

## Kandoolu Privacy Policy

OnHand Schools immensely values your privacy. In this policy, we describe how Kandoolu collects and uses the personal information you provide while using Kandoolu. By submitting personal data through our site, you agree to the terms of this privacy policy, and you expressly consent to the collection, use, and disclosure of your personal data in accordance with this policy.

At OnHand Schools, we have a few fundamental principles:

- We don't ask you for personal information unless we need it.
- We don't share your personal information with anyone except to comply with the law, develop our products, or protect our rights.
- We believe that educators, acting with parent permission, should determine whether any student data is collected and maintain control over that data.
- We don't store personal information on our servers unless required for the on-going operation of one of our services.
- We do not host third party advertisements on our site.
- We aim to make it as simple as possible for you to control what's visible to the public, seen by search engines, kept private, and deleted.

In order to keep students safe:

- OnHand Schools uses industry standard SSL to ensure that student data is encrypted and transmitted securely from end to end.
- Teachers can monitor student accounts and student work.
- Students cannot privately communicate with other students.
- Parents can access their child's account at any time.

In order to improve learning:

- Teachers can use Kandoolu to gain valuable data on student performance and students will receive feedback on how to improve.
- We use anonymous and de-identified data to improve learning opportunities and continually make Kandoolu more effective.
- Wherever we collect student identifiable information, we do so in support of the educational purposes for which Kandoolu is designed.

**A note to minors:** If you are under the age of 13, please get permission from your parent/legal guardian before using this website or sending any e-mails to us. We will not sell or market directly to minors.

## **Compliance**

OnHand Schools makes every effort to ensure consistency with the Family Educational Rights and Privacy Act (FERPA) policies. We also comply with Children's Online Privacy Protection Act (COPPA).

### **Kandoolu Website Visitors**

Like most website operators, OnHand Schools collects non-personally-identifying or anonymous information of the sort, which web browsers and servers typically make available- such as the browser type, language preference, referring site, and the date and time of each visitor request. OnHand Schools' purpose in collecting non-personally-identifying information is to understand better how our visitors use the website. From time to time, OnHand Schools may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

OnHand Schools also collects potentially personally-identifying information like Internet Protocol (IP) addresses. We do not use such information to identify visitors, however, and do not disclose such information, other than under the same circumstances that we use and disclose personally-identifying information, as described below.

### **Gathering of Personally-Identifying Information**

Certain visitors to Kandoolu choose to interact with the site in ways that require OnHand Schools to gather personally-identifying information. The amount and type of information that Kandoolu gathers depends on the nature of the interaction. For example, OnHand Schools asks visitors who sign up for an account through Kandoolu to provide a name, district, username, password, and email address. Those who engage in financial transactions with Kandoolu are asked to provide additional information, such as name and credit card number. In each case, OnHand Schools collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with Kandoolu. OnHand Schools does not disclose personally-identifying information other than as described below. Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.

When you download and use our services, we automatically collect information on the type of device you use, operating system version, and the device identifier (or "UDID"). This enables Kandoolu to provide a user experience that is more tailored to the specific user.

### **Safety on Kandoolu**

Children's safety and full enjoyment of Kandoolu, as well as the safety and well-being of all children and their families, is of the utmost importance to all of us at OnHand Schools. OnHand Schools does not accumulate personal information about any child or family for distribution, sharing, or selling, except as described in this Privacy Policy.

## **Aggregated Statistics**

OnHand Schools may collect statistics about the behavior of visitors to its website. However, OnHand Schools does not disclose personally-identifying information other than as described below.

## **How We Handle Personally-Identifying Information**

OnHand Schools discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors, and affiliated organizations that (i) need to know that information in order to process it on OnHand Schools' behalf or to provide services available on Kandoolu, and (ii) that have agreed not to disclose it to others. Some of those employees, contractors and affiliated organizations may be located outside of your home country; by using Kandoolu, you consent to the transfer of such information to them. OnHand Schools will not rent or sell potentially personally-identifying and personally-identifying information to anyone. Other than to its employees, contractors, and affiliated organizations, as described above, OnHand Schools discloses potentially personally-identifying and personally-identifying information only when required to do so by law, such as to comply with a subpoena, or when OnHand Schools believes in good faith that disclosure is reasonably necessary to protect the property or rights of Kandoolu or third parties, the public at large, or if OnHand Schools is involved in a merger, acquisition, or sale of all or a portion of its assets. You will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. If you are a registered user of Kandoolu and have supplied your email address, OnHand Schools may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with Kandoolu. If you send us a request (for example via a support email or via one of our feedback mechanisms), OnHand Schools reserves the right to publish it in order to help us clarify or respond to your request or to help us support other users. OnHand Schools takes all measures reasonably necessary to protect against the unauthorized access, use, alteration, or destruction of potentially personally-identifying and personally-identifying information. You may choose to stop receiving our emails by contacting us at [info@kandoolu.com](mailto:info@kandoolu.com).

## **How We Store and Process Your Information**

OnHand Schools' servers are located in a secured, locked, and monitored environment to prevent unauthorized entry or theft, and are protected by a firewall. The servers are located in a data center in the United States and backed up daily to a secure, "US-based," offsite data center. We take extra measures to ensure the safety of Personally Identifying Information and student records and apply a Secure Sockets Layer (SSL or HTTPS) encrypting technology to establish and ensure that all data passed between the server and the browser remains encrypted. Governance policies and access controls are in place to ensure that the information of each district or school or other subscriber is separated, and they are only able to access their own data.

## **Parental Rights**

Parents and legal guardians of children under 13 who are members of Kandoolu have certain rights under the Children's Online Privacy Protection Act, and OnHand Schools recognizes those rights.

Parents/guardians can review information their children under 13 have contributed to Kandoolu by accessing their child's account via password reset. Parents can also request that OnHand Schools delete that information and refuse to allow Kandoolu to collect further information from their children by contacting our Support department at [support@kandoolu.com](mailto:support@kandoolu.com). OnHand Schools may ask additional questions or take other steps to verify the identity of parents/guardians before responding to a request to review or delete their child's information, or a request to refuse further collection from children.

A child's participation or access to an activity on Kandoolu cannot be conditioned on him or her providing more information than is reasonably necessary for that activity, or any personally-identifying information.

We encourage schools and districts using Kandoolu to notify parents that the product is used in their school. Parents can log into their children's accounts and access their records. If you are a parent or guardian of a student using Kandoolu with his or her school, you can request the login information from your child or their teacher. You are encouraged to use the student's login information and view all their activities and progress on the account at any time. Parents have a right to request the student's Personally Identifying Information be deleted, or request changes in his or her records if it is inaccurate or misleading by contacting the school or teacher or OnHand Schools at [support@kandoolu.com](mailto:support@kandoolu.com). Parents may also refuse to allow OnHand Schools to collect further information from their children by contacting us at [support@kandoolu.com](mailto:support@kandoolu.com).

## **Tracking Technologies**

Technologies such as cookies, beacons, tags, and scripts are used by OnHand Schools and our partners' affiliates, or analytics or service providers, as described above. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site, and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

As is true of most websites, we gather certain information automatically and store it in log files. This information may include Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically-collected log information with other information we collect about you for analytics and support to improve the performance of the services we offer you.

## **Control of Information You Provide to OnHand Schools**

Teachers: You always remain in control of the information you provide to OnHand Schools. You may review, edit, or delete any information you submit to us at any time by signing into your Kandoolu account; however, deletion of this information may restrict your ability to use the service effectively. You may also delete your account at any time. If you delete your account, all data will be deleted.

Children over the age of 13: You always remain in control of the information you provide to OnHand Schools. You may review, edit, or delete any information you submit to us at any time by signing into your Kandoolu account; however, deletion of this information may restrict your ability to use the service effectively. You may also delete your account at any time. If you delete your account, all data will be deleted.

Parents of children under the age of 13: You will always remain in control of the information the child provides to OnHand Schools. Parents may review, edit, or delete the child's information at any time by signing into the child's account via password reset, or by contacting us at [support@kandoolu.com](mailto:support@kandoolu.com). We will respond to your request within a reasonable timeframe. A parent can also delete the child's account, which will delete all data in the account.

### **Third Parties**

OnHand Schools may use a variety of third-party service providers, such as analytics companies, to understand usage of our services. We may allow those providers to place and read their own cookies, electronic images known as web beacons or single-pixel gifs, and similar technologies to help us measure how users interact with our services. This technical information is collected directly and automatically by these third parties. If you want to opt out of third party cookies, you may do so through your browser.

Kandoolu contains links to third-party websites (though they are not required to use the assessment portion of Kandoolu). Any access to and use of such linked websites is not governed by this Privacy Policy, but instead is governed by the privacy policies of those third-party websites. OnHand Schools is not responsible for the information practices of such third-party websites.

Teachers may also provide children with links to resources located on third party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third-party websites. OnHand Schools is not responsible for the information practices of such third-party websites.

### **Schoology and Google Login**

You can log in to our site using sign-in services such as Schoology and Google. These services will authenticate your identity and provide you the option to share certain personal information with OnHand Schools, such as your name, date of birth, and email address to pre-populate our sign up form.

### **Security**

The security of your personal information is important to OnHand Schools. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it, and our website and apps are protected by HTTPS encryption. When you enter credit card information on our order forms, that information is encrypted and protected by our third-party payment providers, Stripe and Square. OnHand Schools does not process, record, or maintain your

credit card or bank account information. No method of transmission over the internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our website, you can contact us at [privacy@kandoolu.com](mailto:privacy@kandoolu.com).

### **Data Retention**

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, contact us at [support@kandoolu.com](mailto:support@kandoolu.com). We will only retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Data Breach Practices**

We comply with relevant laws regarding data breaches. If we know or have reason to know of a systems security breach by an unauthorized party of your user data where that data is being used or is likely to be used for an unauthorized purpose, we will promptly notify you so that you can take appropriate steps.

### **Contact Us**

If you have questions or wish to send us comments about this Privacy Policy, please contact us at [privacy@onhandschools.com](mailto:privacy@onhandschools.com), call 412-325-8000, or write us:

OnHand Schools Inc. Attn. Kandoolu Privacy  
1501 Reedsdale St  
Suite 5000  
Pittsburgh PA 15233

If you wish to report a security breach, please contact us at [privacy@onhandschools.com](mailto:privacy@onhandschools.com).

### **Privacy Policy Changes**

OnHand Schools reserves the right to modify this Privacy Policy at any time, so please review it frequently. If we change how we use your personally-identifying information, we will notify, by email, and/or by means of a notice on our website prior to the change becoming effective.

This policy was last updated in June 2017 and in effect as of June 1, 2017.