Socionomy.net Student Privacy Policy

1. Overview

Socionomy.net is dedicated to making social relationships and friendships flourish and we take the privacy of our users seriously. Keeping students' personal information safe is a priority for us. This Student Privacy Policy explains how we use the personal information we collect from and about students when they engage with socionomy.net in the classroom. As described below, we use such personal information solely as a service provider or "data processor" to our school and school district collaborators/partners.

2. Our handling of student information

As a trusted provider of tools that help teachers and schools understand the friendship and relational networks of their students, socionomy.net is particularly concerned about the use of students' personal information. We only request the personal information of students that we need to provide the School Services, and we comply with privacy laws, such as the Family Educational Rights and Privacy Act ("FERPA"), the Children's Online Privacy Protection Act ("COPPA"), and the California Student Online Personal Information Protection Act ("SOPIPA"), as applicable.

Socionomy.net does not collect, retain, use or share students' personal information, except as necessary for authorized school purposes, at the direction of our school and school district users/partners. Without limitation, this means that:

- We do not sell students' personal information.
- We do not serve targeted ads on our platforms and do not use information we collect to serve targeted ads on other services. Socionomy.net does not use or disclose information collected through our services for any targeted advertising purposes.
- We do not build a profile of a student other than in support of authorized school purposes.
- We do not retain students' personal information beyond the time period a teacher or a principal has deactivated their account with us.

We support our school partners in providing parents and eligible students with access to their personal information and in fulfilling other requests that parents and eligible students may make, such as to request deletion of students' personal information or to refuse its further collection or use. Socionomy.com maintains a comprehensive program designed to protect the security, privacy, confidentiality and integrity of students' personal information.

3. Students' Personal information

3.1 Personal information we collect from students

Student participating in classroom surveys: Students are not required to provide any personal information when participating in classroom surveys, other than selecting their name from a dropdown list. This is necessary so that they can complete the survey by selecting their friends in the classroom, or who they play with during recess, or any other relational question a teacher may ask. Upon data collection, students' names are replaced with numbers and only the classroom teacher and the super admin can match the names with the numbers.

Personal information collected at a teacher's direction: Certain features of the School Services permit a teacher to include information about the class, as well as about individual students, such as gender, race and ethnicity, English language proficiency, disability status, and other demographic information. We use such information only to provide the services to the teacher, such as to permit the teacher to understand the social interactions within their classroom and see whether students' demographics play a role in the social acceptance of a student. This information is never shared with the students. The teacher, at their discretion, may share some of the findings about a particular student with the student's parents, school principal, school admin staff, as they deem necessary to help the student.

3.2 Information collected automatically

No personal information is collected automatically from students who engage with socionomy.net through the School Services. Product usage data that is collected by socionomy.net from the School Services is always anonymized or aggregated and cannot be linked to individual students.

3.3 Anonymized information

We may anonymize and/or aggregate personal information so that it no longer identifies any student. We may use and disclose such anonymized and/or aggregated information for any purpose, including for analytics purposes, to help us understand how our products are used and improve upon them.

4. Security

Socionomy.net maintains a comprehensive security program designed to protect the security, privacy, confidentiality and integrity of Personal Information within our website. We have in place appropriate and reasonable technical and organizational measures designed to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. Our security measures include data encryption, firewalls, data use, and access limitations for our personnel, and physical access controls to our facilities.

If you have any questions about the security of your Personal Information, you may contact our dedicated Data Protection Officer (DPO) at <u>georgemlar@gmail.com</u>.

5. Compliance with FERPA and COPPA

We comply with FERPA and COPPA when applicable to us. When FERPA applies, we act as a "school official" to our school or school district partner, which means that we are under the direct control of the school or district and use students' personal information only to provide our services to the school or district and not for our own purposes. To the extent COPPA applies, the school or district provides us with any necessary consent on behalf of students' parents or guardians to permit use of socionomy.net in the classroom.

6. Changes to this Policy

We may change this Student Privacy Policy at any time and from time to time. This is the most recent version of the Privacy Policy. We encourage you to review this Student Privacy Policy often to stay informed of changes that may affect you.

If we make material changes in the Privacy Policy, for example if we seek to use personal information in a materially different way than we had previously, we will provide prior notice by, for example, email or a pop-up so that you have sufficient time to evaluate the change in practice. Of course, you can always opt-out by deleting your account if you do not accept the change.

7. About Socionomy.net

Our mailing address: 8542 Macawa Ave San Diego, CA 92123 USA