



## *iKeepSafe Product Profile FERPA and COPPA Certification SchoolJoy*

### Introduction

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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, and which may collect, store, process or otherwise handle student data.

This *iKeepProfile* is intended to assist you in determining whether the SchoolJoy complies with FERPA and COPPA. It indicates that SchoolJoy has been assessed for alignment with the iKeepSafe FERPA and COPPA Guidelines.

### Product Overview

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SchoolJoy

<https://www.schooljoy.com/>

SchoolJoy provides a platform that helps K-12 schools manage and showcase co-curricular programs to increase student enrollment and reduce operational overhead.

SchoolJoy provides a proprietary technology platform and services that enable K-12 educational institutions to manage the documentation and verification of learner activities, achievements, and skills (Learner Profile), as well as the generation of learning, instructional and college & career resources based on the Learner Profile.

## Agreement

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

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

## Children's Online Privacy Protection Act ("COPPA") (15 U.S.C §§ 6501-6506 )

1. SchoolJoy 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. SchoolJoy 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. SchoolJoy makes available a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. SchoolJoy 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. SchoolJoy 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. SchoolJoy 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. SchoolJoy 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. SchoolJoy 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. SchoolJoy 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. SchoolJoy 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 Review Process

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Parents are encouraged to work directly with teachers and school to make any changes in your data. If however, you need to get in touch with us, you can write to [support@schooljoy.com](mailto:support@schooljoy.com) and we will work with the school and do our best to make the required changes.

Teachers, administrators and parents can directly edit their information in their SchoolJoy profiles. Schools also have a right to use any other similar service and can place a request to get all of their data. We will do our best to comply with such requests.

General inquiries related to privacy may be directed to:

SchoolJoy, Inc.  
2734 Bayview Drive  
Fremont, California 94538 USA  
(510) 768-9166  
[support@schooljoy.com](mailto:support@schooljoy.com)

## Security Protocols

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SchoolJoy 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:

HTTPS encrypted

### Data at Rest:

Encryption methodology is inherent in their data storage systems. And, is replicated in encrypted form for backup and disaster recovery.

SSL by GoDaddy Root Certificate Authority; PKCS #1 SHA-256 With RSA Encryption

### Data Center Security:

Akamai cloud storage: <https://www.akamai.com/legal/compliance/privacy-trust-center>

### Data Protection at Akamai:

Akamai is trusted to make digital experiences fast, intelligent, and secure. They understand the way they process personal data is an important part of that trust and are committed to upholding the privacy of their customers, customer's end users, employees, and online users. Akamai complies with the laws of all countries in which it operates, including the data protection laws in the Americas, Europe, and Asia.

The Akamai Data Protection and Privacy Program protects the personal information that they process by respecting global privacy principles. Akamai's Global Data Protection Office, headed by their Chief Data Protection Officer, manages this important effort.

### Personnel:

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

Training: Employees of SchoolJoy 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.

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

### Access to Audit

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Once per year, SchoolJoy will provide schools with:



audit rights to the school's data



access to the results of SchoolJoy or its third-party security audit

### Data Breach

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

SchoolJoy will 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

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SchoolJoy 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.

SchoolJoy 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 SchoolJoy, a user may review or request deletion of their account at any time by contacting their school directly.

## Research

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SchoolJoy 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, SchoolJoy 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

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SchoolJoy 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.

SchoolJoy 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. SchoolJoy 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 SchoolJoy' data privacy and security policies and expectations.

SchoolJoy utilizes the following third-party vendors:

### Technical Service Providers

<b>Name of Service Provider with Link to Privacy Policy or relevant</b>	<b>How SchoolJoy uses the Service Provider</b>	<b>What user information is shared or collected by this Service</b>

<b>privacy documentation</b>		<b>Provider and/or passed back to us from the Service Provider?</b>
<a href="#">Akamai Connected Cloud</a>	Container runtime for web services, APIs, workers, schedulers, and databases. Includes containers for staging and production environments	User IDs, first names, last names, and email addresses; students' interests and activity history
<a href="#">Microsoft Azure Cloud</a>	Container runtime for APIs and AI-related services and features	Students' user IDs, first names, last names, interests, and activity history
<a href="#">New Relic</a>	Server performance monitoring	None
<a href="#">Google Analytics</a>	Platform website traffic monitoring	None

## Product Data List

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<b>Data element</b>	<b>Purpose of Data Collected</b>
Student First and Last Name	Product Functionality
Student Email Address	Product Functionality
Student Password	Product Functionality
Student Academic Data	Product Functionality
Parent First and Last Name	Product Functionality
Parent Mobile/Phone Number	Product Functionality
Parent Email Address	Product Functionality
Parent Password	Product Functionality
School Name	Product Functionality

School Team, Clubs, Associations	Product Functionality
Photograph, Video File	Product Functionality
Browser Type	Product Functionality
Student Ethnicity	Product Functionality
Access Time	Statistics
Time spent on Site	Statistics
Page Views	Statistics
Referring URL's	Statistics



## Accuracy Statement

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

Signed and agreed:



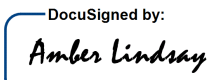
(Signature)

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Fremont, California 94538 USA  
[support@schooljoy.com](mailto:support@schooljoy.com)  
909-967-2588

12/8/2023

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

DocuSigned by:  
  
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(Signature)

Amber Lindsay  
President & CEO  
iKeepSafe

12/8/2023

## Copyright

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## Disclaimer

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