

CVM COPPA Privacy Policy

Last updated: December 16, 2019

1. COPPA

1.1 This policy is in accordance with the U.S. Children’s Online Privacy Protection Act (“COPPA”) and Family Educational Rights and Privacy Act (FERPA), and outlines our practices regarding this website and the collection and use of the personal information of all students users under age 13.

1.2 The policies outlined in this COPPA Privacy Policy are intended to supplement the information appearing in our general Privacy Policy and apply to all students under age 13. Where the COPPA Privacy Policy conflicts with our general Privacy Policy concerning information about a child, the terms of this COPPA Privacy Policy will prevail over our general Privacy Policy.

1.3 This COPPA Privacy Policy applies to personal information and usage information collected by Texas A&M University, College of Veterinary Medicine and Biomedical Sciences (“CVM”) through its Online Course Website/App for accessing the educational services provided within the TAMU PEER One Health Curriculum (the “CVM Services”) at peer.tamucet.org (including any other sub-domain website, collectively the “Website”) and through the software applications made available by us for use on or through computers and mobile devices that link to this Privacy Policy (the “App”).

2. Information We May Collect

2.1 When you use the Website, we may collect three types of data and information: Personal Information; Usage Data, and User Content. As used in this Privacy Policy, “Personal Information” means any information that identifies or could be used to identify an individual, such as the following: (a) name; (b) email address; and (c) name of educational institution you are attending. This information is mandatory and you must consent to the collection and use of these items of Personal Information or you will not be permitted to use the Website. Your registration and continued use of the Website indicates your consent to our use of such Personal Information. We also collect data and information related to your access and use of the educational and instructional content on the Website, such as files accessed and related data; responsive data and information you may enter (e.g., replies to test/exam questions; test/exam scoring; course completion data; assignment materials; etc.).

2.2 Personal Information does not include either: (a) aggregated Personal Information to the extent that an individual’s identity cannot be reasonably derived from it; or (b) publicly available Personal Information that has not been combined with non-public Personal Information. We may use and disclose such aggregated Personal Information for research and education purposes, including but not limited to developing research proposals; improving services offered through the Website; and conducting demonstrations of the structure, purpose, and efficacy of the Website to potential research sponsors, collaborators, and course authors.

2.3 “Usage Data” is information about an individual’s activity on or through the Website that, by itself, does not reasonably identify the individual, such as the following: (a) browser and operating system information; (b) computer or device type; (c) time spent navigating certain webpages or connected via mobile applications; (d) information collected through Data Collection Technologies (as defined below).

2.4 Generally, we do not consider Usage Data as Personal Information, because Usage Data by itself usually does not identify an individual. However, in some jurisdictions, Usage Data may be considered Personal Information because it can be used to make inferences about you.

3. Use, Disclosure, and Permission

- 3.1 At this Website:
- (a) We do not display advertising on our App or on our Website; we do not use your Personal Information or Usage Data to advertise to you.
 - (b) We do not sell or share your Personal Information or Usage Data with third parties to advertise or market to you.
 - (c) We only use the Personal Information and Usage Data you share with CVM to provide you the CVM Services and to improve the delivery of such CVM Services.
 - (d) If you ever want your data deleted, simply email us at peer.tamucet.org and all your data will be completely removed from our system.
 - (e) We do not disclose Personal Information or Usage Data collected from children to third parties other than to persons who provide support for the operations of the Website and CVM Services and who do not use the information for any other purpose, except for parents, teachers, and school administrators.

3.2 We may disclose any (or all) Personal Information collected from a child to the parent or teacher who registered for the service in connection with such child.

3.3 We may disclose your or your child's Personal Information and Usage Data: (a) as required by law; (b) when we believe that disclosure is necessary to protect our rights; or (c) to comply with a judicial proceeding, court order, or legal process.

4. Teacher or School Consent in Lieu of a Parent

4.1 COPPA allows teachers and school administrators to act in place of parents to provide consent for the collection of Personal Information from their students as it may relate to school based activities. Schools should always notify parents about these activities.

4.2 CVM collects limited Personal Information from students where that student's school, district, or teacher has provided access to the CVM Services solely for the use and benefit of the learning environment. CVM requires schools, districts, or teachers to obtain parental consent from parents.

- 4.3 If you are accessing the CVM Services on behalf of a class, school or district (such as a teacher), the following provisions also apply:
- (a) You represent and warrant that you are solely responsible for complying with COPPA's requirement to secure parental consent for accessing applications that require personally identifiable information from children under 13.
 - (b) You must obtain verifiable parental consent from all parents whose children will be accessing CVM Services and provide a copy to us upon our request.
 - (c) When obtaining parental consent, you must provide parents with a copy of our Privacy Policy.

5. Review and Deletion of Personal Information

5.1 If you believe that a student's school, district, or teacher has not required parental consent prior to our collection of any personally identifiable information, contact us at peer.tamucet.org.

5.2 If you are the parent and guardian of a student using CVM Services and cease to agree with CVM's terms of use and privacy policy at some point in the future, you may opt-out by contacting your child's school if you are a school account user, or contact us directly at peer.tamucet.org if you or your child are an individual account user.

5.3 If you wish to review your or your student's or your child's Personal Information stored by CVM, you may email us your request at peer.tamucet.org.

5.4 If you or your student's or your child's Personal Information changes, or if you no longer desire our service, you may correct, update, or delete it by making the change directly in the user profile in the CVM App, or email us at peer.tamucet.org.

5.5 In any correspondence such as e-mail or mail, please include the child's username, the school or organization, and the teacher or parent's email address and telephone number. To protect children's privacy and security, we will take reasonable steps to help verify a teacher or parent's identity before granting access to any personal information.

6. Cookies and Similar Technologies Used

6.1 CVM uses technologies such as cookies, beacons, tags, and scripts ("Data Collection Technology") to improve your experience of the Website. We use analytics cookies to compile statistics about the use of the Website, help us analyze technical and navigational information about the functionalities provided, and detect and prevent fraud. We also may use Data Collection Technology to collect information from the computer or device that you use to access the Website, such as your operating system type, browser type, domain and other system settings, as well as the language your system uses and the country and time zone in which your computer or device is located.

7. Third Party Service Providers

7.1 We work with a number of third-party service providers to assist us in providing and managing the CVM Services and help improve the quality of CVM Services. Third parties support the Website and CVM Services by providing services such as maintaining and analyzing the functioning of the CVM Services and Website; assisting in network communications; and authentication technologies to collect similar information. Such collection and use of such information is only to support the internal operation of CVM Services.

8. Changes to this Policy

8.1 We reserve the right to amend this Privacy Policy at any time. Please check this page periodically for changes. If we intend to make a material change in the collection, use, or disclosure practices with respect to a child's previously-collected Personal Information to which a school or district has previously consented, we will obtain the consent of the school, district, teacher, or parent who registered for the CVM Service in connection with the child to such changes.

9. Links to Other Sites

9.1 If you click on a link to a third-party site, you will leave peer.tamucet.org and be re-directed to the site you selected. Because we cannot control the activities of third parties, we cannot accept responsibility for any use of your Personal Information by such third parties, and we cannot guarantee that they will adhere to the same privacy practices as CVM. We encourage you to review the privacy statements of any other service provider from whom you request services. If you visit a third-party website that links to the peer.tamucet.org site, you should read that site's privacy statement before providing any personally identifiable information.