



iKeepSafe Product Profile

InPlay

OSCAR Platform

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

Product Overview

Product: OSCAR Platform

www.inplay.org

InPlay is a seven-year-old nonprofit whose mission is to connect underserved kids and youth to summer and after-school programs that ignite their individual interests and talents, thereby reducing the achievement gap.

At the request of school districts, InPlay designed the OSCAR text-based registration service that pre-fills registration forms to make it easier for families to enroll priority students in summer and after-school programs. Parents can read the information in their preferred language and sign up using their mobile phones in less than five minutes.

The OSCAR service performs by securely accessing a SIS datafile provided by the school district of all their priority students who are academically underperforming and/or socio-economically vulnerable. Then the service texts the parent/caregiver with a unique URL to read about local program options. If the parent chooses to sign up they may select a program and then review registration forms already pre-filled with the district-provided data, agree to any conditions, and click submit. Parents receive text confirmations of their enrolled programs and do not have to create personal accounts.

The enrollment data is shared with after school/summer program providers by enabling duly authorized and authenticated staff to download their respective program enrollments from a back-end OSCAR administrative console. Authorized school staff can also get access to the administrative console to view the status of student enrollments and support families with signing up if needed. At the end of the contracted registration period, all personally identifiable student data is expunged.

Agreement

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

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

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

The Educational Institution determines the information collected, maintained, and processed using InPlay's 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 InPlay's 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 InPlay and the Educational Institution. If there are any questions regarding the collection, storage, and use of the information the Educational Institution shares with InPlay, please contact the Educational Institution directly.

General inquiries related to privacy may be directed to:

InPlay
55 E. Third Avenue,
San Mateo, CA 94401.

Email: legal@InPlay.org
Telephone: 650-246-9976

Security Protocols

InPlay 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 SFTP or File.io via HTTPS

Data at Rest

Our production database is encrypted at rest with AES-256, block-level storage encryption. Keys are managed by Amazon. All backup files are stored in an encrypted S3 bucket in the US region.

Data Center Security

InPlay 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 InPlay will receive annual privacy and security training that includes FERPA.

Access: Access to student data is role-based; limited to only 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, InPlay will provide schools with:

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

Data Breach

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

InPlay 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

InPlay 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 legal@InPlay.org 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

InPlay 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 their users, collectively, use their site or services. 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

InPlay 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.

InPlay 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. InPlay 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 InPlay's data privacy and security policies and expectations.

InPlay utilizes the following third-party vendors:

- Alphabet, Inc. (Google) - processes Technical Data for the purpose of ease of use of Service;
- Amazon Web Services, Inc. - hosts all Personal Information that we collect;
- DonorBox, Inc. – processes charitable donations;
- Heroku, Inc. – hosts all Personal Information that we collect;
- Keen.io – processes Technical Data to improve use of Service;
- Mr Cowboy LLC – facilitates secure transfer of Personal Data;
- Twilio, Inc. – processes Personal Information to facilitate text communications;
- Zendesk, Inc. - processes Contact Data on our behalf for the purpose of providing user support.

Product Data List

Data Collected	General Purpose of Data Collection
STUDENT FIRST AND LAST NAME	Enroll student in program
STUDENT PHYSICAL ADDRESS	Enroll student in program
OTHER STUDENT ID	Enroll student in program
STUDENT AGE/DOB	Enroll student in program
STUDENT ETHNICITY	Enroll student in program
STUDENT GENDER	Enroll student in program
PARENT FIRST AND LAST NAME	Enroll student in program
PARENT PHYSICAL ADDRESS	Enroll student in program
PARENT PHONE/MOBILE NUMBER	Enroll student in program
PARENT EMAIL ADDRESS	Enroll student in program
OTHER PARENT ID	Enroll student in program
SCHOOL NAME	Enroll student in program
SCHOOL ADDRESS	Enroll student in program
ACCESS TIME	Analytics
TIME SPENT ON SITE	Analytics
PAGE VIEWS	Analytics
Special Needs	Support/Information
Health/Medical issues	Support/Information
Parent preferred language	Support/Information
English Learner status	Support/Information
Foster youth	Support/Information
Homeless status	Support/Information
Justice involved	Support/Information

Accuracy Statement

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


Signed and agreed:


(Signature)

Rod Hsiao
CEO & Co-Founder, InPlay
55 E. Third Avenue,
San Mateo, CA 94401

02/14/2022

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

DocuSigned by:

4936610B3823488
(Signature)

Amber Lindsay
President & CEO
iKeepSafe

02/14/2022