



iKeepSafe Product Profile

CCN: Nexxus Portal

Introduction

The iKeepSafe FERPA 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 CCN: Nexxus Portal Service complies with FERPA. It indicates that the CCN: Nexxus Portal Service has been assessed for alignment with the iKeepSafe FERPA Privacy Program Guidelines.

The iKeepProfile is not legal guidance, nor does it guarantee or otherwise assure compliance with any federal or state laws. If you have questions on how to use the iKeepProfile to support your school's compliance efforts, please contact your school attorney.

Product Overview

The Nexxus Portal is a community engagement platform with key modules / features: forms, activities, bulletin, conversations, and groups.

<https://www.coffeachatnetwork.io/>

Agreement

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

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

Parents are encouraged to work directly with teachers and school to make any changes in your data. If however, you need to get in touch with us, you can write to support@coffeechatnetwork.io and we will work with the school and do our best to make the required changes.

Teachers, parents and administrators can directly edit their information in their CCN: Nexxus Portal profiles. Schools also have a right to use any other similar service and can place a request to get all of their data. We will do our best to comply with such requests.

You may also send requests about your Personal Information, including changes to your contact preferences, and changes to or deletions of your information or content you post, by emailing support@coffeechatnetwork.io

Please contact us at the following with any questions about this Privacy Policy:

CCN: Nexxus Portal

E-Mail: support@coffeechatnetwork.io

Phone: 1-800 548 6542

Postal Code: M5H 3T9

Contact Us Page: www.coffeechatnetwork.io

Security Protocols

CCN: Nexxus Portal has a comprehensive Information Security Program in place that ensures the confidentiality, integrity and availability of systems, networks and data. The following is a general overview of data security protocols:

Data In Transit: All normal communication with the server and uploads are done through HTTPS. Instant messaging communication is protected by SSL.

Data at Rest: Data at rest is encrypted using AES 256-bit encryption

Data Storage: Microsoft Azure is used as both a storage and compute platform.

Data Center Security: <https://azure.microsoft.com/en-us/overview/security/>

Microsoft strictly controls physical access to the areas where the physical servers are placed. It takes a layered approach to reduce the risk of unauthorized users gaining access to the physical servers.

Personnel :

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

Training: Employees of CCN: Nexxus Portal 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.

Access to Audit

Once per year, CCN: Nexxus Portal will provide schools with:

- audit rights to the school's data
- access to the results of CCN: Nexxus Portal or its third-party security audit

Data Breach

In the event of an unauthorized disclosure of a student's records, CCN: Nexxus Portal 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 CCN: Nexxus Portal 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 CCN: Nexxus Portal has taken or shall take to prevent future

- similar unauthorized use or disclosure; and
- g. who at CCN: Nexxus Portal the user can contact. CCN: Nexxus Portal will keep the user fully informed until the incident is resolved.

CCN: Nexxus Portal 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

CCN: Nexxus Portal states they will retain your information for as long as your account is active, or as needed to provide you with our services. Please contact us at the email address at support@coffeechatnetwork.io should you wish to cancel your account or request that we no longer use your information to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Research

CCN: Nexxus Portal stated; We use none of the customer data for research or statistical purposes at this time. If data is used for behavioral or product improvements the data is aggregated and cannot be identified to any particular individual.

CCN: Nexxus Portal may also analyze information that does not contain "Personal Information" (or contains "Personal Information" in anonymous or aggregated form) for trends and statistics, such as through the use of Google Analytics or other similar analytics services.

CCN: Nexxus Portal does not use end user data in any non-production environments including testing, development and training. CCN: Nexxus Portal does not use end user data for production improvement or research unless the data has been de-identified.

Third Parties

CCN: Nexxus Portal 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.

CCN: Nexxus Portal 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. CCN: Nexxus Portal 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. CCN: Nexxus Portal utilizes the following third party vendors as indicated below

Third Party	Purpose	Information Shared
Microsoft Azure	Infrastructure platform	None
Sendgrid	Email delivery	None
Sentry	Issue tracking	System errors and trace information

CCN: Nexus Portal collects the following information:

Product Data List

#	Data Collected for Operation	General Purpose of Data Collection
1	PARENT FIRST AND LAST NAME	Required to support product functionality
2	PARENT PHONE/MOBILE NUMBER	Required to support product functionality
3	PARENT EMAIL ADDRESS	Required to support product functionality
4	PARENT PASSWORD	Required to support product functionality
5	STAFF FIRST AND LAST NAME	Required to support product functionality
6	STAFF PHONE/MOBILE NUMBER	Required to support product functionality
7	STAFF EMAIL ADDRESS	Required to support product functionality
8	Access Time	Business Intelligence
9	Time Spent on Site	Business Intelligence
10	Page Views	Business Intelligence
11	Referring URLs	Business Intelligence

Accuracy Statement

CCN: Nexus Portal, hereby confirms the accuracy and truthfulness of all information contained in the CCN: Nexus Portal Service profile, and has authorized iKeepSafe to make the profile available to any interested schools.

Signed and agreed:



(Signature)

Title *Community Development Rep*
Name *Tony Ding*

E-Mail: support@coffeechatnetwork.io
Phone: 1-800-548-6542
150 King Street West, Suite 200
Toronto, ON, M5H 1J9
Contact Us Page: www.coffeechatnetwork.io

05/20/2022

The CCN: Nexus Portal service has been reviewed and found in alignment with iKeepSafe's FERPA Program Guidelines as indicated by this product profile. CCN: Nexus Portal has been awarded the iKeepSafe FERPA Program badge.

DocuSigned by:
Amber Lindsay
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(Signature)

Amber Lindsay
President & CEO
iKeepSafe

05/20/2022

