iKeepSafe

iKeepSafe Product Profile
ExamRoom.ai

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

Product Overview

A web-based, remote proctoring service and test delivery platforms focused on creating streamlined and scalable proctoring solutions tailored to your needs.

Examroom.AI

Agreement

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

1. Student records obtained by ExamRoom.ai 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 ExamRoom.ai.

2. ExamRoom.ai users retain possession and control of their own original content that they submit to ExamRoom.ai.

3. ExamRoom.ai will not use any information in a student record for any purpose other than those required or specifically permitted by the ExamRoom.ai User Agreement 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 or teacher. Additionally, ExamRoom.ai users may access personal information in their profile by signing into their ExamRoom.ai account. To correct, update, or delete personal information in their profile, ExamRoom.ai users should reach out to the ExamRoom.ai help center to make the appropriate changes.

5. ExamRoom.ai 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, ExamRoom.ai will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.

7. ExamRoom.ai 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. ExamRoom.ai agrees to work with educational institutions to ensure compliance with FERPA and 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. ExamRoom.ai prohibits using personally identifiable information in student records to engage in targeted advertising.

10. ExamRoom.ai will not make material changes to the ExamRoom.ai User Agreement 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. ExamRoom.ai 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 for educational purposes only.

2. ExamRoom.ai 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. ExamRoom.ai makes a copy of the privacy policy available to the **teacher/school** prior to completion of the account setup.

4. ExamRoom.ai provides the **teacher/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. ExamRoom.ai collects limited data from or about children that is reasonably needed to provide users with a feature or activity, or to perform a business activity that meets the definition of "support for internal operations" under COPPA.

6. ExamRoom.ai 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. ExamRoom.ai 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. ExamRoom.ai 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. ExamRoom.ai 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 the 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. ExamRoom.ai 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. ExamRoom.ai 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

ExamRoom.ai collects data on behalf of schools. Any party wishing for ExamRoom.ai to provide or correct their personal information can make a request either via their school or directly to ExamRoom.ai and as legally permitted, ExamRoom.ai will provide or correct the information as instructed and in a timely manner.

A data access request which asks ExamRoom.ai to provide, correct or delete personal information is lodged via an email to dpo@examroom.ai or through the help center. Depending on the nature of the request, ExamRoom.ai may require the requestor to provide information to verify their identity, and/or be an authorized agent of their school.

Security Protocols

ExamRoom.ai 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

Access to the ExamRoom.ai service occurs via encrypted connections (HTTPS) which encrypt all data before it leaves ExamRoom.ai's servers and protects that data as it transits over the internet.

Data at Rest

ExamRoom.ai follow the TLS 2.0 protocol and AWS RSA 2048 method. All the data is behind the firewall, with the AWS security group in place.

Data Center Security

ExamRoom.ai 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 the housed data.

Please see more information below in the available link:

Amazon Web Services (AWS)   https://aws.amazon.com/security/

Personnel

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

<u>Training</u>: Employees receive annual privacy and security training that includes information about FERPA and COPPA.

<u>Access</u>: Access to student data is role-based; limited to those employees who need access to perform job responsibilities.

Access to Audit

Once per year, ExamRoom.ai will provide schools with:

☐   audit rights to the **school's data**

☐   access to the results of Gradient Learning and CZI, or its **third-party security audit**

Data Breach

In the event of an unauthorized disclosure of a student's records, ExamRoom.ai will promptly notify the school without undue delay or as required by the applicable law. Notification shall identify:

a. the name and contact information of the reporting school subject to ExamRoom.ai's Security Incident Notification section in its User Agreement;

b. a list of the types of personally identifiable information that were or are reasonably believed to have been the subject of a security incident;

c. if the information is known at the time the security incident notification is provided, then either (1) the date of the security incident, (2) the estimated date of the security incident, or (3) the date range within which the security incident occurred. The security incident notification shall also include the date of the notice;

d. whether, to the knowledge of ExamRoom.ai at the time notice is provided, the notification was delayed as a result of a law enforcement investigation or request; and

e. a general description of the security incident, if that information is possible to determine at the time the notice is provided.

Data Deletion

ExamRoom.ai stores your personal information for as long as it is necessary to provide ExamRoom.ai to you and others. Personal information associated with the user account will be kept until the account is deleted or until ExamRoom.ai no longer needs the data to provide its products and services.

ExamRoom.ai may have to retain some information after your account is closed, to comply with legal obligations, to protect the safety and security of the community or ExamRoom.ai, or to prevent abuse of ExamRoom.ai's terms in the User Agreement. A user may delete their account at any time by contacting their school directly or by contacting ExamRoom.ai via Help Center or at support@ExamRoom.AI.

Research

ExamRoom.ai 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 ExamRoom.ai. On certain occasions, ExamRoom.ai may share this data with service providers to support the operation of the Services, such as through document management, data hosting, and provisioning customer service tools related to ExamRoom.ai.

Third Parties

ExamRoom.ai does not sell, trade, lease or loan the personal information it collects or maintains, in the course of providing the service, to any third party for any reason, including direct marketers, advertisers, or data brokers.

ExamRoom.ai 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. ExamRoom.ai have 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 ExamRoom.ai's data privacy and security policies and expectations.

ExamRoom.ai utilizes the following third-party vendors:

Technical Service Providers

Name of Service Provider with Link to Privacy Policy	Service	Details
AWS	to store users data	No information shared
AWS S3	to store data video /logs	No information shared
Zoho	CRM	Candidate name, exam name, day/time of scheduled exam, email, in some cases a phone number in case of a disconnection

Product Data List

Student data collection by ExamRoom.ai includes 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	STUDENT PHYSICAL ADDRESS	Only if School requires
4	STUDENT PHONE/MOBILE NUMBER	For contacting the candidate to send reminders before the exam and If they got disconnected or they need any technical help during the exam.
5	STUDENT SOCIAL SECURITY NUMBER	To identify candidates
6	STUDENT AGE/DOB	To verify candidate's identity
7	PARENT FIRST AND LAST NAME	To verify candidate's identity
8	PARENT EMAIL ADDRESS	To contact the candidate as a secondary email
3	PHOTOGRAPH, VIDEO OR AUDIO FILE	Required to support Product Functionality
4	BROWSER TYPE	Business Analytics

Accuracy Statement

ExamRoom.ai hereby confirms the accuracy and truthfulness of all information contained in this profile and has authorized iKeepSafe to make the profile available to any interested teachers/schools.

Signed and agreed:

DocuSigned by:

Parshant Kumar

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Date: 12/3/2025

(Signature)

Parshant Kumar

CEO

ExamRoom.AI

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

DocuSigned by:

Amber Lindsay

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Date: 12/2/2025

(Signature)

Amber Lindsay
President & CEO
iKeepSafe

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