

Privacy Statement

This Privacy Statement applies to your use of Kite applications or services (collectively, the “Kite Suite”). This Privacy Statement is part of the Kite Suite Terms of Use. By accessing any Kite application or service you agree to both our Terms of Use and this Privacy Statement; if you do not agree, please discontinue use of the Kite Suite.

This Privacy Statement may change over time. If we make minor changes, which do not materially change your rights, we will post the modified version on our website without direct notification. For any changes that materially change your rights, we will notify you by email or by presenting you with a new Privacy Statement. Use of the Kite Suite after a modification is posted or after acceptance (in the case of a new Privacy Statement), will mean you have agreed to the Terms of Use and Privacy Statement when made effective.

Data Collection

We may collect personal data from you when you use the Kite Suite. Personal data is data that includes information such as your name, email, or other data that could reasonably be identifiable to you. We may receive information about you, which may include student records as applicable, from other third party data sources to the extent permitted by law. In such cases, we will store, collect, use and share your personal data and student records in compliance with applicable law, including without limitation Family Educational Rights and Privacy Act (“FERPA”) at 20 U.S.C. § 1232g (34 CFR Part 99), Children’s Online Privacy Protection Act (“COPPA”), 15 U.S.C. § 6501-6506; Protection of Pupil Rights Amendment (“PPRA”) 20 U.S.C. § 1232h. To the extent permitted by law, we may share your data, including personal data, with third parties. When you use the Kite Suite we may log and store your IP address and technical information about your visit (“cookies”); when you use the Kite Suite we collect, store and use the data you upload or post, analytical information about your device, such as IP address, OS version, and clickstream, or similar. We will collect, store, use, and maintain your data, including personal data, for educational and research purposes only, except where otherwise required by law; provided, however, we may use and share your non-personal, de-identified or aggregated data in a manner consistent our educational and research purposes, to include without limitation, reports, publications, and activities to improve the website’s information, resources and services or conduct of research as approved by our institutional review board.

Access to Student Records

If any student records are shared with us, to the extent permitted by law, we will treat such information as confidential and protected under the Family Educational Rights and Privacy Act (“FERPA”) 20 U.S.C. § 1232g. If you are using the Kite Suite on behalf of an educational institution as part of a self-monitoring and mentoring intervention program in a school district setting, we agree to serve as a “school official” for purposes of outsourcing to us certain institutional services and functions when we access your educational records to carry out your responsibilities in the program. In such instances, you acknowledge that we have a legitimate educational interest in access to educational records and that such access shall be subject to and limited by 34 CFR 99.31(a)(1)(B).

Storage and Data Security

We maintain your data on secure servers and follow industry standard procedure for log files for accessing accounts. The information collected by log files may include internet protocol (IP) addresses, browser

type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and clickstream; this information is not linked to personally-identifiable data. Access to Kite data will be password protected and restricted to only those individuals that require access, which is controlled by role based access controls. You are responsible for maintaining the security of your credentials. Do not share your password with anyone. Our website automatically generates a CSRF “token” for each active user session managed by the Kite Suite. This token is used to verify that the authenticated user is the user actually making the requests to the Kite Suite.

If you have any questions about this Privacy Statement or requests regarding your personal data, please contact us through email at agilets@ku.edu

The effective date of this Privacy Statement is February 24, 2020.