



iKeepSafe Product Profile

iRobot Education

Root Coding Robots and iRobot Coding Companion App

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 iRobot, specifically the **Root® Coding Robots and iRobot Coding Companion App** comply with COPPA. It indicates that **Root® Coding Robots and the iRobot Coding Companion App** have been assessed for alignment with the iKeepSafe COPPA Privacy Program Guidelines.

Product Overview

Founded with the mission to increase digital literacy and make STEM pathways universally accessible, iRobot Education serves as iRobot's voice for empowering the workforce of tomorrow, today. Inviting experimentation and creativity into learning to code, our powerful, free iRobot Coding App includes progressive learning levels designed to advance with you. From free tutorials to ready-to-go code and beyond, explore the App's ever-growing learning library with SimBots in simulated 3D environments. Or use tangible, creative hands-on experiences with the Root Coding Robot to make learning to code magical while exploring the fundamentals of robotics.

- Web App: <https://code.irobot.com/>
- Android App: <https://play.google.com/store/apps/details?id=com.rootrobotics.rootcoding>
- iOS App: <https://apps.apple.com/us/app/irobot-coding/id1524652548>

Agreement

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

1. iRobot contracts directly with parents and schools. iRobot may rely on consent from the school instead of the parents for collection of personal information from children or students when data collected is for the use and benefit of the school, and not for any other commercial purposes.
2. iRobot makes available clearly written policies explaining what data it collects from users, how such data is used and stored, and to whom it may be disclosed.

3. iRobot makes a copy of the privacy policy available to the parent or school prior to completion of the sale, download, or installation of the product.
4. iRobot provides the parent or school with 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. iRobot 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. iRobot 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. iRobot 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. iRobot 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. iRobot 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. iRobot 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 parent or school, separate from any notice in a "click wrap" agreement. It will notify parents or 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 children or students.

Data Review Process

iRobot does not knowingly collect any information from children under the age of 13 in the United States. Please contact us at global.irobot.com if you believe we have inadvertently collected personal information from a child under 13. This will allow us to delete such information as soon as possible.

Security Protocols

iRobot 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: All iRobot products communicate with the iRobot cloud service using robust encryption. Currently, we use AES 256-bit encryption and Transport Layer Security (TLS v1.2).

Data at Rest: Within iRobot’s cloud (built on top of Google and AWS), customer data is stored encrypted. Within the mobile application, data storage follows the platform’s standards for application-secure data.

Data Center Security: At iRobot, we take a defense-in-depth approach to security, adding multiple layers of protection around our robots, cloud and apps from start to finish. We ensure that the development of our products follows industry-standard security best practices, and we are using technology-leading tools to assist our development and security teams during this process. When deployed to market, we work with our suppliers and partners to ensure that our products and our suppliers' and partners' supporting infrastructure (including physical infrastructure, cloud and mobile apps) are properly configured and monitored, and continuous security improvement processes are in place.

All the data collected from your iRobot products as per the Privacy Policy is handled with care and high levels of security. The data is encrypted both in transit and at rest. Data access is controlled strictly and limited only to authorized personnel to do their job and help improve your product experiences.

Please refer to the Data Security Policy here: <https://www.irobot.com/legal/data-security>

Personnel:

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

Training: Employees of iRobot will receive annual privacy and security training that includes COPPA.

Employees are given access to the minimum services that are required for their job function.

Access to Audit

Once per year, iRobot will provide parents or schools with:



audit rights to their children or school’s data



access to the results of iRobot’s or its third-party security audit

Data Breach

iRobot does not collect any Private Data from children under the age of 13. If iRobot did, however, collect such Private Data, and experienced an unauthorized disclosure of a student’s records, iRobot would promptly notify users unless specifically directed not to provide such notification by law enforcement officials. Notification would 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 iRobot 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 iRobot has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at iRobot the user can contact. iRobot will keep the user fully informed until the incident is resolved.

iRobot would 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

The **Root® Coding Robots and iRobot Coding Companion App** does not intentionally collect or maintain information from persons under the age of 13.

Any data which is collected as described in the Product Data List section is maintained in an aggregated and de-identified format.

Research

If any **Root® Coding Robots and iRobot Coding Companion App** data is used for behavioral or product improvements, the data is aggregated and cannot be identified to, or associated with, any particular individual.

iRobot may analyze information from the **Root® Coding Robots and iRobot Coding Companion App** that does not contain “Personal Information” (or contains “Personal Information” in anonymous or aggregated form) for trends and statistics, such as through the use of Google Analytics or other similar analytics services.

Third Parties

iRobot does not collect personal information from individuals under the age of 13. iRobot does not sell, trade, lease or loan any 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.

iRobot contracts with other third-party companies to perform business functions or services on their behalf and may share de-identified or aggregated data with such third parties as required to perform their functions.

iRobot, specifically the **Root® Coding Robots and iRobot Coding Companion App**, utilizes the following third-party vendors:

iRobot Third Party Service Providers

Provider Name (Link to their Privacy Policy)	How iRobot uses the provider	What user information is shared or collected by this partner and/or passed back to us from the partner?
Amazon Web Services (AWS)	iRobot uses Amazon Web Services to host files for the iRobot Coding web app (S3 bucket).	No information is collected or shared.
Google Cloud Platform and Google Firebase	Google Cloud Platform and Google Firebase provide iRobot with analytics, databases, cloud services, hosting infrastructure, and enhanced mobile App development tools.	All uploaded project data (not local project data), app analytics (IP addresses, device information, user-triggered events), crash reports, and all logs are stored on Google Cloud Platform. All personal data is encrypted in transit and at rest.
Google Analytics	Google Analytics provides usage analytics for our Website and App.	Website and app usage, device information (manufacturer, OS version), and IP addresses. Data is encrypted in transit and IP anonymization is requested. No user-generated data is shared.
Fortrabbbit	iRobot uses Fortrabbbit to host the Craft CMS, associated databases and network infrastructure.	iRobot-assigned school ID codes for unlocking premium educator content are stored. No user-generated data is shared.

Product Data List

Below is a table representing the data elements passively collected from the **Root® Coding Robots and iRobot Coding Companion App**

DATA	TRANSFERRED TO OR SHARED WITH <u>including all third parties</u>	PURPOSE OF TRANSFER OR SHARE
ANALYTICS: DEVICE INFO (CATEGORY, BRAND, MODEL)	Google Cloud Platform, Google Analytics	To monitor usage, provide the Experience and improve performance.
ANALYTICS: OPERATING SYSTEM INFO (TYPE, VERSION)	Google Cloud Platform, Google Analytics	To monitor usage, provide the Experience and improve performance.
ANALYTICS: DEVICE SETTINGS (LANGUAGE, BROWSER VERSION)	Google Cloud Platform, Google Analytics	To monitor usage, provide the Experience and improve performance.
ANALYTICS: ANONYMIZED DEVICE IDENTIFIERS	Google Cloud Platform, Google Analytics	To monitor usage, provide the Experience and improve performance.
CRASH REPORTING: CRASH LOG INFORMATION	Google Cloud Platform, Google Crashlytics	To monitor usage, provide the Experience and improve performance.
ANALYTICS: GEOLOCATION DATA (BASED ON IP, NOT PRECISE – CITY/REGION LEVEL)	Google Cloud Platform, Google Analytics	To monitor usage, provide the Experience and improve performance.
ANALYTICS: USER EVENTS (PLAY/STOP PROGRAM, UPLOAD/ DOWNLOAD PROJECTS, CONNECT ROBOT, OPEN CONTENT)	Google Cloud Platform, Google Analytics	To monitor usage, provide the Experience and improve performance.
ANALYTICS: TIME USING APP	Google Cloud Platform, Google Analytics	To monitor usage, provide the Experience and improve performance.
ANALYTICS: WEB URL (PAGE LOCATION, PAGE REFERRER)	Google Cloud Platform, Google Analytics	To monitor usage, provide the Experience and improve performance.

Accuracy Statement

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

Signed and agreed:

Bethany Singer-Baefsky

(Signature)

Bethany Singer-Baefsky
Director of Privacy
iRobot Corporation
8 Crosby Drive
Bedford, MA 01730
1-877-855-8593

08/31/2021

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

DocuSigned by:
Amber Lindsay
4936610B3823488

(Signature)

Amber Lindsay
President & CEO
iKeepSafe

08/31/2021

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