



## *iKeepSafe Product Profile* *JASON Learning*

### Introduction

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The *iKeepSafe* FERPA 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.

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

### Product Overview

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JASON is an independent 501(c)(3) nonprofit founded in 1989 by Dr. Robert D. Ballard. JASON provides curriculum and learning experiences in science, technology, engineering, and math (STEM) for K-12 students and high-quality professional development for teachers. JASON has been used successfully in a wide variety of formal and informal education environments.

Available online at [jason.org](http://jason.org), JASON's award-winning curricula place students in challenging, real-world situations where they are connected with and mentored by leading STEM professionals.

Each comprehensive JASON Learning curriculum features print and digital materials, hands-on activities, videos, and online games for students, as well as lesson plans, implementation tips, professional development, and a powerful digital platform for educators.

Our forward-thinking design ensures that each and every discrete curriculum component—every article, video, hands-on lab, and online game that comprises the multimedia curricular experience—is aligned with state and national standards. Independent research has validated the JASON approach to teaching and learning, showing that our programs significantly improve student outcomes, academic achievement, and attitudes toward STEM careers.

## Agreement

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

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

## Data Access and Review Process

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A data access request may require JASON Learning to provide, correct or delete personal information. All data access requests are lodged via an email to [help@jason.org](mailto:help@jason.org). Depending on the nature of the request they may require the requestor to provide information to verify their identity, and/or be an authorized agent of their school.

Any party wishing for JASON Learning to provide or correct their personal information can make a request either via their school or directly to JASON Learning and they will provide or correct the information as instructed.

JASON Learning collects data on behalf of schools. Any party wishing for JASON Learning 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

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JASON Learning 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

JASON Learning 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

JASON Learning 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

JASON Learning 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 JASON Learning will receive annual privacy and security training that includes 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

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Once per year, JASON Learning will provide schools with:



audit rights to the school's data



access to the results of JASON Learning's or its third-party security audit

## Data Breach

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

JASON Learning 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 JASON Learning

## Data Deletion

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JASON Learning 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.

JASON Learning 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 JASON Learning, a user may delete their account at any time by contacting their school directly or by contacting JASON Learning at [help@jason.org](mailto:help@jason.org)

## Research

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JASON Learning 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, JASON Learning 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

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JASON Learning 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.

JASON Learning 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. JASON Learning 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 JASON Learning' data privacy and security policies and expectations.

JASON Learning utilizes the following third-party vendors:

**Amazon Web Services (AWS)** for providing servers, databases and network infrastructure for storage, service delivery and other related services. Specific services include but are not necessarily limited to virtual machines, databases, and storage and caching services. All types of website content and traffic data is hosted and stored on these services. All personal data written to disk is encrypted.

**Google** for service and support for Teachers and Customers. For example, Google Shared Drives in JASON's Google Workspaces account are used by JASON staff to perform order fulfillment tracking and educator professional development tracking.

**Hubspot** for customer service and support for Teachers and Customers.

**Microsoft Azure** for providing servers, databases and network infrastructure for storage, service delivery and other related services. Specific services include but are not necessarily limited to virtual machines, databases, and storage and caching services. All types of website content and traffic data is hosted and stored on these services. All Personal data written to disk is encrypted.

**PayPal** for processing payments on orders.

Info shared: Customer details (name, phone), order details. The financial payment information is collected directly by the processor and not shared by JASON.

**WP Engine** for hosting our public website, including news articles and other outreach.

**USPS, FedEx, UPS** for providing shipping services for orders.

Info shared: Customer details (name, phone, address), order details (weights).

## Product Data List

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Data Collection by JASON Learning include the following:

<b>DATA Collected for Operation</b>	<b>General Purpose of Data Collected</b>
STUDENT FIRST AND LAST NAME	Required to support Product Functionality
STUDENT EMAIL ADDRESS	Required to support Product Functionality
SCHOOL NAME	Required to support Product Functionality
SCHOOL POSTAL ADDRESS	Required to support Product Functionality
SCHOOL PHONE NUMBER	Required to support Product Functionality
PARENT FIRST AND LAST NAME	Required to support Product Functionality
PARENT EMAIL ADDRESS	Required to support Product Functionality
TEACHER FIRST AND LAST NAME	Required to support Product Functionality
TEACHER EMAIL ADDRESS	Required to support Product Functionality
AREA OF EXPERTISE	Required to support Product Functionality
ROLE AT THE SCHOOL	Required to support Product Functionality
Browser Type	Statistics/Customer Service
Access Time	Statistics/Customer Service
Time spent on Site	Statistics/Customer Service
Page Views	Statistics/Customer Service

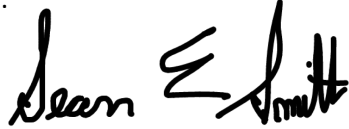


## Accuracy Statement

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

Signed and agreed:



(Signature)

JASON Learning  
44983 Knoll Square, Suite 150, Ashburn, VA 20147  
Email: help@jason.org  
Phone: 1-703-822-7238

05/15/2024

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

DocuSigned by:



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(Signature)

Amber Lindsay  
President & CEO  
iKeepSafe

05/15/2024

## Copyright

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