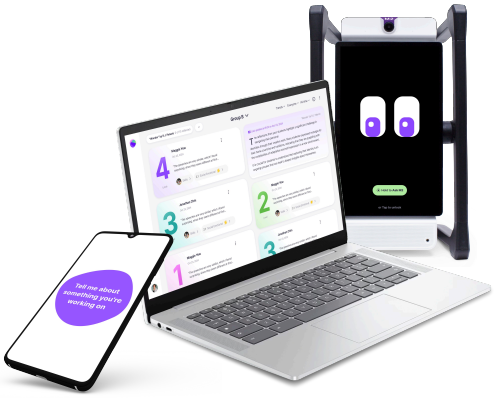
M2+MIRRORTALK

Security and AI privacy concerns



Data security and privacy policies

At Swivl, the security of your data is our highest priority. We understand the trust you place in us to safeguard your information.

- See our Terms to review our contract with you.
- See our Privacy Policy for more information on the information we collect and how it may be used.
- See our Information for California Residents for information on individuals residing in California and compliance with the California Consumer Privacy Act (CCPA).
- See a list of subprocessors with access to certain customer data.

Infrastructure

M2 is powered by MirrorTalk software. MirrorTalk is built on top of Amazon's AWS Cloud platform. This is a partial list of assurance programs with which AWS complies: SOC 1/ISAE 3402, SOC 2, SOC 3 FISMA, DIACAP, and FedRAMP PCI DSS Level 1 ISO 9001, ISO 27001, ISO 27017, ISO 27018.

MirrorTalk uses AES-256 encryption for data storage and TLS 1.2 for data transfer. Databases are regularly backed up and encrypted. We use a number of tools for intrusion monitoring and vulnerability testing. Processes are in place for continual security review, monitoring, and improvement. MirrorTalk content can be stored in United States, Canada, and shortly in UK, Europe, Singapore, and Australia.

MirrorTalk utilizes Google Cloud's Speech-to-Text service to convert recordings into transcripts. Google Cloud complies with global security standards like ISO 27001, SOC 2, SOC 3, HIPAA, GDPR, FedRAMP, and many more. You can view the full list of Google's compliance certifications here.

MirrorTalk utilizes OpenAI Enterprise-grade features via API to generate reflection questions and transcripts as well as analyze transcripts from reflections. OpenAI has several privacy and GDPR certifications, such as SOC2 and 3. More information can be found in its security center:

https://trust.openai.com/.

PII and user content

We collect and store only the personal information needed to create an account, which includes your first name, last name, email address, and position. Registration is restricted to users who are 14 years of age or older from the main sign up form. Registration for students both above and below the age of 14 is achieved via a join weblink issued by a teacher or parent to a group. From this join weblink, a student specific sign up flow is presented for all ages where they can sign up via email or name alone ("Session").

We make sure that we strip all PII prior to using their transcripts. This makes the data we pass as anonymous as possible. For example, we do not send videos or audio to AI. We convert all recordings into transcripts which are devoid of PII.

We do not store audio or video files, nor the resulting transcripts, on Google Cloud's Speech-to-Text service after the transcription is obtained. All content is deleted from the service after processing. Transcripts are temporarily passed through AI for analysis and then returned to Swivl.

One of the ways a teacher can gather student reflections is without connecting students to their district accounts – i.e. students create profiles within the class Session that lives inside a teacher account. This prevents any PII (Personally Identifiable Information) from an SIS system ever being connected.

If the student account is connected to the district system, as it sometimes is necessary for authentication and student record, we do not pass any PII provided by the district system to our AI partners. For example, we do not pass student email or names that are provided by the SIS system to the AI engine. We will never ask a student to provide any PII as part of a reflection or any other MirrorTalk learning activity.

AI

We make sure not to store or allow any of the data to be used for training or other purposes by the AI partners.

Our primary use of AI is for analysis and automation, not content generation. Our users do not have direct access to AI for content generation purposes.

FUNCTION	HOW AI IS USED	HOW YOU'RE PROTECTED
Feedback	Audio stream is temporarily passed through AI to generate live tips, summaries, and feedback.	Our AI partner does not store audio. It is temporarily passed through AI and then returned to Swivl's FERPA/COPPA compliant servers. AI is never trained on your data.
Video	Currently, we support video recordings, but **we do not analyze videos using AI**.	Video files are stored solely on Swivl's FERPA/COPPA compliant servers.
Reflections	MirrorTalk combines research-backed* reflection frameworks, user-inputted learning objectives and/or manual user modifications to produce personalized questions.	Transcripts are temporarily passed through our AI partner for analysis and then returned to Swivl's FERPA/COPPA compliant servers. Audio or video of reflections are never shared. AI is never trained on your data.
Feedback	After a participant reflects, MirrorTalk provides instant, personalized feedback and produces a dashboard with additional insights and scores.	Feedback and reflection data are stored solely on Swivl's FERPA/COPPA compliant servers. AI is never trained on your data.

* Kegan, Piaget, Vygotsky, Webb, Erickson, Dweck, CASEL, and more. For more details, see this article.

Ads

We care about your privacy. No personal identifiable information is shared for advertising. MirrorTalk does not have third-party ads served in our products, and we do not sell personal information to third parties.

FAQ

“Does MirrorTalk share personal information for ads?”

No personal identifiable information is shared for advertising. MirrorTalk does not have third-party ads served in our products, and we do not sell personal information to third parties.

“Our students could use AI to create explicit/inappropriate imagery. Will M2+MirrorTalk allow this?

Our primary use of AI is for analysis and automation, not content generation. We are focusing on building a more reflective student with higher order skills. Currently we do not have any open ended student AI interactions, especially none that have image creation capabilities. In the future, if we ever add such functionality, it will be under district and teacher control to enable and manage, and will be completely logged.

“I heard AI can help students with dangerous activities, such as giving them access to dangerous materials or instructions. Will M2+MirrorTalk allow this?”

Our primary use of AI is for analysis and automation, not content generation. We are focusing on building a more reflective student with higher order skills. Currently we do not have any open ended student AI interactions, especially none that have access to generated materials. In the future, if we ever add such functionality, it will be under district and teacher control to enable and manage, and will be completely logged.

“I heard students use AI to cheat on their assignments. Will M2+MirrorTalk allow this?

Currently we do not have any open ended student AI interactions. When students utilize M2 to ask questions, they are monitored under the teacher’s account, and their questions must be contextually tied to the specific objective entered by the teacher at the beginning of each session. Note that all M2 and MirrorTalk activities are under district and teacher control to enable and manage, and will be completely logged.

“AI is dangerous and is blocked in our district/school so we cannot use M2 or MirrorTalk.”

We understand that certain kinds of AI may pose a threat to your teachers or students. But AI is being used in many existing tools your organization may have already adopted i.e. Google email, Canva, etc. It is not possible to block AI usage entirely if it is embedded in your existing tools, but it is possible to block specific tools such as ChatGPT. Your district most likely is blocking direct use of open-access AI tools students use vs. tools that utilize a closed AI system internally, like M2+MirrorTalk.

“What LLM is being used? What is the corpus that is being used to train the AI? What safe guards are in place to protect against bias, racism, hallucinations, and other negative aspects of current AI models?”

- We understand the concerns for generative AI usage and how it can be imperfect - bias, hallucinating, etc. Companies who are developing LLMs are faced with these challenges and working on solutions.
- We are using AI to analyze audio and reflections and automate that process. We do not provide open ended access to interact with generative AI. Our use of AI is similar to the way other tools, like Gmail work where AI is part of the integrative process and not freely open.We use custom rubrics and prompts to drive the analysis.
- Any AI generated student feedback is provided to the teacher (i.e. “human-in-the-loop”) for the review before turned over to the student.
- We are approaching carefully and gradually in our use of AI models and do test them on a variety of education based stimuli.
- All interactions are logged and can be reviewed and assessed by select internal team members on a case by case basis or upon request.