



## THE DIGITAL ACADEMY PRIVACY POLICY

The Digital Academy understands that privacy is tremendously important to visitors to our website, to teachers and schools who use our Sites, Apps and Services (“Schools”), and to students and parents whose information we store on behalf of their Schools. The Digital Academy has prepared this Privacy Policy to describe our practices regarding personal information that may be collected from users (“you”) when you interact with any Digital Academy site (“Sites”), application (“Apps”) or other related educational service (“Services”) that posts or links to this Privacy Policy:

1. Sites include [www.digitalacademy.org](http://www.digitalacademy.org), [www.logicbox.education](http://www.logicbox.education) and [www.spaceforce.education](http://www.spaceforce.education).
2. Apps include The Digital Academy mobile applications.
3. Services include our APIs and other services.

We are committed to protecting your personal information and satisfying all applicable legal requirements, including the Children’s Online Privacy Protection Act (“COPPA”) and the Family Educational Rights and Privacy Act (“FERPA”), through our compliance with this Privacy Policy.

By submitting personal information through our Sites, Apps or Services, you expressly consent to the processing of your personal information in accordance with this Privacy Policy. We promise to limit the use of personal information collected through our Services to the purposes described in this Privacy Policy.

### 1. HOW WE COLLECT AND USE YOUR INFORMATION

#### Information We May Collect:

- The Digital Academy may collect your name, school name, school district, email address, account name, password, phone number, message content and other information needed by the school such as a student identification numbers and parent-child relationships.
- If you create an account or log in with your Google account, we collect your first name, last name, email and Google ID from your Google account.
- If you attach a file from your Google Drive to a Homework Assignment, Announcement or Post within The Digital Academy, we create a PDF copy of the file and store that as long as the Homework assignment, Announcement or Post is visible within The Digital Academy.
- If you are an individual signing up for a public course, we may also collect your billing address and credit card information; however, individuals who sign up for a free account are **not required** to enter a credit card or billing address.
- Once a School begins using The Digital Academy, we track and retain related records of all activity within the School account.



### How We Collect Information:

- **From your School** – Schools have the option to import information directly to The Digital Academy Website, Apps and Services. In some cases, Schools may choose to import data from another vendor, such as a Student Information System (e.g., PowerSchool) or a third-party data source (e.g., Clever). We may also collect information provided by a School if the School sends us a message, posts content to our Sites, Apps or Services, or responds to emails or surveys.
- **From You** – When you, as a student, parent, teacher or administrator of The Digital Academy, create a Digital Academy account, we ask for your name, username, password, school organization and email address in order to create your account. Additionally, you may upload an image, add a phone number or add an address to your profile. These will also be made part of your online record with The Digital Academy.
- **From Google** – When you link a Digital Academy Account to a Google account for the purpose of logging in, we collect your name, email and Google account ID from Google. When you add a file to The Digital Academy from your Google Drive, we capture a PDF version of the file.
- **Information Automatically Collected through Technology** – We automatically collect certain types of usage information when you view our Sites, Apps and/or Services. We may use cookies — a small text file containing a string of alphanumeric characters — to record current session information. We also collect information about how you use the Services (e.g., the pages you view, the links you click and other actions you take on the Services) and your usage of the Services over time. We may collect log file information from your browser or mobile device each time you access the Services. Log file information may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, information about your mobile device, number of clicks, how you interact with links on the Services, pages viewed and other such information. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Services. We do not allow any third-party advertising networks to collect information about the users of our Sites, Apps or Services.



**What We Do with This Information:**

- **Student (and other user) Data** – The Digital Academy has access to personally identifiable information about users and, in particular, students (“Student Data”) only as determined by the School, and only for the purpose of providing the Services on the School’s behalf. We strictly maintain the confidentiality of Student Data and do not use Student Data for any purpose other than to provide the Services. Schools may allow students, teachers and parents to log into The Digital Academy to access School materials and/or third-party applications that have been authorized by the School. In the case of students, the School is solely responsible for obtaining appropriate parental consents, as needed, before the student is permitted to access the Services.
- **Information Collected Automatically through Technology** – We use automatically collected information to operate, maintain and provide the features and functionality of our Services, to analyze our Services offerings and functionality, and to communicate with Schools and website visitors. We use or may use data collected through cookies, log files and device identifiers to: (a) remember information so users will not have to re-enter it during subsequent visits; (b) provide custom, personalized content and information; (c) provide and monitor the effectiveness of our Services; (d) monitor aggregate metrics such as total number of visitors, traffic, and usage on our website and our Services; (e) diagnose or fix technology problems; and (f) help users efficiently access information after signing in.
- **Billing Information** – Your billing information is only used for billing purposes and is kept confidential.

**Questions about Student Data:** If you are a student or parent, please contact your School if you have questions about the School’s use of technology service providers such as The Digital Academy. If a student contacts The Digital Academy with a question about our Services, we will collect personal information from that student only as necessary to respond to the student’s request and direct the student to contact the student’s School.

See [How We Share Your Information](#) below for more information on the limited ways in which we share School and Student Data. See [Children’s Privacy](#) below for more information on how we collect and use the personal information of children under 13.



## 2. HOW WE SHARE YOUR INFORMATION

The Digital Academy only shares your personal information in a few limited circumstances, described below. We do not rent or sell information for marketing purposes.

With Whom We May Share Information:

- We may share information with third parties that provide us with technology services (“Service Providers”), strictly for the purpose of carrying out their work for us (e.g., web hosting and analytics services) and which are bound by contractual obligations to keep personal information confidential. See [The Digital Academy Service Providers](#) list below.
- We may be required to share information with law enforcement or other third parties when compelled to do so by court order or other legal process, to comply with statutes or regulations, to enforce our [Terms of Service](#), or if we believe in good faith that the disclosure is necessary to protect the rights, property or personal safety of our users.

In the event of a change of control: If we sell, divest or transfer our business, we will not transfer personal information of our customers unless the new owner intends to maintain and provide the Services as a going concern, and provided that the new owner has agreed to data privacy standards no less stringent than our own. In such case we will provide you with notice and an opportunity to opt out of the transfer of Student Data.

### **The Digital Academy Service Providers**

Below is a list of Service Providers that provide us with technology services and with which data is shared. This list covers the major service providers utilized by The Digital Academy but may not be comprehensive. For questions about The Digital Academy Service Providers, please contact us at [support@digitalacademy.org](mailto:support@digitalacademy.org).

Client Data Storage:

The Digital Academy Website and Services have industry-standard security measures in place to protect the loss, misuse and alteration of the information under our control. While there is no such thing as “perfect security” on the Internet, we will take all reasonable steps to insure the safety of your information. Although The Digital Academy owns the data storage, databases and all rights to The Digital Academy application, you retain all rights to your data, and we will never sell or share your client data with any third parties or use your data for our own business advantage. We respect the privacy of our subscribers and the privacy of their data.



**Service Providers (third parties utilized by The Digital Academy):**

- Enterprise Data Solutions, Inc. (EDSI) – All permanent files uploaded to The Digital Academy Learning, including any personal information contained in those files, are stored on servers hosted in the EDSI Data Center. Refer to the section on how we protect your information below for details on data storage.
- SecureData 365 – All data is replicated to a secure facility at the SecureData 365 Data Center. Refer to the section on how we protect your information below for details on data storage.
- Clever, Inc. – The Digital Academy can send roster data to Clever for integration with other thirty-party learning service providers. This is only done at the request of the school and is done using a secure account managed by the school.
- LTI Tool Providers – LTI Tools are approved and added by Schools on an individual basis. Each provider has a different set of required fields for the integration to work. Often these fields require user ID, name, username and/or email.

Please note that The Digital Academy Privacy Policy applies to The Digital Academy and not any third-party services or applications, which may have their own privacy policies.

We store your data in the United States, and we take strong measures to keep your data safe and secure.



### 3. HOW WE STORE AND PROTECT YOUR INFORMATION

**Storage and Processing:** Any information collected through The Digital Academy is stored and processed in the United States. If you use our Services outside of the United States, you consent to having your data transferred to the United States.

**Keeping Information Safe:** The Digital Academy maintains strict administrative, technical and physical procedures to protect your information, which is stored on secure servers located in the United States. Access to information is limited (through user/password credentials and two-factor authentication) to those employees who require such access to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and signup information. Other security safeguards include, but are not limited to, data encryption, firewalls, intrusion detection software and physical access controls to building and files. All information you provide to us is backed up on a regular basis.

The Digital Academy maintains a written incident response plan for responding to security breaches. In the event of a security breach, The Digital Academy will report any confirmed or suspected breach to designated customer leadership as soon as possible after the discovery, both orally and in writing, but in any event within two (2) business days after The Digital Academy security personnel confirm that a breach has or may have occurred.

The safety and security of your information also depends on you. We urge you to be careful about sharing your account information or giving out information in any public areas of the Services such as the message boards or forums. The information you share in public areas may be viewed by other authorized users of the Services.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Services. We are not responsible for circumvention of any privacy settings or security measures contained within the Services.

If you have any questions about data storage and protection, contact us directly at [support@digitalacademy.org](mailto:support@digitalacademy.org).



## 4. YOUR CHOICES ABOUT YOUR INFORMATION

**Account Information and Settings:** Schools may update account information and modify Services by signing into the administrator account. Schools and other website visitors can opt out of receiving promotional email from us by clicking on the “unsubscribe” feature at the bottom of each email. Users can update their individual notification preferences within relevant Sites, Apps and Services to control certain Service-related messaging. Other Service-related messaging (such as password reset communication) cannot be disabled.

If you have any questions about reviewing or modifying account information, contact us directly at [support@digitalacademy.org](mailto:support@digitalacademy.org).

**Access to Student Data:** Student Data is provided and controlled by the Schools. If you have any questions about reviewing, modifying or deleting personal information of a student, please contact your School directly.

**Deleting or Disabling Cookies:** You may be able to disallow cookies to be set on your browser. Please look for instructions on how to delete or disable cookies and other tracking/recording tools on your browser’s technical settings. You may not be able to delete or disable cookies on certain mobile devices and/or certain browsers. For more information on cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Remember, disabling cookies may disable many of the features available on the Services, so we recommend you leave cookies enabled.

### **How long we keep User Content:**

**Schools –** Following termination or deactivation of a School account, The Digital Academy may retain user data and content for a commercially reasonable time, for backup, archival or audit purposes. Any and all Student Data associated with the School will be deleted within 30 days of contract termination. We may maintain anonymized or aggregated data, including usage data, for analytics purposes only.

**Solo Accounts –** Every user with a solo account has an option to deactivate their account at any time. Deactivating the account will result in immediate deletion of all personal account information. Again, we may maintain anonymized or aggregated data, including usage data, for analytics purposes only. If you have any questions about data retention or deletion, please contact [support@digitalacademy.org](mailto:support@digitalacademy.org).

We do not collect any information from children without parental or legal guardian consent.



## 5. CHILDREN'S PRIVACY

**Schools** – Schools using The Digital Academy for children under 13 years of age are required by our [Terms of Service](#) to obtain appropriate parental consent to use The Digital Academy.

**Solo Account Sign Up** – All users must be 13 years or older to sign up for a Digital Academy account. If a child is under the age of 13, a parent or legal guardian **MUST** sign up for a Digital Academy account under the parent's or legal guardian's name on behalf of the child. Except as authorized above, The Digital Academy does not knowingly collect any information from children under the age of 13. Please contact us at [support@digitalacademy.org](mailto:support@digitalacademy.org) if you believe we have inadvertently collected personal information of a child under 13 without proper parental consent. If we learn that we have collected personal information from a child under 13 without parental consent having been obtained, we will delete that information as quickly as possible.

## 6. LINKS TO OTHER WEBSITES AND SERVICES

The Digital Academy reviews our partners and their privacy policies carefully. However, The Digital Academy is not responsible for the practices employed by websites, applications or services linked to or from our Services. We recommend that the School review the privacy policies of other applications before authorizing a third-party to access data through our Sites, Apps or Services.

## 7. HOW TO CONTACT US

If you have any questions about this Privacy Policy or The Digital Academy, please contact us at [support@digitalacademy.org](mailto:support@digitalacademy.org).

Our Mailing Address is

The Digital Academy  
c/o Enterprise Data Solutions, Inc.  
1717 Superior Avenue, E.  
Cleveland, OH 44114

## 8. CHANGES TO THIS PRIVACY POLICY

The Digital Academy may modify or update this Privacy Policy from time to time; please review this page periodically. The date that this Privacy Policy was last updated is identified at the bottom of this page. If we make a material change to this Privacy Policy with respect to how we collect and use your personal information, we will notify you by email. We will provide you at least 30 days' prior written notice using the email address specified in your account (if you have one) so you have sufficient time to evaluate the change. You can choose to opt out by deleting your Digital Academy account before the change takes effect. You are responsible for ensuring that we have an up-to-date, active and deliverable email address for you and for periodically visiting this Privacy Policy to check for any changes.

***This Privacy Policy was last modified on July 1, 2019.***