

Simplified Privacy Statement

Updated: July 22, 2019

Why read this document?

If you are a teacher or parent, the privacy and security of your children and students is no doubt important and reading long legal statements and privacy policies can be a daunting task.

This document outlines the privacy policies of the Buzzmath application in "plain English" and can be read in about 10 minutes. This document also aims at highlighting how we comply with laws and regulations such as COPPA, FERPA and various Privacy Pledges.

This statement is also a guiding document for our teams as we design and build our services.

What personal data we collect

For the purpose of identifying themselves on the platform, we only collect the following personal information for students and teachers:

- Username, which can be their email or a unique word (used for authentication)
Ex.: john@funschool.com or johndoe
- Full name – For teachers convenience when managing the classroom
- Classroom membership.
Ex.: Peter is part of Miss. Julia's 3rd Grade Math Class

Note that the Buzzmath service will never directly request the personal information of students. The registration process is done through the direct involvement of teachers, school staff and parents.

No other personal information is collected. All the other data we keep about students, such as activities scores and progress tracking (aka Checkmarks and Stars), is created from the students' and teachers' activities when they use the platform.

What we track

We keep track of user activities for the following reasons:

- We keep track of student progress as they complete activities.
- We keep track of web traffic and events to maintain the platform health.
- We log any errors and failures in order to notify our technical and support staff that a user might be having difficulties.
- We report summaries of activation and usage in the dashboard for school officials.

We never track your personal activity inside Buzzmath for marketing, sales or any other needs that are not directly linked to teachers teaching and students learning math. All marketing or sales related endeavours are kept outside of the platform where users are either anonymous or consenting adults.

Who we share this information with

The personal information we collect is always restricted to the parents, teachers and school officials that are directly responsible for the student or that have a mandate to collect the data accorded by the educational establishment.

We do not share personal data with any business partners, firms or government officials or with any organisations that do not have a direct line of responsibility regarding the child.

Finally, in the event that data would be used in a research initiative, we would either request the consent of the relevant school officials or the data shared would be anonymised and/or reduced to aggregate and summary data that cannot be traced back to any student.

For example:

- A District Manager could request data (with proper authority on his part) to identify which students are having difficulties in specific areas. In this scenario, the consent is obtained from the school district.
- Scolab could partner with a university or a researcher to analyse user behavior in order to improve the service or the content we provide. In this scenario, we would only export anonymised data.

Where is all the data collected

All student data is stored at a central provider called *Amazon Web Services* in secured environments in North Virginia. These machines are only accessible by our own technical staff. This also includes any backups. Whenever you use Buzzmath, you are always using a secure connection between your browser and our private environments at *Amazon Web Service*.

For adults such as teachers, parents and various school staff members, we use a more diverse set of tools to maintain the business relationship:

- Customer support and relationship tools
- Newsletter subscriptions
- Business analysis
- Billing and Invoicing

While they are not restricted to a single vendor and geographical location, those tools and suppliers have proper privacy policies and terms of service that we can provide.

What about security concerns

- We always use industry best practices such as strong encryption, up-to-date software and modern infrastructures to ensure that your data is kept secure.
- The list of people that have access to the platform data is short and limited to Scolab's employees working on building the platform. We don't have strangers or partners that have access to personal data. And the list of commercial providers that store your personal data is limited and controlled.
- In the advent of a data breach, we are fully committed to be open and transparent with our customers. If this ever happens, customers and school establishments will be informed about the precise nature and impact of any security incident.
- After 2 years of account inactivity, we will remove your personal information and close the account. Only anonymous usage data and statistics are kept for analysis.

Question and Answers

- **Q: As a teacher I don't believe I have the right to share my students' names or email addresses. What can I do?**
A: Some of our clients use pseudonyms for each student. This is a simple solution that otherwise causes no problems when using the platform.
- **Q: Are you watching us with special tools when we move through the platform ?**
A: Sometimes when testing new versions of the platform, we use special recording tools that follow your cursor as you use it. But this practice is *only limited to specific classrooms for which teachers have signed-up and consented to*. We do this to help improve the product for "real life" situations and to involve teachers more closely with our design process.
- **Q: As a parent or teacher I would like my data or the data of my students permanently deleted.**
A: Simply contact our support team (contact information below) and we will comply with your request.
- **Q: Our establishment has special regulations, laws to follow and forms to fill out. What is the next step ?**
A: We often work with establishments to answer those types of questions. We can provide you with the necessary details to comply with each regional law. Don't hesitate to contact us, we will help you in filling the forms or contracts needed so that you can be sure you are respecting the laws that apply to you.
- **Q: Are you compliant with regulatory frameworks such as COPPA, FERPA, PIPEDA ?**
A: While we have not yet gone through a third party certification program, to the best of our internal assessment, we do comply with both regulations. We can also comply with more specific auditing processes with school establishments when needed.

Contacting Scolab and making requests

If you have additional questions about this privacy policy, or wish to make more specific requests regarding your privacy, please contact us and someone will reply promptly:

By email: privacy@scolab.com

Buzzmath: 1-888-528-8878

If you have specific questions about legal or technical issues, please contact the following people at Scolab:

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