GoGuardian, Pear Deck, and Edulastic COPPA Disclosure & Consent Form Regarding Personal Student Information

Last Updated: October 28th, 2021

Because your School is utilizing GoGuardian Offerings, Pear Deck Offerings, and or Edulastic Offerings, Liminex, Inc. dba GoGuardian and its Affiliates, including Pear Deck and Edulastic are providing you with information about how we collect and use the personally identifiable information of students under thirteen (13) years of age, as set forth in the **Children's Online Privacy Protection Act** ("Disclosure"). We are providing this Disclosure to you as an official authorized to act on behalf of your School.

GoGuardian, Pear Deck, and Edulastic will not knowingly collect, use, or disclose any Personal Student Information without a School's verifiable consent or in accordance with applicable school policy. Our **Product Privacy Policy** ("Product Privacy Policy") provides more details about our data practices. If there is a conflict between the Product Privacy Policy and this Disclosure, the terms of this Disclosure shall take precedence. Capitalized Terms not defined herein shall be ascribed the same meaning as in our Product Privacy Policy or **End User License Agreement / Terms of Service** ("EULA").

Collection of Personal Student Information

GoGuardian, Pear Deck, and/or Edulastic may collect Personal Student Information when a user is logged onto your school-managed accounts and devices provided by your School, a parent/guardian, or a student for your School's educational purposes. More specifically, GoGuardian, Pear Deck, and Edulastic collect the following Personal Student Information:

GoGuardian

- *Student's School-Managed Account Information and Association Information:* GoGuardian's Offerings collect students' Google or Microsoft School-managed account information: student name, email address, Google Profile ID and Google Image URL (for school-managed Google accounts), Microsoft Profile ID (for school- managed Microsoft accounts), and organizational unit as well as device identifiers necessary to associate a student with a certain device and Additionally, GoGuardian Offerings may also need to associate

  a student with a particular teacher's classroom by using a Google classroom identifier or other identifier.

- *Activity Information:* Depending on a School's currently selected GoGuardian Offerings, features, integrations and settings, GoGuardian may collect additional information, from or about online account or any activity when a user is logged on the school-managed accounts and devices,

including chats (within GoGuardian Teacher), video conferencing recordings (including audio and videos of participating Students and chats included in a video conference) (within GoGuardian Teacher), a student's browsing history, IP address, online content, screenshots, and key percentage variance ((but not the actual inputs or sequence of inputs) to identify patterns like gaming) collected when the user is logged on to the school-managed device or account.

- *Grade, Attendance, and Assignment Information:* Depending on a School's currently selected GoGuardian Offerings, features, integrations, and settings, GoGuardian may also receive grade, attendance, and assignment information.

- *Location Information:* Using GoGuardian Admin, a School can collect the geographic location of devices for the purpose of locating and recovering its devices. GoGuardian Offerings can collect IP addresses while GoGuardian Offerings are active, no precise geographic login locations of mobile phones can be accessed or stored by GoGuardian.

- *Integration Information*: If your School chooses to integrate GoGuardian Offerings with other Integration Offerings (e.g., integrate with other School software with GoGuardian Offerings), then we will collect the information necessary to integrate and perform our Offerings, including unique identifiers (e.g., Google classroom identifier to connect a student to his/her classroom if your School integrates Google Classroom with GoGuardian Teacher) and other information (e.g., Parent/Guardian Information if your School integrates GoGuardian Offerings with the Parent/Guardian Information from Classlink or Clever).

- Please note that the information collected may change if your School starts utilizing new features and GoGuardian

Pear Deck

- Student's School-Managed Account Information and Association Information: For students who log into Pear Deck with a School-Managed Account, we collect student name, email address, the school-managed account ID (for example the Google ID or Microsoft ID), as well as identifiers and associated information necessary to associate a student with a certain device, account, presentation, teacher, and/or school. When a student joins a session with a code in Anonymous Mode, we do not collect student name or email address to join such session.
- Activity Information: We collect additional information about the student's activity within a presentation, including engagement with and any student content generated in the session. This may include free text, multiple choice answers, drawings, or URLs.
- Device and Usage Information: We collect general device and usage information such as IP address, device identifier, operating system, browser type, non-precise geographic location (e.g. zip code and city), technical information about your device, system and app software, and peripherals, and date and time stamps associated with login.
- Integration Information: If your School chooses to integrate Pear Deck Offerings with other Integration Offerings (e.g., integrate with other School software with Pear Deck), then we will collect the information necessary to integrate and perform our Offerings, including unique identifiers (e.g., Google classroom identifier to connect a student to his/her classroom if your School integrates Google Classroom with Pear Deck).

Edulastic

- *Student's School-Managed Account Information and Association Information*: The Edulastic Offerings may collect a student's name, email address, student ID, Edulastic user name.

- *Demographic Information*: We may collect student demographic information, including gender, date of birth, English language learner status, individualized education plan status, and free and reduced lunch status).

- *Assessment Information*: We collect student assessment responses, student assessment scores, and teacher

- *Device and Usage Information*: We collect general device and usage information such as IP address, browser type, time on task (the length of time a student spends on a question), browser lock (if students try to leave a browser), and user interaction.

- *Integration Information*: If your School chooses to integrate Edulastic Offerings with other Integration Offerings (e.g., integrate with other School software with Edulastic Offerings), we will collect the information necessary to facilitate such integration, including unique identifiers (e.g., SIS data for enterprise integration).

Use of Personal Student Information

GoGuardian, Pear Deck, and Edulastic may:

- use Personal Student Information to provide and improve our Offerings and for legitimate educational purposes, including, allowing students to access our Offerings, restricting access to certain websites, alerting schools to online content viewed by students, as well as enabling teachers to distribute educational material, view student activity, and exchange messages with their students. GoGuardian may use Personal Student Information such as browsing information, device

identifiers, cookies, or IP addresses to improve and understand usage of GoGuardian Offerings, Pear Deck Offerings, and/or Edulastic Offerings.

- use, transfer, and disclose non-personal information (information that does not, on its own, permit direct association with students' identities) for any lawful purpose. For example, we may aggregate and use information regarding usage of GoGuardian Offerings, Pear Deck Offerings, and/or Edulastic Offerings to help us understand which parts of our Offerings that are of most interest to schools. Aggregated data is considered non-personal information.

GoGuardian, Pear Deck, and Edulastic may *not*:

- sell Personal Student Information
- use Personal Student Information to target advertisements or market to students or anyone else, to amass a profile about a K-12 educational student for a non-educational purpose, or for any purposes prohibited by the Family Educational and Privacy Rights Act (20 U.S.C. § 1232g; 34 CFR Part 99.3) ("FERPA"), applicable state law including California Business & Professions Code section 22584 ("SOPIPA"), and California Education Code section 1.

Lastly, as a company committed to student privacy, GoGuardian, Pear Deck, and Edulastic have all signed the 2020 Student Privacy Pledge.

Disclosure of Personal Student Information to Third Parties

Depending on your School's selection of GoGuardian Offerings, Pear Deck Offerings, and Edulastic Offerings, and selected settings and policies within our Offerings, your School's students may share information with teachers, administrators, and other school personnel. GoGuardian, Pear Deck, and/or Edulastic may provide Personal Student Information to certain service providers that act on our behalf to support our Offerings and customers such as information processing and customer support technologies. We may also disclose Personal Student Information about your students if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users; to comply in good faith with any law enforcement, legal, or regulatory process; or in connection with a health and safety exception; or with your School's consent and/or at your School's direction; or with parent/guardian/eligible student consent and/or at parent/guardian/eligible student's direction. Additionally, in the event of a reorganization, merger, or sale, we may transfer any and all Personal Student Information your School provides to the relevant party subject to the terms of this Disclosure and our Product Privacy Policy.