

ClassCabinet Privacy Policy

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Purpose:

ClassCabinet is committed to protecting the information of all its users, particularly students. The purpose of this document is to share the ways that user information is managed by ClassCabinet.

About ClassCabinet:

ClassCabinet is a web-based learning management system with the sole purpose of increasing teacher effectiveness and student success. On the teacher side this is accomplished by providing teachers with simple yet powerful tools to easily and flexibly plan for and develop their courses, units, and assignments; this includes the ability to customize every lesson for each student’s needs while easily managing each student’s progress in a course, including their grades. On the student side, this is accomplished by providing students with clearly outlined expectations for each day, plainly organized information and assignments, and highly visible information about their grades, including the ability to forecast the effect of future assignments on their score in each class.

All information gathered by ClassCabinet about any user will be used solely for the purposes stated above, and nothing else. Every reasonable effort is made to secure the data using current industry best practices, to ensure that any users data is only available to

intended individuals who have a legal right to the data that meets the stated educational goals of ClassCabinet.. ClassCabinet adheres to and follows the principles outlined in the [Student Privacy Pledge 2020](#). Continue reading for more details.

Summary of Changes to this Version

- Added a statement to the “User Information Visibility, Use, and Editing Potential” section to explicitly acknowledge the **schools right to access student data**.
- Add clauses to the **Information Security** section to describe how cookies are used and maintained, and to provide information on the employment of an independent security company to enhance ClassCabinet security.
- Added information to the tables on **User information Collected** regarding teacher or school administrators ability to indicate whether or not a student should receive accommodations on assignments or have differentiated academic expectations.
- Added a section on **Users Intellectual Rights**, guaranteeing users that ClassCabinet will make not claim to their intellectual property uploaded to ClassCabinet.
- Added a new section on **De-Identified Data** to clarify the previous statement on the use of de-identified information.
- Added a new section on **Third-parties** to make the policies easier to find and to clarify how ClassCabinet may introduce third-party features in the future.
- Added a section on the use of data in **Marketing and Advertising**.
- Added a section on ClassCabinet’s **Data Breach Response Plan**, indicating what ClassCabinet’s response will be to a data breach.
- Added the requirement that **changes to this Privacy Policy** which alters how data is collected or used would only take effect after receiving consent from relevant users and educational institutions.

Information Security

ClassCabinet.com is hosted by [InMotion Hosting](#) using a paid, professional account. All data is stored at their [West Coast Data Center](#), located in Los Angeles, California.

Every reasonable effort is made to secure all information stored by ClassCabinet from unauthorized access. These measures include but are not limited to:

- Access to every ClassCabinet page is redirected to take place over a secure connection using HTTPS over TLS protocol.
- Every user’s initial sign in on unrecognized devices requires a private username, encrypted password, and 2-factor authentication.
- Persistent sign-ins on trusted devices authenticate through local cookies.
 - Individual sessions persist for 1 day, after which time the user must re-enter their password.
 - 2-factor authentication persist for 7 days, after which time the user must re-authenticate.
- Every page other than the public facing pages, which do not require sign-in and do not display user data, authenticates the user credentials and user type for the information being accessed; authentication failure returns an error and ends data transfer.
- Best practices are employed in coding techniques to prevent attacks such as SQL injection.
- ClassCabinet has contracted with Sucuri, an independent security platform which enhances ClassCabinet security by providing services such as firewall protection, malware detection and removal, regular security scans, reports on any security threats and suspicious activity, and more.

These efforts notwithstanding, it is impossible for any organization to guarantee 100% security of information stored electronically or transmitted over the internet. If you have concerns about the security of your data, or have reason to believe that it may have been compromised, please let us know immediately by sending an email to help@classcabinet.com.

Users of ClassCabinet

ClassCabinet will not share any information with any third-party entity or individual, except where required to do so by law. Thus, the only individuals able to access information stored by ClassCabinet are authenticated users.

ClassCabinet distinguishes between different user types to control who gets to view and edit different types of information. The user types are described in the table below, along with general information about account creation, and the editing and viewing privileges of each user type.

User Type	Definition	When Accounts are Created	Editing Privileges	Viewing Only Privileges
ClassCabinet Super-user	Highest level ClassCabinet workers.	When occupying a high-level position for ClassCabinet.	All	None
ClassCabinet Developer	ClassCabinet workers responsible for code generation and database design.	When occupying a developer position for ClassCabinet.	User and Database management for an institution only as needed for troubleshooting and debugging.	None
ClassCabinet Administrator	ClassCabinet workers who provide support for assigned institutions where ClassCabinet is used.	When occupying an administrator position for ClassCabinet.	User and database management as it pertains to assigned institutions. Course Management for all courses at assigned institutions.	None
Institution Administrator	Employee of an institution where ClassCabinet is used, who oversee its use for their institution.	When a ClassCabinet record is created for an institution that plans to use ClassCabinet for any of its courses. When ClassCabinet is adopted by individual teachers, that teacher will be their own Institution Administrator.	User and database management as it pertains to their institution. Course Management for all courses at their institutions.	None
Teachers	Employee of an institution where ClassCabinet is used with teaching responsibilities at their institution.	Either when a ClassCabinet Administrator or Institution Administrator creates their account, or when individual teachers adopt ClassCabinet for their courses and create their own account.	Course Management (Course settings, learning units, assignments, accommodations for individual students assigned to their courses, grades for students assigned to their courses, etc.)	Student data for students in their courses.
Course Observer	Employee of an institution, such as an administrator, evaluator, or teacher who are granted rights to view a course as a teacher	When a ClassCabinet Administrator, Institution Administrator, or Teacher associates an individual from their institution to	None	Student data for students in the course they are observing. Course Management (Course settings, learning units, assignments,

	does, but without editing privileges.	satisfy this role for a specific course.		accommodations for individual students assigned to the courses being observed, grades for students assigned to the courses being observed, etc.)
Support-staff	Employee of an institution where ClassCabinet is used with responsibilities for providing support for individual students taking courses at the institution.	When a ClassCabinet or Institution Administrator associates an individual from their institution to satisfy this role for a specific student and course.	None	Course information, assignments, and grades for the specific student and course to which they are assigned.
Teaching Assistants	Employees or Students at an Institution where ClassCabinet is used, who aid teachers in the administration of specific courses at their institution.	When a ClassCabinet or Institution Administrator associates an individual from their institution to satisfy this role for a specific course.	Creating and Editing assignments with default accommodations for individual students. Student grades for individual assignments.	None
Students	Individuals who are enrolled in courses taught at an institution where ClassCabinet is used for their courses.	When a ClassCabinet or Institution Administrator associates a student from their institution to satisfy this role for a specific course.	Submitting assignments for work assigned to them in their courses.	Course information, their own assignments, and their own grades for their own courses.
Parents	Those who are the legal guardians for students enrolled in a secondary school where ClassCabinet is used.	When a ClassCabinet or Institution Administrator associates an individual to satisfy this role for a specific student based on credible information that this individual has a legal right to view a student's academic information; usually based on an institution's records for each student.	None	Course information, assignments, and grades for their children for the course to which they are assigned.

User Information Collected

Information collected by ClassCabinet will differ for each type of user. Users have the ability to either change directly or request a change for all information pertaining to themselves, or on behalf of those for whom they are legally responsible by sending an email to help@classcabinet.com. For certain voluntary information, such as preferred name, pronouns, and gender identity, users may indicate which users who have access to their information can see this information. All information collected or entered about students is intended and will solely be used for a direct educational objective, including helping teachers to become familiar with their students, assess their work, provide needed accommodations and differentiated expectations, to grade, assess, and provide feedback on their educational progress in a class.

User Type	Information Type	Information	Required/Voluntary	When/How Collected	Editable
All	Identity	Given Name	Required	Account creation	Upon Request
All	Identity	Last Name	Required	Account creation	Upon Request
All	Identity	Middle Name	Voluntary	Account creation	Upon Request
All	Identity	Preferred Name	Voluntary	When/If Desired by user	When/If Desired
All	Identity	Pronouns	Voluntary	When/If Desired by user	When/If Desired
All	Identity	Whether their pronouns are traditional or non-conforming	Voluntary	When/If Desired by user	When/If Desired
All	Identity	Title	Voluntary	When/If Desired by user	When/If Desired
All	Identity	Photograph of themselves	Voluntary	When/If Desired by user (though students may be prompted to do so by their teacher).	When/If Desired
All (except Parents)	Institutional	Institution Names	Required	Account creation or upon request to add an additional institution	Upon Request
All	Institutional	Course Names	Required	Course Creation by Administrator or Teacher	When/If Desired by administrator or teacher
All (except Parents)	Contact	Email - Institutional	Required	Account creation or upon request to add an additional institution	Upon Request
Parents	Contact	Email - Personal email submitted to the institution where their child attends.	Required	Account creation	Upon Request and Verification
All	Contact	Mobile Phone number	Voluntary	When/If Desired by user	When/If Desired

All	Contact	An alternate, personal email address	Voluntary	When/If Desired by user	When/If Desired
Teachers	Contact	A customized email signatures for each class	Voluntary	When/If Desired by user	When/If Desired
Parents	Relationship	Affiliation with a student who is their dependent, and a specific class.	Required	When their child is added to a class	Upon Request
Support Staff	Relationship	Affiliation with a student for whom they have an official educational responsibility, and a specific class.	Required	When students they support are added to a class	Upon Request
Students	Accommodations and Differentiations	Information for each student pertaining to accommodations or differentiated expectations on assignments and assessments, particularly as it pertains to extended time on assignments and assessments.	Voluntary	At any time that it a teacher or a school administrator deems it necessary for any reason to give said accommodations or differentiated expectations.	By the teacher at any time.
Students	Student Work	Web form entries to posted activities and questions	Required	When students submit work	Before due date and/or graded (depending on assignment settings)
Students	Student Work	File Uploads; pictures of hand-written or drawn responses to activities and questions.	Required	When students submit work	Before due date and/or graded (depending on assignment settings)
Students	Student Work	Discussion Board Posts. Could include links to online documents, comments on educational videos, responses to posted questions, responses to other student's posts, etc.	Required	When students submit work	Before due date and/or graded (depending on assignment settings)
Students	Student Work	Assessment Data. Could include responses to multiple choices questions	Required	When students submit work	Before due date and/or graded (depending on

		and the like, short answer questions, and file uploads.			assignment settings)
Students	Student Work	Grades for individual assignments, grade categories, and grading periods	Required	When students submit work	Before due date and/or graded (depending on assignment settings)

User Information Visibility, Use, and Editing Potential

The table below describes the circumstances where personal information is viewable and/or editable by users. Any data help by ClassCabinet pertaining to student and a school, will be made available to the relevant school upon request; The only exception would be for personal data that the student has indicated should not be made visible, specifically the student's pronouns, preferred name, and gender identity.

Users	Activity	What they can see	What they can edit	What they can submit a request to be edited
<ul style="list-style-type: none"> All 	<ul style="list-style-type: none"> When signed in 	<ul style="list-style-type: none"> Preferred Name Pronouns (if made visible to self) ClassCabinet Courses in which they are enrolled 		
<ul style="list-style-type: none"> All 	<ul style="list-style-type: none"> In User Settings 		<ul style="list-style-type: none"> Photograph Title Preferred Name Pronouns Whether or not they want to indicate to teachers that their pronouns are non-conforming (<i>i.e.</i>, that they are transgendered) Whether or not they want pronouns to be visible to the following groups: Self, Teachers, Other Students, Parents/Guardians, Support Staff Mobile Phone and Carrier Personal Email For Teachers only: Default Email Signature 	<ul style="list-style-type: none"> Given Name Last Name ClassCabinet Sign-in ID Institution Email

<ul style="list-style-type: none"> • Students • Parents • Support Staff 	<ul style="list-style-type: none"> • Submitting Group Assignments • Making Discussion Board Posts <p>*Note Parents and Support Staff may view, but not submit assignments and Discussion Board Posts.</p>	<ul style="list-style-type: none"> • Preferred Name of Other Students in the same course and section/period. • Last Name of Other Students in the same course and section/period. • Pronouns of Other Students in the same course and section/period if that student has opted for them to be visible to other students. 		
<ul style="list-style-type: none"> • ClassCabinet Super-users • ClassCabinet Developer (on as a- needed basis) • ClassCabinet Administrator • Institution Administrator 	<ul style="list-style-type: none"> • Managing User Information 		<ul style="list-style-type: none"> • All Information for each user associated with a given institution (including Parents of Students at the institution) 	
<ul style="list-style-type: none"> • ClassCabinet Super-users • ClassCabinet Developers (on as a- needed basis) • ClassCabinet Administrators • Institution Administrators • Teachers 	<ul style="list-style-type: none"> • Adding users to the course. Users may be set as <ul style="list-style-type: none"> ○ Teachers ○ Teacher Aids ○ Students ○ Course Observers ○ Parents for a specific student ○ Support Staff for a specific student 	<ul style="list-style-type: none"> • The User's Preferred Name • The User's Last Name • The User's Pronouns (if the user has made them visible to Teachers) • The User's ClassCabinet ID • The User's Institutional ID 		
<ul style="list-style-type: none"> • ClassCabinet Super-users • ClassCabinet Developers (on as a- needed basis) • ClassCabinet Administrators • Institution Administrators • Teachers 	<ul style="list-style-type: none"> • When viewing student profiles 		<p>Lists of accommodations to be given to each student, including extra time to be generally granted on assignments and online assessments.</p>	

<ul style="list-style-type: none"> • Students • Parents 	<ul style="list-style-type: none"> • When viewing individual assignments or assessments 	<ul style="list-style-type: none"> • Whether or not extra time has been given for the assignment or assessment. 		
<ul style="list-style-type: none"> • ClassCabinet Super-users • ClassCabinet Developers (on as a- needed basis) • ClassCabinet Administrators • Institution Administrators • Teachers • Teacher Aids • Course Observers 	<ul style="list-style-type: none"> • When Grading Individual Assignments <p>*Note: Under normal circumstances, only Teachers and Teacher Aids may enter grades; Course Observers may never enter grades. The other users indicated may do so on an as-needed basis only.</p>	<ul style="list-style-type: none"> • Photograph of the Students who submitted the assignment • Preferred Name of the Students who submitted the assignment • Last Name of the Students who submitted the assignment • Pronouns of the Students who submitted the assignment if that student has opted for them to be visible to Teachers or Students (For the Teacher Aid). • The Grade for that individual assignment 		
<ul style="list-style-type: none"> • ClassCabinet Super-users • ClassCabinet Developers (on as a- needed basis) • ClassCabinet Administrators • Institution Administrators • Teachers • Course Observers 	<ul style="list-style-type: none"> • When submitting course-wide accommodations for individual students, when recording notes about the students progress in the class, including notes of conversations. <p>*Note: Under normal circumstances, only Teachers may enter accommodations and notes for students enrolled in a given course. Course Observers may never do so. The other users indicated may do so on an as-needed basis only.</p>	<ul style="list-style-type: none"> • Each students photograph • Each student's preferred name • Each student's Last Name • Each Students Pronouns (if the student has made them visible to Teachers) 		
<ul style="list-style-type: none"> • ClassCabinet Super-users 	<ul style="list-style-type: none"> • When adjusting assignment 	<ul style="list-style-type: none"> • Each student's 		

<ul style="list-style-type: none"> • ClassCabinet Developers (on as a- needed basis) • ClassCabinet Administrators • Institution Administrators • Teachers • Course Observers 	<p>settings for individual students</p> <p>*Note: Under normal circumstances, only Teachers may enter adjust assignment settings for a given course. Course Observers may never do so. The other users indicated may do so on an as-needed basis only.</p>	<p>Preferred Name</p> <ul style="list-style-type: none"> • Each student's Last Name • Each Students Pronouns (if the student has made them visible to Teachers) • Each Student's ClassCabinet ID • Each Student's Institutional ID 		
<ul style="list-style-type: none"> • ClassCabinet Super-users • ClassCabinet Developers (on as a- needed basis) • ClassCabinet Administrators • Institution Administrators • Teachers • Course Observers 	<ul style="list-style-type: none"> • When viewing course grade lists <p>*Note: Under normal circumstances, only Teachers may enter or change grades from within course grade lists. Course Observers may never do so. The other users indicated may do so on an as-needed basis only.</p>	<ul style="list-style-type: none"> • Each student's photograph • Each student's Preferred Name • Each student's Last Name • Each Students Pronouns (if the student has made them visible to Teachers) • Each Student's ClassCabinet ID • Each Student's Institutional ID • Each Student's Grades 		
<ul style="list-style-type: none"> • Teachers 	<ul style="list-style-type: none"> • Sending an email from ClassCabinet <p>*Note: Only teachers may send emails to students, their parents, and their Support Staff from ClassCabinet. These emails are copied</p>	<ul style="list-style-type: none"> • Each recipient's Preferred Name • Each recipient's Last Name 		

	<p>to the teacher’s institutional email, and the teacher’s institutional email is set as the reply-to address for the email. These emails are always sent to the recipient’s institutional email. Copies will also be sent to the recipient’s personal email if the user has supplied one.</p>	<ul style="list-style-type: none"> • Each recipient’s Pronouns (if the recipient has made them visible to Teachers) 		
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Use of De-Identified Data

ClassCabinet workers may also use de-identified information for product development and for aggregate data analysis and summaries. De-identified data will have all direct and indirect personal identifiers removed; this includes names, ClassCabinet ID numbers, School ID numbers, date of birth, contact information, photographs of users, photographs of users work, and any other information that could facilitate re-identification of the data. ClassCabinet will never try to re-identify previously de-identified data, does not condone, and will never assist any party doing so.

ClassCabinet will never provide de-identified data pertaining to any one individual to any third party. In the event that data is made available it would only be in the form of statistical summarizes, or generalized verbal summarizes.

Communication

Only teachers may send emails to students, their parents, and their support staff from ClassCabinet. These emails are copied to the teacher’s institutional email, and the teacher’s institutional email is set as the reply-to-address for the email. These emails are always sent to the recipient’s institutional email. Copies will also be sent to the recipient’s personal email if the user has supplied one.

Automated messages may also be sent to students, parents, and support staff at their institutional emails as well as user provided personal emails and mobile phones. Each user can control the type of automated communication, as well as the frequency in the “Info” tab for each class, or in the “All Classes” settings.

Children’s Privacy (COPPA)

The Children's Online Privacy and Protection Act (COPPA) requires ClassCabinet to do the following as it applies to users under the age of 13.

- Provide notice to parents and get their consent before collecting information from children under 13.
- Have a “clear and comprehensive” privacy policy.
- Make every reasonable effort to maintain the security and confidentiality of information pertaining to children under 13.

ClassCabinet is not designed for use by children under 13 years of age; however, when it needed for a student under the age of 13 to use ClassCabinet, parental consent must first be sought by a teacher or administrator before creating an account for that child, and allowing that child to use ClassCabinet.

Were information pertaining to a child under 13 to be found on ClassCabinet, consent must be immediately obtained or the data removed from ClassCabinet servers.

Any ClassCabinet user who knowingly does not comply with this policy, could have their rights to use ClassCabinet revoked.

Updating Your Information

Certain types of personal information can be changed by each user in User Settings. All other requests pertaining to other information or account settings can be made by sending an email to help@classcabinet.com. To ensure privacy, such requests must be sent from an email registered on ClassCabinet. Please also include the following information in such requests

- A descriptive subject line
- First and Last name (as it appears in ClassCabinet)
- ClassCabinet ID (found in “User Settings” on ClassCabinet.com)

Before requests are granted, ClassCabinet workers may seek to authenticate the request through further communication with the requesting party.

Retention of Personal Data

Student Accounts

By default, ClassCabinet retains all user data while the student is expected to be in attendance at their educational institution, and for 2 years thereafter; after that time, the following information is retained, while all other data (*e.g.*, student work, discussion board posts, grades) is permanently deleted.

- ClassCabinet ID
- ClassCabinet login ID
- ClassCabinet password
- Given Name
- Middle Name
- Last Name
- Preferred Name
- Courses taken on ClassCabinet
- Institutional Email
- Personal Email registered with ClassCabinet

Prior to the 2 years, this allows students and teachers to verify grades as needed after they leave the institution. After the 2 years, the data retained allows students to access/verify their accounts, and view teacher notes and other teacher provided files as desired. In Account Settings, students may choose to adjust these data retention settings so that alternatively 1) their account is permanently deleted, along with all data, after 2 years, or 2) their account retains all data beyond the 2 years, until they request that it be removed. This policy was developed in part in response to former students asking to gain access to materials from former classes on ClassCabinet a number of years after the class had ended.

Teacher or other Institutional Accounts

Information associated with teacher and other institutional accounts (such as administrators, support staff, observers, etc.) are retained indefinitely unless requested to be removed by sending an email to help@classcabinet.com. However, privileges associated with these accounts such as adding and editing other user data, or creating classes, may be altered.

Parents

Parents retain access to their child’s data for 2 years after their child is expected to leave the educational institution where ClassCabinet is used. After that the Parents account is deleted, along with all relationship data.

ClassCabinet Worker Accounts

ClassCabinet worker accounts (Super-users, Developer, and Administrators) are suspended immediately after they are no longer associated with ClassCabinet, and permanently deleted 1 year thereafter.

User's Intellectual Rights

All data, information, resources, etc. uploaded to ClassCabinet remains the intellectual property of the individual submitting the data. ClassCabinet will make no intellectual claim on that property, and does not authorize its use for any purpose other than the educational goals previously stated.

Third Parties

At present, ClassCabinet does not work with or rely on third parties for any of its functions, and will not share any data with any third party for any reason, except when legally mandated to do so.

If in the future ClassCabinet initiates the potential use of third-party applications in connection with ClassCabinet, this would only be done so after a notice of at least two weeks to all users, and user data would only be shared with the third-party after receiving the users express consent. Furthermore, ClassCabinet will only share the least amount of data necessary for the third-party application to function, and only if the third-party agrees to

- only use that data for the express educational function of their application
- to never share ClassCabinet data with any additional parties
- and to destroy all ClassCabinet data after it is no longer needed for their function, or to transfer the data to the user or to the users relevant educational institution, at the users or institutions request.

If relationships are established with third-party applications in the future, this document will be modified to list all third parties with whom data is shared, and to provide information about the shared data, its uses, and the protections provided by the third party.

Marketing and Advertising

ClassCabinet will never use user data for marketing or advertisement purposes, unless the user provides that data specifically for this purpose and expressly agree that it can be used in this way. Any such information used for marketing or advertising will be carefully de-identified.

Data Breach Response Plan

In the event that data from ClassCabinet is accessed by an unauthorized entity, or is used in a way that is inconsistent with this policy, all affected users and schools will be notified immediately by e-mail, and messages posted on ClassCabinet to affected users. The cause of the breach will also be immediately investigated, and appropriate measures taken to prevent similar incidents from occurring in the future.

Contact ClassCabinet

At present ClassCabinet is still in development mode, under limited use by its sole developer (Jason Mayberry, PhD), and is not formally incorporated. Because of this there is no corporate address for ClassCabinet. Please address any questions regarding this privacy policy to help@classcabinet.com.

Changes to this Privacy Notice

On occasion, ClassCabinet may need to update this Privacy Policy. Any change to the privacy policy that would result in additional data being collected, or increase the visibility of their data, without their express consent will only take effect after a notice of not less than 2 week and with the relevant party's consent; such notices will be posted on ClassCabinet.com, and emailed to all potentially affected users.