

Introduction

The iKeepSafe FERPA Program© is available to operators and service providers of websites and online services, data management systems and other technologies that are, in whole or in part, intended for use or often used in and by schools, and which may collect, store, process or otherwise handle student data.

Quizlet targets both individual teachers and students as end users of the Quizlet product. Quizlet requires individual end users to accept an online Terms of Use and Privacy Policy to create an account and access the service for the first time.

This iKeepProfile is intended to assist you in determining whether or not Quizlet Inc. can be used in accordance with your FERPA obligations, as well as with your state laws and district policies. It indicates that Quizlet Inc. has been assessed for alignment with the iKeepSafe FERPA Program Guidelines.

The iKeepProfile is not legal guidance, nor does it guarantee or otherwise assure compliance with FERPA. If you have questions on how to use the iKeepProfile to support your school's compliance efforts, please contact your school attorney.¹

Agreement

Quizlet Inc.

Quizlet - <https://quizlet.com/>

Quizlet is a free website providing learning tools for users to help with memorization. It can be used by the general public, students, and teachers - anyone with a desire to learn and/or teach.

As such, Quizlet allows users to create "sets" of terms customized for their own needs that can be studied via several study modes including flash cards, spelling, practices tests, and competitive learning games. Additionally, teachers can create classes to organize their students around study sets.

Accounts may be upgraded to bring additional functionality to the learning experience including adding your own images and voice to study sets as well as the ability to view student activity and progress.

Quizlet is also available via iPhone, iPad, and Android apps.

To help support schools in meeting their FERPA obligations, Quizlet Inc. agrees:

1. **Education records as provided by teachers and students using the Quizlet product continue to be the property of and under the control of those students and teachers;** and Quizlet is willing to stipulate as such in their terms of use agreement and/or privacy policy.
2. **Students may retain possession and control of their own student generated content.**
3. **It will only use education records as provided by individual teachers and students for the purposes authorized by agreement to the Quizlet Terms of Use and Privacy Policy.**
4. **It will not use personally identifiable information in student records to engage in targeted advertising.** Advertising on Quizlet is minimal. Upgraded users, mobile app users, and children under 13 are never served ads. Users 13 and over are served ads based on basic browsing activity, which is not linked to individual user accounts. Quizlet does not provide any additional information to advertisers.
5. **It will provide a means by which students or, in the case of students under the age of 13, a parent or legal guardian, may review personally identifiable information** in the student's records and correct erroneous information.
6. **It will take actions to help ensure the security and confidentiality of education records as provided by teachers and students using the Quizlet product.**
7. **It will conduct annual training related to data privacy and security,** including FERPA requirements, for all employees responsible for any aspect of student data management.
8. **It has a data breach procedure in place** and will notify the affected end users, including teachers, students, and parents or legal guardians of those students under 13 years of age, in the event of an unauthorized disclosure of the educational records.
9. **It is willing to include in the terms of use and/or privacy policy details** of how end users, including teachers and students, have direct access to the education records that they provide to Quizlet.
10. **It will not make material changes to its privacy and security policies,** including adding practices around new or additional data collection, or changes that may lessen the previously noted protections **without prior notice to the end user,** including teachers, students, and parents or guardians of those students under the age of 13 separate from any notice in a "click wrap" agreement.

Data Review Process

Quizlet provides users direct access to the personally identifiable information that they provide to Quizlet via product functionality. The following is the process for handling such requests:

Control of Information Provided to Quizlet

All users, including students and teachers, remain in control of the data they provide to Quizlet; more specifically:

Teachers remain in control of the information they provide to Quizlet. They may review, edit or delete any information submitted to Quizlet at any time by signing into their Quizlet account. Teachers may also delete their account at any time which will delete all study sets, folders, and classes that they've created.

Users 13 years of age and older remain in control of the information they provide to Quizlet. They may review, edit or delete any information they submit to Quizlet at any time by signing into their Quizlet account. They may also delete their account at any time which will delete all study sets, folders, and classes that they've created.

Children under the age of 13: The parent or guardian remains in control of the information the child provides to Quizlet. Parents or guardians may review, edit or delete the child's information at any time by signing into the child's account via password reset, or by contacting Quizlet at quizlet.com/feedback. Quizlet will respond to your request within a reasonable timeframe. A parent or guardian can also delete the child's account which will delete all study sets, folders, and classes that the child has created.

Quizlet has posted within their Privacy Policy appropriate contact information for comments and questions:

Attention Privacy

Quizlet Inc.

501 2nd Street, Suite 500

San Francisco, CA 94107 USA

privacy@quizlet.com

+1-510-495-6550

Security Protocols

The following is a general overview of Quizlet Inc.'s data security protocols:

Quizlet is a web-based application that can be accessed via a standard Web browser or mobile device, there are no differences between application functionality or user/student data security whether the application is accessed at school or on a home network. Due to the fundamental nature of Web protocols and Web browser technology, cloud-based applications such as Quizlet are not able to access any data or information stored on student or user machines, hard drives or devices.

Only authorized Quizlet staff are permitted to access student data and logins for internal staff are limited by role-based access controls to enforce this.

Quizlet adds encryption and safeguards to hosted data both during transport and storage. Quizlet web and mobile app requests are over HTTPS. Quizlet data is stored encrypted in a secure data facility operated by Google that leverages FDE (full disk encryption) and drive locking to protect data at rest. Data traveling between Quizlet and Google is encrypted using HTTPS/TLS (Transport Layer Security).

Personnel

Employees of Quizlet receive annual privacy training that includes both COPPA and FERPA. Employees with access to user data have undergone background checks and are provided access to student data based roles and responsibilities.

Facility Security

Quizlet is hosted on the Google Cloud Platform.

Physical access is strictly controlled at building ingress points by professional security staff utilizing video surveillance, state of the art intrusion detection systems, employee authentication standards, and other electronic means.

Google data centers are monitored 24/7 and feature a layered security model, including safeguards like custom-designed electronic access cards, alarms, vehicle access barriers, perimeter fencing, metal detectors, and biometrics. The data center floor features laser beam intrusion detection.

Data Breach

Quizlet has established protocols in place in the event of a data breach.

Quizlet complies with relevant laws regarding data breaches. If Quizlet knows or has reason to know of a systems security breach by an unauthorized party of user data where that data is being or is likely to be used for an unauthorized purpose, Quizlet will promptly notify the user so that the user can take appropriate steps.

Product Data List

Quizlet gathers potentially personally-identifying and personally-identifying information based on the nature of the product interaction.

Data Collected for Operation:

General Purpose of Data Collection

Required: General Account		
1	Self-created User name	Required to create an account
2	Date of Birth	Required to create an account.
3	User Email Address	Required to create an account
4	Parent (s) Email Address	Required if user is identified as under the age of 13
5	IP	Required for internal operations
6	Device Identifier (UDID)	Required for internal operations
Optional: Product Upgrade		
1	First and/or Last Name	Required for optional use of "Send an invoice" feature that allows someone else to pay for your upgrade. Not available to users under 13.
2	Credit Card Number	Required for optional product upgrade

Note: If a user chooses to use a single sign on feature, they collect Facebook login info (photo, birthday, name, school name(s), email, Facebook identifier), Google login (photo, name, email, Google identifier).

Third Parties

Quizlet does not rent or sell potentially personally-identifying and personally-identifying information to anyone.

Quizlet discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors and affiliated organizations that (i) need to know that information in order to process it on Quizlet's behalf or to provide services available on Quizlet's website and mobile applications, and (ii) that have agreed not to disclose it to others.

Quizlet uses encryption technology for the information they share with third parties, and the list of third parties they share with is accurately documented in their Privacy Policy as demonstrated below.

iKeepSafe technical assessment indicated appropriate use of third parties for product functionality and analytics.

Name of Third Party Partner	What info is shared with or collected by this partner	Partner's purpose	Link to Partner's privacy policy
AWS	Compressed archives of certain database content	Serving images and data backup	AWS Privacy Policy
Cloudflare	Traffic data	Provider of network infrastructure for basic service delivery	Cloudflare Privacy Policy
comScore (Scorecard Research)	Anonymous usage data (e.g., what pages on our site people visit)	Analytics	comScore Privacy Policy
Desk	Email address and username	Customer service management	Desk Privacy Policy
Google Inc. (Analytics)	Anonymous usage data (e.g., what pages on our site people visit)	Analytics	Google Analytics Privacy Policy
Google Inc. (Cloud Platform)	Traffic data	Provider of servers and network infrastructure for basic service delivery	Google Privacy Policy
Google Inc. (DFP)	Anonymous demographic and site-usage information	Serving ads on Quizlet	Google DFP Privacy Policy
Looker	Anonymous usage data (e.g., what pages on our site people visit)	Analytics	Looker Privacy Policy
Mailgun	Email address and username	Email service for sending emails to our users	Mailgun Privacy Policy
New Relic	Anonymous page-speed metrics (e.g., how fast Quizlet loads on a user's screen) and anonymous usage data (e.g., what pages on our site people visit)	Help websites load faster for better use	New Relic Privacy Policy
Quantcast Corporation	Anonymous usage data (e.g., what pages on our site people visit)	Data provider, aggregator	Quantcast Privacy Policy
Rollbar	Username and site usage data	Website code error tracking	Rollbar Privacy Policy
TRUSTe	IP address	Privacy verification	TRUSTe Privacy Policy

Accuracy Statement

Quizlet Inc. hereby confirms the accuracy and truthfulness of all information contained in the profile, and has authorized iKeepSafe to make the profile available to any interested schools

Signed and agreed:



(Signature)

Thompson Paine
VP, Operation and Business Development

Quizlet Inc.

05/10/16

Quizlet Inc. has been reviewed and found in alignment with iKeepSafe's FERPA Evaluation Program Guidelines as indicated by this product profile. Quizlet Inc. has been awarded the iKeepSafe FERPA Program badge.



(Signature)

Marsali Hancock
President & CEO
iKeepSafe

05/10/16

(Date)

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