RingCentral Videoconferencing for Schools

CHILDREN'S PRIVACY NOTICE AND SCHOOL/PARENTAL NOTIFICATION

Last Updated: April 4, 2022

RingCentral provides its RingCentral RingEX Services, including videoconferencing, to primary and secondary schools, and allows students to access the videoconferencing feature, including associated applications ("Service") exclusively in support of their educational mission, for example, to support virtual classrooms, educational office hours, counseling, and more. RingCentral permits students, including those under the age of 16, to use the Service with the consent of their respective schools and in accordance with the school's rules for such usage and RingCentral's acceptable use policies. This Children's Privacy Notice and School/Parental Notification ("Notification") explains how RingCentral complies with the requirements of the Children's Online Privacy Protection Act ("COPPA"), the California Consumer Privacy Act ("CCPA"), the Federal Education Rights and Privacy Act ("FERPA"), and other applicable laws in connection with the Service.

What does this Notification cover?

This Children's Privacy Notice and School/Parental Notification applies to RingCentral's Processing of any information or data collected from and relating to an identified or identifiable student ("Student Personal Data") in connection with the Service. It also applies to RingCentral's treatment of records, files, documents, and other materials maintained by the School Partner that are directly related to a student (collectively, "Educational Records" as defined by FERPA).

Student Access to the Services

Students under the age of 16 may only access the videoconferencing feature of the Service as a guest participant. An authorized user (e.g., a school teacher, aide, or administrator with a RingCentral account) can invite students to join a meeting as a guest participant by, for example, sending a copy of the meeting link or invitation to the student. Students may then join the

meeting as a guest participant by clicking the meeting link and providing their name at the prompt without logging into a RingCentral account.

Consent

Before RingCentral collects Student Personal Data, we require the "School Partner," which may be the students' school district, school, or teacher, to provide verifiable consent to our collection, use, and disclosure of such information in accordance with this Notification. We collect and process Student Personal Data only to provide the videoconferencing feature to the School Partner as detailed below. With the limited exception of service providers discussed in more detail below, we do not share Student Personal Data with parties except as directed by the School Partner or required by law.

Student Personal Data and Educational Records We Collect

The types of Student Personal Data we collect may include, without limitation: a student's first and last name; screen or user names that function as online contact information; telephone numbers; persistent identifiers such as School Partner ID or cookie IDs, IP address or MAC address; photos, videos, or audio files containing a child's image or voice; log data including date and time stamp and clickstream data; and any information associated with these identifiers. More information about the Student Personal Data we collect, process, and maintain, and the source of that information, is provided below.

Student Personal Data we collect from School Partners and/or students on behalf of School Partners

In order to provide the Service to School Partners, RingCentral may collect and process from School Partner, School Partner's authorized users (e.g., teachers, aides, administrators, etc.), or from students at the direction of our School Partners, the following categories of Student Personal Data:

· Identifying information collected by the Service such as user/screen names, School Partner ID, and any other identifiers required by the School Partner;

· Other identifying information, if provided by the School Partner, its authorized users, or students at the direction of School Partner, such as full names, physical and email addresses, telephone numbers, and other similar identifiers;

· Information about the School Partner to which a student belongs, including its name and location, and the student's grade, class(es), teacher(s), courses, curriculum, attendance, participation, and performance, etc.;

· Student work, including uploaded class or homework, art, or other written online contributions, comments, questions, and answers associated with any of the personal identifiers described above;

· Information about a student's use of Service features such as virtual hand raising, clapping, voting, etc.,

· Student, teacher, and class schedules; and

· Other forms of Student Personal Data collected in the course of providing and as reasonably necessary to provide the Service to School Partners.

RingCentral collects, maintains, processes, and shares this Student Personal Data on behalf and at the direction of the School Partner to deliver support internal operations of the Service. We do not use Student Personal Data for other commercial purposes.

Educational Records we collect from School Partners

We may collect Educational Records from the School Partners and their authorized account users (e.g., teachers, educational aides, and administrators). RingCentral collects, maintains, and processes Educational Records on behalf and at the direction of the School Partner for the purpose of providing the Service, subject to the limitations of FERPA. We do not use Educational Records for other commercial purposes.

Student Personal Information we collect automatically from students using the Service

We may collect, process, and maintain certain information automatically from a student's device when they use the videoconferencing feature.

Usage Information– When a student uses the Service, we may collect:

o Traffic data about communications that take place through our platform (such as class chat, video conferencing) to enable us to transmit those communications effectively and efficiently;

o Network monitoring data to enable us to maintain the security and agility of our internal networks;

o Information that we log in connection with operating the Service, including the Internet Protocol ("IP ") address, Internet Service Provider ("ISP"), and type of browser that a student is using when accessing the Service; referring/exit pages; the files viewed while using the Service (e.g., HTML pages, graphics, etc.); date/time stamp; call detail records for any student joining a videoconference by phone; and/or information about actions taken when using the service;

o Device data, including device type, identifiers such as MAC address or mobile phone number, and other information related to mobile devices like operating system and model if students use the Service via our applications on mobile devices.

o Metadata, or data about other data, which can include information about the size, formatting, or other characteristics of a data item.

Cookies and other similar technologies – We use various technologies to collect information when students use the Service, including cookies, javascript, web beacons, pixels, and other similar technologies. A cookie is a small file or a string of letters and numbers placed on user devices to provide the Service, facilitate the interaction with users, and as well as to provide reporting information in support of the internal operations of the Service.

Information We Use

We use Student Personal Data collected from students to:

o Deliver the Service, including to deliver customized content at the direction of our School Partners;

o Support the internal operations of the Service, including to maintain and analyze its usage and functioning, authenticate users, and protect the security of the Service, students, and School Partners;

o Fulfill requests made by School Partners, including requests for access to or deletion of Student Personal Data;

o Send School Partners technical alerts, updates, security notifications, and administrative communications; and

o Comply with our legal obligations or the legal obligations of our School Partners.

We do not use Student Personal Data for marketing or for any other commercial purpose.

Sharing and Disclosure of Information

RingCentral processes Student Personal Data and Educational Records at the direction of our School Partners. All Student Personal Data and Educational Records collected about the students of a School Partner is available to that School Partner for its use and disclosure as permitted by law. In addition, RingCentral may disclose Student Personal Data and Educational Records to third parties at the direction of the School Partner.

Depending on decisions made by a School Partner, including decisions about Service settings, Student Personal Data and Educational Records may be shared with others, including students, teachers, administrators, parents, and other third parties. For example, students' names, chat messages, spoken contributions, and other content shared by a student in a meeting, webinar, or other interactive educational setting, including Student Personal Data, may be available to all other participants in that meeting. If a School Partner elects to record meetings, webinars, or interactive sessions, that School Partner may share that information with third parties as permitted by law or, when required or permitted by the applicable contract, direct RingCentral to do so.

RingCentral may use third-party service providers, affiliates, and partners, and may provide them with access to Student Personal Data and Educational Records as needed to provide the Service and support RingCentral's internal operations. RingCentral enters into binding contracts with service providers that may have access to Student Personal Data and Educational Records, which limit their use of such information to that which is strictly necessary to perform their work on behalf of RingCentral. We prohibit service providers' use of Student Personal Data and Educational Records for marketing or other commercial purposes, and we obligate them to take reasonable security measures to safeguard Student Personal Data and Educational Records.

Except as described above and as required by law, RingCentral does not disclose Student Personal Data or Educational Records to third parties.

School/Parental Rights

RingCentral does not require participating students to provide more Student Personal Data than is reasonably necessary to provide the Service on behalf of a School Partner. Under COPPA, a School Partner is entitled to: (1) receive a description of the types of Personal Data collected from its students by RingCentral; (2) review a student's Personal Data and/or have that

information deleted; and (3) prevent further use or online collection of a student's Personal Data. Parents or guardians of students using the Service at the consent of a School Partner should contact that School Partner to exercise any of their rights under COPPA.

Further Information

Additional information about RingCentral's privacy and security practices is available here ("RingCentral Privacy Notice"). Note that the RingCentral Privacy Notice governs RingCentral's collection, use, and disclosure of all personal data aside from to Student Personal Data and Educational Records. For example, information about teachers and school administrators will be treated in accordance with the general RingCentral Privacy Notice, except to the extent it qualifies as Student Personal Data or an Educational Record.

Contact Us

If you have any questions about how RingCentral collects, uses, or discloses Personal Data about students using RCV for Schools, please contact us at privacy@ringcentral.com. Alternatively, you can contact us in the following ways:

Via Postal Mail:

Privacy,
RingCentral
20 Davis Drive
Belmont CA 94002

Via phone/fax addressed to Privacy, RCV for Schools
(888) 528-RING (7464)
(650) 472-4100