RCSD ROSEVILLE CITY SCHOOL DISTRICT
— Est. 1869 —

Technology Services

1050 Main Street Roseville, CA 95678
Phone (916) 771-1645 Fax (916) 771-1650

Laura Assem, Executive Director of Technology

Vendor Statement of Compliance
Data Privacy and Protection

This agreement is entered into between the __Roseville City School District__ ("LEA" or "District") and

_____Texthelp_____ ("Service Provider") on __10/19/2022__ ("Effective Date").

WHEREAS, the LEA and the Service Provider entered into an agreement for Educational Technology services;

WHEREAS, the LEA is a California public entity subject to all state and federal laws governing education, including but not limited to California Assembly Bill 1584 ("AB 1584"), the California Education Code, the Children's Online Privacy and Protection Act ("COPPA"), and the Family Educational Rights and Privacy Act ("FERPA");

WHEREAS, AB 1584 requires, in part, that any agreement entered into, renewed or amended after January 1, 2015, between a local education agency and a third-party service provider must include certain terms;

NOW, THEREFORE, the Parties agree as follows:

Section I: General - All Data

1. **PASSWORD SECURITY.** All passwords are considered secure. Vendors may not disseminate any passwords unless specifically directed by Educational or Technology Services management. Vendors will not provide information concerning Admin accounts (ROOT Admin, container Admin, local NT administrator or Domain administrator) or their equivalent to any persons. District personnel ONLY will disseminate this information. Vendors will never create "back door" or "generic" user accounts on any systems unless specifically directed to do so by LEA management.

   Agree: Yes ☑ No ◯

2. **SYSTEM SECURITY.** Unauthorized access to or modification of District systems including file servers, routers, switches, NDS and Internet services is prohibited. Any attempt to bypass or subvert any District security system, both hardware, and software is prohibited.

   Agree: Yes ☑ No ◯

3. **PRIVACY**. The vendor will adhere to all provisions of the Federal Family Educational Rights and Privacy Act (FERPA, 20 U.S.C. 123g), California Education Code and district policies regarding the protection and confidentiality of data. At all times, the vendor will consider all data collected in the course of their duties to be protected and confidential. Release of this data can only be authorized by Technology & Information Services management and state and federal law.

   Agree: Yes ☑ No ◯

Section I: General - All Data *(Continued)*

4. **REUSE**: Vendors shall not copy, duplicate, sell, repackage or use for demonstration purposes any Roseville City School District data without the prior, written consent of Educational or Technology Services management.

   Agree: Yes ⬤ No ◯

5. **TRANSPORT**: Vendor must provide a secure channel (S/FTP, HTTPS, SSH, VPN, etc) for the District to "push" data to the vendor and to extract data as required. Vendors will not have direct access to District systems and will not "pull" data at any time.

   Agree: Yes ✔ No ◯

6. **EXTERNAL SECURITY:** Vendor must attach to this document reasonable evidence that their system is secure from external hacking and attacks. Devices such as firewalls and technologies such as NAT are the minimum requirements. Active IDS or similar technology is preferred.

   Agree: Yes ✔ No ◯

7. **INTERNAL SECURITY:** Vendors must attach to this document reasonable evidence that their system is secure from internal hacking and attacks. Describe the interactions vendor personal (or their representatives) will have directly with District data. How is uploaded data from the District handled and processed? Who has access to this data? What happens to the data after the upload is complete? What security safeguards are in place to protected unauthorized access to District data? How are backup performed and who has access to and custody of the backup media? How long are backup maintained; what happens to the District data once the backup is "expired"? If any data is printed, what happens to these hard copy records?

   Agree: Yes ✔ No ◯

8. **DISTRICT ACCESS:** Vendor must provide a secure means (see Item 5 above) for the District to extract ALL data from the vendor system. This can either be an online extraction tool or a vendor-provided extract as needed by the District (not to exceed quarterly). Describe the means and format of the data (delimited, Excel, MDB, SQL Dump).

   Agree: Yes ✔ No ◯

9. **TERMINATION:** Upon termination of this agreement as provided herein, the vendor will permanently delete all customer data from their system as allowed by state and federal law. Vendor may be required to certify the destruction of LEA data within 90 days of contract termination.

   Agree: Yes ✔ No ◯

RCSD ROSEVILLE CITY SCHOOL DISTRICT — Est. 1869 —

Section II: AB1584 Compliance - Student Information Only

1. Vendor agrees that the Roseville City School District retains ownership and control of all student data.

   Agree: Yes ☑ No ○

2. Vendor must attach to this document a description of how student-created content can be exported and/or transferred to a personal account. NA

   Agree: Yes ○ No ○

3. Vendor is prohibited from allowing third-parties access to student information beyond those purposes defined in the contract.

   Agree: Yes ☑ No ○

4. Vendor must attach to this document a description of how parents, legal guardians and students can review and correct their personally identifiable information. NA

   Agree: Yes ○ No ○

5. Vendor will attach to this document evidence how student data is kept secure and confidential.

   Agree: Yes ☑ No ○

6. Vendor will attach to this document a description of procedures for notifying affected parents, legal guardians or eligible students when there is an unauthorized disclosure of student records. NA

   Agree: Yes ○ No ○

7. Vendor certifies that student records will not be retained or available to a third party once the contract has expired or is canceled (See Page 2, Item 9). NA

   Agree: Yes ○ No ○

8. Vendor will attach to this document a description of how they and any third party affiliates comply with FERPA.

   Agree: Yes ☑ No ○

9. Vendor and its agents or third parties are prohibited from using personally identifiable information from student records to target advertising to students

   Agree: Yes ☑ No ○

RCSD ROSEVILLE CITY SCHOOL DISTRICT
— Est. 1869 —

Technology Services

1050 Main Street Roseville, CA 95678
Phone (916) 771-1645 Fax (916) 771-1650

Laura Assem, Executive Director of Technology

Section III: SB 1177 SOPIPA Compliance - Student Information Only

1. Vendors cannot target advertising on their website or any other website using information acquired from students.

   Agree: Yes ☑ No ◯

2. Vendors cannot create a profile for a student except for school purposes as defined in the executed contract.

   Agree: Yes ☑ No ◯

3. Vendors cannot sell student information.

   Agree: Yes ☑ No ◯

4. Vendors cannot disclose student information unless for legal, regulatory, judicial, safety or operational improvement reasons.

   Agree: Yes ☑ No ◯

5. Vendors must attach to this document evidence of how student information is protected through reasonable security procedures and practices.

   Agree: Yes ☑ No ◯

6. Vendors must delete district-controlled student information when requested by the District.

   Agree: Yes ☑ No ◯

7. Vendors must disclose student information when required by law, for legitimate research purposes and for school purposes to educational agencies.

   Agree: Yes ☑ No ◯

As an authorized representative of my organization, I accept the conditions listed in this document.

Jeffrey Levinson
_____
Print Name

_____
Signature, Date

Laura Assem
_____
Print Name (Roseville City School District)

_____ 11/29/2022
Signature, Date (Roseville City School District)

Privacy Policy for Texthelp Products

At Texthelp, we are committed to safeguarding and preserving the privacy of our website visitors and product users. This Privacy Policy explains what happens to any personal data that you provide to us or that we collect from you while you use our software or visit our site. Texthelp have signed the Student Privacy Pledge, and implement FERPA, COPPA, and comply with the California Consumer Privacy Act (CCPA), the Australian Privacy Act and the General Data Protection Regulation (EU GDPR) compliant data policies. All data stored by Texthelp is stored according to our Information Security Policy.
It is a requirement of using Texthelp products that end-users are made aware of this Privacy Policy. In a school/college type environment where acceptance/consent dialogs would be detrimental to the student's user experience these are not shown 'in program' and should be made available to the students or employees by the institution or organization using the product.

User settings

We use cookies, local storage, your Google™ or Microsoft™ account, and our servers to store a user's settings, such as the currently selected voice, and any document annotations.

Your Google or Microsoft account and personal information

You are uniquely identified by your Google or Microsoft email address. This information is used to determine the status of your current license. No other Google or Microsoft profile information is collected. You have a right to request erasure of this data should you wish to, otherwise it will be deleted 2 years after the expiry of the current contract.

Students and Personally Identifiable Information

Where possible the only student information that we store is the student's Login ID. We need to store this so that we can store the user's preferences and data, and to confirm that they are a licensed user.   You are uniquely identified by your login address. A de-identified version of this information is used to determine the status of your Texthelp Product current license. No other Google or Microsoft profile information is collected. We may keep this de-identified data indefinitely however this does not prevent your right of erasure of your information should you request it.

Verifiable Parental Consent

In order to remain compliant with COPPA the licensee (The School District, School or Teacher) must obtain verifiable parental consent to store the following student information on the online platform. Where student information is shared with Texthelp by a School District, School or Teacher, Texthelp accepts that consent is authorized by that institution in lieu of parental consent.

Additional Data Stored by Fluency Tutor for Google

Because Fluency Tutor has a teacher dashboard and displays class rosters, and individual student running records some additional information is stored. This is stored in compliance with our Information Security Policy, encrypted in transit and at rest. The data which is stored is:

> The Teacher or Student first and second name
> The Teacher or Student email address
> Their Google Profile image (if the school policy permits access)
> Audio recordings of the student
> Their running record (WCPM and teachers comments)

Additional Data Stored by WriQ

Because WriQ has a teacher dashboard and displays class rosters, and individual student writing records some additional information is stored. This is stored in compliance with our Information Security Policy, encrypted in transit and at rest. The data which is stored is:

> The Teacher or Student first and second name
> The Teacher or Student email address
> Their Google Profile image (if the school policy permits access)
> Audio recordings of notes created by the teacher
> Their writing scores record (WriQ scores, document metrics and teachers comments)
> An encoded string containing student writing and the types of errors in the document.

Additional Data Stored by EquatIO Mathspace

Because Mathspace has a teacher dashboard and displays class rosters, and individual student Math documents some additional information is stored. This is stored in compliance with our Information Security Policy, encrypted in transit and at rest. The data which is stored is:

> The student first and second name
> The student email address
> Their Google Profile image (if the school policy permits access)
> Teacher feedback for Mathspace assignments (Assignment score and teachers comments)
> The students Mathspace documents

Additional Data Stored by ReachDeck/Browsealoud

By default, Browsealoud does not capture any end user information. However, administrators may log into the ReachDeck/Browsealoud portal to manage their subscription. In this instance we collect the following additional information:

> The portal user's email address

Additional Data Stored by ReachDeck Auditor

The Auditor feature does not process or store any personally identifiable information.

Additional Data Stored by ReachDeck Editor

Whilst the ReachDeck Editor does not request personal information, the purpose of the product is to help the User improve the readability of their content. Therefore the user will be entering information into this product. The information entered is sent to Texthelp for processing, however it is not stored and is deleted immediately after processing.

Additional Data Stored by OrbitNote

When using the OCR Scanning feature, PDFs that are sent for OCR are stored by Texthelp for 24 hours to ensure repeated requests are cached for optimum performance. After this period, the PDF is automatically deleted.
The PDFs are stored in compliance with our data procedures (See GDPR Compliance & International Data Transfers section) and are encrypted at rest during this period.

Required Permissions

Applications that integrate with a Microsoft, Chrome or a Google account must declare their intent by requesting permissions. These permissions to your browser and account must be granted in order to integrate with your Microsoft, Chrome or Google accounts. Below is a list of these permissions and why they are required. At no time will Texthelp request or have access to your Microsoft or Google account password.

Read&Write for Windows, Mac, Google & Edge

Read&Write for Google Chrome Extension permissions

Read and change all your data on all websites

Used by the reading and prediction features etc. to read and modify content.

Know your email address

For licensing, storing settings

Manage your apps, extensions and themes

Used to integrate with other Texthelp extensions such as WriQ.

Read&Write for Google Chrome, Google Drive permissions

Connect itself to Google Drive

We need your permission to open the PDF, KES and EPUB files from your Google Drive menus.

See, edit, create, and delete only the specific Google Drive files you use with this app

We need your permission to open the PDF, KES and EPUB files from your Google Drive in our accessible viewers.

See, edit, create, and delete all of your Google Drive files

Used to create the collected highlights, vocabulary and voice notes files.

See, create, and delete its own configuration data in your Google Drive

Used to store the location of the voice notes folder

View your Google Drive apps

Used to create the voice notes folder.

Google Drive Open with PDF and Epub viewers

View your email address

For licensing, storing settings, and the annotations that you make on PDF and EPub Files.

View basic information about your account

For licensing, storing settings, and annotations.

Screenshot Reader Extension

Read and change all your data on the websites that you visit

Used to read the content on the page using the screenshot reader

Read&Write for Microsoft Edge Extension permissions

Read your browsing history

Required to identify if we can display the toolbar.

See your email address

For licensing and storing settings.

Manage your apps, extensions and themes

Check if other Texthelp extensions are installed.

Read and change content on websites you visit

Used by the reading and prediction features etc. to read and modify content.

Microsoft Account permissions

Read your profile

For licensing and storing settings

View your email address

For licensing and storing settings

 View your basic profile

For licensing and storing settings

Sign you in

For licensing and storing settings

Google Documents integration

View and manage your documents in Google Drive

We need permission to make a new Google Doc for you when we create the collected highlights and vocabulary documents.

Connect to an external service

We need permission to connect to the Texthelp Vocabulary service. This service provides dictionary definitions, and symbols to be used in Vocabulary Worksheets.

DataDesk permissions

View your Google Classroom classes

Used by DataDesk to display the list of your classes if logged in as a teacher.

View your Google Classroom class rosters

Used to get a list of students for each class.

View the email addresses of people in your classes

Used to toggle a student's features and to retrieve analytics.

Read&Write Admin Tool permissions

View groups on your domain

Used to select Google groups to sync with Read&Write licensing.

View users on your domain

Used to get the students within the selected groups to send to our licensing service. All user data is hashed before sending on. This encrypted hash cannot be decrypted by Texthelp or anybody else. We use the hashed value to identify users within Read&Write.

Read&Write Admin Tool Microsoft Account permissions

Read your profile

For licensing and storing settings

View your email address

For licensing and storing settings

View your basic profile

For licensing and storing settings

Sign you in

For licensing and storing settings

OrbitNote

Google Drive Permissions

OrbtiNote will only interact with the files you choose on your Google Drive. OrbitNote does not scan or interact with Google Drive files unless instructed to do so by the User.

See and download all your Google Drive files

Used to open PDFs directly from Google Drive on a User's request.

See, edit, create and delete all of your Google Drive files

Used to Upload PDFs to Google Drive on a User's request.

View your Google Drive apps

Used to Check the required Texthelp Apps are installed.

Manage your coursework and view your grades in Google Classroom

Used to check if a PDF is part of your active coursework within Google Classroom.

View coursework and marks for students in the Google Classroom classes that you teach or administer

Used to check the status of PDFs within your Google Classroom classes.

View your coursework and grades in Google Classroom

Used to check if a PDF is part of your active coursework within Google Classroom.

View your Google Classroom classes

Used to check if a PDF is part of your active coursework within Google Classroom.

Manage your Google Classroom classes

Used to check if a PDF is part of your active coursework within Google Classroom.

Snapverter

Google Drive integration

View your email address
For sending emails and displaying on dashboard..
View basic profile info
For licensing and storing settings.
View and manage Google Drive files opened or created with this app
We need your permission to open PDF, JPG, TIFF, GIF, PNG and ZIP (Daisy) files in your Google Drive.
View and manage files in your Google Drive
We need your permission to open and add PDF, JPG, TIFF, GIF, PNG and ZIP (Daisy) files in your Google Drive.
Have offline access
We need offline access to allow the conversion process to open and save files in your Google Drive.

Fluency Tutor for Google

Google Drive Permissions

View your email address
For sending emails and displaying on dashboard..
View basic profile info
For licensing and storing settings.
Add itself to Google Drive
We need your permission to install Fluency Tutor for Google as the default viewer for reading passages.
Have offline access
We need offline access to allow the conversion process to open and save files in your Google Drive.

Android App permissions

View your email address

For sending emails and displaying on dashboard..

View basic profile info

For licensing and storing settings.

You can revoke these permissions at any time on your Google [Account Permissions](#) page.

EquatIO

EquatIO Chrome Extension Permissions

Read and change all your data on the websites you visit

We read the browsing history so we can access the URL so we know which Google Apps integration to insert the math into.

This is required for us to drop the toolbar on top of Google Apps.

This is required for us to drop the floating toolbar onto any web page.

Know your email address

Your email address is required for licensing.

Basic account info

View your email address

Your email address is required for licensing

View your basic profile info

Your email address is required for licensing

Google Apps Permissions

View and manage your Google Docs documents

This may be required to insert math into the currently opened Google Doc

View and manage your Google Slides presentations

This may be required to insert math into the currently opened Google Slide

See, edit, create, and delete your spreadsheets in Google Drive

This is required for us to replace EquatIO Image URLs with images of math inside the currently opened Google Sheet

This may be required to insert math into the currently opened Google Sheet

WriQ

WriQ Google Chrome Extension permissions

Read and change your data on a number of websites

Used to insert the WriQ sidebar into Google Docs and display the errors on the document.

This allows WriQ to appear by default in Google Docs and Google Classroom and access the marking services.

All texthelp.com sites

classroom.google.com

docs.google.com

Read your browsing history

Used to read the url of the current tab so WriQ can automatically be displayed

Communicate with cooperating websites

Used to integrate with other Texthelp web applications

Know your email address

For licensing, storing settings

Manage your apps, extensions and themes

Used to integrate with other Texthelp extensions such as Read & Write.

Google Docs (Chrome extension only)

View and manage your documents in Google Drive

This is required to score the document

Google Drive (Chrome extension only)

View and manage the files in your Google Drive

This is required to check you have access to the document you plan to score with WriQ and to retrieve the author of the document

See and download all your Google Drive Files

This is required to check you have access to the document you plan to score with WriQ and to retrieve the author of the document

View and manage its own configuration data in your drive

This is required to store the configuration data and writing statistics

Google Classroom (WriQ Teacher Dashboard only)

View the email addresses of people in your classes

This is required to import your students and classrooms from Google Classroom

View the profile photos of people in your classes

This is required to import your students and classrooms from Google Classroom

View your Google Classroom class rosters

This is required to import your students and classrooms from Google Classroom

View your Google Classroom classes

This is required to import your students and classrooms from Google Classroom

Manage coursework and grades for students in the Google Classroom classes that you teach and view the coursework and grades for classes that you administer

This is required to create and manage Google Classroom assignments through WriQ

Basic account info (Chrome extension and WriQ Dashboard)

View your email address

Your email address is required for licensing.

View your basic profile info

Your email address is required for licensing.

WriQ for Microsoft Word (Word Addin and WriQ Dashboard)

Permissions Required

View users email address

Your email address is required for licensing.

Read all files that user can access

This is required to score the document and identify the author

Sign users in

Your email address is required for licensing.

View users basic profile

Your email address is required for licensing.

Read&Write access to users profile

This is required to display the errors within a document

ReachDeck / Browsealoud

ReachDeck / Browsealoud Portal

View your email address

Your email address is required for licensing

Data privacy

Texthelp employees will only access content on our servers with the express permission of the provided administrator or contact at the time of purchase for a site or group license. Similar express permission from a single user license owner or trialist must be provided.

Disclosing your information

We will not disclose your personal information to any other party other than in accordance with this Privacy Policy and in the circumstances detailed below:

> Where we are legally required by law to disclose your personal information.

Scraping Content

We do not scrape any personal content. Our systems are not designed to associate personal information with your activities.

We don't sell your personal data to other companies.

We never sell any personal information.   Occasionally our products need to send your personal data (such as name, email,) to 3rd parties. These 3rd parties are our Hosting and Services providers.   For Example, we use Amazon Web Services to host Fluency Tutor and WriQ. The database needs to store Student information so that we can display it for you and help you track progress. These data sharing partners do not disclose your personal information, and they store it with the same level of security or greater than we do as laid out in our Information Security Policy. No ad companies collect data through our service.
We do not display advertising, therefore, no data is collected through our software for ad targeting. We do not operate any referral program and do not display any sponsored links.

We take steps to protect personal information.

We take reasonable steps to secure your personally identifiable information against unauthorized access or disclosure. We encrypt transmission of data on pages where you provide payment information. However, no security or encryption method can be guaranteed to protect information from hackers or human error. Information we collect may be stored or processed on computers located in any country where we do business.

Your rights to the personal information we may hold on you

You have the right to request the amending, erasure or a copy of your personal information that we may collect and store while you use our products. A Data Subject Access Request may be made **via this form**. Alternatively you may telephone using the numbers on our '**Contact Us**' page or email to **datasecurity@texthelp.com.** We will respond to a request within these time limits.
United Kingdom 40 days, US 45 days, Canada 30 days, Australia 30 days.

GDPR Compliance & International Data Transfers

Texthelp Billing & Contact Data and Customer/User data (name only) is stored in Amazon Web Services (AWS). We have entered into Standard Contractual Clauses with AWS to ensure we comply with the GDPR rules on international transfers. We have also included Standard Contractual Clauses in our End User License Agreement to cover the transfer of personal data from end users in the EU to AWS based in the United States. This complies with data protection requirements and GDPR legislation when transferring data outside of the EU.

Monitoring usage

Our software uses tracking software to monitor visitors to better understand how they use it. This is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website but will not store, save, or collect personal information. You can read Google's privacy policy here for further information http://www.google.com/privacy.html.

Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their website. Google Analytics customers can view a variety of reports about how visitors interact with their website so they can improve it. Google Analytics collects information anonymously. It reports website trends without identifying individual visitors.
Privacy Policy and Choices

Enforcement

We regularly review our compliance with our Privacy Policy. If we receive a formal written complaint, we will follow up and contact the person who made the complaint.

Changes

We do update this Policy from time to time, so please review this Policy regularly.