



iKeepSafe Product Profile

T3 Partnership

T3 Connect

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 T3 Connect Platform complies with FERPA. It indicates that T3 Partnership has been assessed for alignment with the iKeepSafe Program Guidelines.

Product Overview

Product: T3 Scholar CM

<https://t3partnership.org/>

The Tarrant To & Through (T3) Partnership is an organization that launched in early 2020. T3 aims to ensure more Tarrant County students obtain a postsecondary credential and that each student has the training and skills they need to thrive in today's workforce.

The T3 Partnership is a coalition of educators, leaders, and everyday advocates working with Tarrant County schools, postsecondary institutions, and community partners. We are an organization focused on continuously learning and making data driven decisions to best serve students and families in our community. We are committed to measuring, collecting, and analyzing multiple data points and remaining agile to respond to what the data tells us.

We are dedicated to improving student outcomes in three primary areas: 1) Graduating more students from high school who are College, Career, and Military Ready (CCMR); 2) Helping more students enroll in a postsecondary pathway with confidence; 3) Empowering more students to persist and earn a degree or credential and enter the workforce prepared for a successful career.

Agreement

A. As related to the Family Educational Rights and Privacy Act (“FERPA”) (20 U.S.C. Section 1232g), T3 Partnership agrees:

1. Student records obtained by T3 Partnership 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 T3 Partnership.
2. T3 Partnership users may retain possession and control of their own generated content.
3. T3 Partnership will not use any information in a student record for any purpose other than those required or specifically permitted by the T3 Partnership 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. T3 Partnership 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, T3 Partnership will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.
7. T3 Partnership 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. T3 Partnership 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. T3 Partnership prohibits using personally identifiable information in student records to engage in targeted advertising.
10. T3 Partnership 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

T3 Partnership provides users direct access to the personally identifiable information that they provide to T3 Partnership through product functionality. Users also have the ability to contact T3 Partnership for access to all personal information on file by contacting T3 Partnership through help@t3partnership.org

The Educational Institution determines the information collected, maintained, and processed using T3 Partnership'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 T3 Partnership'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 T3 Partnership and the Educational Institution. If there are any questions regarding the collection, storage, and use of the information the Educational Institution shares with T3 Partnership, please contact the Educational Institution directly.

General inquiries related to privacy may be directed to:

- By email: help@t3partnership.org
- By post mail: T3 Partnership
Attn: Data Steward
999 Taylor Street, Suite 900
Fort Worth, TX 76102

Security Protocols

T3 Partnership 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

SFTP is utilized to transmit data between T3 and its partners. [Box.com](https://www.box.com) is also utilized for general content sharing and collaboration efforts internally and externally.

Data at Rest

AWS: Amazon S3-managed keys (SSE-S3)

[Protecting data using server-side encryption - Amazon Simple Storage Service](#)

Salesforce:128-bit Advanced Encryption Standard (AES)

https://help.salesforce.com/articleView?id=sf.security_pe_vs_classic_encryption.htm&type=5

Box: 256-bit AES encryption

<https://support.box.com/hc/en-us/articles/360044194533-Data-Encryption-at-Box>

Data Center Security

T3 Partnership 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 T3 Partnership 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, T3 Partnership will provide schools with:

audit rights to the school's data

access to the results of T3 Partnership or its third-party security audit

Data Breach

In the event of an unauthorized disclosure of a student's records, T3 Partnership 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 T3 Partnership 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 T3 Partnership has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at T3 Partnership the user can contact. T3 Partnership will keep the user fully informed until the incident is resolved.

T3 Partnership 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

T3 Partnership 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 help@t3partnership.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

T3 Partnership 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 its Program Supporting Platforms to help provide the user with an optimal student and community engagement experience.

Third Parties

T3 Partnership 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.

T3 Partnership 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. T3 Partnership 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 T3 Partnership's data privacy and security policies and expectations.

T3 Partnership utilizes the following third-party vendors:

Program Supporting Platform	Purpose	Information Shared
Amazon Web Services (AWS)	Cloud hosting, storage, SFTP services	Geo information, IP address(s) and tracking – via analytics gathering
Classlink	Data transfer intermediary	Geo information, IP address(s) and tracking – via analytics gathering
Salesforce (Education Data Architecture)	Student Records database and Student Relationship Management System	Student Personal Information and educational records
Salesforce Dataloader	Sync data from T3 Partners with Salesforce	Data from T3 Partners received via SFTP
Jitterbit	Sync data from T3 Partners with Salesforce	Data from T3 Partners received via SFTP
Box.com	Document and content storage	Documents and T3 program content, and Student Personal Information and educational records
ActiveCampaign	mail communication	Student and program participant contact information
Signal Vine	SMS communication	Student Personal Information and educational records
FormAssembly	Data collection via secure forms	Student Personal Information and educational records
CloudAlly	Data backup and recovery	Documents, content, student personal information and educational records

Tableau	Analytics and reporting	De-identified educational records
Graduway ("T3 Connect")	Mentorship platform	Student Personal Information
Submittable	Scholarship management platform	Student Personal Information and Financial Data
Student Success Agency	Mentorship platform	Student Personal Information

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
STUDENT PHONE/MOBILE NUMBER	Enroll student in program
STUDENT EMAIL 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
SCHOOL NAME	Enroll student in program
Do you have children?	To share student progress and assist in providing T3 program supports to students
I currently live with ?	To share student progress and assist in providing T3 program supports to students
FAFSA Complete?	To share student progress and assist in providing T3 program supports to students
TASFA Complete?	To share student progress and assist in providing T3 program supports to students
First Generation Student	To share student progress and assist in providing T3 program supports to students
Institution Email	To share student progress and assist in providing T3 program supports to students
Institution ID	To share student progress and assist in providing T3 program supports to students

Accuracy Statement

T3 Partnership hereby confirms the accuracy and truthfulness of all information contained in the T3 Partnership profile and has authorized iKeepSafe to make the profile available to any interested schools.

Signed and agreed:

Raj Shah

(Signature)

Raj Shah
Director of Technology & Data
Tarrant To & Through Partnership
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T3partnership.org | @T3partnership
Direct: (817) 717-8738

02/24/2022

The T3 Partnership service has been reviewed and found in alignment with iKeepSafe's FERPA Privacy Program Guidelines as indicated by this product profile. T3 Partnership has been awarded the iKeepSafe FERPA Privacy Program badges.

DocuSigned by:
Amber Lindsay

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(Signature)

Amber Lindsay
President & CEO
iKeepSafe

02/24/2022