



Privacy Policy of Scholarly Space (www.Scholarly.Space)

This Application collects some Personal Data from its Users.

Data Controller and Owner

Scholarly Space, LLC, privacy@scholarly.space

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies, Usage Data, first name, last name, email address and school name.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data

collection. The Personal Data may be freely provided by the User, or collected automatically when using this Application. Any use of Cookies - or of other tracking tools - by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User. Failure to provide certain Personal Data may make it impossible for this Application to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from

the Data Controller at any time.

Place

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

Retention time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

The use of the collected Data

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Analytics, Access to third party services' accounts, Registration and authentication, Content commenting and Displaying content from external platforms.

The Personal Data used for each purpose is outlined in the specific sections of this document.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services: You may revoke Scholarly Space's access to your account on any Integrated Service, such as Google, at any time by updating the appropriate settings in the account preferences of the respective Integrated Service. You should check your privacy settings on each Integrated Service to understand and change the information sent to us through each Integrated Service. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Properties.

Access to third party services' accounts

This type of services allows this Application to access Data from your account on a third party service and perform actions with it. These services are not activated automatically, but require explicit authorization by the User.

Access to the Google Drive account (Google Inc.)

This service allows this Application to connect with the User's account on Google Drive, provided by Google, Inc.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: US – [Privacy Policy](#)

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#)

Content commenting

Content commenting services allow Users to make and publish their comments on the contents of this Application. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments. If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

Comment system managed directly (This Application)

This Application has its own internal content comment system.

Personal Data collected: Usage Data and User ID.

Displaying content from external platforms

This type of services allows you to view content hosted on external

platforms directly from the pages of this Application and interact with them. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

These platforms require affirmative opt-in consent from the user. Scholarly Space will never share Education Records with third parties except (i) as directed by a Scholarly Space user (i.e., teacher sharing with another teacher or parent); or (ii) to our service providers that are necessary for us to provide the Service.

YouTube video widget (Google Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#)

Vimeo video (Vimeo, LLC)

Vimeo is a video content visualization service provided by Vimeo, LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#)

Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is

described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third party services, for registration or identification purposes. If you decide to register through or otherwise grant access to a third-party social networking or integrated service (what we call an "Integrated Service"), such as Google, Scholarly Space may also collect Personal Information that is already associated with your Integrated Service account. You may also have the option of sharing additional information with Scholarly Space through an Integrated Service. If you choose to provide such information, during registration or otherwise, you are giving Scholarly Space the permission to use, share, and store it in a manner consistent with this Privacy Notice.

Google OAuth (Google Inc.)

Google OAuth is a registration and authentication service provided by Google Inc. and is connected to the Google network.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: US – [Privacy Policy](#)

Direct registration (This Application)

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data collected: school name, email address, first name and last name.

Further information about Personal Data

The Service is directed to children under the age of 13

This Application is directed to children under the age of 13. It doesn't require the child to disclose any more information than is reasonably necessary to participate in its activity. Parents may review the personal information about their child collected by this Application - if any - outlined in the rest of this policy, ask for its deletion and request any further collection or use to be omitted by contacting the Owner. Parents may also agree to the collection and use of their child's information, but still not allow disclosure to third parties, unless disclosure is integral to the Service.

Legal FAQs

Does Scholarly Space comply with COPPA (Child Online Privacy Protection Act)?

Yes. The FTC has specifically stated that COPPA's requirements do not apply to sites that contract with schools to offer online programs for the benefit of the schools and their students, and collect personal information only for these purposes. (FTC COPPA FAQ #55.) Thus, these services are not required to get prior verifiable parental consent before collecting or maintaining personal information. Scholarly Space, LLC's services are offered pursuant to Scholarly Space, LLC's contracts with

school districts, and Scholarly Space, LLC does not collect personal information for other purposes. The FTC has said that in such circumstances, operators like Scholarly Space, LLC may presume that the school has authorized the collection of personal information based upon the school having obtained the parents' consent. Schools often obtain parental consent via Acceptable Use Policies that they provide to students and parents. In addition, COPPA also allows, but does not require, schools to act as agents on behalf of parents and to provide consent for the online collection of a student's personal information within the school context. (FTC COPPA FAQ #54.)

Does Scholarly Space comply with FERPA (Family Educational Rights and Privacy Act)?

Yes. Scholarly Space, LLC is compliant with FERPA. Scholarly Space expects and suggests that institutions comply with FERPA's notice requirements regarding the use and disclosure of directory and non-directory education records so that students and parents are aware that the school may engage services like Scholarly Space. Institutions are free to inspect or audit our services to assure themselves that all information is used only for the purposes of assisting instructors. Data is kept secure at all times.

Does Scholarly Space comply with P.A. 16-189 (An Act Concerning Student Data Privacy)?

Yes. Scholarly Space, LLC is compliant with P.A. 16-189, including: Scholarly Space, LLC maintains the reasonable security practices outlined by P.A. 16-189. Scholarly Space, LLC treats the privacy of

student data with the utmost seriousness and actively follows generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. We have physical, electronic, and procedural safeguards in place to protect your personal information, including the use of passwords to gain access to your personal information. To protect your privacy and security, you must keep your password confidential. However, even with such measures, no one is able to guarantee that unauthorized third parties will not be able to bypass these measures or otherwise capture information you provide over the Internet. Scholarly Space, LLC does not use personally identifiable information from student from student records to engage in advertising or for any purposes other than those contractually authorized. Scholarly Space, LLC will delete student information upon student, parent, guardian, or board of education request. A student, parent, guardian, or board of education member can make such a request by contacting us at privacy@scholarly.space. [Click here to learn more about P.A. 16-189](#)

Who can I contact at Turnitin if I have privacy concerns?

We are always ready to answer any question or concerns you may have. Please write to us at privacy@scholarly.space.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services. The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System logs) or use for this purpose other Personal Data (such as IP Address).

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

The rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their

contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application does not support "Do Not Track" requests. To determine whether any of the third party services it uses honor the "Do Not Track" requests, please read their privacy policies.

Changes to this privacy policy

Scholarly Space reserves the right, at our discretion, to change, modify, add, or remove portions of the Privacy Policy at any time. Please check the Privacy Policy periodically for changes. Your continued use of the Website after the posting of changes constitutes your binding acceptance of such changes. For any material changes to the Privacy Policy, Scholarly Space will make reasonable effort to provide notice to you of such changes, such as by an email notification to the address associated with your account and/or by posting a notice on the Website requiring a user to affirm their agreement of the updated Privacy Policy. Such amended terms will be effective against You on the earlier of (i) your actual notice of such changes and (ii) thirty days after Scholarly Space makes reasonable attempt to provide you such notice. Disputes arising under the Privacy Policy will be resolved in accordance with the version of the Privacy Policy in place at the time the dispute arose.

Information about this privacy policy

The Data Controller is responsible for this privacy policy.

Definitions and legal references

Personal Data (or Data)

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

Usage Data

Information collected automatically from this Application (or third party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

Data Subject

The legal or natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

Data Controller (or Owner)

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The hardware or software tool by which the Personal Data of the User is collected.

Cookies

Small piece of data stored in the User's device.

Student-generated content

Any student materials created by a student including, but not limited to, essays, research papers, portfolios, creative writing, music or other audio files or photographs, except "student-generated content" does not include student responses to a standardized assessment.

This privacy policy relates solely to this Application.

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