



October 5, 2020

## Privacy Policy

The privacy of EdGems Math's users is important to us. We have created our technology and services with our users' protection and privacy in mind and make every effort to be transparent in our data collection and use practices. We are a signatory to the Student Privacy Pledge and we comply with the FTC's Children's Online Privacy Protection Act (COPPA). We support the goals and guidelines set forth by industry self-regulatory bodies and experts such as the Center for Media Education (CME), whose early research, along with research from the FTC, led to the passage of COPPA in 2000.

We also support districts and schools that are subject to compliance with the Family Educational Rights and Privacy Act (FERPA). This document explains what information we collect about our users, how we use this information, who we share the information with and other privacy and security issues.

## Notices of Privacy Policy Changes

When we make changes to this policy, we will post the changes on this document and change the effective date at the top. We will notify the IT departments in each of our districts when the changes are made, and we will display new changes prominently on our website. Your continued use of EdGems Math implies that you consent to any changes to our privacy policies.

## Definitions

For purposes of this Policy, we introduce the definitions of how we characterize users' information:

"Personally-Identifiable Information" or "PII" is information that can identify a user, such as an e-mail address. "Anonymous Information" is information that does not enable identification of an individual user.

## What Type of Information Do We Collect and Why? General

The Personally-Identifiable Information (PII) we collect are the first and last names of teachers and their students, at the time teachers create classes to roster students in those classes. We also collect the email address for each student and teacher. We do not collect email passwords, phone numbers, addresses, billing or any other information. We collect this information through automatic rostering within LMS' set up by the district (i.e., through Clever and Canvas), or through the Google and Microsoft login process, as detailed below.

When students log into EdGems Math via the "Sign in with Google" or "Sign in with Microsoft" buttons, the sign-in processes will require two-factor authentication.

Google and Microsoft authenticate users through secure encrypted passwords. Districts establish their email protocol using the software and set-up of their choice.

The Anonymous Information we collect is aggregated usage analytics by grade or class.

Teachers can access their student results of EdGems Math's online assessments (Gem Challenges) through their personal teacher dashboards. Students can also access the results of their assessments (Gem Challenges). No student data is accessible by other students or other teachers.

EdGems Math stores and can access student assessment results.

We do not use cookies to collect Personally-Identifiable Information nor do we combine such general information with other PII to identify a user. We do not collect a user's web search history across third party websites or search engines.

### **We do NOT collect or use information as follows:**

- We do not collect, use or share Personally-Identifiable Information other than as described above, or with the consent of a parent or legal guardian as authorized by law, or otherwise as directed by an applicable district or school or required by contract or by law.
- In no event shall we use, share or sell any Personally-Identifiable Information for advertising or marketing purposes. There are no advertisements in EdGems Math.
- No third parties are used for ads or tracking.
- EdGems only tracks interactions within its application, and does not use any tracking technology for ads.

### **Google Permissions**

Below is a list of Google permissions that we may ask for depending on the functionality that you use in EdGems Math. With each scope is the description of what EdGems Math is given access to, and why we ask for that.

- General Google Authentication Scopes - These are needed for basic Google authentication. EdGems Math stores the user's first name, last name, and email.
  - Profile - View your basic profile info
  - Email - View your email address
  - Openid - Authenticate using OpenID Connect
- Google Classroom Scopes - These scopes give EdGems Math access to the user's classes that are configured in Google Classroom. We use them to pull over roster information and allow configuring your class in EdGems Math a seamless experience.

EdGems Math only has read-only access to this information, as follows:

- classroom.courses.readonly - View your Google Classroom classes
  - classroom.rosters.readonly - View your Google Classroom class rosters
  - classroom.profile.emails - View the email addresses of people in your classes
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- Google Groups Scopes - In some cases schools will use Google Groups to manage their classes. EdGems Math has permissions to read the group information as well as information about the members of the groups. Owners of the group will become teachers in EdGems Math when synced over, members are registered as students. EdGems Math only looks at this hierarchy to determine the class structure. These scopes provide EdGems Math with read-only access to your Google Groups and members of those groups.
    - admin.directory.group.readonly - View groups on your domain, used by EdGems to list the groups the user has associated with their account.
    - admin.directory.group.member.readonly - View group subscriptions on your domain, used by EdGems to read information about the users in a particular group.

## EdGems' COPPA Compliance

Parents and legal guardians of children under 13 who use EdGems Math have certain rights under the Children's Online Privacy Protection Act (COPPA), and EdGems Math recognizes those rights. Parents/guardians can consent to collection and use of a child's personally-identifiable information without consenting to the disclosure of information to third parties.

A child's participation or access to an activity on EdGems Math cannot be conditioned on him or her providing more information than is reasonably necessary for that activity. EdGems Math does not collect personally-identifiable information from children under or over 13 years of age without their school district's consent.

Each teacher's dashboard allows direct control over student information at all times. A teacher can create and delete students. When teachers delete students, all student data affiliated with the removed students is also deleted. The teachers using EdGems Math will only be able to access or use the site via a district password provided by EdGems Math.

Students are only able to use EdGems Math via a Class Code created and provided by their teachers.

We encourage schools and districts using EdGems Math to notify parents that the product is used in their school. Parents can log into their children's accounts and access their records. If you are a parent or guardian of a student using EdGems Math in his or her school, you can request the login information from your child or their teacher. You are encouraged to use the student's login information and view all their activities and progress on EdGems Math at any time. Parents have a right to request the student's Personally Identifiable Information be deleted or request changes in his or her records if it is inaccurate or misleading by contacting the school or teacher.

## **FERPA Compliance**

We understand the obligation educational agencies, districts and school systems have to comply with the Family Educational Rights and Privacy Act (FERPA).

Under the terms of our contracts with schools, we agree to act as a "School Official" as defined by FERPA, meaning that we:

- Perform an institutional service or function for which the school or district would otherwise use its own employees;

- Have been determined to meet the criteria set forth in the school's or district's annual notification of FERPA rights for being a School Official with a legitimate educational interest in the education records;
- Are under the direct control of the school or district with regard to the use and maintenance of education records; and
- Use education records only for authorized purposes and will not re-disclose Personally-Identifiable Information from education records to other parties (unless we have specific authorization from the school or district to do so and it is otherwise permitted by FERPA).

### **Third Party Web Sites**

EdGems Math includes links to other sites. We do not share student information with third party sites. We are not responsible for the data collection practices on those other sites.

### **How Long We Retain Student Information**

Districts and schools are able to delete information at any time and in real time using the teacher dashboard as mentioned above. Once information is deleted, we do not retain any copies.

We will not retain student personal information for longer than necessary to deliver services or for school purposes.

EdGems Math will delete student, teacher, and/or class data and information upon request from the district, or, if schools or districts no longer use EdGems Math.

Each summer, we delete all accounts, unless a district makes a specific request, in writing, that accounts remain in place.

We may use or share Anonymous Information for educational research purposes, to evaluate the educational benefit of using our services or to improve our services. We will NOT share any information for marketing or advertising purposes.

## Ownership of Student Data

School districts are the exclusive owners of all student data.

## Security Practices

We have put in place physical, electronic, and administrative procedures to safeguard and help prevent unauthorized access to and maintain the security of Personally-Identifiable information collected through EdGems Math. We take reasonable, industry-standard measures to protect the confidentiality, security and integrity of personal information collected on our Site. This includes the use of encryption, firewalls and other security technologies to prevent access to the data from unauthorized parties. All data is encrypted in transit and at rest. All connections between users and our site are secured via SSL/TLS encryption communication technology. All student personal information is encrypted at rest in the database using the AES-256 encryption algorithm. All connections between users and our Site are secured via encryption communication technology (SSL/TLS).

We will only contract with future companies consistent with pledge principals.

While we have taken all steps to protect the personal information we collect, and we work to keep our systems in line with industry standards, no system is 100% fail proof and secure. If we believe that the security of your personal information has been compromised, we will seek to notify you as soon as possible, and you consent to our use of email as a means of such notification.

EdGems Math is a service developed by EdGems Math, LLC.

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