

ADI Online is Powered by EduFlow. EduFlow's Security and Privacy information is outlined below. For the most up to date policies, please visit: <https://www.eduflow.com/security> and <https://www.eduflow.com/privacy-policy>



## SECURITY

Customer trust and data security are critical to everything we do.

### COMPLIANCE

We're compliant with GDPR, Privacy Shield, SOC2 and Cloud Security Alliance

General Data Protection Regulation



### PRODUCT SECURITY

#### Permissions

Eduflow operates with different levels of permissions inside the app. Institutions have owners with access to billing and high level settings. Additionally institutions have admins that can do most of the things that owners can do. Most users will be added either as instructors with limited access to data and settings or students with access limited to just their own work and courses.

#### Password and Credential Storage

Eduflow enforces a password complexity standard and credentials are stored using Argon2.

#### Uptime

We have uptime of 99.9% or higher for both our website and our app. This is monitored using Uptime Robot.



## NETWORK & APPLICATION SECURITY

### Data Hosting and Storage

The Eduflow service is hosted on Heroku ([www.heroku.com](http://www.heroku.com)) which is owned and run by Salesforce ([www.salesforce.com](http://www.salesforce.com)). Their security documents are here: [www.trust.salesforce.com/en/](http://www.trust.salesforce.com/en/).

Our application and application database is located in Ireland, inside the EU to comply with GDPR. Additionally parts of our data (for example backups and submission files) are stored on Amazon S3 ([www.aws.amazon.com/s3/](http://www.aws.amazon.com/s3/)) in Ireland.

### Encryption

All data sent to or from Eduflow is encrypted in transit using 256 bit encryption. Our API and application endpoints are TLS/SSL only and score an "A+" rating on Qualys SSL Labs' tests. This means we only use strong cipher suites and have features such as HSTS and Perfect Forward Secrecy fully enabled. We also encrypt data at rest using an industry-standard AES-256 encryption algorithm.

### Incident Response

Eduflow implements a protocol for handling security events which includes escalation procedures, rapid mitigation and post mortem.

### Back Ups and Monitoring

We use Logentries, Sentry and our own internal logging system to log every interaction between users and our application.

### Permissions and Authentication

Access to customer data is limited to authorized employees who require it for their job. Eduflow is served 100% over https. There are no corporate resources or additional privileges from being on Eduflow's network. We have Single Sign-on (SSO), 2-factor authentication (2FA) and strong password policies on GitHub, Google, AWS and Intercom to ensure access to cloud services are protected.

### Pentests, Vulnerability Scanning and Bug Bounty Program

Eduflow uses third party security tools to continuously scan for vulnerabilities. Our security team responds to issues raised. Yearly we engage third-party security experts to perform detailed penetration tests on the Eduflow application and infrastructure.



## ADDITIONAL SECURITY FEATURES

### Policies

Eduflow has a data security policy covering a range of topics. This policy is updated frequently and signed by all employees on their first day.

### Confidentiality

All employee contracts include a confidentiality agreement.



# PRIVACY POLICY

## **What is Eduflow?**

Eduflow is a platform that facilitates online courses including content and feedback for students. Educators use Eduflow to allow students to see content, submit work (“submissions”) and give feedback to each other (“reviews”) and in doing so highlighting strengths and weaknesses in their work – ones like persistence, critical thinking, teamwork, and leadership. This is done through the Eduflow Website.

Students can have their own account. In order to have a student account created, students will need to either (1) have the student account created at school by their teacher; (2) receive a unique code from their teacher to create their own account with a password and an email address; or (3) log in via a Single-Sign On integration between the Educational Institution and Eduflow, for example LTI or WAYF. For cases (1) and (2) we require that the teacher represents to Eduflow that they have obtained any necessary parental consent. For (3), a Single Sign-On integration will only be provided if the Education Institution represents to Eduflow that they have obtained any necessary parental consent.

Educational Institution Staff (“Institutional Admins”) also play a meaningful role on Eduflow. They can get an overview of classes, students, and teachers connected to their institution. Educational Institution Staff have access to all classes connected to the institution, and can also create classes, add or remove teachers from an institution, and view submissions and reviews in classes connected to the institution.

More information on how the Service operates is located here and your participation and use of the Service is governed by our Terms of Service (“Terms”).

## **How does Eduflow protect children’s personal information?**

Protecting children’s privacy is especially important to us – we’re educators and parents ourselves, after all. COPPA protects the online privacy of children under the age of 13 (“child” or “children”); for more information about COPPA and generally protecting children’s online privacy, please visit OnGuard Online.

## **What information does Eduflow collect from children, and how is it used?**

Eduflow collects the minimal amount of information from students necessary to use our Service. Currently student accounts are created in the following ways: (1) by the student’s teacher; or (2) by the student if the teacher elects to provide the student with a Class Code; or (3) by the Educational Institution when logging in via a Single Sign-On integration. When logging into a student account created by a teacher or using Single Sign-On, students do not need to provide any information other than choosing a password. If a student has created their own account, they will use the email and password they created.

If a student’s Educational Institution or teacher elects to utilize student accounts on a shared device (or any other devices) in the Educational Institution (e.g. a school), the Educational Institution will be responsible for obtaining any necessary parental consent under COPPA to create the student account on behalf of the student and let students access their accounts.

Alternatively, a teacher may choose to allow students to set up their own account using the unique code provided by the teacher. When students set up their own Eduflow account, we ask students to provide their name, an email address, a password and the unique code they have been given by their teacher to connect with the class. They will use the email address and password to access their account instead of the Class Code. Consistent with the requirements of COPPA, before inviting the students via the Class Code the teacher has represented to Eduflow that they have obtained any necessary parental consent.

## **Submissions, Reviews, Reflections, and Conversations**

Once a student account is created (whether created by the student's teacher or Educational Institutional or the student themselves), students will be upload or write submissions, write reviews and reactions, and participate in conversations with student's in their class, all of which may be collected by Eduflow. A student account can only be created after the teacher has represented to Eduflow that they have obtained any necessary parental consent.

An uploaded submission can be photo or video or any other type of file, depending on the settings of Assignment to which the submission is uploaded. The User Submission can be viewed by the student themselves, other students in the class, the student's teachers and Educational Institution Staff. If the Educational Institution or teacher elects to utilize student accounts in the classroom, the Educational Institution will be responsible for obtaining any necessary parental consent under COPPA.

## **Further information and content**

In addition to the information listed above, we automatically collect some information from any use of our Service as set forth in the "Information collected automatically" section.

We use this information to provide the Service to the child, for security and safety purposes, as required by law, or to enforce our Terms. We will not require children to provide more personal information than is reasonably necessary in order to participate in the Service. If we discover that we have collected information from a child in a manner inconsistent with COPPA, we will take appropriate steps to either delete the information, or immediately seek the parent's consent for that collection. We do not disclose any personal information about children to third-parties, except to service providers necessary to provide the Service, as required by law, or to protect the security of the Service or other users. Additionally, personal information collected from students is never used for behaviorally-targeted advertising to students by us or any third-party, and children's personal information is never sold or rented to anyone, including marketers and advertisers.

We also receive from the child or the child's teacher whatever name he or she has provided.

## **Email notifications**

Eduflow may send email notifications to students, if they, their teacher, or educational institution provided the email address of the student - for example, letting them know that a submission deadline is coming up, or telling them that a fellow group member submitted their work. The student can disable further email notifications via their account settings. If you are a student or educator and no longer want these communications to be sent, please either turn off the email notifications in your account settings, or contact us on [privacy@eduflow.com](mailto:privacy@eduflow.com).

## **What Children's Information is Visible to Others?**

No student's account, or User Submission is made available or visible to the public through Eduflow. Only the student, the student's teachers or Educational Institution Staff at the student's institution can see the student's account and User Submissions. No child can upload content (such as a photo or video) to the Service except through their student account. A student account cannot be created for children without the child's teacher or Educational Institution representing to Eduflow that they have obtained any necessary parental consent. No photos or videos added by a child to their student account is viewable by the general public. A student's account info (name, email, and username) and Content added by a student in a class, will be viewable by other students in the class under various conditions. For example, if the teacher has allowed group submissions students will be able see each other's name, email address, and username. Furthermore during the process of a normal Assignment in Eduflow students will have access to the submissions of other students in the class they have to review, and they will have access to reviews from other students in the class that were given to their submission.

Teachers may share their classes, including User Submissions in those, with other teachers. If the teacher is part of an Educational Institution, the Educational Institution Staff will also have access to the teacher's classes and User Submissions in those classes.

### **What Children's Information is Visible to Others? (Continued)**

Classes and User Submissions are not visible to the general public. Please note that if the teacher chooses to display Eduflow in their classroom, students physically present in that classroom may see other students' names, assignment progress, and scores – this is similar to how paper-based sticker charts displayed in a classroom might work. If some of this information should be private, teachers can choose not to display Eduflow this way, for example by not presenting Eduflow on a screen in the class.

### **How Long Does Eduflow Keep Children's Information?**

We keep a child's personal information until his or her student account is deleted, except if we are required by law to retain it, need it to ensure the security of our community or our Service, or to enforce our Terms. After 2 years we will de-identify data by users that have not been active in the last 6 months.

### **Parental Choices**

If you are the parent or legal guardian of a child who has created a Eduflow account and you have not received notice or been asked for consent by the child's school (as per COPPA), you should contact the teacher and school that set up the account for your child.

At any time, parents can refuse to permit us to collect further personal information from their children, and can request that we delete the personal information we have collected from their child by contacting the teacher that created the account for the child. Please keep in mind that deleting records may require us to terminate the account in question.

### **What information does Eduflow collect?**

We collect two types of information about you: (1) information that you voluntarily provide us by using the Eduflow Service (described below under "Information you provide to us") and (2) information collected automatically as result of your use of the Service (described below under "Information collected automatically"). The types and amounts of information collected will vary depending on whether the user is a student, teacher, or Educational Institution Staff (e.g. we collect less information from students) and how they use Eduflow (e.g. if teachers join their Educational Institution on Eduflow, we may need to collect school address information).

### **Information you provide to us**

There are currently three categories of users on our Service: students, teachers, and Educational Institution Staff. We describe the information collected from students under 13 in the section above; for other users, we collect and store the following types of information from each type of user:

#### **Account information**

To create an Eduflow account as a teacher or Educational Institution Staff, you may be asked to provide some basic information such as your first and last name, the name of your Education Institution, email address, and password. Student accounts are created in the following ways: (1) by the student's teacher; or (2) by the student if the teacher elects to provide the student with a Class Code; or (3) by the Educational Institution when logging in via a Single Sign-On integration. Before the student account is created the student's teacher or Educational Institution will have represented to Eduflow that they have obtained any necessary parental consent. If the student's teacher is creating the student account, they will have provided certain information, like the student's name, about the student to Eduflow when setting up their class that is then used to create the student account. If a student sets up the account, they will be asked to enter the unique code they have been given by their teacher (students are unable to sign up for the Service without this), their name, a unique username or email address and password. In this case the student's teacher or Educational Institution will have represented to Eduflow that they have obtained any necessary parental consent, as per COPPA. Student profiles are not made available or visible to the general public through the functionality of our Service. Teacher profiles may be made available to the public if the teacher has given their consent.

## **School Information, Collaboration Features and Content**

If you are a teacher or Educational Institution Staff, as part of the account information you provide, you may choose to associate your account with an existing school or may enter a new school name and possibly your school's address if we do not have it already. By connecting you with your Educational Institution, the Service may enable and provide additional collaboration features for teachers and Educational Institution Staff within the same Educational Institution such sharing rubrics or classes.

## **Class Information**

As a teacher you'll need to enter the class name and possibly the names of the students in your class. It is the teacher's choice what they enter here: for example, teachers could enter John S or John Smith. Alternatively, teachers can also upload a spreadsheet to the Service with the student's first and last names. If a teacher is part of an Educational Institution, the classes they set up in Eduflow will be shared with teachers and Educational Institution Staff at the Educational Institution.

## **Inviting Others**

As a teacher or Educational Institution Staff, you can invite other teachers (such as colleagues) to join the Service, for example by providing their email address within Eduflow. We will collect and store the emails you provide with these requests, and will also treat this as personal information in accordance with this Privacy Policy. We may also ask you for access to contacts stored in your Google account to prevent you having to enter the contact information for those invitations you send through our application and may store these contacts. If these individuals would like to request deletion of their information, they may contact us directly on [privacy@eduflow.com](mailto:privacy@eduflow.com).

## **Reviews and reactions**

As a teacher you can review student submissions and leave reactions to student reviews. These reviews and reaction cannot be viewed by the general public through our Service. A teacher's reviews and reactions can only be viewed in Eduflow by the receiving student or students (in case of a group submission), teachers in the class, Educational Institution Staff at the teacher's institution.

## **Contact Information**

When you choose to provide us with your personal information through the Service in some other manner (e.g., when you send us an email asking a question, submit a support request, participate in a video testimonial about our Service, or choose to participate in any research efforts with Eduflow to improve the Service).

Our use of the information above is described below in the "How Does Eduflow Use the Information it Collects" section.

## **Information collected automatically**

Like most web-based services, we (or our service providers) may automatically receive and log information on our server logs from your browser or your device when you use the Service. For example, this could include the frequency and duration of your visits to Eduflow (similar to TV ratings that indicate how many people watched a particular show). If you use Eduflow on different devices, we may link the information we collect from those different devices to help us provide a consistent Service across your different devices. If we do combine any automatically-collected information with personal information, we will treat the combined information as personal information, and it will be protected as per this Privacy Policy.

## **The technologies and information we automatically collect include:**

**Cookies and other similar technologies:** We (or our service providers) may use cookies or similar technologies to identify your browser or device. We (or our service providers) may also use these technologies (never in student logged in areas of our Service) in connection with advertising of our services that may appear on other sites or in connection with advertising their products outside of our Service (e.g. if you view an embedded YouTube video player on our Service, YouTube may place cookies or similar technologies on your browser when you play the video off our site). We don't allow these third-parties to advertise directly on our service (i.e. such as when an advertiser would bid to place an advertisement directly on a platform such as Facebook), but we may serve contextually relevant advertising for third-party products and services ourselves that we believe may be of interest to you.

**Local storage:** We may also use, collect and store information locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches. Like many services, Eduflow uses these technologies to analyze trends, gather demographic information, understand your engagement with the Eduflow Website, administer the Service, tailor the Service for you, and to help the Service work better for you – for example, by remembering your language preferences.

**Device information:** We collect device-specific information such as your device type, device brand, operating system, hardware version, device settings, file and software names and types, battery and signal strength, and device identifiers. This helps us measure how the Service is performing, improve Eduflow for you on your particular device.

**Server log information:** Like most online services, when you use our Service, we automatically collect and store certain information in our server logs. This information helps us make decisions about what we should work on next – for example, by showing which features are most (or least!) popular. Examples include things like:  
Details of how you used our service, such as your activity on the Service, and the frequency and duration of your visits to the Eduflow Website (similar to TV ratings that indicate how many people watched a particular show)  
IP Address

Device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL

## **Information received from third-party sources**

We may also obtain information, including personal information, from third-party sources to update or supplement the information you provided or we collected automatically (such as information gathered from a student information system or learning management system). Local law may require you authorize the third-party to share your information with us before we can acquire it. This may include aggregated anonymous information or certain personal information that may be provided to us. If we receive personal information from third-parties, we will handle it in accordance with this Privacy Policy. If we directly combine information we receive from other third-parties with personal information that we collect through the Service, we will treat the combined information as personal information and handle it in accordance with this Privacy Policy. Additionally, we may use any aggregated anonymous information received by third-parties as set forth below under the heading “Aggregated Information and Non-Identifying Information”.

## **How does Eduflow use the information it collects?**

First and foremost, you should know that Eduflow does not sell or rent any of your, or your child's, personal information to any third-party for any purpose – including for advertising or marketing purposes. Eduflow does not share personal information with third-parties except in the limited circumstances set forth in the section “Will Eduflow share any information it collects?” Third-party advertising is not permitted on areas where users are required to log in to Eduflow and personal information collected from students is never used for behaviorally-targeted advertising to students (by us or third-parties). We use the information we collect from you to provide you with the best Eduflow experience. More specifically, this information is used to:

- Provide and improve the Service, for example by developing new products and features, based on information you have provided directly (through support chat) or that we have collected in aggregate
- Respond to your emails, submissions, questions, requests for information or customer support
- Customize the Service for you, and improve your experience with it
- Send you information about features on our Service or changes to our policies and Service
- Provide teachers information about events, announcements, offers and promotions (related to the Eduflow service), products, including third-party products, and services we think will be of interest to you
- Most crucially, to protect our community by making sure the Service remains safe and secure

We use automatically collected information (described in the “Information collected automatically” section above) to provide and support our Service, and for the additional uses described in this section of our Privacy Policy.

### **Will Eduflow share any information it collects?**

First and foremost, you should know that Eduflow does not sell or rent your (or your child's) personal information to any third-party for any purpose – including for advertising or marketing purposes. Third-party advertising is not permitted on areas where users are required to log in to Eduflow and personal information collected from students is never used for behaviorally-targeted advertising to students (by us or third-parties). 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:

### **Other Users You Share and Communicate with on Eduflow**

No student profiles are made available to the general public through our Service. Furthermore, students cannot share their account information with anyone on Eduflow, outside of their teachers, or school leaders. If you are a teacher or school leader, you may choose to share information or content through the Service with other Eduflow teachers, school leaders, or students – for example, things like your account information, feedback to students you teach (if you are a teacher or school leader) or other information you share with teachers or school leaders you are communicating with through Eduflow.

Please keep in mind that information (including personal Information or children's personal information) or content that you voluntarily disclose to others – including to other Eduflow users you interact with through the Service (such as messages you might send other users or other teachers and school leaders you collaborate with) – can be viewed, copied, stored, and used by the people you share it with. We cannot control the actions of people with whom you choose to share information and we are not responsible for the collection, use or disclosure of such information or content by others.

### **Third-party integrations on our Service**

When, as a teacher or school leader, you use third-party apps, websites or other services that use, or are integrated with, our Service, they may receive information about what you post or share. For example, when you invite others via Facebook or Twitter, these services receive the information that you share through this functionality, and information that you are sharing from Eduflow. Information collected by these apps, websites or integrated services is subject to their own terms and policies.

### **Service Providers**

Third-party advertising is not permitted on areas where users are required to log in to Eduflow and personal information collected is never used for behaviorally-targeted advertising to students (by us or third-parties). We do work with vendors, service providers, and other partners to help us provide the Service by performing tasks on our behalf – we can't build everything ourselves, after all! We may need to share or provide information (including personal information) to them to help them perform these business functions, for example sending emails on our behalf, database management services, database hosting, providing customer support software, and security. Additionally, we may also share information with social networking and other websites, applications or partners, for marketing and advertising our products or services on those websites or applications (this will never include personal information of students). Please see here for a list of the third-parties we work with to provide the Service. Generally, these service providers do not have the right to use your personal information we share with them beyond what is necessary to assist us. Additionally, these service providers must adhere to confidentiality and security obligations in a way that is consistent with this Privacy Policy.

### **Testimonials**

We post testimonials on our Service which may contain personal information such as the name, photo and/or a video of the individual in the testimonial. We obtain the individual's consent in advance to ensure we have permission to post this content publicly. To request removal of your personal information from our testimonials, please contact us at [privacy@eduflow.com](mailto:privacy@eduflow.com).

### **Analytics Services**

We use analytics services to help us understand and improve how the Service is being used. These services may collect, store and use information in order to help us understand things like how often you use the Service, the events that occur within the application, usage, performance data, and from where the application was downloaded. A current list of analytics providers that we use is located here. regarding your data if we go out of business, please see our FAQ.

## How does Eduflow protect and secure my information?

Your Eduflow account is protected by a password. You can help us protect against unauthorized access to your account by keeping your password secret at all times.

The security of your personal information is important to us. We work hard to protect our community, and we maintain administrative, technical and physical safeguards designed to protect against unauthorized use, disclosure of or access to personal information. In particular:

Our engineering team is dedicated to keeping your personal information secure

We periodically review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems

We continually develop and implement features to keep your personal information safe – for example, when you enter any information anywhere on the Service, we encrypt the transmission of that information using secure socket layer technology (SSL/TLS) by default

We ensure passwords are stored and transferred securely using encryption and salted hashing

The Eduflow Service is hosted on servers at a third-party facility, with whom we have a contract providing for enhanced security measures. For example, personal information is stored on a server equipped with industry standard firewalls. In addition, the hosting facility provides a 24x7 security system, video surveillance, intrusion detection systems and locked cage areas.

For additional information on our security practices, please visit our Privacy Center.

Although we make concerted good faith efforts to maintain the security of personal information, and we work hard to ensure the integrity and security of our systems, no practices are 100% immune, and we can't guarantee the security of information. Outages, attacks, human error, system failure, unauthorized use or other factors may compromise the security of user information at any time. If we learn of a security breach, we will attempt to notify you electronically (subject to any applicable laws) so that you can take appropriate protective steps; for example, we may post a notice on our homepage ([www.eduflow.com](http://www.eduflow.com)) or elsewhere on the Service, and may send email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

Can I opt-out of providing information?

You can always decline to share personal information with us, or even block all cookies. However, it's important to remember that many of Eduflow's features may not be accessible, or may not function properly – for example, we may not be able to remember your language preferences for you.

How can I access and manage my personal information?

Eduflow aims to provide you with easy access to any personal information we have collected about you. If that information is incorrect, we give you easy ways to update it, or to delete it, unless we have to keep that information for legitimate business (e.g., we need at least an email address for your account) or legal purposes.

**Accessing Your Information:** Upon request, Eduflow will provide you with information about whether we hold any of your personal information, and, if you are a user of Eduflow, you may request access to all your personal information we have on file by contacting us on [privacy@eduflow.com](mailto:privacy@eduflow.com). In some cases, we won't be able to guarantee complete access due to legal restrictions – for example, you will not be allowed to access files that contain information about other users or information that is confidential to us.

**Managing Your Information:** You may update, correct, or delete some of your profile information or your preferences at any time by logging into your account on Eduflow and accessing your account settings page. You may have to verify your identity before you can do that. You may also, at any time, update, correct, or delete certain personal information that you have provided to us by contacting us on [privacy@eduflow.com](mailto:privacy@eduflow.com). We will respond to your request within a reasonable timeframe.

**Accessing Your Child's Information:** Take a look at our "Parental Choices" section to see how you can obtain copies of your child's personal information.

We may reject requests for access, change or deletion that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, even after you update or delete personal information you have provided us from our Service, your personal information may be retained in our backup files and archives for a reasonable period of time for legal purposes or for so long as is necessary in light of the purposes for which such records were collected or legitimately further processed.

**How can I delete my account?**

We hope you love using Eduflow now and always. However, if for some reason you ever want to delete your account (or your student's account, if you are his or her teacher), you can do that at any time by contacting us on [privacy@eduflow.com](mailto:privacy@eduflow.com).

When you delete your account, we delete your profile information and any other content you provide in your profile (such as your name, username, password, email address) and depending on the category of user you are (i.e., teacher, school leader or student), submissions, received feedback and information collected through the mobile permissions you've granted. For more details, please read "What happens when I delete my account?" in our FAQs.

**How long does Eduflow keep information about me?**

We store your personal information for as long as it is necessary to provide products and Services to you and others, including those described above. Personal information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide products and services, in which case we will delete prior to you deleting your account.

Please note that we may have to retain some information after your account is closed, to comply with legal obligations, to protect the safety and security of our community or our Service, or to prevent abuse of our Terms. You can, of course, delete your account at any time, as per the "What happens when I delete my account?" section of our Help Center. Additionally, please note, that even if your account is deleted, messages sent between teachers and students are retained to assist schools with various record keeping or compliance obligations. This includes, for example, any content uploaded which we consider messaging between students and teachers. For more details, please read "What happens when I delete my account?" in our Help Center.

**What communications will I receive from Eduflow?**

If you registered on Eduflow, provided an email or phone number to us, or otherwise opted-in to receive communications from us, we may send you messages and updates regarding your account, including privacy and security notices, updates regarding the Service, and information regarding products, features or services from Eduflow (or third-parties we believe you may be interested in). These communications may include, but are not limited to, social media updates, SMS/MMS messages, push notifications, email, and postal mail. If you have an account with us, we'll also use your email address to contact you for customer service purposes, or for any legal matters that arise in the course of business. We may receive a confirmation when you open an email from us if your device supports it. We use this confirmation to help us understand which emails are most interesting and helpful.

If you invite another person to join you on Eduflow by providing their email address, we may contact them regarding the Service using the appropriate form of communication. If they would prefer not to receive our communications, they may opt-out using the "Unsubscribe" or "STOP" instructions contained in those communications.

You can always unsubscribe from receiving any of our emails whenever you'd like by clicking the "Unsubscribe" link at the bottom of the email

You can further indicate your preferences by contacting us using the information in the "How can I contact Eduflow with questions?" section below. Please note that if you do not want to receive legal notices from us, such as this Privacy Policy, those legal notices will still govern your use of the Website, and you are responsible for reviewing those legal notices for changes.

## **Social Media Features/Widgets**

The Service may now or in the future include social media features, such as the Facebook Like button, and the Twitter Tweet button, or the ability to register on Eduflow or otherwise grant access to a third-party social networking service, such as through Facebook Connect or Google (collectively “Social Media Features”). These social features are only available to teachers and administrators (not students). These Social Media Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. You may be given the option by such Social Media Features to post information about your activities on our Service to a profile page of yours that is provided by a third-party social media network in order to share with others within your network. Additionally, if you decide to register on Eduflow through a Social Media Feature, Eduflow may also collect personal information that is already associated with your account connected to the Social Media Feature. If you choose to provide such information, during registration or otherwise, you are giving Eduflow the permission to use, share, and store it in a manner consistent with this Privacy Policy. Social Media Features are either hosted by a third-party or hosted directly on our Service. Your interactions with these Social Media Features are governed by the privacy policy of the company providing each Social Media Feature. If you are not comfortable accessing such social media websites and using such Social Media Features, please don't use them!

## **Third-party Services**

The Service may contain links to websites and services provided by third-parties (e.g. video players). Any personal information you provide on third-party websites or services is provided directly to that third-party and is subject to that third-party's policies governing privacy and security. This Privacy Policy does not apply to these websites or services. The fact that we link to a website is not an endorsement, authorization or representation that we are affiliated with that third-party, nor is it an endorsement of their privacy or information security policies or practices. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you, including if you view a video through an embedded video player which is played off our Service, but may appear to still be playing on our Service. We are not responsible for the content or privacy and security practices and policies of third-party websites or services. We encourage you to learn about third-parties' privacy and security policies before providing them with personal information.

## **How will Eduflow notify me of changes to this policy?**

We may occasionally update this Privacy Policy - you can see when the last update was by looking at the “Last Updated” date at the top of this page. We won't reduce your rights under this Privacy Policy without your explicit consent. If we make any significant changes, we'll provide prominent notice by posting a notice on the Service and/or notifying you by email (using the email address you provided), so you can review and make sure you know about them.

In addition, if we ever make significant changes to the types of personal information we collect from children, or how we use it, we will notify teachers in order to obtain parental consent or notice for those new practices.

We encourage you to review this Privacy Policy from time to time, to stay informed about our collection, use, and disclosure of personal information through the Service. If you don't agree with any changes to the Privacy Policy, you may terminate your account (although we'll be sad to see you go!). By continuing to use the Service after the revised Privacy Policy has become effective, you acknowledge that you accept and agree to the current version of the Privacy Policy.

## **EU - U.S. Privacy Shield and Swiss - U.S. Privacy Shield**

Eduflow complies with the EU - U.S. Privacy Shield Framework and Swiss - U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Eduflow certified to the Department of Commerce that it adheres to the Privacy Shield Principles. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

## Canada

We endeavor to provide privacy protection that is consistent with Canada's private sector privacy laws, including the Personal Information Protection and Electronic Documents Act ("PIPEDA"). For any questions regarding how we comply with PIPEDA, please contact us at [info@eduflow.com](mailto:info@eduflow.com).

## California Privacy Disclosures

**Do Not Track:** Currently, various browsers offer a "do not track" or "DNT" option that relies on a technology known as a DNT header, which sends a signal to Web sites visited by the user about the user's browser DNT preference setting. Eduflow does not track its users over time and across third-party websites to provide behaviorally-targeted advertising and therefore does not respond to Do Not Track (DNT) signals. For more information on "do not track", please visit [www.allaboutdnt.org](http://www.allaboutdnt.org).

Third-parties that have content embedded on the Eduflow Website, such as a social feature, or an embedded video player, may set cookies on a user's browser and/or obtain information about the fact that a web browser visited the Eduflow Website from a certain IP address. Third-parties cannot collect any other personally identifiable information from Eduflow's websites unless you provide it to them directly.

## Notice for Minors (users under 18)

If you are under the age of 18, or the parent of a child using Eduflow under the age of 18 residing in California, you are entitled to request removal of content or information you (the minor) have publicly posted on our Service. Currently, we do not allow minors to post content to share publicly, but we do still allow minors (or the minor's parents if under 13) the option to delete personal information associated with their user accounts or content that they upload through their student account (which is not shared publicly (only the student's parents, teachers, or school leaders can view)). If you are a minor, or the parent of a minor under 13, and would like to delete personal information associated with your account or content you uploaded through your account, please follow the directions set forth in the "What happens if I delete my account?" section of our Help Center. Although we offer deletion capabilities on our Service, you should be aware that the removal of content may not ensure complete or comprehensive removal of that content or information posted through the Service, as there may be de-identified or recoverable elements of your content or information on our servers in some form. Additionally, we will not remove content or information that we may be required to retain under applicable laws.



## How can I contact Eduflow with questions?

If you have any questions or concerns about this Privacy Policy or how we protect our community, please contact us at [info@eduflow.com](mailto:info@eduflow.com) - we'd love to help. If you'd like, you may also write to us at:

Peergrade Inc.  
548 Market St #58941  
San Francisco, California 94104-5401  
United States of America  
+45 60 67 70 42  
Attention: Chief Privacy Officer

### Further Privacy and Security Resources

For teachers, school leaders, parents, students, or administrators seeking more information on how we provide safety on Eduflow, we provide privacy and security related materials on our Privacy Center.



## **ARGUMENT-DRIVEN INQUIRY CONTACT INFORMATION**

**For any questions about ADI Online Powered by EduFlow, you can also contact ADI at:**

Argument-Driven Inquiry  
12707 Nutty Brown Rd. C-200  
Austin, TX 78737  
Phone: 512-777-4099  
Email: [online@argumentdriveninquiry.com](mailto:online@argumentdriveninquiry.com)  
Website: [www.argumentdriveninquiry.com](http://www.argumentdriveninquiry.com)