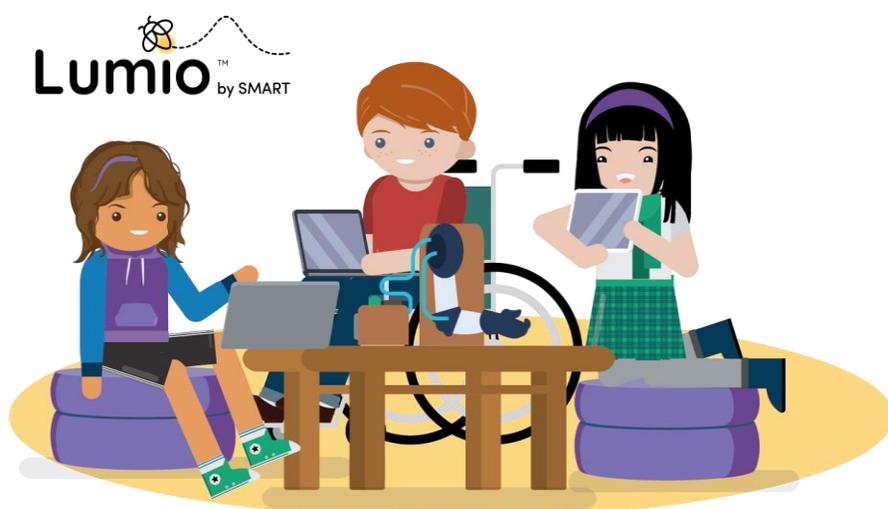


# Checklist: Evaluating Privacy & Security in Digital Learning

Data privacy and security are important and we know you need secure and worry-free data protection. Privacy and security are at the core of Lumio's product design and we believe that educators and students should not surrender their right to privacy in exchange for teaching and learning. We have compiled a list of questions related to privacy and security along with our responses. When comparing digital learning tools, ask other providers these questions and get their answers in writing to make sure you get the protection you deserve.



## 9. How long do you keep my user data for? What is it used for?

Lumio will only keep personal data for as long as required to provide the service or as required for tax and legal reasons. User data will be deleted after 2 years of inactivity

## 10. Can I request my data to be erased?

Yes, with Lumio you can request to have your data erased at any time.

## 11. Who are the employees, contractors and vendors that have access to my data?

We operate by the principle of least privilege. Data access is restricted only to parties that need it, only for the minimum amount of time required, and we tell you who these parties are. [Contact us](#) to find out more.

## 12. What mandatory information is collected during the standard account registration process for use of the service by a teacher or an administrator?

- First name
- Surname
- Email address
- Country or state/province

## 13. Are administrators and teachers offered anonymity and / or pseudonymity when dealing with the service provider?

Yes, administrators and teachers can enter a display name of their choice and hence choose to maintain anonymity and / or pseudonymity.

## 14. Does your product have ad trackers?

No. Lumio does not have ad trackers and consequently does not use user data for profiling, behavioral advertising and selling.

## 15. Do you have a dedicated data security officer on staff?

Yes. Lumio has a dedicated data security officer on staff to protect your data against theft or compromise

## 16. Are you part of the [Student Privacy Pledge](#)?

Yes. SMART, the developer of Lumio, has signed the Student Privacy Pledge .

## 17. In what jurisdiction would legal disputes, regarding usage of the service, be handled?

Legal disputes, if any, will be handled in the customer's home jurisdiction.

## 18. Do you transfer data out of the EU using Privacy Shield?

No. Lumio does not transfer European product user data out of Europe. Privacy Shield has not been an approved method to transfer data out of Europe since July 2020 as per [The Court of Justice of the European Union \("CJEU"\)](#).

## 1. Where is my product user data located?

Lumio's product user data is stored in the EU in accordance with EU and GDPR legislation.

## 2. Are you GDPR compliant?

Yes. Regulatory compliance is a top priority for us and as such we observe all local and federal legislation, including but not limited to GDPR, FERPA, COPPA and SOPPA.

## 3. Where is your company located? Is it in accordance with the [GDPR's adequacy decision](#)?

SMART, the developer of Lumio, is located in Canada. The European Commission has recognized Canada as providing adequate protection.

## 4. How often is the technology audited to ensure security & privacy standards?

Lumio performs internal security audits every quarter and a security audit is run by a third party annually. These audits include a penetration testing assessment and the annual reports are publicly available.

## 5. Can you provide a list of all your sub-processors, vendors and software partners, what data they have and where it is hosted?

Yes. You can find a list of all the data collected and sub-processors on our [website](#).

## 6. Do you have a list of all the data you collect and where it is stored?

Yes. You can find a list of product user and customer data collected and stored on our [website](#).

## 7. Do you encrypt my product user data?

Yes. All of Lumio's product user data is encrypted at rest and in transit. All personal data is encrypted at REST using AES 128 or higher and while in transit, it is encrypted using TLS 1.1 or higher.

## 8. Is my data sold?

No, we do not sell any of your personal data. We grow our business by protecting your privacy, not exploiting it.