REFLECTIVITY

Privacy protections

FERPA

PROTECTION STATED IN THE POLICY	HOW IT SUPPORTS COMPLIANCE
Institutional subscribers own account information and may monitor use.	Supports institutional oversight of education records.
Other users access projects only when deliberately shared.	Supports controlled disclosure of student records.
Users and parents can request copies, corrections, deletion, and electronic exports.	Helps schools respond to records requests.
Personnel must maintain confidentiality; stored file access is restricted.	Supports safeguards against unauthorized access.

COPPA

PROTECTION STATED IN THE POLICY	HOW IT SUPPORTS COMPLIANCE
Under-16 Student accounts require appropriate parental or teacher-provided consent.	Supports consent before collecting children's information.
Parents may object to use and request account or data deletion.	Supports parental control over children's information.
Student information shared with processors is limited to service needs.	Supports limits on third-party data use.
Student account information is not disclosed to business partners.	Supports restrictions on commercial disclosure.
User-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@swivl.com
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@swivl.com