



iKeepSafe Product Profile *Gaggle*

Introduction

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 Gaggle complies with FERPA and COPPA. It indicates that Gaggle has been assessed for alignment with the iKeepSafe FERPA and COPPA and Guidelines.

Product Overview

Gaggle: <https://www.gaggle.net/>

“Gaggle” is a real-time mail and cloud content filtering service with a human monitoring team aided by technology to alert school officials of student safety concerns.

Gaggle is the recognized leader in helping K-12 districts manage student safety on school-provided devices and platforms, currently serving 5.8 million students at over 1,500 school districts across the United States.

Gaggle Safety Management combines artificial intelligence with trained safety experts to provide real-time analysis and review of students’ use of collaboration platforms for email and schoolwork.

Gaggle integrates with Google, Microsoft 365, and Canvas platforms and gives administrators, teachers, and parents peace of mind knowing that students’ mental health and safety are being monitored around the clock.

Agreement

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

1. Student records obtained by Gaggle 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 Gaggle.
2. Gaggle users may retain possession and control of their own generated content.
3. Gaggle will not use any information in a student record for any purpose other than those required or specifically permitted by the Gaggle 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 Gaggle users may access, correct, update, or delete personal information by accessing their Gaggle account and making the appropriate changes.
5. Gaggle 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, Gaggle will promptly notify impacted schools unless specifically directed not to provide such notification by law enforcement officials.
7. Gaggle will delete or de-identify personal information via Gaggle 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. Gaggle 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. Gaggle prohibits using personally identifiable information in student records to engage in targeted advertising.
10. Gaggle 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. Gaggle contracts directly with schools for Gaggle 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. Gaggle makes available clearly written policies for Gaggle explaining what data it collects from users, how such data is used, stored and to whom it may be disclosed.
3. Gaggle makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. Gaggle 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. Gaggle collects limited data from or about children via Gaggle 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. Gaggle 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. Gaggle 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. Gaggle 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. Gaggle 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. Gaggle will not make material changes to its privacy and security policies for Gaggle, 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 materially change user rights with respect to collection or use of personal information from students.

Data Access and Review Process

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

Some Gaggle users may access, correct, update, or delete personal information by accessing their account and making the appropriate change or by contacting support@gaggle.net.

Security Protocols

Gaggle has a comprehensive Security Program for Gaggle 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

Gaggle 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

Gaggle'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

Gaggle 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 Gaggle 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

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

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

Data Breach

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

Gaggle 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 Gaggle.

Data Deletion

Gaggle stores personal information for as long as it is necessary to provide products and services to the school that is Gaggle'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.

Gaggle 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 their school directly.

Research

Gaggle 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, Gaggle 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

Gaggle 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.

Gaggle 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. Gaggle 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 Gaggle's data privacy and security policies and expectations.

To find out where our third party service providers process your personal information contact support@gaggle.net.

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

Third Party	Purpose	Information Shared
-------------	---------	--------------------

AWS	Hosting service for data processing and optional archival	All information if archival service is enabled.
Salesforce	CRM	District information, Administrative contacts and contracts
Hubspot	Advertising/Public website	None

Product Data List

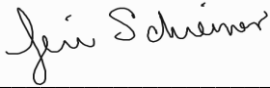
Data Collection by Gaggle include the following:

SCHOOL NAME	Required to support Product Functionality
STUDENT FIRST AND LAST NAME	Required to support Product Functionality
STUDENT EMAIL ADDRESS	Required to support Product Functionality
Student ID	Required to support Product Functionality
STUDENT PHYSICAL ADDRESS	Required to support certain Product Functionality
Parent/Guardian First and Last Name	Required to support Product Functionality
Parent/Guardian Email Address	Required to support Product Functionality
PARENT/Guardian PHYSICAL ADDRESS	Required to support certain Product Functionality
Parent/Guardian telephone number	Required to support certain Product Functionality
School District Name	Required to support Product Functionality
School Address	Required to support Product Functionality
School Phone number/email address	School Phone number/email address
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

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

Signed and agreed:



(Signature)


Jeri Schreiner

Director - System Support Engineering &
Information Security Officer

Phone: 561-814-8294

08/16/2023

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

DocuSigned by:

4936610B3823488...

(Signature)

Amber Lindsay

President & CEO

iKeepSafe

08/16/2023

Copyright

© 2023 Internet Keep Safe Coalition (iKeepSafe). All rights reserved. iKeepSafe's California Privacy Assessment Program™ materials have been developed, copyrighted, and

distributed for incidental, classroom use only. iKeepSafe's copyright notice and distribution restrictions must be included on all reproductions whether in electronic or hard copy form. These materials are intended to convey general information only and not to provide legal advice or any other type of professional opinion.