any interested schools.

Signed and agreed:



(Signature)

Jason Morgan
Owner and Data Controller
Innersync Studio, Ltd.
752 Dunwoodie Dr.
Cincinnati, OH 45230

10/04/2021

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

DocuSigned by:



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(Signature)

Amber Lindsay
President & CEO
iKeepSafe

10/04/2021