



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

Introduction

The *iKeepSafe* FERPA, COPPA and CSPC 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, COPPA and CSPC. It indicates that [CloudLabs](#) and [CloudEvents \(Hackathon\)](#) have been assessed for alignment with the iKeepSafe FERPA, COPPA and CSPC 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.

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.

B. Children's Online Privacy Protection Act ("COPPA") (15 U.S.C §§ 6501- 6506)

1. CloudLabs and CloudEvents (Hackathon) may contract 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. CloudLabs and CloudEvents (Hackathon) 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. CloudLabs and CloudEvents (Hackathon) makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. CloudLabs and CloudEvents (Hackathon) 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. CloudLabs and CloudEvents (Hackathon) 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. CloudLabs and CloudEvents (Hackathon) does not/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. CloudLabs and CloudEvents (Hackathon) 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. CloudLabs and CloudEvents (Hackathon) 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. CloudLabs and CloudEvents (Hackathon) 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. CloudLabs and CloudEvents (Hackathon) 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 the Student Online Personal Information Protection Act (SB 1177 -“SOPIPA”), CloudLabs and CloudEvents (Hackathon) agrees:

Prohibitions:

1. CloudLabs and CloudEvents (Hackathon) does not target advertising via the CloudLabs and CloudEvents (Hackathon) service or on any other website using information about a K-12 student, their families/guardians or educators acquired from a use of the technology.
2. CloudLabs and CloudEvents (Hackathon) does not use information, including persistent unique identifiers, created or gathered by the CloudLabs and CloudEvents (Hackathon) service to amass a profile about a K–12 student, their families/guardians or educators except in furtherance of K–12 school purposes.
3. CloudLabs and CloudEvents (Hackathon) does not and will not sell, rent, or otherwise provide personally identifiable information to any third party for monetary gain.
4. CloudLabs and CloudEvents (Hackathon) does not disclose student information unless for legal, regulatory, judicial, safety or operational improvement reasons.

Obligations:

1. CloudLabs and CloudEvents (Hackathon) is committed to maintaining the security and confidentiality of pupil records as noted herein.
2. CloudLabs and CloudEvents (Hackathon) will delete student information when requested by the school district.
3. CloudLabs and CloudEvents (Hackathon) will disclose student information when required by law, for legitimate research purposes and for school purposes to educational agencies.

D. As it relates to California AB 1584 (Buchanan) Privacy of Pupil Records: 3rd- Party Digital Storage & Education Software (Education Code section 49073.1)

1. Pupil records obtained by CloudLabs and CloudEvents (Hackathon) from LEA continue to be the property of and under the control of the LEA.
2. CloudLabs and CloudEvents (Hackathon) does not provide a platform by which pupils can create content ; therefore, CloudLabs and CloudEvents (Hackathon) does not provide a means by which pupils may retain possession and control of such content.
3. CloudLabs and CloudEvents (Hackathon) will not use any information in pupil records for any purpose other than those required or specifically permitted by the CloudLabs and CloudEvents (Hackathon) Service Agreement.
4. Parents, legal guardians, or eligible pupils may review personally identifiable information in the

- pupil's records and correct erroneous information by contacting the educational institution. District personnel have direct access via the CloudLabs and CloudEvents (Hackathon) product account login to review pupil data. CloudLabs and CloudEvents (Hackathon) will provide clients with a copy of pupil data, and will modify and/or delete upon written request by the LEA.
5. CloudLabs and CloudEvents (Hackathon) is committed to maintaining the security and confidentiality of pupil records. To that end, CloudLabs and CloudEvents (Hackathon) has taken the following actions: (a) limiting employee access to student data based on roles and responsibilities; (b) conducting background checks on employees who have access to student data; (c) conducting privacy training that includes FERPA for employees with access to pupil data; (d) protecting personal information with technical, contractual, administrative, and physical security safeguards in order to protect it from unauthorized access, release or use.
 6. In the event of an unauthorized disclosure of a pupil's records, CloudLabs and CloudEvents (Hackathon) will promptly notify the educational institution unless specifically directed not to make such notification by law enforcement. The notification will include: date of the breach, the types of information that were subject to the breach; general description of what occurred; steps the CloudLabs and CloudEvents (Hackathon) is taking to address the breach; the contact person at the vendor who the data holder can contact. CloudLabs and CloudEvents (Hackathon) will keep the client District fully informed until the incident is resolved.
 7. CloudLabs and CloudEvents (Hackathon) will delete personally identifiable data upon request of the LEA and/or upon expiration of the services agreement. All data is deleted within 60 -days of expiration of services agreement.
 8. CloudLabs and CloudEvents (Hackathon) agrees to work with the LEA 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 pupil records and to correct any inaccuracies therein as described in statement 4 above.
 9. CloudLabs and CloudEvents (Hackathon) prohibits using personally identifiable information in pupil records to engage in targeted advertising.

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 and COPPA**.

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:

audit rights to the school's data

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 environment- infrastructure Tests Application | No Information Shared | Microsoft Privacy Statement – Microsoft privacy |
| Amazon | Lab/Practice environment Tests | No Information Shared | Amazon.in Privacy Notice - Amazon Customer Service |
| Microsoft Teams | Lab/Practice environment Tests | No Information Shared | Microsoft Privacy Statement – Microsoft privacy |
| GCP | Lab/Practice environment Tests | 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 |

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:

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(Signature)

Renjini Baby Girija
CFO
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10/25/2023

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

DocuSigned by:

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(Signature)

Amber Lindsay
President & CEO
iKeepSafe

10/25/2023

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