October 21, 2017

Privacy Policy

The privacy of EdGems' 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 comply with the FTC's Children's Online Privacy Protection Act (COPPA), and 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.

Wherever we collect student identifiable information, we do so in support of the educational purposes for which EdGems is designed.

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.

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. When students log into EdGems, they are asked to click a “Sign in with Google” or “Sign in with Microsoft” button. 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’ 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 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.

EdGems' COPPA Compliance

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

A child's participation or access to an activity on EdGems cannot be conditioned on him or her providing more information than is reasonably necessary for that activity. EdGems does not collect personally-identifying 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.

The teachers using EdGems will only be able to access or use the site via a district password provided by EdGems. Students are only able to use EdGems via a Class Code provided by their teachers.

We encourage schools and districts using EdGems 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 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 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) and we support schools in their compliance efforts and facilitate their alignment with 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 includes links to other 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.

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

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.

Security Practices

We strive to maintain security policies and procedures that are designed to protect the personal information of students and teachers. 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. 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 connections between users and our Site are secured via encryption communication technology (SSL/TLS).

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 have 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 is a service developed by ComCore Connect, Inc.

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