



## *iKeepSafe Product Profile* *Snorkl*

### Introduction

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The *iKeepSafe* FERPA, CSPA (California) 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 [Snorkl](#) complies with FERPA, COPPA and CSPA (California). It indicates that [Snorkl](#) has been assessed for alignment with the iKeepSafe FERPA, CSPA (California) and COPPA Guidelines.

### Product Overview

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Snorkl

<https://snorkl.app/>

Snorkl is a tool for students to record explanations and get immediate AI feedback. Teachers assign questions and students create short recordings of their voice and work on a digital whiteboard.

## Agreement

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### **A. As related to the Family Educational Rights and Privacy Act (“FERPA”) (20 U.S.C. Section 1232g) and California AB 1584 , Snorkl agrees:**

1. Student records obtained by Snorkl 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 Snorkl.
2. Snorkl users retain possession and control of their own generated content by contacting the educational institution.
3. Snorkl will not use any information in a student record for any purpose other than those required or specifically permitted by the Snorkl Terms of Service 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, Snorkl users may access, correct, update, or delete personal information in their profile by signing into Snorkl, accessing their Snorkl account, and making the appropriate changes.
5. Snorkl 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, Snorkl will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.

Notification shall identify:

- (i) the date and nature of the unauthorized use or disclosure;
  - (ii) the Private Data used or disclosed;
  - (iii) general description of what occurred including who made the unauthorized use or received the unauthorized disclosure;
  - (iv) what Snorkl has done or shall do to mitigate any effect of the unauthorized use or disclosure;
  - (v) what corrective action Snorkl has taken or shall take to prevent future similar unauthorized use or disclosure; and
  - (vi) who at Snorkl the User can contact. Snorkl will keep the User fully informed until the incident is resolved.
7. Snorkl 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. Snorkl 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. Snorkl prohibits using personally identifiable information in student records to engage in targeted advertising.
10. Snorkl will not make material changes to our Terms of Service 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. As related to the Children's Online Privacy Protection Act ("COPPA") (15 U.S.C §§ 6501-6506 ), Snorkl agrees:**

1. Snorkl 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. Snorkl 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. Snorkl makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. Snorkl 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. Snorkl 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. Snorkl does not and 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. Snorkl 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. Snorkl 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. Snorkl will conduct annual training related to data privacy and security, including FERPA and 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. Snorkl 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 Student Online Personal Information Protection Act (SB1177 -“SOPIPA”), Snorkl agrees:**

**Prohibitions:**

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

**Obligations:**

5. Snorkl is committed to maintaining the security and confidentiality of pupil records as noted herein.
6. Snorkl will delete student information when requested by the school district.
7. Snorkl will disclose student information when required by law, for legitimate research purposes and for school purposes to educational agencies.

## Data Access and Review Process

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

A data access request which asks Snorkl to provide, correct or delete personal information is lodged via an email to [support@snorkl.app](mailto:support@snorkl.app). 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.

Snorkl collects data on behalf of schools. Any party wishing for Snorkl 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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Snorkl 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

Snorkl 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

Snorkl 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

Snorkl 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/](https://aws.amazon.com/security/)

## Personnel

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

Training: Employees of Snorkl, Inc. 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, Snorkl will provide schools with:

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

## Data Breach

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

Snorkl 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 Snorkl.

## Data Deletion

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Snorkl 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.

Snorkl 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 Snorkl, a user may delete their account at any time by contacting their school directly or by contacting Snorkl at [support@snorkl.app](mailto:support@snorkl.app).

## Research

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Snorkl 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, Snorkl 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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Snorkl 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.

Snorkl 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. Snorkl 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 Snorkl data privacy and security policies and expectations.

**Snorkl utilizes the following third-party vendors:**

### Service providers

Subprocessor Name	How Snorkl uses this subprocessor	What is shared with the subprocessor	Location	Security
<a href="#">Render</a>	We use Render to manage the computers we use to operate Snorkl. All information we collect is stored on computers and databases managed by Render.	Everything in Snorkl.	USA	<a href="#">More</a>
<a href="#">Amazon Web Services</a>	We use Amazon Web Services (AWS) to manage our data centers and the computers that we use to operate Snorkl.	Video content uploaded to Snorkl.	USA	<a href="#">More</a>
<a href="#">Sendgrid</a>	We use Sendgrid to send email messages to Snorkl users about activity in their account.	Name and email address.	USA	<a href="#">More</a>
<a href="#">OpenAI</a>	We use OpenAI's API to power the grading and feedback features in Snorkl.	User's audio recordings & text transcripts of video recordings.  Note: We remove personally identifiable student information before sharing and we have an agreement that ensures that data is not saved or used by any third parties to train or refine future models.	USA	<a href="#">More</a>

### Analytics providers

Subprocessor Name	How Snorkl uses this subprocessor	What is shared with the subprocessor	Location	Security
<a href="#">Mixpanel</a>	We use Mixpanel for analytics and reporting.	Name, email, device information and actions or interactions with the app.	USA	<a href="#">More</a>
<a href="#">LogRocket</a>	We use LogRocket for analytics, reporting, and customer support.	Name, email, device information and actions or interactions with the app.	USA	<a href="#">More</a>
<a href="#">Vercel</a>	We use Vercel for analytics and reporting.	Device information, county-level location	USA	<a href="#">More</a>



## Product Data List

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Data Collection by Snorkl include the following:

	<b>DATA Collected for Operation</b>	<b>General Purpose of Data Collected</b>
1	STUDENT FIRST and LAST NAME	Required to support Product Functionality
2	STUDENT EMAIL ADDRESS	Required to support Product Functionality
3	SCHOOL NAME	Required to support Product Functionality
4	SCHOOL ADDRESS	Required to support Product Functionality
5	PHOTOGRAPH,VIDEO OR AUDIO FILE	Required to support Product Functionality
6	GEOLOCATION DATA	Monitor, secure, and improve the platform
7	BROWSER TYPE	To help investigate and fix reported bugs.
8	ACCESS TIME	To provide and improve the platform for the user (e.g., letting schools know about usage).
9	TIME SPENT ON SITE	To provide and improve the platform for the user (e.g., letting schools know about usage).
10	PAGE VIEWS	To provide and improve the platform for the user.

## Accuracy Statement

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Snorkl hereby confirms the accuracy and truthfulness of all information provided to iKeepSafe during the assessment process. Snorkl hereby confirms the accuracy and truthfulness of all information contained in the Snorkl profile and has authorized iKeepSafe to make the profile available to any interested schools.

Signed and agreed:

*Jeffrey Plourd*  
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(Signature)

Jeff Plourd  
Co-Founder & CEO  
Snorkl  
5383 Balboa Avenue  
San Diego, CA 92117

05/16/2024

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

DocuSigned by:  
*Amber Lindsay*  
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(Signature)

Amber Lindsay  
President & CEO  
iKeepSafe

05/16/2024

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