



## *iKeepSafe Product Profile CyberStart America*

### Introduction

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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 CyberStart America complies with FERPA. It indicates that CyberStart America has been assessed for alignment with the iKeepSafe FERPA Guidelines.

### Product Overview

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CyberStart America is a free national program for high school students to master cybersecurity as a gateway to the industry, up their digital skills, and compete for college scholarships through the National Cyber Scholarship Foundation. By registering for the program, U.S. high school students get free access to CyberStart, an immersive gamified learning platform.

## Agreement

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

1. Student records obtained by CyberStart America 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 CyberStart America.
2. CyberStart America users may retain possession and control of their own generated content.
3. CyberStart America will not use any information in a student record for any purpose other than those required or specifically permitted by the CyberStart America 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, some CyberStart America users may access, correct, update, or delete personal information by accessing their CyberStart America account and making the appropriate changes.
5. CyberStart America 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, CyberStart America will promptly notify impacted schools unless specifically directed not to provide such notification by law enforcement officials.
7. CyberStart America will delete or de-identify personal information via CyberStart America 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. CyberStart America 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. CyberStart America prohibits using personally identifiable information in student records to engage in targeted advertising.
10. CyberStart America 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 Access and Review Process

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CyberStart America may collect data on behalf of schools. Any party wishing for CyberStart America to provide, correct or delete their personal information on CyberStart America can make a request via their school, and they will fulfill the data request in a timely manner.

Some CyberStart America users may access, correct, update, or delete personal information by accessing their account and making the appropriate change or by contacting [support@cyberstartamerica.org](mailto:support@cyberstartamerica.org).

## Security Protocols

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CyberStart America 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

CyberStart America 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

CyberStart America's 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

CyberStart America uses AWS Data Centers, EU-West region 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 CyberStart America 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

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Once per year, upon written request, CyberStart America will provide schools with:

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

## Data Breach

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In the event of an unauthorized disclosure of a student's records via CyberStart America, CyberStart America will promptly notify impacted schools unless specifically directed not to provide such notification by law enforcement officials. Notification(s) 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 CyberStart America 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 CyberStart America has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at CyberStart America the school can contact. CyberStart America will keep impacted schools fully informed until the incident is resolved.

CyberStart America will notify impacted school(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 via CyberStart America.

## Data Deletion

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CyberStart America stores personal information for as long as it is necessary to provide products and services to the school that is CyberStart America's client. Personal information associated with a user account will be kept until the account is deleted or until we no longer need the data to provide products and services.

CyberStart America may have to retain some information after a user 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. Individual users that wish to delete or cancel their account at any time should contact CyberStart America by email on [support@cyberstartamerica.org](mailto:support@cyberstartamerica.org) if appropriate.

## Research

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CyberStart America 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, CyberStart America may share this data with business partners to improve 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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CyberStart America 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.

CyberStart America contracts with other third-party companies to perform business functions or services on their behalf and may share personal information with such third parties as required to perform their functions. CyberStart America 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 CyberStart America's data privacy and security policies and expectations.

CyberStart America utilizes the following third-party vendors for storing, accessing, or processing student personal information:

Third Party	Purpose	Information Shared
Facebook/Meta	Audience building for marketing activities (over 18s only)	Before transmission to Facebook, the user data is irreversibly encrypted in the form of hash values (encrypted numeric values) on our computers. The data of minors is not used for this purpose; this only applies to those registering as a teacher or educator.
Facebook, Snapchat, Instagram, Twitter, Google Ads, MiQ and Blis	Measuring effectiveness of adverts/organic posts"	Non-essential opt-in cookies. Cookies are managed through our cookie banner that will allow you to 'opt in' or 'opt out' of non-essential cookies.
Hotjar	Analytics and screen recordings of how users interact with the website so we can make improvements to the usability and experience of the site.	Non-essential opt-in cookies. Cookies are managed through our cookie banner that will allow you to 'opt in' or 'opt out' of non-essential cookies.
Google Analytics (non-essential)	Measuring effectiveness of marketing activities"	Non-essential opt-in cookies. Cookies are managed through our cookie banner that will allow you to 'opt in' or 'opt out' of non-essential cookies.
Google Analytics (essential)	To provide anonymous analytics for us to monitor the usage of and errors shown by this site	Essential cookies
CSA State Taskforce for Alabama (Lead organization: Alabama State Department of Education - alabamaachievers.org)	support the delivery of the CyberStart America program in that state	name, school, and contact information
CSA State Taskforce for Florida (Lead organization: STEM2Hub - stem2hub.org)	support the delivery of the CyberStart America program in that state	name, school, and contact information
CSA State Taskforce for Georgia (Lead organization: University of North Georgia - ung.edu)	support the delivery of the CyberStart America program in that state	name, school, and contact information
CSA State Taskforce for Texas (Lead organization: Texas Advanced Computing Center TACC - tacc.utexas.edu)	support the delivery of the CyberStart America program in that state	name, school, and contact information

CSA State Taskforce for Virginia (Lead organization: CodeVA - codevirginia.org)	support the delivery of the CyberStart America program in that state	name, school, and contact information
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## Product Data List

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Data Collection by CyberStart America include the following:

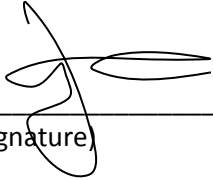
SCHOOL NAME	Assessing eligibility, and reporting
STUDENT FIRST AND LAST NAME	Required to support Product Functionality
STUDENT EMAIL ADDRESS	Required to support Product Functionality
STUDENT AGE/DOB	Assessing eligibility
STUDENT ETHNICITY	Aggregated demographic monitoring and reporting
STUDENT GENDER	Aggregated demographic monitoring and reporting
SCHOOL GRADE LEVEL	Assessing eligibility
Affiliation with JROTC/CAP	Assessing eligibility
IP Address	Required to support Product Functionality
Browser Type	Statistics/Customer Service
Browser Language	Statistics/Customer Service
Access Time	Statistics/Customer Service
Time spent on Site	Statistics/Customer Service
Domain name and landing page	Statistics/Customer Service
Pages Views	Statistics/Customer Service

## Accuracy Statement

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

Signed and agreed:



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(Signature)

[Jennifer Esposito](#)

Head of Operations

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[jesposito@nationalcyberscholarship.org](mailto:jesposito@nationalcyberscholarship.org)

8/16/2023

The CyberStart America service has been reviewed and found in alignment with iKeepSafe's FERPA Privacy Program Guidelines as indicated by this product profile. CyberStart America has been awarded the iKeepSafe FERPA Certifications.

DocuSigned by:

*Amber Lindsay*

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(Signature)

[Amber Lindsay](#)

President & CEO

iKeepSafe

08/16/2023



## Copyright

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