

# **Privacy Policy**

#### February 14, 2019

The privacy of MZ Development's OSCAR Classroom 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). 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 OSCAR Classroom 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 teacher and optionally for students. We do not collect email passwords, phone numbers, addresses, billing or any other information.

Authentication is done 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 assessments through their personal teacher dashboards. No student data is accessible by other students or other teachers.

MZ Development stores and can access student assessment results if required to do so in a support activity.

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.

#### **Google Permissions**

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

- General Google Authentication Scopes These are needed for basic Google authentication.
  OSCAR Classroom stores your first name, last name, and email.
  - Profile View your basic profile info
  - o Email View your email address
  - Openid Authenticate using OpenID Connect
- Google Drive Scopes These scopes give OSCAR Classroom access to your files in Google Drive.
  We use this access to pull student work from Google Drive and upload it directly into our system for teacher scoring.
  - o drive.readonly View and download your Google Drive files

## **OSCAR Classroom COPPA Compliance**

Parents and legal guardians of children under 13 who's assessment responses that may be scored in OSCAR Classroom have certain rights under the Children's Online Privacy Protection Act (COPPA), and MZ Development 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.

MZ Development 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 OSCAR Classroom will only be able to access or use the site via district account creation or approval of registration by district administration.

We encourage schools and districts using OSCAR Classroom to notify parents that the product is used in their school.

#### **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 schoolor 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**

OSCAR Classroom may include 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.

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

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

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 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 OSCAR Classroom. 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.

OSCAR Classroom is a service developed by MZ Development.

For information, contact: contact@mzdevinc.com