

Privacy Policy

Last updated May 31, 2023

The privacy of students, teachers, and administrators is critically important to us. This is why we've adopted and comply with the following privacy policies and legislation.

- The General Data Protection Regulation ("GDPR")
- The Children's Online Privacy Protection Act ("COPPA")
- The Family Educational Rights and Privacy Act ("FERPA")
- The California Consumer Privacy Act ("CCPA")
- The Virginia Consumer Data Protection Act (CDPA)
- The Student Online Personal Information Protection Act ("SOPIPA")

To ensure our products and services are compliant, we have built our solutions on Google Cloud Platform ("GCP"). See Section 6. HOW DO WE KEEP YOUR INFORMATION SAFE? for more information.

This privacy notice for Doowii ("Company," "we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("Process") the information when our services are used ("Services"). Our services are offered to schools, school districts or other education organizations ("School"), and provide web-based data analytics and reporting services. This Privacy Policy relates to the Personal Information that we may collect from users or that is provided to us by the School, or any users in connection with the School's use of the Services. "Personal Information" is information that can identify a specific individual.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, or have any questions or concerns, please contact us at privacy@doowii.io.

1. What information do we collect?

In short: We collect personal information provided to the Company by Schools, including student data, to provide a Service to the School.

We may collect information about students directly from Schools, including School and District administrators, teachers, and students. Users will not be required to disclose more information than is reasonably necessary to use our Services.

Personal Information Provided by You. The personal information that is collected depends on the context of the interactions each School has with us, and the Services used, and the choices made. Our services are retained by a School or district to provide and host the Services on the School's behalf and under the School's control. The School customizes the content, controls who can register for and use the various features of the Services and who can access the Personal Information posted or maintained on the Services. The personal information we collect, or which may be provided to us by each School, may include the following:

- names
- email addresses
- job titles
- usernames
- passwords
- student data

We consider student data and student records ("Student Data") to be confidential. We will not use Student Data for any purpose other than to provide the Service on the School's behalf.

When the Service is used as part of a School's educational technology strategy, personal information related to students that is (i) provided to the Company by a School, or (ii) collected by the Company during the provision of the Service to a School, may include information defined as "educational records" by the Family Educational Rights and Privacy Act ("FERPA") or "covered information" under California's Student Online Personal Information Protection Act ("SOPIPA").

Student Data is owned and controlled by the School. Our collection and use of Student Data is governed by our contracts with the Schools and by applicable privacy laws.

How we share and disclose Student Data: Student Data and account usage data may be disclosed to, or accessible by users who are authorized to use the Service on behalf of the School.

How we retain Student Data: We will not knowingly retain Student Data beyond the time period required to support an educational purpose, unless authorized by the School.

It should be noted that the Service uses Student Data shared by the School with the Company. Schools are responsible for maintaining Student Data, and retaining it for educational purposes through their use of the Service.

Questions about Student Data: For questions relating to Student Data provided to the Company by a School, please direct those questions to the School.

Other Information Collected: To provide a personalized and high-quality experience for our users, we, and our third-party partners, may use various technologies that automatically record certain technical information from the browser or device when a user visits our website, reads our emails, uses our Service, or otherwise engages with us. Technical information like this is typically collected through a variety of tracking technologies, including cookies, web beacons, embedded scripts, location-identifying technologies, file information, and similar technology. We may collect analytics data, or use third-party analytics tools, to help us measure web traffic and usage trends for the Service, and to understand more about our users by monitoring aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website.

2. How do we process your information?

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law.

We do not use Student Data for marketing purposes.

We process your personal information for a variety of reasons, including:

- To provide the Service to users
- To facilitate communication with users
- To track usage, monitor Service performance, and improve the Service
- To protect the security and integrity of the Service, the Company, and our users
- To market the Service

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: We only process personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide Schools with the Service to enter into or fulfill our contractual obligations, to protect user rights, or to fulfill our legitimate business interests.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Article 6.1(a) GDPR (Consent):** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Article 6.1(b) GDPR (Contract):** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Article 6.1(c) GDPR (Legal Obligation):** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Article 6.1(f) GDPR (Legitimate Interest):** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person. For instance, we view "legitimate interests" to provide the Service for purposes such as:
 - emergency contacts for people who work with us, such as employees, for health and safety purposes
 - recruitment and onboarding of new employees or contractors
 - business development and growth
 - enabling and servicing login systems to users

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Publicly:** Public feedback, content, or otherwise user generated content on our Service or website may be displayed on our websites or on our social media pages.
- **Service Providers:** We share personal information with third-party vendors, consultants and other service providers who perform functions or services on our behalf and under our instructions to make our Service available to you [such as 3rd-party marketing agencies, web hosting, or infrastructure services providers].
- **Legal Obligations and Rights:** We may disclose personal information to third parties, such as legal advisors and law enforcement as required by applicable law.
- **As Contractually Requested:** If outlined in our contract between the Company and a School that the sharing of data, including Student Data, be shared with a 3rd party with legitimate business reasons.

We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

Doowii products are hosted on GCP--considered one of the most security compliant cloud service providers available today (see list of GCP security compliance certifications [here](#)). GCP cloud infrastructure has (among others) the following security certifications:

- FedRAMP (S)
- SOC 1 (S), SOC 2 (S), & SOC 3 (S)
- ISO/IEC 27001 (S), ISO/IEC 27017 (S), ISO/IEC 27018 (S), & ISO/IEC 27701 (S)
- Higher Education Cloud Vendor Assessment Tool (HECVAT) (S)
- PCI DSS (S)
- GDPR (S)
- COPPA (S)
- FERPA (U.S.) (S)
- California Consumer Privacy Act (CCPA) (S)

7. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Canada, you have rights that allow you greater access to and control over your personal information.

In most cases, Doowii is not your Data Controller, and is instead providing a service to a School. As such, you should contact the School directly for requests, related to:

- to request access and obtain a copy of your personal information
- to request rectification or erasure
- to restrict the processing of your personal information
- if applicable, to understand data portability

Where we are the Data Controller, please make your request directly to the Data Protection Officer at privacy@doowii.io. We commit to respond within one month.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

If you have questions or comments about your privacy rights, you may email us at privacy@doowii.io.

8. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, you may email us at privacy@doowii.io.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

- a natural person (as opposed to a corporation or other business entity) who resides in California, even if the person is temporarily outside of the state.

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under California or federal law	Gender and date of birth	YES
D. Commercial information	Transaction information, purchase history, financial details, and payment information	YES
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	YES
G. Geolocation data	Device location	YES
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level, job title, work history, and professional qualifications if you apply for a job with us	YES
J. Education Information	Student records and directory information	YES
K. Inferences drawn from other personal information	Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	NO
L. Sensitive Personal Information	Account login information	YES

We will use and retain the collected personal information as needed to provide the Services or for:

- Category A, B, C, D, F, G, I, J, L - As long as the user has an account with us

Category L information may be used, or disclosed to a service provider or contractor, for additional, specified purposes. You have the right to limit the use or disclosure of your sensitive personal information.

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

How do we use and share your personal information?

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at privacy@doowii.io, or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt out we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf, following the same strict privacy protection obligations mandated by the CCPA.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" your personal information.

The Company has not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. The Company will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

Your rights with respect to your personal data

Right to request deletion of the data — Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

Right to be informed — Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell or share personal information to third parties;
- the categories of personal information that we sold, shared, or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- the business or commercial purpose for collecting, selling, or sharing personal information; and
- the specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Right to Limit Use and Disclosure of Sensitive Personal Information

If the business collects any of the following:

- social security information, drivers' licenses, state ID cards, passport numbers
- account login information
- credit card numbers, financial account information, or credentials allowing access to such accounts
- precise geolocation
- racial or ethnic origin, religious or philosophical beliefs, union membership
- the contents of email and text, unless the business is the intended recipient of the communication
- genetic data, biometric data, and health data
- data concerning sexual orientation and sex life

you have the right to direct that business to limit its use of your sensitive personal information to that use which is necessary to perform the Services.

Once a business receives your request, they are no longer allowed to use or disclose your sensitive personal information for any other purpose unless you provide consent for the use or disclosure of sensitive personal information for additional purposes.

Please note that sensitive personal information that is collected or processed without the purpose of inferring characteristics about a consumer is not covered by this right, as well as the publicly available information.

To exercise your right to limit use and disclosure of sensitive personal information, please email privacy@doowii.io.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other privacy rights

- You may object to the processing of your personal information.
- You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.
- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- You may request to opt out from future selling or sharing of your personal information to third parties. Upon receiving an opt-out request, we will act upon the request as soon as feasibly possible, but no later than fifteen (15) days from the date of the request submission.

To exercise these rights, you can contact us by email at privacy@doowii.io, or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

9. DO VIRGINIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of Virginia, you may be granted specific rights regarding access to and use of your personal information.

Virginia CDPA Privacy Notice

Under the Virginia Consumer Data Protection Act (CDPA):

"Consumer" means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

"Personal data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information.

"Sale of personal data" means the exchange of personal data for monetary consideration.

If this definition "consumer" applies to you, we must adhere to certain rights and obligations regarding your personal data.

The information we collect, use, and disclose about you will vary depending on how you interact with the Company and our Services. To find out more, please review the following sections:

- 1. WHAT INFORMATION DO WE COLLECT?
- 2. HOW DO WE PROCESS YOUR INFORMATION?
- 4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

Your rights with respect to your personal data

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data

- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

The Company has not sold any personal data to third parties for business or commercial purposes. The Company will not sell personal data in the future belonging to website visitors, users, and other consumers.

Exercise your rights provided under the Virginia CDPA

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at privacy@doowii.io or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Verification process

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

Right to appeal

If we decline to take action regarding your request, we will inform you of our decision and reasoning behind it. If you wish to appeal our decision, please email us at privacy@doowii.io. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may contact the Attorney General to submit a complaint to privacy@doowii.io.

10. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at privacy@doowii.io.

12. HOW CAN YOU REVIEW, UPDATE, OR DELETE DATA COLLECTED FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please contact us at privacy@doowii.io.

doowii



Product

K-12
Higher Ed
Partners
Pricing
Support

About

Team
Careers
Blog
Privacy Policy
Terms of Service
Security & Trust

Contact Us

hello@doowii.io
(720) 780-7447
1550 Wewatta St, 2nd Floor
Denver, CO, USA 80202

Learn More

Have questions about how Doowii can transform your data into actionable insights?

Email us at hello@doowii.io for a personalized walkthrough!

