



Student information is critically important to Apptegy and we know you feel the same. Please read below for information about how we are partnering with you in best practices.

### **Why are you sending this now?**

The Federal Trade Commission (FTC) has made student information a priority, particularly as it relates to COPPA ([link](#)). And the FTC has recently given new guidance about what it expects for EdTech COPPA practices ([link](#)). We want to make sure you have this information, summarize the key points, and give you confidence in Apptegy's practices.

### **What do we need to do for Thrillshare?**

Two things - schools must make a reasonable effort to (1) provide notice to parents and guardians about Apptegy's student information practices and (2) establish consent through an FTC-accepted method.

### **How do we do that?**

*1: provide notice about Apptegy's student information practices:* Apptegy publicly discloses our student information practices in detail in our privacy policy, which is always accessible [here](#). Parents and guardians can review our practices at any time via that link. We have attempted to make it easily readable and understandable. We update it when there is a material change in our practices. Schools can provide parents and guardians our privacy policy in any number of ways, including forwarding this notice in its entirety to parents and guardians or making the link available on the school website.

*2: establish consent through an FTC-accepted method:* For Thrillshare, schools establish FTC-accepted consent by "school authorization." School authorization means a school representative authorizes Apptegy to collect student information by the practices disclosed in our privacy policy on the condition that student information is collected only for an "educational purpose." Educational purpose includes any use related to a child's education including instruction in the classroom or at home, administrative activities, and collaboration between students, school personnel, or parents. The FTC has described school authorization as the school providing consent as agent on behalf of parents and guardians for educational purpose EdTech.

Schools can rely on school authorization for Thrillshare because of Apptegy's relationship with you. Our contract with you confirms in writing that we collect and use student information solely for the educational purposes authorized by you. We do not collect student information for any other purposes. We also confirm in writing that all student information is always under your direct control, and we provide detailed descriptions of all personal information that is collected and how it will be used and disclosed. You don't have to take our word for it: iKeepSafe, a leading third-party COPPA audit organization, reviewed our practices and granted Thrillshare its COPPA compliance certification (<https://ikeepsafe.org/certifications/>).

### **In summary**

We are your partner in student information best practices. We only use student information to provide Thrillshare to you and your users. We only collect the student information that is necessary for that limited purpose. You always directly control the use and maintenance all student information. Please see our [privacy policy](#) for more detailed information.

*\*This information is for general information purposes only and is not legal advice. It is summary information and may not include all details relevant to individual circumstances. For advice with respect to any particular circumstance or question, you should seek the advice of your legal counsel.*