



iKeepSafe Product Profile *Genially*

Introduction

The *iKeepSafe* FERPA, CSPA (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 or Children's data.

This *iKeepSafe* Product Profile is intended to assist you in determining whether [Genially](#) complies with FERPA, COPPA and CSPA (California). It indicates that [Genially](#) has been assessed for alignment with the *iKeepSafe* FERPA, CSPA (California) and COPPA Guidelines.

Product Overview

Genially is a company dedicated to the provision of software-based services to create interactive communication experiences. Genially allows users of its platform to make presentations, dossiers, deliverables and share them as well as to use other users' creations.

Agreement

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

1. Student records obtained by Genially 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 Genially
2. Genially users retain possession and control of their own original content that they submit to Genially.
3. Genially will not use any information in a student record for any purpose other than those required or specifically permitted by the Genially 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, Genially users may access, correct, update, or delete personal information in their profile by signing into Genially, accessing their Genially account, and making the appropriate changes.
5. Genially, 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, Genially will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.
7. Genially 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. Genially 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. Genially prohibits using personally identifiable information in student records to engage in targeted advertising.
10. Genially 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. Genially 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. Genially 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. Genially makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. Genially 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. Genially 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. Genially 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. Genially 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. Genially 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. Genially 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. Genially 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”), Genially agrees:

Prohibitions:

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

Obligations:

5. Genially is committed to maintaining the security and confidentiality of pupil records as noted herein.
6. Genially will delete student information when requested by the school district.
7. Genially 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 Genially to provide or correct their personal information can make a request either via their school or directly to Genially and they will provide or correct the information as instructed.

A data access request which asks Genially to provide, correct or delete personal information is lodged via an email to support@genial.ly. Depending on the nature of the request they may require the requestor to provide information to verify their identity, and/or be an authorised agent of their school.

Genially may collect data on behalf of schools. Any party wishing for Genially 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

Genially 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

Genially 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

Genially 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

Genially 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 or children data have undergone criminal background checks.

Training: Employees of Genially, Inc. will receive annual privacy and security training that includes FERPA and COPPA.

Access: Access to student or children data is role-based; limited to those employees who need access to perform job responsibilities.

Access to Audit

Once per year, Genially . will provide schools with:

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

Data Breach

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

Genially . 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 Genially

Data Deletion

Genially 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.

Genially 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 Genially, a user may delete their account at any time by contacting their school directly or by contacting Genially at support@genial.ly.

Research

Genially 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, Genially 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

Genially 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.

Genially 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. Genially 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 Genially data privacy and security policies and expectations.

Genially utilizes the following third-party vendors:

Name	Description	Data	Privacy Policy	Exception to data sharing
AWS	Hosting Services	All customer data	https://aws.amazon.com/es/privacy/	No
Pipedrive	Pipedrive is a sales pipeline management and CRM tool.	Email, Plan, Sector, Role, Country, geniallys number, last access, Phone number	https://www.pipedrive.com/en/privacy	No

Mailchimp	Mailchimp is the integrated marketing platform companies	User's email address, role, sector, language, plan, number of geniallys, last access, subscription type, registration date, country	https://mailchimp.com/legal/privacy/	No
Freshdesk	Comprehensive customer service software with omnichannel service and fast amortization	Email, Plan, Subscription period, Subscription end date, Subscription start date, Subscription ID, geniallys number, Company name, LoginRRSS, Country, City, Industry, Role, Last login date, Registration date, User ID, Time zone, Language	https://www.freshworks.com/privacy/	No
Facebook	Social Network	Allows users to share information and access the Web Site through Social Login.	https://www.facebook.com/policy.php	Yes
Twitter	Social Network	Allows users to share information and access the Web Site through Social Login.	https://twitter.com/en/privacy	Yes
Linkedin	Social Network	Allows users to share information and access the Web Site through Social Login.	https://www.linkedin.com/legal/privacy-policy	Yes
Reddit	Social Network	Allows users to share information	https://www.redditinc.com/policies/privacy-policy-september-12-2021	Yes
Pinterest	Social Network	Allows users to share information	https://policy.pinterest.com/es/privacy-policy	Yes
Tumblr	Social Network	Allows users to share information	https://www.tumblr.com/privacy/en	Yes
Office 365	line of subscription services offered by Microsoft	Allows users to access the Web Site through Social Login.	https://privacy.microsoft.com/es-es/privacystatement	Yes

Google	Internet-related services and product	Allows users to access the Web Site through Social Login.	https://policies.google.com/privacy?hl=en-US	Yes
Stripe	A payment API package for companies operating on the Internet, including fraud prevention and subscription management.	User's purchase data (email, card, country)	https://stripe.com/es/privacy	No
Braintree	Online payment gateway for all transaction sizes.	User purchase data (email, paypal account, country)	https://www.braintreepayments.com/legal/acceptable-use-policy	No
Logrocket	LogRocket combines session replay, performance monitoring, and product analytics – empowering software teams to create the ideal product experience.	Record sessions of application usage or functionalities	https://logrocket.com/privacy/	No
Userguiding	Product guides, product marketing, help center, Surveys	Email, Plan, Subscription period, Subscription start date, Subscription end date, Subscription ID, LoginRRSS, geniallys number, Country, City, Sector, Role, Organization, Team role, Last login date, Registration date, User ID, Time zone, Language, Name, User ID, Browser, Operating System, Device,	https://userguiding.com/privacy-policy/	No
Google Analytics	Free web analytics tool from Google.	User ID	https://policies.google.com/privacy?hl=en-US	Yes
Sentry	Sentry provides an open source bug tracker to monitor and respond to errors and failures anywhere in your application in real time.	Application error logs. User IDs and request information (IP, browser, OS).	https://sentry.io/privacy/	No

Product Data List


Data Collection by Genially include the following:

	DATA Collected for Operation	General Purpose of Data Collected
1	STUDENT FIRST and LAST NAME	Required to support Product Functionality (Optional)
2	STUDENT PHYSICAL ADDRESS	Upgraded Plan and Purchase license Only
3	STUDENT EMAIL ADDRESS	CRM, purchasing license, help center, analytics
4	STUDENT PASSWORD	Required to support Product Functionality
5	SCHOOL NAME	Required to support Product Functionality
6	GEOLOCATION DATA	Required to support Product Functionality
7	PHOTOGRAPH,VIDEO OR AUDIO FILE	Required to support Product Functionality (Optional is using Avatar)
8	BROWSER TYPE	Required to support Product Functionality, Analytics and Ads for NonStudents/Children
9	ACCESS TIME	Analytics
10	TIME SPENT ON SITE	Analytics
11	PAGE VIEWS	Analytics
12	REFERRING URLS	Analytics

Accuracy Statement

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

Signed and agreed:


DocuSigned by:

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(Signature)

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12/16/2021

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

DocuSigned by:

4936610B3823488

(Signature)

Amber Lindsay
President & CEO
iKeepSafe

12/16/2021

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