

Dillon School District 3
Information on External Applications

Date of Application: 7/11/2023

Application: ActionEducate (formely VapeEducate)

Site: vapeducate.com

Company Location: Solon, OH

Student Accounts: Yes

Any Data Integrations Needed with District: No. Student accounts are created manually or imported in bulk into the system by the group leader.

Data Storage Location: There is no indication of where the data is stored opening the potential for data to be stored outside of the US following different privacy and security rules.

Privacy/Security Information: <https://www.vapeducate.com/privacy-policy/>

Key Privacy points:

Pros:

FERPA compliant
COPPA compliant
GDPR compliant
CIPA compliant
HIPPA compliant
PPRA compliant
SOPIPA compliant
PIPEDA compliant
Approved for children under 13
No advertising is allowed on the platform

Cons:

- Policies do not state who owns the data or that the supplier owns all of the data.
- Policies do not state if users can delete their data or policies do not allow data deletion or policies do not state how to delete data.
- Policies do not state a data retention policy or that the data is retained as long as the supplier needs it.

Narrative: The only qualms of using VapeEducate from a security/privacy standpoint are outlined in the cons section and the Data Storage Location information.

Status: Approved as long as we are fine with accepting the points noted above about data location and retention.