

PERTS Privacy Policy for Neptune-Based Programs

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About PERTS

PERTS is a center at Stanford University that helps educators apply evidence-based strategies in order to increase student engagement and success. We believe that properly scaling evidence-based strategies can empower schools to reduce inequality and create better experiences for all students and teachers. We are committed to protecting students' privacy, and we take multiple measures to ensure that all data are stored safely and used only by authorized individuals for appropriate purposes, as described below. Our data policies are approved by the Stanford University Institutional Review Board.

Privacy Policy Overview

Personal Information is any information provided to PERTS that personally identifies students, like their name, email address, student ID, or other information that could be used to figure out a student's identity (for a more complete definition, see "[Personal Information](#)" in the definitions section below). In order to develop and improve useful recommendations for educational organizations, PERTS sometimes collects Personal Information about students. Permission to collect and store Personal Information is provided to PERTS by an Originating Educational Organization when it registers to participate in a PERTS program. That agreement strictly limits the ways PERTS can use that information, as described below, and PERTS never sells or rents Personal Information to any third party for any purpose. The most up-to-date version of this policy can always be found at perts.net/neptune-privacy.

Covered Programs

This Privacy Policy governs the way PERTS collects, uses, and shares Personal Information collected from Originating Educational Organizations in the course of administering the following programs:

- Growth Mindset for College Students
- Growth Mindset for 9th Graders
- Social-Belonging for College Students

Table of Contents

About PERTS	1
Privacy Policy Overview	1
Covered Programs	1
Table of Contents	1
The Who, What, and Why of this Privacy Policy	2
Purpose	2
Ownership of Information	2
Expiration	3
Allowed Access	3
Sharing Personal Information	3
Information Storage	3
Information Transfer	3
Deletion	3
Anonymous Information	4
Changes to this Policy	4
3rd Party Tracking	4
Definitions	4
Originating Educational Organization	4
Direct Identifier	4
Indirect Identifier	4
Personal Information	4
Anonymous Information	5
Authorized Organizational Representative	5

The Who, What, and Why of this Privacy Policy

Purpose

PERTS collects Personal Information in order to enable an Originating Educational Organization to successfully implement a PERTS program. For example, PERTS may provide an Originating Educational Organization with the student IDs of students who did not complete a program so that make-up sessions can be arranged for them. PERTS will only collect personal information to the extent that it is necessary for the provision of services under this agreement; we never collect extraneous Personal Information.

Ownership of Information

All Personal Information is considered the property of the Originating Educational Organization. We will never sell or rent it or use it any way not allowed by this policy. We will also comply with their requests to delete it.

Expiration

PERTS deletes Personal Information within four years of receiving it unless we are granted explicit written permission by the Originating Educational Organization to extend that period.

Allowed Access

PERTS only allows individuals to access Personal Information under one of the following circumstances:

- The individual is an [Authorized Organizational Representative](#) (defined below) of the Originating Educational Organization.
- We are required to do so by law. (FYI, this has never happened before.)
- The individual is a member of the PERTS staff or an organization that provides business services to PERTS and all of the following conditions are met:
 - The individual needs to access that information for the purposes of implementing the program in question.
 - The individual has been trained in data management and student privacy laws and protections.
 - The individual is explicitly forbidden from sharing the Personal Information with other parties.

Sharing Personal Information

We do not share Personal Information with anyone except under the circumstances explicitly described under [allowed access](#). Furthermore, lest there be any doubt, we never share Personal Information with marketing companies or other third parties who are not directly involved in the provision of services to the Originating Educational Organization. (That is already covered by the allowed access provisions, but we want to leave absolutely no doubt.)

Information Storage

We store Personal Information strictly on encrypted media that can only be accessed by the individuals who are allowed to access it, as described under “[allowed access](#).” We only use cloud services that are audited by third parties and certified to meet the SSAE-16 standard or higher. To see a full list of the cloud storage providers we use and their security statements, see perts.net/cloud-security. We have strict policies for physical security as well, including requiring that staff use only PERTS-provided, password-protected computers.

Information Transfer

All our websites involved in data collection, and all data transfer between them and various cloud services (see Information Storage, above) use industry-standard Transport Layer Security (TLS) encryption, also known as HTTPS.

Deletion

Requests to delete the personal information of one or more students should be submitted to PERTS at support@perts.net by an Authorized Organizational Representative of the Originating Educational Organization. All requests will be honored as soon as technically possible.

Anonymous Information

PERTS may share Anonymous Information, e.g., aggregated usage numbers, publicly or with its users or partners, e.g., to promote its services or to increase awareness about the effectiveness of specific evidence-based strategies. Any information shared in this way will not contain any Personal Information, and it will only be shared if it meets the strict definition of [Anonymous Information](#) we specify below.

Changes to this Policy

We may update this Privacy Policy in the future. However, we will not reduce the rights of students or Originating Educational Organizations under this Privacy Policy without the explicit consent of an Authorized Organizational Representative. If there are significant changes to this policy, we will email its Authorized Organizational Representative a new version of the policy and a description of the change that was made. At that point, the Authorized Organizational Representative may request that we delete all Personal Information collected from their organization.

3rd Party Tracking

We do not track individuals across third party websites.

Definitions

Originating Educational Organization

An Originating Educational Organization is an educational organization that provides information about students to PERTS under this agreement.

Direct Identifier

A direct identifier is a piece of information that could, on its own, be used by someone in the public or the school community to uniquely identify a student with reasonable certainty. For example, a student's name, student ID, or school network ID are all direct identifiers.

Indirect Identifier

An indirect identifier is a piece of information that could — in combination with other information — potentially be used by a reasonable person in the school community to uniquely identify a student. Indirect identifiers include any features about a student that a typical member of the school community might know or be able to observe about a student. As such, they include, but are not limited to, race, ethnicity, nationality, gender, birth date, age, classroom, ELL status, and teacher name.

Personal Information

PERTS bases its definition of Personal Information on FERPA, the federal law governing student privacy. We consider something Personal Information if it “includes any information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty.” In other words, we consider something Personal Information if it contains direct identifiers, like a student’s email address or school network ID. But we also consider it Personal Information if it contains indirect identifiers that would allow someone in the school community to uniquely identify a student with reasonable certainty. For example, if there is only one male Native American student at a particular school, then the combination of the school’s name and the student’s race and gender would be sufficient to identify the individual student with reasonable certainty. In that student’s case, therefore, information that contained that student’s race, gender, and school would be Personal Information.

Anonymous Information

Anonymous Information is information that contains no Personal Information, as defined above. That is, it does *not* contain any data that could be used to identify an individual student because any potentially identifying information has been aggregated or removed. PERTS only considers information Anonymous Information if (1) it has no direct identifiers and no indirect identifiers or (2) no direct identifiers and the full combination of indirect identifiers is shared across at least 5 records. For example, if there are 4 White females in a particular classroom, then a dataset for that classroom would not be anonymized if it contained gender and race because there would be only 4 records containing the indirect identifier “White” for race and “female” for gender. In contrast, the dataset would be considered anonymized if there were 5 or more White females.

Authorized Organizational Representative

An authorized organizational representative is a person designated by an Originating Educational Organization to receive Personal Information from PERTS. For example, PERTS may provide an Authorized Organizational Representative with the student IDs of students who did not complete a program so that make-up sessions can be arranged.