M2

Privacy protections

FERPA

PROTECTION STATED IN THE POLICY	HOW IT SUPPORTS COMPLIANCE
Swivl acts as a school official under the institution's direct control.	Supports the school official exception for authorized access to education records.
Student information is used only to provide services to the institution.	Supports restrictions on unauthorized use of education records.
Institutions and users can request access, export, and deletion.	Helps schools respond to requests involving student records.
Authorized personnel and processors must maintain confidentiality.	Supports controlled handling of student information.

COPPA

PROTECTION STATED IN THE POLICY	HOW IT SUPPORTS COMPLIANCE
Under-13 use requires appropriate consent, including school authorization where applicable.	Provides a basis for authorized collection in the educational context.
Parents can review, correct, delete, and stop further collection of children's information.	Supports parental control over children's personal information.
Children need disclose only information reasonably necessary for participation.	Supports data minimization.
Customer data is not sold or used for unrelated advertising or marketing.	Supports limits on commercial use of student information.
Deleted content is permanently removed after a 30-day recovery period.	Provides a defined deletion process.

Additional consideration

1. Swivl has signed NDPA agreements with majority of states which any district can incorporate via Exhibit E. If you need to find your specific state NDPA, or from a state where we do not yet have a signed NDPA or have your own version of data sharing agreement, please contact us at support@mirrortalk.ai
2. All the customer data is encrypted in transition and at rest (storage).
3. If you have any IT related questions regarding infrastructure, security, data handling, etc. please contact us support@mirrortalk.ai