



iKeepSafe Product Profile *HelpKidzLearn Hub*

Introduction

The *iKeepSafe* FERPA, CSPC (California) 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 [HelpKidzLearn Hub](#) complies with FERPA, COPPA and CSPC (California). It indicates that [HelpKidzLearn Hub](#) has been assessed for alignment with the iKeepSafe FERPA, CSPC (California) and COPPA Guidelines.

Product Overview

HelpKidzLearn Hub

<https://hub.helpkidzlearn.com/>

HelpKidzLearn Hub is an online platform offering a collection of accessible software specifically designed for students of all ages with severe, profound, and complex additional needs. A list of the products available in the HelpKidzLearn Hub are listed below:

- Games & Activities
- Chooselt Maker
- Chooselt Readymades
- Inclusive Stories
- Insight

Agreement

A. As related to the Family Educational Rights and Privacy Act (“FERPA”) (20 U.S.C. Section 1232g) and California AB 1584 , HelpKidzLearn Hub agrees:

1. Student records obtained by HelpKidzLearn Hub 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 HelpKidzLearn Hub.
2. HelpKidzLearn Hub users retain possession and control of their own generated content by contacting the educational institution.
3. HelpKidzLearn Hub will not use any information in a student record for any purpose other than those required or specifically permitted by the HelpKidzLearn Terms of Service 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, HelpKidzLearn Hub users may access, correct, update, or delete personal information in their profile by signing into HelpKidzLearn Hub, accessing their HelpKidzLearn Hub account, and making the appropriate changes.
5. HelpKidzLearn Hub 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, HelpKidzLearn will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.

Notification shall identify:

- (i) the date and nature of the unauthorized use or disclosure;
- (ii) the Private Data used or disclosed;
- (iii) general description of what occurred including who made the unauthorized use or received the unauthorized disclosure;
- (iv) what HelpKidzLearn has done or shall do to mitigate any effect of the unauthorized use or disclosure;
- (v) what corrective action HelpKidzLearn has taken or shall take to prevent future similar unauthorized use or disclosure; and
- (vi) who at HelpKidzLearn the User can contact. HelpKidzLearn will keep the User fully informed until the incident is resolved.

7. HelpKidzLearn Hub 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. HelpKidzLearn agrees to work with educational institutions 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. HelpKidzLearn Hub prohibits using personally identifiable information in student records to engage in targeted advertising.
10. HelpKidzLearn Hub will not make material changes to our Terms of Service 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. As related to the Children’s Online Privacy Protection Act (“COPPA”) (15 U.S.C §§ 6501-6506), HelpKidzLearn Hub agrees:

1. HelpKidzLearn Hub 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 not for any other commercial purposes.
2. HelpKidzLearn Hub 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. HelpKidzLearn Hub makes a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. HelpKidzLearn Hub provides the 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. HelpKidzLearn Hub collects limited data from or about children that is reasonably needed to provide users with a feature or activity, or to perform a valid business function that meets the strict definition of support for internal operations.
6. HelpKidzLearn Hub 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. HelpKidzLearn Hub 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. HelpKidzLearn Hub 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. HelpKidzLearn Hub 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 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. HelpKidzLearn Hub 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, separate from any notice in a “click wrap” agreement. It 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.

C. As related to Student Online Personal Information Protection Act (SB1177 -“SOPIPA”), HelpKidzLearn Hub agrees:

Prohibitions:

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

Obligations:

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

Data Access and Review Process

Any party wishing for HelpKidzLearn Hub to provide or correct their personal information can make a request either via their school or directly to HelpKidzLearn and they will provide or correct the information as instructed.

A data access request which asks HelpKidzLearn to provide, correct or delete personal information is lodged via an email to info@helpkidzlearn.com. Depending on the nature of the request they may require the requestor to provide information to verify their identity, nd/or be an authorized agent of their school.

HelpKidzLearn Hub collects data on behalf of schools. Any party wishing for HelpKidzLearn to provide, correct or delete their personal information can make a request via their school, and they will fulfill the data request in a timely manner.

Security Protocols

HelpKidzLearn Hub 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

HelpKidzLearn Hub uses secure socket layer technology (SSL) when a user enters any information anywhere on the Service as a default and this technology enables the encryption of that information during server transmission.

Data at Rest

HelpKidzLearn Hub database is encrypted at rest, where they store a user's personal information, which converts all personal information stored in the database to an unintelligible form.

Data Center Security

HelpKidzLearn Hub uses AWS and Azure Data Centers and these centers conform to the following:

AWS adheres to the following privacy standards:

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 your data.

Please see more information below in the available link:

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

Azure adheres to the following privacy standards:

Azure complies with many external privacy standards, laws, and regulations, including: the GDPR, ISO/IEC 27701, ISO/IEC 27018, EU Standard Contractual Clauses, HIPAA, HITRUST, FERPA, Japan My Number Act, Canada PIPEDA, Spain LOPD, and Argentina PDPA.

<https://azure.microsoft.com/en-gb/explore/trusted-cloud/privacy>

Personnel

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

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

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

Access to Audit

Once per year, HelpKidzLearn Hub will provide schools with:

audit rights to the school's data

access to the results of HelpKidzLearn Hub or its third-party security audit

Data Breach

In the event of an unauthorized disclosure of a student's records, HelpKidzLearn Hub will promptly notify users unless specifically directed not to provide such notification by law enforcement officials. Notification shall identify:

- a. the date and nature of the unauthorized use or disclosure;
- b. the Private Data used or disclosed;
- c. general description of what occurred, including who made the unauthorized use or received the unauthorized disclosure;
- d. what HelpKidzLearn has done or shall do to mitigate any effect of the unauthorized use or disclosure;
- e. advice to the impacted user on how they can best protect themselves;
- f. what corrective action HelpKidzLearn has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at HelpKidzLearn the user can contact. HelpKidzLearn will keep the user fully informed until the incident is resolved.

HelpKidzLearn will notify impacted user (s) within a reasonable period of time following the discovery of a breach of security that results in the unauthorized release, disclosure or acquisition of student information, and any acquisition of computerized data that compromises the security, confidentiality, or integrity of personal information maintained by HelpKidzLearn Hub.

Data Deletion

HelpKidzLearn Hub stores your personal information for as long as it is necessary to provide products and Services to you and others. Personal information associated with the user account will be kept until the account is deleted or until we no longer need the data to provide products and services.

HelpKidzLearn Hub may have to retain some information after your account is closed, to comply with legal obligations, to protect the safety and security of our community or our Service, or to prevent abuse of our Terms. At HelpKidzLearn Hub, a user may delete their account at any time by contacting their school directly or by contacting HelpKidzLearn Hub at info@helpkidzlearn.com

Research

HelpKidzLearn Hub 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 the Services. On certain occasions, HelpKidzLearn Hub may share this data with business partners to improve their services or offerings. If they disclose information to authorized business partners to conduct research on online education or assist in understanding the usage, viewing, and demographic

patterns for certain programs, content, services, promotions, and/or functionality on our Service, such data will be aggregated and, or anonymized to reasonably avoid identification of a specific individual.

Third Parties

HelpKidzLearn Hub 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 data brokers.

HelpKidzLearn Hub 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. HelpKidzLearn Hub has 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 HelpKidzLearn Hub data privacy and security policies and expectations.

HelpKidzLearn Hub utilizes the following third-party vendors:

Technical Service Providers

Name of Service Provider with Link to Privacy Policy or relevant privacy documentation	How HelpKidzLearn uses the Service Provider	What user information is shared or collected by this Service Provider and/or passed back to us from the Service Provider?
AWS	Amazon Web Services (AWS) provides HelpKidzLearn with servers, databases, analytics, network infrastructure, and email services.	All user personal information and uploaded content, device ID, request data, and all logs are stored on AWS. Passwords are stored as one-way hashes. All personal information is encrypted at rest.
Azure	Microsoft Azure provides HelpKidzLearn with servers, databases, analytics, network infrastructure, and email services.	All user personal information and uploaded content, device ID, request data, and all logs are stored on AWS. Passwords are stored as one-way hashes. All personal information is encrypted at rest.
Stripe	Payment transaction processor for HelpKidzLearn subscriptions.	Stripe shares a Transaction ID with HelpKidzLearn to acknowledge an active subscription as well as the date the individual signed up for HelpKidzLearn and the payment status (paid or cancelled). We do not receive any user credit card or other financial information from Stripe.
Cloudflare	For human user validation and protection from bots and harvesters.	Anonymous browser data.

YouTube embedded player	For embedding video content. Videos are not used in student logged in areas (e.g. Hub).	HelpKidzLearn receives video analytics (e.g., number of views and generalised demographic information). If the viewer clicks or taps out of the embedded video, and is redirected to another website or app, that website or app may track the viewer's behaviour as per that websites or app's policies and terms.
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Internal Tools that may have incidental disclosure of personal information

Service Providers used in providing (in connection with) the HelpKidzLearn Website (only).

Name of Service Provider with Link to Privacy Policy or relevant privacy documentation	How HelpKidzLearn uses the Service Provider	What user information is shared or collected by this Service Provider and/or passed back to us from the Service Provider?
Slack	Internal team communication tool.	In the course of investigating and resolving bugs and/or support requests, HelpKidzLearn teammates collaborate via Slack instant messaging and may incidentally share the email address or user IDs of individuals submitting requests and the content of the requests itself (e.g., bug reports, any other help center requests, and data pull requests from teachers and schools).
Microsoft Teams	Internal team communication tool.	In the course of investigating and resolving bugs and/or support requests, HelpKidzLearn teammates collaborate via Teams instant messaging and may incidentally share the email address or user IDs of individuals submitting requests and the content of the requests itself (e.g., bug reports, any other help center requests, and data pull requests from teachers and schools).

Zendesk	Organising and responding to support requests.	In the course of responding to a support request, HelpKidzLearn shares with Zendesk the email address of individuals submitting requests, the content of the requests itself (e.g., bug reports, any other help center requests, and data pull requests from teachers and schools). Users may also provide information directly to Zendesk in the course of responding to a support request and communicating with a HelpKidzLearn Agent.
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Service Providers used in providing (in connection with) the HelpKidzLearn Website (only).

Name of Service Provider with Link to Privacy Policy or relevant privacy documentation	How HelpKidzLearn uses the Service Provider	What user information is shared or collected by this Service Provider and/or passed back to us from the Service Provider?
Facebook Ads (Pixel, Custom Audiences)	Analytics and retargeting for the HelpKidzLearn Website (not in Hub (e.g. logged in areas of the Service) areas) when users come from a Facebook link and when they load the HelpKidzLearn Website page as a logged in HelpKidzLearn parent or teacher user (to be able to omit these users from any Facebook campaigns).	Anonymous site usage data and ad conversion events (excluding any usage data from HelpKidzLearn product (e.g. Service) areas). For Custom Audiences we send hashed emails of parents and teachers.
LinkedIn Ads (Pixel, Customer Audiences)	Analytics and retargeting for the HelpKidzLearn Website (not in Hub (e.g. logged in areas of the Service) areas) when users come from a LinkedIn link and when they load the HelpKidzLearn Website page as a logged in HelpKidzLearn parent or teacher user (to be able to omit these users from any LinkedIn campaigns).	Anonymous site usage data and ad conversion events (excluding any usage data from HelpKidzLearn product (e.g. Service) areas). For Custom Audiences we send hashed emails of parents and teachers.

Product Data List

Data Collection by HelpKidzLearn Hub include the following:

	DATA Collected for Operation	General Purpose of Data Collected
1	PHOTOGRAPH, VIDEO OR AUDIO FILE	Required to support Product Functionality
2	GEOLOCATION DATA	Monitor, secure, and improve the platform
3	BROWSER TYPE	To help investigate and fix reported bugs.
4	ACCESS TIME	To provide and improve the platform for the user (e.g., letting schools know about usage).
5	TIME SPENT ON SITE	To provide and improve the platform for the user (e.g., letting schools know about usage).
6	PAGE VIEWS	To provide and improve the platform for the user.

Accuracy Statement

HelpKidzLearn Hub hereby confirms the accuracy and truthfulness of all information provided to iKeepSafe during the assessment process. HelpKidzLearn Hub hereby confirms the accuracy and truthfulness of all information contained in the HelpKidzLearn Hub profile and has authorized iKeepSafe to make the profile available to any interested schools.

Signed and agreed:



(Signature)

Chris Thornton | Head of Product

Inclusive Technology
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Company Reg: 3525459
Registered in England

06/14/2024

The HelpKidzLearn Hub service has been reviewed and found in alignment with iKeepSafe's FERPA, CSPC and COPPA Privacy Program Guidelines as indicated by this product profile. HelpKidzLearn Hub has been awarded the iKeepSafe FERPA, CSPC and COPPA Certification.

DocuSigned by:



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(Signature)

Amber Lindsay
President & CEO
iKeepSafe

06/14/2024

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