



## *iKeepSafe Product Profile* *Artsonia*

### Introduction

---

The *iKeepSafe* FERPA 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 Artsonia complies with COPPA and FERPA. It indicates that Artsonia has been assessed for alignment with the iKeepSafe FERPA and COPPA Guidelines.

### Product Overview

---

Artsonia is an online student art museum where teachers and schools create online student art galleries. Parents and relatives view the artwork online, leave comments for the artists, join the artists' fan clubs and also order custom keepsakes with their children's artwork imprinted. 20% of all merchandise sales is donated back to the school art program as a fundraiser.

<https://www.artsonia.com/>

## Agreement

---

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

1. Student records obtained by Artsonia 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 Artsonia
2. Artsonia users may retain possession and control of their own generated content.
3. Artsonia will not use any information in a student record for any purpose other than those required or specifically permitted by the Artsonia 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, Artsonia users may access, correct, update, or delete personal information in their profile by signing into Artsonia, accessing their Artsonia account, and making the appropriate changes.
5. Artsonia 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.
  - e.
6. In the event of an unauthorized disclosure of a student’s records, Artsonia will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.
7. Artsonia 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. Artsonia 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. Artsonia prohibits using personally identifiable information in student records to engage in targeted advertising.
10. Artsonia 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. Artsonia 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. Artsonia 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. Artsonia makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. Artsonia 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. Artsonia 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. Artsonia 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. Artsonia 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. Artsonia 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. Artsonia 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. Artsonia 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.

## Data Review Process

---

Right to Access and Correction of Data: Artsonia support access to and correction of student personal information by the student or their parent or legal guardian, either by 1) assisting the school in meeting its requirements for access by responding to requests Artsonia receive from schools, or 2) directly responding to requests from parents when the information is collected directly from a student and Artsonia obtains the parental consent (not the school). Teachers, parents and other users can contact us as described below, to correct or update their personal information, or they can use the features in their account settings to do so.

General inquiries related to privacy may be directed to:

***E-Mail:***

**privacy@artsonia.com**

***Phone:***

1-(800)-869-9974

***Postal:***

Artsonia LLC  
ATTN: Privacy  
1350 Tri-State Parkway, Ste 106  
Gurnee, IL 60031

## Security Protocols

---

Artsonia 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

Artsonia 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

Artsonia's 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

Artsonia uses Microsoft Azure and AWS Data Centers and these centers conform to the following:

Data centers operated by Microsoft Azure has extensive experience in designing, constructing, and operating large-scale data centers. Microsoft Azure data centers are housed in nondescript facilities. Physical access is strictly controlled both at the perimeter and at building ingress points by professional security staff utilizing video surveillance, intrusion detection systems, and other electronic means. Authorized staff must pass two-factor authentication a minimum of two times to access data center floors. Microsoft Azure only provides data center access and information to employees and contractors who have a legitimate business need.

**Microsoft Azure** for providing servers, databases and network infrastructure for storage, service delivery and other related services. Specific services include Azure Virtual Machines, Azure Sql Database and Azure Storage Services.

**Amazon Web Services (AWS)** for backing up and serving artwork images for the website.

## Personnel

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

Training: Employees of Artsonia 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

---

Once per year, Artsonia will provide schools with:

audit rights to the school's data

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

## Data Breach

---

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

Artsonia 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 Artsonia.

## Data Deletion

---

Artsonia 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, unless we no longer need the data to provide products and services.

Artsonia 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 Artsonia, a user may delete their account at any time, as per the *Deleting Your Account* section in their privacy policy.

## Research

---

Artsonia stated we use de identified data for usage patterns and for product design purposes.

## Third Parties

---

Artsonia 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.

Artsonia 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. Artsonia 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 Artsonia' data privacy and security policies and expectations.

### **Artsonia utilizes the following third-party vendors:**

**Amazon** for fulfillment of electronic gift cards for teacher fundraising payouts.

**Info shared:** Teacher name, email and transaction amount.

---

**Amazon Web Services (AWS)** for backing up and serving artwork images for the website.

**Info shared:** artwork images.

---

**Blick Art Materials** for fulfillment of electronic gift cards for teacher fundraising payouts.

**Info shared:** Teacher contact (name, school, email), transaction amount.

---

**Chase Paymentech** for processing credit card payments on gift shop orders.

**Info shared:** Customer details (name, phone), credit card details, order details.

---

**Google** for single sign-on services and teachers integrating with Google Classroom.

**Info shared:** For Google Classroom: Artsonia shares project name and project link. For single sign-on, Artsonia receives authentication token and email address, but does not share any data with Google.

---

**Microsoft Azure** for providing servers, databases and network infrastructure for storage, service delivery and other related services. Specific services include Azure Virtual Machines, Azure Sql Database and Azure Storage Services.

**Info shared:** Our full website content and traffic data is hosted and stored on Microsoft Azure services. All personal data written to disk is encrypted.

---

**NAEA** for fulfillment of NAEA membership requests.

**Info shared:** Teacher contact (name, school, email, phone).

---

**PayPal** for processing payments on gift shop orders.

**Info shared:** Customer details (name, phone), order details. The financial information is collected directly by processor and not collected, transmitted or shared by Artsonia. User must separately have a PayPal account.

---

**SmartyStreets** for validating addresses for delivery of gift shop orders.

**Info shared:** Customer address.

---

**Squarespace** for hosting our news articles and blog portion of our site.

---

**Twilio** for sending SMS notification messages.

**Info shared:** User mobile phone number.

---

**UPS** for providing shipping services for gift shop orders.

**Info shared:** Customer details (name, phone, address), order details (weights).

---

**USPS** for providing shipping services for gift shop orders.

**Info shared:** Customer details (name, phone, address), order details (weights).

---

**ZenDesk** for hosting our help desk articles and for facilitating our chat help desk for Teachers, Parents and Customers of our Gift Shop.



## Product Data List

---

Data Collection by Artsonia 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 ID	Required to support Product Functionality
3	STUDENT GRADE	Required to support Product Functionality
4	PARENT FIRST AND LAST NAME	Required to support Product Functionality
5	PARENT PHONE/MOBILE NUMBER	Required to support Product Functionality
6	PARENT PHYSICAL ADDRESS	Required to support Product Functionality
7	PARENT EMAIL ADDRESS	Required to support Product Functionality
8	SCHOOL NAME	Required to support Product Functionality
9	SCHOOL ADDRESS	Required to support Product Functionality
10	PHOTOGRAPH,VIDEO OR AUDIO FILE	Required to support Product Functionality
11	Browser Type	Statistics/Customer Service
12	Access Time	Statistics/Customer Service
13	Time spent on Site	Statistics/Customer Service
14	Page Views	Statistics/Customer Service
15	Referring URL	Statistics/Customer Service

## Accuracy Statement

---

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

Signed and agreed:

Jim Meyers

DocuSigned by:  
*Jim Meyers*  
EC547F4FABA641E...

---

(Signature)

Jim Meyers  
CEO  
Artsonia

11/10/2021

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

DocuSigned by:  
*Amber Lindsay*  
4936610B3823488...

---

(Signature)

Amber Lindsay  
President & CEO  
iKeepSafe

11/10/2021

## Copyright

---

© 2018 Internet Keep Safe Coalition (iKeepSafe). All rights reserved. iKeepSafe's California Privacy Assessment Program™ materials have been developed, copyrighted, and distributed for incidental, classroom use only. iKeepSafe's copyright notice and distribution restrictions must be included on all reproductions whether in electronic or hard copy form. These materials are intended to convey general information only and not to provide legal advice or any other type of professional opinion.