School District Data Protection And Transparency
SB15-173

Voluntary Industry Student Privacy Pledge

We Commit To:

✗   Not collect. maintain. use or share student personal information beyond that needed for authorized educational/school purposes. or as authorized by the parent/student.

✗   Not sell student personal information.

✗   Not use or disclose student information collected through an educational/school service (whether personal information or otherwise) for behavioral targeting of advertisements to students.

✗   Not build a personal profile of a student other than for supporting authorized educational/school purposes or as authorized by the parent/student.

✗   Not make material changes to school service provider consumer privacy policies without first providing prominent notice to the account holder(s) (i.e.. the educational institution/agency, or the parent/student when the information is collected directly from the student with student/parent consent) and allowing them choices before data is used in any manner inconsistent with terms they were initially provided; and not make material changes to other policies or practices governing the use of student personal information that are inconsistent with contractual requirements.

✗   Not knowingly retain student personal information beyond the time period required to support the authorized educational/school purposes. or as authorized by the parent/student.

✔   Collect. use. share. and retain student personal information only for purposes for which we were authorized by the educational institution/agency. teacher or the parent/student.

✔   Disclose clearly in contracts or privacy policies. including in a manner easy for parents to understand. what types of student personal information we collect. if any. and the purposes for which the information we maintain is used or shared with third parties.

✔   Support access to and correction of student personally identifiable information by the student or their authorized parent. either by assisting the educational institution in meeting its requirements or directly when the information is collected directly from the student with student/parent consent.

✔   Maintain a comprehensive security program that is reasonably designed 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.

✔   Require that our vendors with whom student personal information is shared in order to deliver the educational service. if any. are obligated to implement these same commitments for the given student personal information.

✔   Allow a successor entity to maintain the student personal information. in the case of our merger or acquisition by another entity. provided the successor entity is subject to these same commitments for the previously collected student personal information.

Attachment E

School District Data Protection And Transparency
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Voluntary Industry Student Privacy Pledge
132 Signatories as of 4.16.15

STUDENT PRIVACY PLEDGE

Including:

Microsoft

KHAN ACADEMY

Cambium LEARNING' Group

Google

KNEWTON
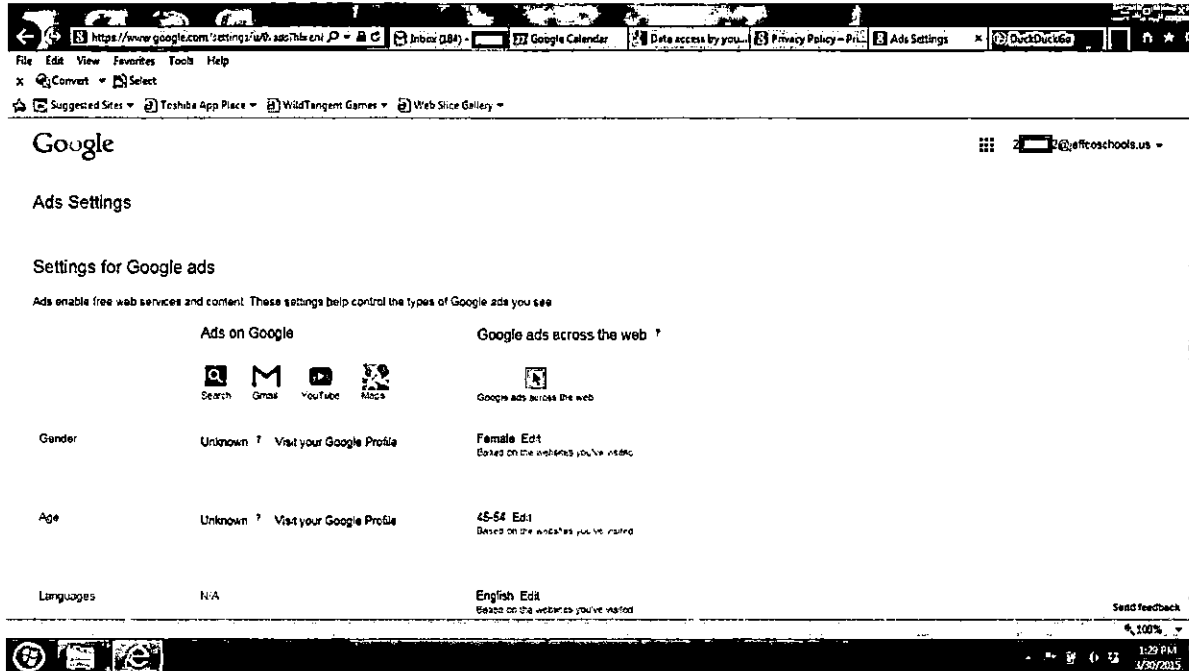
CODE

Excluding:

K12™

YAHOO!

PEARSON Education

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Google Apps for Education

In an emailed statement provided to *Education Week*, Bram Bout, the director of Google Apps for Education, said that "ads in Gmail are turned off by default for Google Apps for Education and we have no plans to change that in the future."

Google Under Fire for Data-Mining Student Email Messages

By Benjamin Herold
Published Online: March 13, 2014

A Google spokeswoman confirmed to *Education Week* that the company "scans and indexes" the emails of all Apps for Education users for a variety of purposes, including potential advertising, via automated processes that cannot be turned off—even for Apps for Education customers who elect not to receive ads. The company would not say whether those email scans are used to help build profiles of students or other Apps for Education users, but said the results of its data mining are not used to actually target ads to Apps for Education users unless they choose to receive them.

In November, Kyle C. Wong, a lawyer representing Google, also argued in a formal declaration submitted to the court...

"They [Google] do not 'read' your email per se. For use in targeted advertising on their other sites, if your email is not encrypted, software (not a person) does scan your email and compile keywords for advertising. For example, if the software looks at 100 emails and identifies the word 'Doritos' or 'camping' 50 times, they will use that data for advertising on their other sites."

Raz-Kids.com

The New York Times

Digital Learning Companies Falling Short of Student Privacy Pledge

By Natasha Singer
March 5, 2015 11:54 am

Cambium Learning Group, the parent company of Raz-Kids, recently signed on to a **nationwide student privacy pledge** in which signatory companies promise to protect students' personal information.

Digital learning products can collect and analyze a wealth of detail about student use of apps and online services. The pledge was intended to reassure parents and teachers that the education technology industry was committed to safeguarding the student information it collected and to using it responsibly.

Among other things, the pledge requires signatory companies to "maintain a comprehensive security program that is reasonably designed to protect the security, privacy, confidentiality, and integrity of student personal information against risks — such as unauthorized access or use."

Yet, Cambium Learning Group and several other digital learning companies **signed the pledge even though**, at the time they joined, they had not begun full encryption, an elementary security measure.

POLITICO

Data mining your children

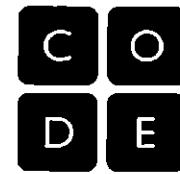By: Stephanie Simon
May 15, 2014 05:05 AM EDT

Consider the popular nonprofit tutorial service **Khan Academy**. It's free. But users do pay a price: In effect, they trade their data for the tutoring.

"Data is the real asset," founder Sal Khan told an academic conference last fall.

The site tracks the academic progress of students 13 and older as they work through online lessons in math, science and other subjects. It also logs their location when they sign in and monitors their Web browsing habits. And it reserves the right to seek out personal details about users from other sources, as well, potentially building rich profiles of their interests and connections.

After POLITICO inquired about Khan Academy's privacy policy, which gave it the right to draw on students' personal information to send them customized advertising, the policy was completely rewritten. The new text, **posted online** late last week, emphasizes Khan Academy's commitment to protecting privacy and deletes the line about targeted advertising.

But the revised policy makes clear that Khan Academy still allows third parties, such as YouTube and Google, to place the tiny text files known as "cookies" on students' computers to collect and store information about their Web usage. Khan Academy also states that it may share personal information with app developers and other external partners, with students' consent.

C O D E

Code.org - encourages people - especially students - to learn computer science

POLITICO

Data mining your children

By: Stephanie Simon
May 15, 2014 05:05 AM EDT

The organization gives schools free curricular materials and teacher training to set up computer science classes.

All it asks for in exchange: Data. Lots and lots of data.

Code.org requires that its partner schools turn over up to a dozen years of academic records, including test scores, on every participating student, according to a **model contract** reviewed by POLITICO.
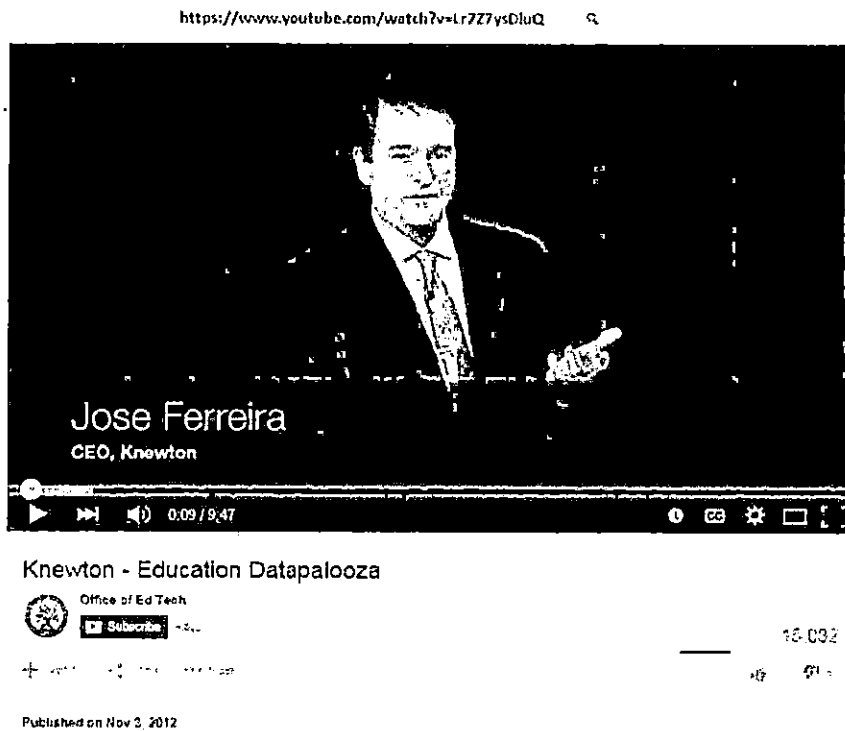
In addition to their official academic records, Code.org collects huge amounts of new information on participating students as they watch the tutorials and do the activities on its website. It collects their computer login, email address and password and captures their interaction with the website, including searches conducted on the site.

Officials in some districts that have signed up with Code.org said they were comfortable with handing over the data because they assumed it would be aggregated and anonymized — though the contract makes no mention of that — and used to gauge the effectiveness of the program. "That kind of analysis and research goes on all the time," said Robert Runcie, superintendent in Broward County. "It's not a problem."

Others said they didn't realize when they signed the contract how much data would be turned over.

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Knewton - an adaptive learning program with a platform to personalize content

Jose Ferreira
CEO, Knewton

0:09 / 9:47

Knewton - Education Datapalooza

Office of Ed Tech

Published on Nov 3, 2012

White House Education Datapalooza 2012

" Well education happens to be today the world's most data minable industry by far and it's not even close."

"So Newton today gets five to ten million actionable data per student per day."

"We literally know everything about what you know and how you learn best, everything because we have five orders of magnitude and more data about you than Google has."

"We literally have more data about our students than any company has about anybody else about anything, and it's not even close."

What if your math syllabus could tell you what to eat for breakfast to score higher on your quiz tomorrow? Jose Ferreira, CEO of Knewton, shares his vision for a future where every student receives a truly personalized curriculum best suited to his or her needs. Knewton collects millions of data points about student users in order to provide them with more effective timing and content to enhance learning.

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What an IP Address Can Reveal About You

A report prepared by the Technology Analysis Branch of the
Office of Privacy Commissioner of Canada
https://www.priv.gc.ca/information/research-recherche/2013/ip_201305_e.asp

Knowledge of an IP address allows a searcher to obtain other information about a network, device or service. Specifically, one can:

- determine who owns and operates the network. Searching the WHOIS database using an IP address can provide a range of information about the individual[4] (which could, in turn, reveal organizational affiliations) or organization to which the address is assigned, including a name, phone number, and civic address[5];

- perform a reverse lookup (the resolution of an IP address to its associated domain name) to obtain a computer name[6], which often contains clues to logical and physical location;

- conduct a traceroute (a computer diagnostic tool for displaying the route (path) of packets across an IP network) to find the logical path to the computer, which often contains clues to logical and physical location;

- determine the geolocation of the computer, with varying degrees of accuracy. Depending on the lookup tool used[7], this could include country, region/state, city, latitude/longitude, telephone area code and a location-specific map;

- search the Internet using the IP address or computer names. The results of these searches might reveal peer-to-peer (P2P) activities (e.g., file sharing), records in web server log files, or glimpses of the individual's web activities (e.g., Wikipedia edits). These bits of individuals' online history may reveal their political inclinations, state of health, sexuality, religious sentiments and a range of other personal characteristics, preoccupations and individual interests; and/or

- seek information on any e-mail addresses used from a particular IP address which, in turn, could be the subject of further requests for subscriber information.

According to Electronic Frontier Canada[8], even non-commercial Internet activity, such as reading documents on web pages, invariably requires the transmission of IP address information that can identify what one reads online.