



# Tools Digital Products Privacy Policy

## Introduction

Tools of the Mind (“Tools”) is a research-based early childhood program that works to close the achievement gap for low income, minority and dual language learning (DLL) children by systematically building the foundational skills children need to be successful in school and life.

Tools Digital Products (“TDP”) support the Tools of the Mind curricular approach to learning, as an innovative literacy learning platform designed to provide children with supported reading practice and increase teachers’ understanding of each child’s development with powerful data and analytics. Tools Digital Products is designed to be used only by educators who are implementing the Tools of the Mind curriculum to help support children learning. Teachers are in complete control of how that information is shared.

Here are key takeaways from our Privacy Policy:

- Protecting children’s privacy is fundamental to working with teachers, schools, and school districts. Our practice is not to collect any more information we need in order to provide and improve our educational services;
- We do not sell child, school, or district data;
- We do not advertise in Tools Digital Products;
- Children’s work is private to the school district and to Tools support staff;
- We use the latest security industry best practice to protect you;
- We are transparent in our practices and will notify you if things change.

By using Tools Digital Products, you agree to this Privacy Policy. If you don’t agree, don’t use Tools Digital Products. You can contact us at any time with questions at [privacy@toolsofthemind.org](mailto:privacy@toolsofthemind.org).

## Tools Digital Products and Parental Consent

We require that teachers and school-districts obtain parental consent before using Tools Digital Products. Classrooms participating in Tools professional development programs including, but not exclusive to TREE (Teachers Reaching Educational Excellence program) or Tools Teacher and Coach Endorsement, will share classroom videos with Tools. The teacher is responsible to apply discretion and only capture in videos children whose families have given the school permission to videotape.

Parental consent can be obtained as part of a school-wide technology consent process that you already have in place. Tools provides the school district access to TDP on the district’s representations that they have obtained this consent for each child to whom the district will provide access to any of the applications. As a teacher or a school district, you may withdraw the consent by sending a request to [privacy@toolsofthemind.org](mailto:privacy@toolsofthemind.org). A parent of a child that uses TDP at one of our partner schools can refuse to permit us to collect further personal information from the parent’s child in association with a particular account, and can request that we delete from our records the personal information we have collected in connection with

that account. The parent should communicate such request to the child’s teacher, or by sending a request to [privacy@toolsofthemind.org](mailto:privacy@toolsofthemind.org) that includes the name of the child, teacher, and school district. Please keep in mind that a request to delete records may lead to a termination of an account, membership, or other service. We may request additional information to verify the requestor’s identity in response to receiving a request.

## For what purpose do Tools Digital Products collect information?

The sole reason for collecting this information is in furtherance of Tools Digital Products’ educational purposes, including improving classroom instruction and child learning outcomes.

## What information does Tools Digital Products collect?

We collect data regarding a) the child, b) the teacher or school administrator, c) family communication, and d) the device being used and non-identifiable metadata.

Summary of All Data Collected	
<p><b>a) The Child</b></p> <ul style="list-style-type: none"> <li>• Child’s name or any other identifier chosen.</li> <li>• Child’s interactions with Tools Digital Products application, including audio recordings.</li> <li>• Classroom videos that teachers choose to share with Tools</li> </ul>	<p><b>c) The Teacher/School Administrator</b></p> <ul style="list-style-type: none"> <li>• Teacher/school administrator’s name and email address.</li> <li>• Name of school and district.</li> <li>• Teacher classification of child’s data.</li> <li>• Messages (including photos and/or videos) shared between teachers, and between teachers and Tools support staff.</li> <li>• Classroom videos that teachers choose to share with Tools</li> </ul>
<p><b>b) Family Communication</b></p> <ul style="list-style-type: none"> <li>• Text messages, videos, and/or photos of home learning that the family chooses to share with teachers.</li> </ul>	<p><b>d) Device and Metadata</b></p> <ul style="list-style-type: none"> <li>• Type of device used (incl. iPad model and operating system version).</li> <li>• Device’s IP address and identifier (“UDID”).</li> <li>• Metadata collected through Google Analytics and other analytic programs (incl. time spent using the app, anonymous usage trends).</li> </ul>

## **How does Tools use the information collected through Tools Digital Products?**

The information gathered is used with teachers, literacy specialists, coaches, and school administrators in a continuous, adaptive, and personalized feedback loop to improve instruction, track children's progress, and provide targeted individual support to each child. Additionally, TDP combine data about its users in an anonymous (de-identified) and aggregated fashion, which allows us to analyze overarching trends and patterns. With de-identified data, we can continuously improve our application to better meet the needs of teachers and children and advance our understanding of the educational science behind how children learn to read.

## **Who has access to children's information?**

The school authorizes and designates school administrators, teachers, literacy specialists and/or coaches to have access to a child's data. Those authorized are able to use the Tools Digital Products Portal (the web-based, electronic dashboard) to access information about an individual child. Teachers and school administrators may choose to share a child's information with other educators and administrators in their system. Specific Tools staff may access data in order to provide support to classroom teachers. No child, teacher, school administrator, classroom or school-district information are made available to the general public through TDP.

If a parent or legal guardian wishes to review a child's data, he or she may contact his/her child's teacher or school administrator.

Please keep in mind that personal, identifiable data (including children's personal information) that TDP teachers, school-administrators, and parents voluntarily share with others – including to other TDP users (such as posts shared in the Tools Community) – can be viewed, copied, stored, and used by the people you share it with. Tools cannot control the actions of people with whom users choose to share information and we are not responsible for the collection, use or, disclosure of such information by others.

## **Is information collected through Tools Digital Products shared with third parties?**

Tools does NOT release, disclose or sell personal identifying information collected or received in Tools Digital Products or its other services to any unrelated third parties, including for promotional or advertising purposes. We may, however, share information with our service providers, research collaborators and as required by applicable law (e.g., to comply with government requests).

As part of Tools' mission to meet the needs of all learners and close the achievement gap, Tools partners with a select group of leading literacy and neuroscience researchers to continue to advance the science of how children learn to read and meet the needs of diverse learners. As part of these partnerships, Tools may share de-identified/anonymized data.

The de-identified data and information described above is collected for the purposes of empowering teachers and school administrators to improve instruction and facilitate a child's learning.

## Does Tools Digital Products use third-party analytics?

Tools uses web analysis tools, including Google Analytics and similar analytics applications, to track teachers' and school administrators' use of the Tools Digital Products Analytics Portal (the web-based, electronic dashboard).

This non-identifiable metadata collected at the device level provides Tools with information that can help us ensure that Tools Digital Products is implemented in classrooms seamlessly across different device models and operating system versions, and to ensure that the Tools Digital Products app is generally tailored to the needs of Tools Digital Products users.

## How can information be deleted from Tools Digital Products?

Any school or district-authorized Tools Digital Products user can permanently delete all identifiable data for each individual child at any time by logging into the classroom account. Under our agreement, Tools retains a nonexclusive royalty-free license to use de-identified data that is maintained by the school system for educational and research purposes.

Unless otherwise requested or as stipulated in the school district's contract, all data collected about a child will be automatically destroyed five (5) years after collection.

## How does Tools keep information safe?

We apply a number of technical and physical security measures to help protect against loss, misuse, and alteration of user information collected by Tools Digital Products. Only selected members of Tools staff can access the raw data for technical assistance and quality assurance purposes. We employ all industry standards and best industry practices to secure the data that is entrusted to us.

All of Tools Digital Products' infrastructure runs in the cloud. Our primary cloud provider, Amazon Web Services (AWS), is the industry leader in secure and reliable hosting, and conforms to numerous domestic and international security standards including SOC 1/SSAE 16/ISAE 3402, SOC 2, PCI DSS Level 1, ISO 27001, and FISMA. AWS provides infrastructure for thousands of companies, K-12 schools, universities, and governments.

We use modern industry standard encryption (e.g. AES-256) to encrypt user data in Tools Digital Products that is stored on our servers, use TLS / SSL to encrypt communication in transit to and from our servers and secure access to the Tools Digital Products Analytics Portal via end-to-end encrypted HTTPS connections to provide user security. While we strive to use commercially reasonable means to secure your data, no method of transmission over the Internet, or method of electronic storage is 100% secure and we cannot guarantee absolute security of your information. User credentials are handled via Auth0, which provides industry standard security, is HIPAA eligible and PCI DSS, SOC, and ISO/EIC 27018, compliant. In addition, all sensitive usage and analytics data is stored separately from identifiable data such as children's names and is linked to a child's name only using a randomly generated key which is stored in a secure encrypted database.

## Changes to This Privacy Policy

*Last Updated: June 30, 2023*

We understand that technology and data privacy best practices change rapidly. We are committed to reviewing this Privacy Policy periodically to ensure that this Privacy Policy is informed by the latest available privacy guidelines and regulations.

Any successor in interest to TOTM, including but not limited to by operation of law, shall comply with the terms of this Privacy Policy.

If we make any material changes, we will send the school district a notice outlining clearly what the changes are and obtain the school's explicit consent within 30 days of the change.

## **Contact Us**

If you have any questions or feedback regarding your privacy and this policy, please contact us at [privacy@toolsofthemind.org](mailto:privacy@toolsofthemind.org).