

Frequently Asked Questions

Student Data Privacy & Security FAQ

About this FAQ

This FAQ was produced by West's Education group to help answer questions from educators, families and community stakeholders about the collection, use and safeguarding of student personal information maintained by our SchoolMessenger solutions. This includes the products and services we provide under license or other agreement to our customer educational agencies and institutions ("schools"), and indirectly includes users of those services about whom we maintain personal information on our school customers' behalf. We believe the personal information of our school customers and users is private, treat this information confidentially, and are committed to its security.

In general, for our SchoolMessenger solutions:

- We will not ask for or collect personal information unless necessary to deliver our service or respond to a request;
- We will not use or share personal information with anyone except to deliver our services, comply with the law, protect our rights or the safety of our users, or as otherwise directed by our customers and users;
- We do not sell, trade, lease or loan student personal information to any third party for any reason, including for marketing or advertising; and
- We use industry standard measures to help protect personal information against unauthorized access and use.

Does West's Education group collect personally identifiable information (PII) directly from students through SchoolMessenger solutions?

In general, we do not knowingly collect personal information directly from students. Exceptions are a student username, password and related account login

credential information if necessary when they login to our services. By default, students cannot create an account without the school's consent. When we do collect personal information directly from students, we do so only on behalf of and under the direct control of our school customer, and the school is responsible for obtaining any necessary parental consent.

What student PII is maintained by SchoolMessenger solutions?

We maintain only the student personal information that is necessary to provide the authorized services to and on behalf of our school customer, or as otherwise shared with us by the school or their users. This information likely includes identity data (e.g., student name, unique identifier, email address, and password) as well as their parent/guardian contact information (e.g., phone number and email address). This information may also include other student data as determined by the school, including student attendance data, lunch account status, bus route, class schedule and other information contained in notifications personalized for a specific student. For schools using SecureFile, SafeMail or Presence, this information may also include other personal information contained within files or web pages hosted on our platform or distributed through our services. For schools using SafeMail, this information may include student and school staff emails, as well as other files filtered through our technology.

How does West's Education group use student PII maintained by SchoolMessenger solutions?

We use student personal information only as necessary to deliver the authorized services to and on behalf of our customer agency/institution. We do not use or share student personal information to target advertising to students or other users. We use this personal information to verify and provide account access, to

deliver our products and services, to resolve problems in service delivery, and as otherwise requested or directed by the agency/institution. We may as necessary also use this personal information to ensure legal or regulatory compliance, to protect the safety of individuals or the security of the service, to take precautions against liability, and as otherwise required or permitted by law.

Does SchoolMessenger share, disclose or otherwise provide third parties with access to student PII?

We do not sell, trade, lease or loan the personal information we collect or maintain to any third party for any reason. We do not knowingly share or disclose student personal information with any third parties other as necessary to deliver and improve the service, protect the rights or safety of individuals or the service, ensure legal or regulatory compliance, or as otherwise expressly directed by our school customers. We have agreements in place with our third party service providers to ensure they only use personal information to deliver the authorized service to us and they maintain the confidentiality and security of the information.

Are there other ways student PII may be used, shared or disclosed?

We do not use, share or disclose student personal information in ways other than that described above. However, schools may choose to other ways with or via our products. For example, schools may share such information with third parties through our services including for advertising-related purposes. In such cases, that information sharing is determined by and controlled by our school customer and not by us. In addition, we do not determine what, if any, personal information that our school customers choose to make publicly available, such as on their school websites or apps hosted on our platform.

Do parents/guardians have access to student PII maintained by West's Education group and its SchoolMessenger solutions?

Yes, we will support family access to their student's personal information as authorized and facilitated by our school customer. We will assist our customer agency/institution in its response to requests from parents/guardians/students to review and/or correct a student's personally identifiable information. If we receive such requests directly from parents/guardians/students, we will refer those requests to our customer agency/institution and will not otherwise directly respond to those requests.

What security measures are taken by West's Education group to safeguard student PII maintained by SchoolMessenger solutions?

We maintain a comprehensive set of security practices that are reasonably designed in accordance with commercial best practices to protect the security, privacy, confidentiality, and integrity of student personal information against risks – such as unauthorized access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information. If we know of a systems security breach or other unauthorized use of personal information, we will comply with relevant laws and notify our customer agency/institution in the most expedient way possible.

What is the data retention and deletion practice followed by West's Education group for student PII maintained by SchoolMessenger solutions? Is data destroyed or returned when no longer needed?

In general, we will retain personal information only as necessary to support the authorized purpose, comply with our legal obligations, resolve disputes, or as otherwise directed by our school customers. We will permanently delete student personally identifiable information within fourteen (14) business days of a request from the customer agency/institution and within 24 months after the agency/institution account is expired, terminated or otherwise inactive, unless otherwise requested. To support our school customers in their compliance with certain federal requirements, we may archive and retain certain personal information for a more extended period of time with school authorization.

What other resources are available to explain or certify the West's Education group policies and practices for student PII?

SchoolMessenger Communicate has been awarded the iKeepSafe Privacy FERPA Badge, providing schools with an independent, trusted review of alignment with iKeepSafe's FERPA evaluation program guidelines (<http://ikeepSAFE.org/participating-companies/>). In addition, West's SchoolMessenger solutions are a signatory to the Student Privacy Pledge (www.studentprivacypledge.org), which legally binds us to a dozen commitments regarding the collection, maintenance, and use of student personal information. Additional detail regarding our use of student personal information and other user information is described in our Privacy Statement (<http://www.schoolmessenger.com/privacy-statement>).