iKeepSafe Product Profile
Robolink

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

Product Overview

Robolink: www.robolink.com

Robolink provides learning robotics materials to schools and individuals (our "Services"). They provide these Services via our dedicated online portals that contain lessons, content and materials ("Education Portals"). In order to provide the Education Portals and our Services, they collect limited personal information.

Advancing student engagement, retention and future readiness by integrating competitive drone play with existing teaching methods.

https://learn.robolink.com/

Basecamp is where you can follow along with tutorials and access educational materials with our various robots

https://codrone.robolink.com/edu/blockly/

Blockly is a block coding program from Robolink based on Python. The types of blocks are divided into junior blocks and senior blocks according to the difficulty level.

https://docs.robolink.com/

Robolink Library Documentation

Agreement

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

1. Student records obtained by Robolink 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 Robolink.

2. Robolink users retain possession and control of their own generated content by contacting the educational institution.

3. Robolink will not use any information in a student record for any purpose other than those required or specifically permitted by the Robolink 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, Robolink users may access, correct, update, or delete personal information in their profile by signing into Robolink, accessing their Robolink account, and making the appropriate changes.

5. Robolink 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, Robolink 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 Robolink has done or shall do to mitigate any effect of the unauthorized use or disclosure;
   (v) what corrective action Robolink has taken or shall take to prevent future similar unauthorized use or disclosure; and
   (vi) who at Robolink the User can contact. Robolink will keep the User fully informed until the incident is resolved.

7. Robolink 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. Robolink 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. Robolink prohibits using personally identifiable information in student records to engage in targeted advertising.

10. Robolink 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), Robolink agrees:

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

4. Robolink 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. Robolink 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. Robolink 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. Robolink 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. Robolink 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. Robolink 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.   Robolink 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 Access and Review Process

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

A data access request which asks Robolink to provide, correct or delete personal information is lodged via an email to privacy@robolink.com. 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.

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

Robolink 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

> Robolink 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

> Robolink'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

Robolink uses Google Cloud Platform

https://cloud.google.com/blog/topics/developers-practitioners/data-security-google-cloud

To help protect your data, Google encrypts data at rest, ensuring that it can only be accessed by authorized roles and services, with audited access to the encryption keys. Data is encrypted prior to it being written to disk.

All communications over the Internet to Google Cloud require properly terminated TLS connections. Encryption in transit protects your data if communications are intercepted while data moves between your site and the cloud provider or between two services. This protection is achieved by encrypting the data before transmission; authenticating the endpoints; and decrypting and verifying the data on arrival. For example, Transport Layer Security (TLS) is often used to encrypt data in transit for transport security, and Secure/Multipurpose Internet Mail Extensions (S/MIME) is used often for email message security.

Personnel

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

Training: Employees of Robolink 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, Robolink will provide schools with:

X   audit rights to the school's data

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

Data Breach

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

Robolink will <u>notify</u> 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 Robolink.

Data Deletion

Robolink 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.

Robolink 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 Robolink, a user may delete their account at any time by contacting their school directly or by contacting Robolink at privacy@robolink.com.

Research

Robolink 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, Robolink 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

Robolink 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.

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

Robolink utilizes the following third-party vendors:

Third Party	Purpose	Information Shared
Google Analytics	Only on our main business website. Used for collecting usage analytics data to understand how our website is being used.	Number of users, Session statistics, Approximate geolocation, Browser and device information
Facebook	Only on our main business website. Remarketing to visitors of our business website	According to Facebook: Http headers, which can include IP addresses, browser information, pager location, document, referrer and person using the website. Pixel-specific data. Button clock data.
AdRoll	Only on our main business website. Remarketing to visitors of our business website	According to AdRoll: HTTP headers, advertiser specific data, cookie ID.
Google Remarketing	Only on our main business website. Remarketing to visitors of our business website	
Google Cloud Platform	Hosting our lesson portal, block coding platform, our old archived website, and our single static instructional page for Zumi	Identifiers
HelpDocs	For handling our technical support articles and for customers to contact us	Usage data. Also name and e-mail, if users choose to reach out for support help.
Zoho	Our ticketing system for support issues	Name, e-mail, notes about their issues, product they are asking about
Klaviyo	Only on our main business website. For our e-mail	Name, e-mail at least. Depending on how they entered

	marketing and creating interest sign-up lists.	our list, we may also have phone number, address, organization, position.
Mailgun	Our SMTP server, which is used to send out automated e-mails, such as post-purchase confirmations, account signup confirmations, an automated quote request.	This is used to send e-mails out for many of our services, so e-mails and names pass through our SMTP server
Hubspot	This is our Customer Relations Management system for sales leads. Information is only added when people contact us with orders, or start a sales conversation with us.	Name, org, phone number, e-mail, address
Shopify	Our main business website, where a majority of customers learn about our products and make purchases, is hosted with Shopify. A majority of financial transactions are done through Shopify or Shopify apps.	Name, phone number, org, e-mail, address, payment information
Easy PO	Only on our main business website. Used for generating quotes for customers who need to request a quote for putting together a purchase order	E-mail, phone number, organization, address
Affirm	Only on our main business website. This is one of the ways a customer is able to make payments. It is especially used for making their payments in installments.	Payment information
Shop Pay	Only on our main business website. This is a way for customers to pay for their order. It's one of the options for payment in our Shopify checkout process.	Payment information
PayPal	Only on our main business website. This is a way for customers to pay for their order. It's one of the options for payment in our Shopify checkout process.	Payment information
Google Pay	Only on our main business website. This is a way for customers to pay for their	Payment information

	order. It's one of the options for payment in our Shopify checkout process.	
Meta Pay	Only on our main business website. This is a way for customers to pay for their order. It's one of the options for payment in our Shopify checkout process.	Payment information
Shippo	Only on our main business website. We use Shippo to handle fulfillment and shipping label creation. It's synchronized with Shopify and collects shipping info and connects to shipping services, such as DHL, USPS, UPS.	Name, org, address, e-mail, phone number if international
Synder	Only on our main business website. Inventory management system, used for inventory and accounting purposes	Unsure, need to fill this out
DHL	Only on our main business website. We use it sometimes for shipping items internationally to customers or for shipping items to business partners. Currently used rarely, mostly use FedEx.	Name, org, address, phone number, e-mail
FedEx	We use it for shipping orders mainly to international customers, partners, fulfilling reseller partner orders	Name, org, address, phone number, e-mail
USPS	We use it for shipping orders mainly to domestic customers, partners, fulfilling reseller partner orders. Sometimes it is also used for international as well	Name, org, address, phone number, e-mail
UPS	We use it for shipping orders mainly to domestic customers, partners, fulfilling reseller partner orders. Sometimes it is also used for international as well.	Name, org, address, phone number, e-mail

Product Data List

Data Collection by Robolink include the following:

	DATA Collected for Operation	General Purpose of Data Collected
1	STUDENT FIRST AND LAST NAME	Required to support Product Functionality
2	STUDENT EMAIL ADDRESS	Required to support Product Functionality
3	BROWSER TYPE	To help investigate and fix reported bugs.
4	ACCESS TIME	To provide and improve the platform for the user (e.g., letting schools know about usage).
5	TIME SPENT ON SITE	To provide and improve the platform for the user (e.g., letting schools know about usage).
6	PAGE VIEWS	To provide and improve the platform for the user.

Accuracy Statement

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

Signed and agreed:

_____
(Signature)

Wesley Hsu
Robolinks

08/14/2024

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

DocuSigned by:

Amber Lindsay
_____4936610B3823488..._____
(Signature)

Amber Lindsay
President & CEO
iKeepSafe

08/14/2024

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