



iKeepSafe Product Profile
The Learning Experience
Bubbles and Friends

Introduction

The iKeepSafe 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, parents, or children and which may collect, store, process or otherwise handle student or children's data.

This iKeepProfile is intended to assist you in determining whether Bubbles and Friends, specifically the Bubbles and Friends application complies with COPPA. It indicates that Bubbles and Friends Application has been assessed for alignment with the iKeepSafe COPPA Privacy Program Guidelines.

Product Overview

[Bubbles and Friends | Home](#)

The TLE (The Learning Experience)is an organization that provides childcare and childhood education to children between the ages of six weeks and six years throughout the United States of America and the United Kingdom.

Bubbles and Friends is COPPA compliant and does NOT collect any personal information. The only data that can be collected is entered by the Child Care Provider or Parent. Bubbles and Friends APP does NOT have third party advertisements directed to children.

Bubbles and Friends offers an online and Mobile application for use by children, TLE parents, and Child care providers. The online and mobile application contains educational videos, games, and music that are designed to inspire a child's curiosity and enhance problem-solving.

Agreement

Children’s Online Privacy Protection Act (“COPPA”) (15 U.S.C §§ 6501- 6506)

1. Bubbles and Friends does not knowingly collect any information directly from children under the age of 13 in the United States. The only exception is the collection of the IP address which is used for internal operations and is not shared with any third parties.
2. Bubbles and Friends makes available clearly written policies explaining what data it collects from users, how such data is used and stored, and to whom it may be disclosed.
3. Bubbles and Friends makes a copy of the privacy policy available to the parent prior to completion of the sale, download, or installation of the product.
4. Bubbles and Friends provides the parent 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. Bubbles and Friends 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. Bubbles and Friends 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. Bubbles and Friends 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. Bubbles and Friends 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. Bubbles and Friends 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. Bubbles and Friends 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 parent, separate from any notice in a “click wrap” agreement. It will notify parents and obtain any required verifiable consent for any material changes to its privacy policy that affect the collection or use of personal information from children.

Data Review Process

Bubbles and Friends does not knowingly collect any information from children under the age of 13 in the United States. Please contact them at privacy@tlecorp.com if you believe they have inadvertently collected personal information from a child under 13. This will allow them to delete such information as soon as possible.

If you would like to exercise your rights with respect to data, please send an email to privacy@tlecorp.com or call toll free at 1-888-865-7775.

Security Protocols

Bubbles and Friends 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:

Bubbles and Friends 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:

Bubbles & Friend'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:

At Bubbles and Friends, takes a defense-in-depth approach to security, adding multiple layers of protection around the cloud and apps from start to finish. They ensure that the development of products follows industry-standard security best practices, and are using technology-leading tools to assist development and security teams during this process. When deployed to market, they work with suppliers and partners to ensure supporting infrastructure (including physical infrastructure, cloud and mobile apps) are properly configured and monitored, and continuous security improvement processes are in place.

All the data collected from the Bubbles and Friends service as per the Privacy Policy is handled with care and high levels of security. The data is encrypted both in transit and at rest. Data access is controlled strictly and limited only to authorized personnel to do their job and help improve your product experiences.

Personnel:

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

Training: Employees of Bubbles and Friends will receive annual privacy and security training that includes COPPA.

Employees are given access to the minimum services that are required for their job function.

Access to Audit

Once per year, Bubbles and Friends will provide parents with:

audit rights to their children data

access to the results of Bubbles and Friends or its third-party security audit

Data Breach

Bubbles and Friends does not collect any Private Data from children under the age of 13. If Bubbles and Friends did, however, collect such Private Data, and experienced an unauthorized disclosure of a child's data, Bubbles and Friends would promptly notify users unless specifically directed not to provide such notification by law enforcement officials. Notification would 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 Bubbles and Friends 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 Bubbles and Friends has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at Bubbles and Friends the user can contact. Bubbles and Friends will keep the user fully informed until the incident is resolved.

Bubbles and Friends would notify impacted user(s) within 72 hours upon the discovery of a breach of security that results in the unauthorized release, disclosure or acquisition of student information.

Data Deletion

Bubbles and Friends may collect IP address information from children which is used for the purpose of providing support for the internal operations of the service, for things such as blocking abuse and diagnosing user connectivity issues. Bubbles and Friends does not share this information with any third parties, except for those subprocessors necessary to help provide the service by performing tasks on their behalf. They do not use IP address information collected from children to contact them, including through behavioral advertising, or for any other purpose. Additionally, they delete or de-identify IP address information every six (6) months.

Research

Bubbles and Friends 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, Bubbles and Friends may share this data with business partners to improve services or offerings. If they disclose information to authorized business partners to conduct research or assist in understanding the usage, viewing, and demographic patterns for certain programs, content, services, and/or functionality on our service, such data will be aggregated and/or anonymized to reasonably avoid identification of a specific individual.

Third Parties

Bubbles and Friends does not collect personal information from individuals under the age of 13. Bubbles and Friends does not sell, trade, lease or loan any 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.

Bubbles and Friends contracts with other third-party companies to perform business functions or services on their behalf and may share de-identified or aggregated data with such third parties as required to perform their functions.

Bubbles and Friends utilizes the following third-party vendors:

Bubbles and Friends Third Party Service Providers

- **Amazon** for providing servers, databases and network infrastructure for storage, service delivery and other related services.
- **Google** for CAPTCHA during registration to prevent bots, Google Analytics, Firebase Crashlytics, Firebase Performance Monitoring, and push notifications
- **Sendgrid** for email messaging
- **Atlassian** (JIRA) for issue tracking
- **New Relic** for server performance
- **WaveLynx*** for controlling door access
- **Shopify** for hosting our eCommerce store
- **MagicBlox** for book data from independent publishers
- **Microsoft Visual Studio App Center** for mobile app deployment
- **FiServ** for processing payments on eCommerce orders and subscriptions
- **Apple** for push notifications
- **Avalara** for calculating sales tax
- **ElevenLabs** for speech synthesis

Product Data List

Below are the data collection elements from Bubbles and Friends:

Parent's Use only:

The following information is collected during the registration process:

- Child's First Name
- Child's Date of Birth
- Avatar image
- PIN – used for entering and exiting Child Mode

Directly from the Child's Use

IP address for internal operations only

TLE Child Care Provider's Use

Bubbles and Friends will, from time to time, send push notifications with Child Care updates for those children currently enrolled in TLE Centers. Updates include, but are not limited to:

- Check in and Check out times
- Classroom activities, including meals
- Supply requests
- Photos, uploaded by the center, if the parent provides consent for photos to be taken

Accuracy Statement

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

Signed and agreed:

DocuSigned by:
Howard Samson
3D1A2BC0001B4E8

(Signature)

Howard Samson
Product Manager – Bubbles and Friends
hsamson@tlecorp.com
210 Hillsboro Technology Drive
Deerfield Beach, FL 33441

561-855-3790

11/17/2023

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

DocuSigned by:
Amber Lindsay
4936610B3823488...

(Signature)

Amber Lindsay
President & CEO
iKeepSafe

11/17/2023

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