

Genesis Educational Services

Privacy Policy

Your privacy is very important to us. Accordingly, we have developed this Policy in order for you to understand how we collect, use, communicate, protect and make use of personal information. The following outlines our policy.

Genesis Educational Services does not own any of the student data or district-created data within its products. This data within the product are property of, and under the control of the local educational agency. The collection, input, use, retention, disposal, and disclosure of any information in our software applications are controlled solely by the LEAs which license our products.

Genesis will not collect, maintain, use or share student personal information beyond that needed for the LEAs purposes. We will collect and use of personal information solely with the objective of fulfilling those purposes.

In addition:

- Genesis will not sell student personal information.
- We will not use or disclose student information collected through an educational/school service (whether personal information or otherwise) for behavioral targeting of advertisements to students.
- We will not build a personal profile of a student other than for supporting authorized educational/school purposes or as authorized by the parent/student.
- We will only retain personal information as long as necessary for the fulfillment of those purposes.
- We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

Our Services comply with all applicable provisions of the Children’s Online Privacy Protection Act (COPPA) (15 USC 6501 et seq.) To the extent COPPA applies to information we collect, we process such information for educational purposes only, at the direction of the partnering LEA and on the basis of educational institution consent. For additional information on COPPA and educational institution consent, please refer to the Federal Trade Commission’s Complying with COPPA: Frequently Asked Questions.

Our Services comply with all applicable provisions of the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) as well as N.J.A.C. 6A:32-7.5. We receive Student Data from School Customers as a “school official” under FERPA and only process Student Data for educational purposes. Only those Genesis employees who need it to perform their job responsibilities are authorized to have access to it. In the event we receive a subpoena or judicial order for the disclosure of education records, we will notify the associated

School Customer(s) prior to fulfilling the request in accordance with §99.31(a)(9). For additional information on FERPA, please visit the U.S. Department of Education's Privacy Technical Assistance Center.

Customer data hosted by Genesis is stored on our servers in the Cologix Data Center in Parsippany NJ and AWS S3 (US-EAST) which meets SOC 1 (SSAE18/ISA3402), SOC2/3, HIP AA, FedRAMP, CIS, NIST and PCI DSS compliance. More information on our Data Centers can be found here.

<http://www.genesisedu.com/images/uploads/NNJ2DataCenter.pdf>

and

<http://www.genesisedu.com/images/uploads/NNJ3DataCenter.pdf>

We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.