

BLOOMSIGHTS US, LLC PRIVACY POLICY

Effective Date: November, 5th 2019

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BLOOMSIGHTS PRIVACY ETHOS

At Bloomsights US, LLC, we take privacy very seriously. We know that in order for our platform to provide the greatest degree of benefit to students, there must be transparency in how we utilize student data. It is the goal of this Privacy Policy to inform students, parents, guardians, teachers, and administrators of how we collect, store, share, or otherwise handle the sensitive data within the Bloomsights platform. The following contact information is also provided as a point of contact for any additional privacy questions or to report privacy concerns:

Adam Rockenbach, CPO Bloomsights

Email Address: adam@bloomsights.com

Physical Correspondence Address: 7056 Lightning Court Timnath, CO 80547

Telephone Number: 970.568.8981

BLOOMSIGHTS COLLECTS SPECIFIC USER DATA

The Bloomsights platform provides insight by analyzing student responses to carefully crafted prompts as well as educator and parent/guardian input about particular students. Additionally, Bloomsights also creates new data related to the collected data.

All data collected directly from students within the Bloomsights platform is authorized through informed, unambiguous, user consent. Additionally, users (through their parent(s)/guardian(s)) may withdraw consent to collect additional data at any time using the contact information listed above or through an authorized contact at the student's school.

Specifically, Bloomsights collects, analyzes, or creates:

- **Survey Responses** - Bloomsights uses a broad range of key learning and health-related indicators that are used to collect student data on attitudes, behaviors, and experiences related to school and learning. This feedback helps support educators' work to promote well-being, well-functioning social and academic communities, and positive learning environments in schools.
- **Educator and Parent/Guardian Input** - At this time, Bloomsights does not receive input from educators or parents. However, it is anticipated that such functionality may be utilized in the future.
- **Teacher Reports** - Based on received survey responses (and, eventually, on educator and parent/guardian input) Bloomsights utilizes evidence-based social and emotional development research to analyze student responses. Teachers automatically receive notifications with expert recommendations and ideas for activities to promote wellbeing that are tailored to meet the needs of the class. These reports will evolve to include comprehensive and data-driven best practices to inform and guide efforts to identify student needs early, address social and emotional behavior, and monitor progress.
- **Real-time Status Analysis** - Bloomsights provides a calculated real-time status of each student's and each class' well-being based on data within the platform

- **Trend Analysis** - Bloomsights provides a view of student and class well-being over time
- **Conflict Detection Analysis** - Bloomsights provides functionality to aid to quickly and easily detect conflicts and to help with early interventions
- **Positive Social Interaction Analysis**- Bloomsights pinpoints opportunities to improve social interactions

In addition to the types of data indicated above, the Bloomsights platform also collects some additional Personally Identifiable Information (PII) as part of an initial account setup. Specifically, when a class joins Bloomsights, a teacher or school administrator generates individual user accounts for each student that includes:

- First and Last name
- Photo
- Grade level
- Class schedule
- Birthdate
- Gender

Bloomsights does not collect or generate any personal data that is not required to provide the functions and services of the Bloomsights platform.

HOW BLOOMSIGHTS ENSURES DATA SECURITY

Depending on the existing infrastructure capabilities or demands at a particular school, Bloomsights may operate as either a standalone service or in conjunction with an existing Learning Management System (LMS). In either scenario, data needed by the Bloomsights platform to provide services is stored within a Bloomsights specific data repository. In some instances, information needed by the Bloomsights platform may be directly accessed from an existing LMS system.

Regardless of how data enters the Bloomsights platform, all data is encrypted while at rest. Additionally, all data transmissions between any remote Bloomsights data repository and an end user is encrypted during transfer using secured HTTP (HTTPS) through a web-browser or secure application. Bloomsights utilizes standard security measures, such as firewall, limited access, and SSL encryption technology, designed to help protect against misuse and alteration of user information collected by Bloomsights during its transmission.

Bloomsights is committed to reacting quickly on any information or hint regarding unauthorized access to sensitive data and will inform applicable regulatory bodies of any such discovery within 72 hours, and any affected parties of any such discovery without undue delay (in compliance with the EU General Data Protection Regulation EU [GDPR](#).)

BLOOMSIGHTS DOES NOT SHARE DATA FOR PROFIT

Bloomsights is not in the business of selling student data. Rather, student data is used only within the particular educational environment where it is collected from the student. As such, Bloomsights will never sell, trade, or otherwise provide individual student data to any entity outside of the school district where it is collected. Within a particular school, individual student data is provided to authorized teachers, administrators, or other identified individuals that have been trained to utilize the data to leverage the Bloomsights platform.

Some Bloomsights data will be stored by third-party infrastructure providers (such as database hosting by Amazon Web Services or Google) who are contracted to provide services necessary to provide the Bloomsights platform. Such third-parties will not share or otherwise benefit directly from the data. Furthermore, we do not share personal information with any third-parties except in the limited circumstances described in this Privacy Policy and as set forth below:

- **Aggregated Information and Non-Identifying Information:** We may share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other de-identified or non-personally identifiable information (such as statistics about users and usage patterns) to demonstrate the efficacy of Bloomsights, spot industry trends, or to provide marketing materials for Bloomsights. Any aggregated information and non-personalized information shared this way will not contain any personal information.
- **Legal Requirements:** We may disclose information, including personal information, if we have a good faith belief that doing so is necessary to comply with the law, such as complying with a subpoena or other legal process. We may need to disclose personal information where, in good faith, we think it is necessary to protect the rights, property, or safety of Bloomsights, our employees, our community, or others, or to prevent violations of our Terms of Service or other agreements. This includes, without limitation, exchanging information with other companies and organizations for fraud protection or responding to law enforcement and government requests. Where appropriate, we may notify users about the legal requests, unless (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law; (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon Bloomsights, or its users. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

BLOOMSIGHTS DOES NOT OWN YOUR DATA

Bloomsights makes no claim of ownership to any individual collected student data or data generated directly from student data. Bloomsights users can request access to their own data by sending a request to Bloomsights using the contact information included at the beginning of this document. Bloomsights guarantees a response within 60 days from receiving the request.

Users can also request to have their personal data and feedback deleted or anonymized at any time (including from live databases and backups.) Bloomsights guarantees to remove requested data within 60 days from receiving the request. Live data and archived data may be removed at different times based on the age of the data within the archives.

Bloomsights guarantees to completely anonymize student data within 60 days following being notified of the student's exit from the school. This includes a student changing schools or graduating from a school.

Additionally, Bloomsights will store student information and feedback a maximum of 60 days after termination of the school official relationship (e.g., when the contract ends), or when no longer needed for the purpose for which it was disclosed (whichever comes first).

DO NOT TRACK

Some functions within the Bloomsights platform require the use of session identifiers in the form of "cookies" or other browser-based user tracking methods. Because of this, Bloomsights does not currently follow "Do Not Track" flags present in a user's web browser.

Bloomsights is committed to utilizing browser-based user tracking only where necessary in order to directly provide platform services.

GENERAL DATA PROTECTION REGULATION COMPLIANCE

Beginning 25 May 2018, the European Union "General Data Protection Regulation" (GDPR) places limitations and regulations on the collection, processing, and storage of personally identifiable information. It is the intent of Bloomsights and this Privacy Policy to fully comply with all applicable portions of the GDPR including GDPR policies and guidelines for collecting, storing, sharing, or otherwise handling covered data.

As of the effective date of this Privacy Policy, the GDPR generally requires higher standards of data protection and disclosure than similar requirements within the [United States](#).

However, Bloomsights is committed to applying the guidelines of the GDPR within its operations within the United States and other locations not officially covered by the GDPR. If additional local regulations are required that supercede the GDPR, Bloomsights is committed to complying with those additional regulations.

FERPA

Pursuant to the Family Educational Rights and Privacy Act (FERPA), students and other authorized individuals may request access to personal data generated by Bloomsights in accordance with FERPA guidelines. Any such request should be directed to an appropriate individual at the school where the Bloomsights platform is being utilized. Alternatively, users may contact Bloomsights at the contact information listed at the beginning of this Privacy Policy for help in determining how to facilitate such requests.

COPPA

The Children's Online Protection and Privacy Act (COPPA) generally regulates collection of personal data about children under the age of 13. COPPA contains an exemption allowing schools or educational service providers to collect the information in the course of providing educational services.

WAIVER OF CERTAIN LIABILITIES

The goal of Bloomsights is to use data to provide schools with insights about the students who utilize the Bloomsights platform. However, Bloomsights is in no way liable for the manner in which schools or individuals within a school utilize any provided information. For example, the Bloomsights platform should not be utilized on its own to predict student behavior, diagnose social or psychological conditions, perform interventions, or otherwise affect the manner that a school interacts with a student or the way students interact with other students. Rather, the Bloomsights platform should only be utilized to provide insights that may function to inform decisions or other actions by students, teachers, administrators, or other authorized users.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of February 1, 2018. Any changes to this privacy policy will be communicated directly to all users through the communications channel designated for each user as stored within the existing infrastructure within which Bloomsights operates. Additionally, as changes are made to this Privacy Policy, archived links will be included to identify the various versions of the Privacy Policy according to their respective effective dates.