iKeepSafe Product Profile
QoreInsights

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 the QoreInsights complies with FERPA. It indicates that QoreInsights has been assessed for alignment with the iKeepSafe Program Guidelines.

Product Overview

Product: QoreInsights

https://QoreInsights.com/

> The Classroom Education Plan (CEP) is central to QoreInsight's mission to make evidence-based instruction and equitable outcomes a reality, at scale. The CEP is a decision support and workflow-embedded professional development system to aid teachers' implementation and monitoring of evidence-based instructional strategies in elementary math and literacy. The CEP uses whole-child data to identify a classroom's most urgent needs in both academic and underlying non-academic factors associated with learning (e.g., socio-emotional, executive function, and foundational learning skills), incorporates decision intelligence algorithms to recommend integrated evidence-based literacy strategies to address those needs, and provides multiple guided learning opportunities to deepen teachers' expertise and implementation.

Agreement

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

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

QoreInsights provides users direct access to the personally identifiable information that they provide to QoreInsights through product functionality. Users also have the ability to contact QoreInsights for access to all personal information on file by contacting QoreInsights through Support@QoreInsights.com.

The Educational Institution determines the information collected, maintained, and processed using QoreInsights' services.   The Educational Institution retains the right to review, modify, and/or refuse to permit further collection or use of student data information at any time.   The Educational Institution uses QoreInsights' services to assist with the administration of school-related activities and to provide a streamlined way to collect, organize, access, and report information for educational purposes. These uses are specific to each Educational Institution and are governed by the contract between QoreInsights and the Educational Institution. If there are any questions regarding the collection, storage, and use of the information the Educational Institution shares with QoreInsights, please contact the Educational Institution directly.

General inquiries related to privacy may be directed to:

QoreInsights

> By Email: *Questions@QoreInsights.com*
> By Mail: QoreInsights Inc, 9935-D Rae Road, #252, Charlotte, NC 28277
> By Phone: 704-540-5252

Security Protocols

QoreInsights 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 data is transmitted securely via HTTPS, specifically the more secure TLS 1.3 protocol.

Data at Rest

QoreInsights' data storage is provided by Microsoft Azure   Encryption methodology is inherent in their data storage systems. And, is replicated in encrypted form for backup and disaster recovery.

Data Center Security

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

By following the standards of ISO/IEC 27001 and the code of practice embodied in ISO/IEC 27018, Microsoft demonstrates that its privacy policies and procedures are robust and in line with its high standards.

Customers of Microsoft cloud services know where their data is stored. Because ISO/IEC 27018 requires certified CSPs to inform customers of the countries in which their data may be stored, Microsoft cloud service customers have the visibility they need to comply with any applicable information security rules.

Customer data won't be used for marketing or advertising without explicit consent. Some CSPs use customer data for their own commercial ends, including for targeted advertising. Because Microsoft has adopted ISO/IEC 27018 for its in-scope enterprise cloud services, customers can rest assured that their data will never be used for such purposes without explicit consent, and that consent cannot be a condition for use of the cloud service.

Microsoft customers know what's happening with their PII. ISO/IEC 27018 requires a policy that allows for the return, transfer, and secure disposal of personal information within a reasonable period of time. If Microsoft works with other companies that need access to your customer data, Microsoft proactively discloses the identities of those sub-processors.

Microsoft complies only with legally binding requests for disclosure of customer data. If Microsoft must comply with such a request (as in the case of a criminal investigation), it will always notify the customer unless it is prohibited by law from doing so.

Please see more information below in the available link:

https://azure.microsoft.com/en-us/overview/trusted-cloud/privacy/

Personnel

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

Training: Employees of QoreInsights 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.

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

Access to Audit

Once per year, QoreInsights will provide schools with:

- X audit rights to the school's data

- X access to the results of QoreInsights or its third-party security audit

Data Breach

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

QoreInsights will <u>notify</u> 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

QoreInsights states they will retain personal identifiable information for as long as the account is active, or as needed to provide their users with their services. Please contact them at the email address at Support@QoreInsights.com should someone wish to cancel their account or request that we no longer use the information to provide services. They will retain and use the information as necessary to comply with their legal obligations, resolve disputes, and enforce their agreements.

Research

QoreInsights stated they use none of the customer data for research or statistical purposes at this time. If they use any customer database for troubleshooting or conducting research, the data is de-identified and no Student PII is available to view.

Additionally, as part of this use of information, they may provide aggregate information to partners about how our users, collectively, use our site.   They may share this type of statistical data so that their partners also understand how often people use their partners' services and the Website to help provide the user with an optimal online experience.

Third Parties

QoreInsights 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.

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

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QoreInsights utilizes the following third-party vendors:

Third Party	Purpose	Information Shared
Azure	Cloud-based hosting	All information in the system
GG4L	Single sign-on intermediary to integrate CEP with schools	All information in the system

Product Data List

Data Collected	General Purpose of Data Collection
STUDENT FIRST AND LAST NAME	Required to support product functionality
OTHER STUDENT ID	Required to support product functionality
SCHOOL NAME	Required to support product functionality
SCHOOL ADDRESS	Required to support product functionality
OTHER PERSISTENT IDENTIFIER	Required to support product functionality
ACCESS TIME	Analytics
TIME SPENT ON SITE	Analytics
PAGE VIEWS	Analytics

Accuracy Statement

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

Signed and agreed:

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(Signature)

Toni Shub, EdD
Founder and CEO
www.qoreinsights.com
www.pathwaysforlearning.com

01/03/2022

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

DocuSigned by:

Amber Lindsay
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(Signature)

Amber Lindsay
President & CEO
iKeepSafe

01/03/2022