

OnToCollege Schools Data and Privacy Policy

Effective Date / Revised Date: January 1, 2025

OnToCollege (hereafter called "OTC" "us" or "we") is committed to protecting the privacy and security of student data. This Data and Privacy Policy outlines our data practices in connection with our online test preparation and college and career readiness services offered to schools.

1. Overview

OnToCollege partners with schools to provide online educational content, including preparation for standardized tests such as the ACT® and SAT®, as well as courses supporting college and career readiness. As part of this service, limited student information is collected solely for the purpose of enabling access to and personalization of the OnToCollege platform.

2. Information We Collect

We only collect the minimum amount of personally identifiable information (PII) necessary to provide our services. For each student user, we collect:

- Full Name
- School-issued Email Address
- Expected Graduation Year
- Password (encrypted)

School Information. When a teacher, school administrator, or other authorized person associated with a School registers for an account on our Service or corresponds with us, we may collect personal information such as a name, e-mail address, password, and information about the School.

We do **not** collect sensitive personal information such as home addresses or phone numbers.

We consider such Student Data to be strictly confidential and in general do not use such data for any purpose other than improving and providing our Services to the School or on the school's behalf.

3. How We Use Student Data

Student data is used strictly to:

- Create and manage user accounts
- Provide access to assigned courses and track progress
- Allow school administrators and educators to monitor usage and participation

- Improve and support the delivery of our educational services

During the course of providing the Service, we collect information about your use of the Service, as well as any information that you submit to the Service, such as answers to questions or content.

We do **not** use student data for marketing purposes, nor do we sell, rent, or share student data with third parties for commercial use.

4. Data Retention and Deletion

OnToCollege retains student data only for as long as necessary to provide services.

- Student accounts and associated data are removed from our platform within **three months following July of the student's graduation year**.
- Schools may request earlier deletion of student data at any time.

5. Data Security

We implement industry-standard security measures to protect student information, including:

- Encryption of stored passwords
- Secure data transmission using SSL/TLS
- Role-based access controls for school and OnToCollege staff
- Regular system audits and monitoring

6. Compliance with Student Privacy Laws

OnToCollege complies with applicable student privacy regulations, including:

- **FERPA** (Family Educational Rights and Privacy Act): We operate as a “school official” under FERPA and use student data only for educational purposes authorized by the school.
- **COPPA** (Children’s Online Privacy Protection Act): We do not knowingly collect personal information from children under 13 without direct consent from schools, as permitted under COPPA’s school exception.

7. Third-Party Services

OnToCollege may use trusted third-party vendors to support delivery of our services (e.g., cloud hosting, learning management systems). These vendors are contractually required to:

- Protect student data under the same standards as OnToCollege
- Use student data only to perform the services requested by OnToCollege
- Not share or use student data for any other purpose
- A list of these third-party vendors is available upon request.

8. School and Parent Rights

School administrators may access, review, and request corrections or deletions of student data at any time. Parents and guardians wishing to access their child's information should direct their request to the school, which may coordinate with OnToCollege as needed.

9. Policy Updates

We may update this policy from time to time. Schools will be notified of material changes prior to implementation. The latest version will always be available at: [Schools Data & Privacy Policy](#)

10. Compliance with State-Specific Student Privacy Laws

OnToCollege complies with applicable state-specific student privacy laws, including but not limited to:

- **California Student Online Personal Information Protection Act (SOPIPA, Cal. Bus. & Prof. Code § 22584 et seq.)**
- **California Consumer Privacy Act (CCPA), as amended by the CPRA**
- **New York Education Law § 2-d**
- **Colorado Student Data Transparency and Security Act**
- **Connecticut Public Act 16-189**

In accordance with these and similar laws:

- We **do not sell student data**, and we do not use it for targeted advertising or behavioral profiling.
- We **do not build a personal profile of a student** except for supporting legitimate educational purposes.
- We provide schools with full access to, and control over, their student data.
- We implement reasonable security procedures and practices to protect student data from unauthorized access, destruction, use, modification, or disclosure.
- Upon contract termination or at the request of the school, we will delete student data in a timely manner consistent with applicable law.
- We will clearly and transparently disclose our data policies and practices.
- OTC does not collect, maintain, use or share Student Data beyond that needed for an authorized educational or school purpose, or as authorized by our agreement with a School.
- OTC does not use or disclose Student Data for targeted advertising purposes.

11. Data Breach Monitoring and Response

OnToCollege takes all reasonable measures to prevent unauthorized access to student data. In the event of a suspected or confirmed data breach, we follow a structured incident response plan that includes:

- **Continuous Monitoring:** Our systems are monitored for unusual activity, access patterns, or anomalies that may indicate unauthorized access or misuse.
- **Immediate Investigation:** Upon detection of a potential breach, our security team initiates an investigation to assess the scope, source, and impact of the incident.
- **Containment and Mitigation:** We act promptly to contain the breach, secure data, and prevent further unauthorized access. This may include revoking credentials, updating security configurations, or isolating affected systems.
- **Notification:** If a breach involves student PII, OnToCollege will notify affected school districts, and, where required, affected individuals and relevant authorities, in accordance with federal and applicable state laws.
- **Remediation and Reporting:** We provide a summary report to affected school districts and implement additional safeguards as needed to prevent future incidents.
- **Support:** We cooperate fully with schools and regulatory authorities during and after a breach response and provide reasonable support to assist in compliance with any required parent or student communications.

We are happy to enter into **Data Privacy Agreements (DPAs)** with school districts and state agencies to ensure full legal compliance and transparency.

Contact Us

If you have any questions or concerns about this policy or our data practices, please contact:

OnToCollege

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