



Product Profile: ClassLink

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

This *iKeepProfile* is intended to assist you in determining whether ClassLink complies with FERPA, SOPIPA, California AB 1584, and other California state laws and district policies. It indicates that ClassLink has been assessed for alignment with the iKeepSafe FERPA and California Privacy Program Guidelines.

Product Overview

ClassLink: <https://www.classlink.com>

ClassLink is a leading provider of cloud-based education products that connect teachers and students with their classroom, their curriculum, and each other in richer, more powerful ways, empowering educators to improve learning through innovative systems and services. ClassLink provides unlimited OneClick single sign-ons to web and Windows applications and instant access to files on school networks and cloud storage. Accessible from any device, ClassLink is ideal for 1to1 and Bring Your Own Device (BYOD) initiatives.

Agreement

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

1. Student records obtained by ClassLink 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 ClassLink.
2. ClassLink does not collect or store any student-generated content. In the event the platform is updated to incorporate such a feature, ClassLink will amend this statement to describe the means by which students may retain possession and control of student-generated content.
3. ClassLink will not use any information in a student record for any purpose other than those required or specifically permitted by the ClassLink 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, ClassLink users may access, correct, update, or delete personal information by accessing their ClassLink.com account, and making the appropriate changes.
5. ClassLink 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, ClassLink will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.
7. ClassLink 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. ClassLink agrees to work with educational institution 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. ClassLink prohibits using personally identifiable information in student records to engage in targeted advertising.
10. ClassLink 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.

As related to the Student Online Personal Information Protection Act (SB 1177 -“SOPIPA”), ClassLink agrees:

Prohibitions:

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

Obligations:

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

Third Parties

ClassLink 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 databrokers.

ClassLink contracts with third-party companies to perform business functions or services on their behalf but do not share PII with such third parties. The agreements align with ClassLink data privacy and security policies and expectations.

ClassLink will make available the list of third-party service providers upon request.

Product Data List

	Data Collected for Operation:	General Purpose of Data Collection
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	BROWSER TYPE	Business Intelligence; Customer Support
6	ACCESS TIME	Business Intelligence
7	PAGE VIEWS	Business Intelligence (Browser)

Data Review Process

ClassLink provides users direct access to their personally identifiable information via product functionality. Any other request for access to personally identifiable information held by ClassLink must be made via the educational institution.

45 East Madison Avenue, Suite 7 Clifton, NJ 07011

Phone: 1.888.963.7550

Fax: 973.546.5981

Email: info@classlink.com

Security Protocols

ClassLink 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

Data is protected in transit by using SAML, oAuth2, or LTI encryption, and uploads are done using SFTP.

Data at Rest

Data is protected by storing on database servers with authentication protection under customer control.

Data Center Security

Data is stored on servers under customer control.

Personnel

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

Training: Employees of ClassLink receive annual privacy and security training that includes COPPA and FERPA.

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

Once per year, will provide schools with:

audit rights to the school's data

access to the results of ClassLink's security audit

Data Breach

In the event of any acquisition of computerized data that compromises the security, confidentiality, or integrity of personal information maintained by ClassLink, company will promptly notify users.

Notification shall identify:

Information in the notice to include:

- Company contact information.
- An explanation of what happened.
- A listing of the types of personal information that was compromised.
- If known, the date and time of the breach, or a best estimate.
- Whether the notification was delayed as a result of law enforcement.
- Steps taken to mitigate the situation and prevent it from happening again
- Advice to the impacted individuals on how they can best protect themselves.

Notifications will be sent via email to all impacted users. Written notice will be sent to the impacted schools in addition to emails.

Data Retention and Deletion

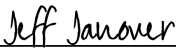
Users may deactivate their account at any time by accessing their account through the ClassLink platform.

Following the termination of a license, a school or district may request that ClassLink deactivate and ClassLink will do so, unless the school, district, or applicable regulations require the retention of such data. This will apply even in the case when the termination of a license is initiated by the Company.

Accuracy Statement

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

Signed and agreed:

DocuSigned by:


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ClassLink, Inc.

Date: 9/4/2019

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

DocuSigned by:


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(Signature)

iKeepSafe

Date: 9/4/2019

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