iKeepSafe Product Profile
Spektra Systems LLC
CloudLabs Portal
CloudEvents Portal (Hackathon)

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 *iKeepSafe* Product Profile is intended to assist you in determining whether CloudLabs and CloudEvents (Hackathon) offered by Spektra Systems complies with FERPA. It indicates that CloudLabs and CloudEvents (Hackathon) have been assessed for alignment with the iKeepSafe FERPA Guidelines.

Product Overview

CloudLabs platform helps to run hands-on-labs, test drives & POCs for various scenarios at large scale. CloudLabs is designed for Organizations and educational institutes of all sizes to offer an impactful learning experience with zero to minimal management overhead.

https://cloudlabs.ai , https://admin.cloudlabs.ai & https://portal.cloudlabs.ai

CloudEvents: Technical Hackathon: Conduct complex hackathons with fully manageable lab environments where attendees can join as a group. Admins can also easily sign up and create teams and groups as per event requirements.

https://cloudevents.ai/

https://events.cloudlabs.ai/events

Agreement

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

1. Student records obtained by CloudLabs and CloudEvents (Hackathon) 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 CloudLabs and CloudEvents (Hackathon).

2. CloudLabs and CloudEvents (Hackathon) users retain possession and control of their own original content that they submit to CloudLabs and CloudEvents (Hackathon).

3. CloudLabs and CloudEvents (Hackathon) will not use any information in a student record for any purpose other than those required or specifically permitted by the CloudLabs and CloudEvents (Hackathon) Terms of Use Agreement 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 or teacher. Additionally, CloudLabs and CloudEvents (Hackathon) users may access personal information in their profile by signing into their CloudLabs and CloudEvents (Hackathon) account. To correct, update, or delete personal information in their profile, CloudLabs and CloudEvents (Hackathon) users should reach out to the CloudLabs and CloudEvents (Hackathon) help center to make the appropriate changes.

5. CloudLabs and CloudEvents (Hackathon) 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, CloudLabs and CloudEvents (Hackathon) will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.

7. CloudLabs and CloudEvents (Hackathon) 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. CloudLabs and CloudEvents (Hackathon) agrees to work with educational institutions to ensure compliance with FERPA and 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. CloudLabs and CloudEvents (Hackathon) prohibits using personally identifiable information in student records to engage in targeted advertising.

Agreement

10. CloudLabs and CloudEvents (Hackathon) will not make material changes to the CloudLabs and CloudEvents (Hackathon) User Agreement 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 Access and Review Process

CloudLabs and CloudEvents (Hackathon) collects data on behalf of schools. Any party wishing for CloudLabs and CloudEvents (Hackathon) to provide or correct their personal information can make a request either via their school or directly to CloudLabs and CloudEvents (Hackathon) and as legally permitted, CloudLabs and CloudEvents (Hackathon) will provide or correct the information as instructed and in a timely manner.

A data access request which asks CloudLabs and CloudEvents (Hackathon) to provide, correct or delete personal information is logged via an email to privacy@spektrasystems.com . Depending on the nature of the request, CloudLabs and CloudEvents (Hackathon) may require the requestor to provide information to verify their identity, and/or be an authorized agent of their school.

Security Protocols

CloudLabs and CloudEvents (Hackathon) 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

Access to the CloudLabs and CloudEvents (Hackathon) service occurs via encrypted connections (HTTP over TLS, also known as HTTPS) which encrypt all data before it leaves CloudLabs and CloudEvents (Hackathon)'s servers and protects that data as it transmits over the internet.

Data at Rest

All personally identifiable information is encrypted at rest using modern encryption algorithms such as AES--256 or stronger.

Data Center Security

CloudLabs and CloudEvents (Hackathon) uses **Microsoft Azure SQL Servers** and these centers conform to the following:

TLS encryption in Azure

Microsoft gives customers the ability to use Transport Layer Security (TLS) protocol to protect data when it's traveling between the cloud services and customers. Microsoft datacenters negotiate a TLS connection with client systems that connect to Azure services. TLS provides strong authentication, message privacy, and integrity (enabling detection of message tampering, interception, and forgery), interoperability, algorithm flexibility, and ease of deployment and use.

Perfect Forward Secrecy (PFS) protects connections between customers' client systems and Microsoft cloud services by unique keys. Connections also use RSA-based 2,048-bit encryption key lengths. This combination makes it difficult for someone to intercept and access data that is in transit.

Please see more information below in the available link:

https://azure.microsoft.com/en-us/solutions/network-security/#overview

Personnel

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

Training: Employees of CloudLabs and CloudEvents (Hackathon) receive annual privacy and security training that includes information about 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, CloudLabs and CloudEvents (Hackathon)will provide schools with:

X   audit rights to the school's data

X   access to the results of CloudLabs and CloudEvents (Hackathon) or its third-party security audit

Data Breach

In the event of an unauthorized disclosure of a student's records, CloudLabs and CloudEvents (Hackathon) will promptly notify the school without undue delay or as required by the applicable law. Notification shall identify:

     a. the name and contact information of the reporting school subject to CloudLabs and CloudEvents (Hackathon)'s Security Incident Notification section in its User Agreement;

     b. a list of the types of personally identifiable information that were or are reasonably believed to have been the subject of a security incident;

     c. if the information is known at the time the security incident notification is provided, then either (1) the date of the security incident, (2) the estimated date of the security incident, or (3) the date range within which the security incident occurred. The security incident notification shall also include the date of the notice;

     d. whether, to the knowledge of CloudLabs and CloudEvents (Hackathon) at the time notice is provided, the notification was delayed as a result of a law enforcement investigation or request; and

     e. a general description of the security incident, if that information is possible to determine at the time the notice is provided.

Data Deletion

CloudLabs and CloudEvents (Hackathon) stores your personal information for as long as it is necessary to provide CloudLabs and CloudEvents (Hackathon) to you and others. Personal information associated with the user account will be kept until the account is deleted or until CloudLabs and CloudEvents (Hackathon) no longer need the data to provide its products and services.

CloudLabs and CloudEvents (Hackathon) may have to retain some information after your account is closed, to comply with legal obligations, to protect the safety and security of the community or CloudLabs and CloudEvents (Hackathon), or to prevent abuse of CloudLabs and CloudEvents (Hackathon)'s terms in the User Agreement.   A user may delete their account at any time by contacting their school directly or by contacting CloudLabs and CloudEvents (Hackathon) at privacy@spektrasystems.com.

Research

CloudLabs and CloudEvents (Hackathon) 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 CloudLabs and CloudEvents (Hackathon). On certain occasions, CloudLabs and CloudEvents (Hackathon) may share this data with service providers to support the operation of the Services, such as through document management, data hosting, and provisioning customer service tools related to CloudLabs and CloudEvents (Hackathon). CloudLabs and CloudEvents (Hackathon) will only share de-identified information should CloudLabs and CloudEvents (Hackathon) wish to demonstrate how CloudLabs and CloudEvents (Hackathon) is used, its efficacy, or otherwise provide information or marketing materials related to CloudLabs and CloudEvents (Hackathon). CloudLabs and CloudEvents (Hackathon) may share aggregated and/or non-personally identifiable information publicly (such as statistics about visitors, and website traffic patterns).

Third Parties

CloudLabs and CloudEvents (Hackathon) does not sell, trade, lease or loan the personal information it collects or maintains, in the course of providing the service, to any third party for any reason, including direct marketers, advertisers, or data brokers.

CloudLabs and CloudEvents (Hackathon) 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. CloudLabs and CloudEvents (Hackathon) have 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 CloudLabs and CloudEvents (Hackathon)'s data privacy and security policies and expectations.

CloudLabs and CloudEvents (Hackathon) utilizes the following third-party vendors:

Third Party	Purpose	Information Shared	Privacy Policy
Microsoft Azure	Lab/Practice Tests environment- Application infrastructure	No Information Shared	Microsoft Privacy Statement – Microsoft privacy
Amazon	Lab/Practice Tests environment	No Information Shared	Amazon.in Privacy Notice - Amazon Customer Service
Microsoft Teams	Lab/Practice Tests environment	No Information Shared	Microsoft Privacy Statement – Microsoft privacy
GCP	Lab/Practice Tests environment	No Information Shared	Privacy Policy – Privacy & Terms – Google

Product Data List

Student data collection by CloudLabs and CloudEvents (Hackathon) includes the following:

	DATA Collected for Operation	General Purpose of Data Collected
1	STUDENT FIRST and LAST NAME	Registration/To address Lab related information
2	STUDENT EMAIL ADDRESS	Registration/To address Lab related information
3	SCHOOL NAME	Registration/To address Lab related information
4	SCHOOL ADDRESS	Registration/To address Lab related information
5	GEOLOCATION	For Audit Purpose/ To track any unauthorized acts by the user
	CloudEvents (Hackathon) Below	
6	Student PHONE NUMBER	Optional (Determined by the Event Host)
7	PHOTOGRAPH,VIDEO OR AUDIO FILE	Optional (To distinguish the participants-Determined by the Event Host)
8	BROWSER TYPE	For Audit Purpose/Application Insights
9	OTHER PERSISTENT IDENTIFIER	For Audit Purpose/Application Insight
10	ACCESS TIME	For Audit Purpose/Application Insights
11	TIME SPENT ON SITE	For Audit Purpose/Application Insights
12	PAGE VIEWS	For Audit Purpose/Application Insights

Product Data List

Accuracy Statement

CloudLabs and CloudEvents (Hackathon) hereby confirms the accuracy and truthfulness of all information contained in this profile and has authorized iKeepSafe to make the profile available to any interested teachers/schools.

Signed and agreed:

DocuSigned by:

Renjini Baby Girija

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(Signature)

Renjini Baby Girija
CFO
 Spektra Systems
+1 425 533 3308

08/17/2022

CloudLabs and CloudEvents (Hackathon) has been reviewed and found in alignment with iKeepSafe's FERPA Privacy Program Guidelines as indicated by this product profile. CloudLabs and CloudEvents (Hackathon) has been awarded the iKeepSafe FERPA Certification.

DocuSigned by:

Amber Lindsay

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(Signature)

Amber Lindsay
President & CEO
iKeepSafe

08/17/2022

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