



*iKeepSafe Product Profile
Attainment Company, Inc.
Attainment Hub*

Introduction

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 [Attainment Hub](#) complies with FERPA, COPPA and CSPC (California). It indicates that [Attainment Hub](#) has been assessed for alignment with the *iKeepSafe* FERPA, CSPC (California) and COPPA Guidelines.

Product Overview

hub.attainmentcompany.com

The Attainment Hub is an Information System that houses several Attainment Company's educational software products. The Attainment Hub also tracks student progress for these software products. A list of the products available in "The Hub" are listed below. The products *iKeepSafe* has certified are listed below and can be accessed as a Web APP.

Access Language Arts
Access Language Arts - WRITE
Computers at Work
Core Words Power Station
Courseware
CPR + AED Basics
Dollars and Cents
Early Literacy Skills Builder
ELSB for Older Students
Early Reading Skills Builder
Go Manage
GoTalk Design
Go Write
Job Coaching on Demand
Job Skills on Demand
Looking for Words
Laureate Learning
Math Skills Builder
Number Sense

PixWriter
Show Me Math
Show Me Spelling
Symbol Support

Agreement

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

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

targeted advertising.

10. Attainment Hub 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. Attainment Hub 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. Attainment Hub 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. Attainment Hub makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.

4. Attainment Hub 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. Attainment Hub 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. Attainment Hub 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. Attainment Hub 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. Attainment Hub 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. Attainment Hub 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. Attainment Hub 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”), Attainment Hub agrees:

Prohibitions:

1. Attainment Hub 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. Attainment Hub 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. Attainment Hub does not and will not sell, rent, or otherwise provide personally identifiable information to any third party for monetary gain.
4. Attainment Hub does not disclose student information unless for legal, regulatory, judicial, safety or operational improvement reasons.

Obligations:

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

Data Access and Review Process

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

A data access request which asks Attainment Hub to provide, correct or delete personal information is lodged via an email to info@attainmentcompany.com. Depending on the nature of the request they may require the requestor to provide information to verify their identity, and/or be an authorized agent of their school.

Attainment Hub collects data on behalf of schools. Any party wishing for Attainment Hub 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

Attainment Hub 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

Attainment Hub 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

Attainment Hub 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

Attainment Hub 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 Attainment Company, 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

Once per year, Attainment Company, Inc. will provide schools with:

- audit rights to the school's data
- access to the results of Attainment Company, Inc. or its third-party security audit

Data Breach

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

Attainment Company, 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 the Attainment Hub.

Data Deletion

Attainment Hub 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.

Attainment Hub 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 Attainment Hub, a user may delete their account at any time by contacting their school directly or by contacting Attainment Hub at info@attainmentcompany.com.

Research

Attainment Hub 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, Attainment Hub 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

Attainment Hub 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.

Attainment Hub 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. Attainment Hub 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 Attainment Hub's data privacy and security policies and expectations.

Attainment Hub utilizes the following third-party vendors:

Third Party	Purpose	Information Shared
Amazon Web Services	Host Attainment Hub and store any progress data	Student progress data and basic profile information
Clever	single sign-on services	
Classlink	single sign-on services	
CloudFlare	hosting our domain names	

Product Data List

While no specific PII as identified as FERPA or COPPA are required for HUB use, some of the information collected could be used to correlate a specific student with their educational records by someone familiar with the classroom. Therefore, the following pieces of information collected by the Attainment HUB software programs are protected by data encryption and stored in separate tables in order to separate student records from identifiers that could be used to identify a participant by a person familiar with the classroom.

Data Collection by Attainment Hub include the following:

	DATA Collected for Operation	General Purpose of Data Collected
1	Student Name or Identifier	Required to support Product Functionality
2	Teacher name or Identifier	Required to support Product Functionality
3	Student avatar	Required to support Product Functionality
4	Email addresses: (School/Teacher)	Required to support Product Functionality
5	Answers to Generic Questions by Child/Student	Required to support Product Functionality
6	Browser Type	Required to support Product Functionality
7	Access Time	Required to support Product Functionality/Statistics
8	Other device/usage analytics	Required to support Product Functionality

Accuracy Statement

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

Signed and agreed:



(Signature)

Attainment Company, Inc
504 Commerce Pkwy
Verona, WI 53593
United States
Phone: 800-327-4269
Fax: 608-845-8040
info@attainmentcompany.com

09/11/2023

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

DocuSigned by:

Amber Lindsay

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(Signature)

Amber Lindsay
President & CEO
iKeepSafe

09/11/2023

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