# **Educational Services Compliance Guide**

April 2024

# **RingCentral**<sup>\*</sup>



RingCentral offers RingCentral for Education<sup>1</sup>, RingEX, and RingCentral Video Pro as part of RingCentral's educational mission to support virtual classrooms, educational office hours, counseling, and communication with students through use of our Services, in compliance with requirements applicable to School Partners<sup>2</sup> under privacy laws such as the Children's Online Privacy Protection Act ("COPPA") and the Federal Education Rights and Privacy Act ("FERPA").

This whitepaper provides information on privacy requirements potentially applicable in school settings and how RingCentral supports compliance of School Partners with these requirements.

RingCentral is focused on creating a safe environment for remote and hybrid learning in school settings for School Partners. RingCentral offers RingCentral for Education exclusively to School Partners as a solution for primary and secondary schools to access RingCentral RingEX Services (messaging, video, and phone or the "Services"), specifically videoconferencing, and allows students to access the video conferencing feature, including associated applications. RingCentral for Education allows students under the age of sixteen years to access the videoconferencing (including in-meeting chat, transcription, closed captioning and virtual backgrounds) feature of the Services as a guest participant, without having to create an account. RingCentral also offers RingEX and RingCentral Video Pro to School Partners, such as secondary schools whose students are over the age of sixteen years.

<sup>&</sup>lt;sup>1</sup> More information about <u>RingCentral for Education</u>.

<sup>&</sup>lt;sup>2</sup> School Partners are any educational customers who provide, as a primary service, educational services and which have secured appropriate consent for their students (or parental consent where applicable).

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#### COPPA Requirements and Individual Rights

COPPA requires operators such as RingCentral to obtain verifiable parental consent prior to any collection, use, and/or disclosure of Personal Information (as defined by COPPA) from children. RingCentral relies on School Partners to obtain consent from parent(s) or legal guardian(s) of students for RingCentral's collection, use, and disclosure of Personal Information in accordance with the <u>Children's Privacy Notice and School/Parental Notification</u>. Parents or legal 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.

While RingCentral makes available the necessary information on how it processes student Personal Information, we rely on our School Partners to provide, on behalf of the parent(s) or legal guardian(s) of the students, consent for the collection and processing of Personal Information before using or inviting students to use RingCentral for Education or the RingEX Services.

FERPA RequirementsWith respect to School Partners subject to FERPA, RingCentral<br/>operates as a school official under the direct control of School<br/>Partners with respect to the use and maintenance of Education<br/>Records (as defined by FERPA) with legitimate educational interests<br/>in obtaining or accessing Personally Identifiable Information (as<br/>defined by FERPA, hereinafter used interchangeably with "Personal<br/>Information"), including Education Records pertaining to students.<br/>RingCentral shall only use or disclose such Personal Information in<br/>accordance with FERPA as is reasonably necessary to provide<br/>RingCentral for Education or the RingEX Services and to perform its<br/>obligations under agreement.

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	RingCentral may require School Partners to demonstrate compliance with legal requirements, or reliance on applicable exceptions regarding processing of student Personal Information.
RingCentral's Children's Privacy Notice	RingCentral makes available a specific privacy notice for School Partners, the <u>COPPA Privacy Notice</u> . This notice explains how RingCentral processes student Personal Information in compliance with applicable privacy laws. RingCentral permits students, including those under the age of sixteen years, 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.
How to access the Services	Students under the age of sixteen years may access the videoconferencing (including in-meeting chat, transcription, closed captioning and virtual backgrounds) feature of the Services as a guest participant, rather than as a subscriber. An authorized user (for example, a school teacher, aide, or administrator with a RingCentral account) can invite students under sixteen years to join a meeting as a guest participant by, for example, sending a copy of the meeting link or an invitation to the student. Students under sixteen years may then join the meeting as a guest participant by clicking the meeting link and providing their name at the prompt without logging into or registering a RingCentral account.
	Students over the age of sixteen years may be provisioned their own user account as a part of the School Partner's account. Use of the Services in this manner provides access to message, videoconferencing, and phone capabilities and will be subject to the entitlements/controls imposed by a customer administrator.
External Data Protection Officer	RingCentral has appointed an external Data Protection Officer to guarantee an independent and impartial insight into its privacy and data protection practices.

	RingCentral DPO contact details are:
	HewardMills Ireland Ltd. Fitzwilliam Hall, Fitzwilliam Place, Dublin 2 DO2 T292 Ireland privacy@ringcentral.com
More Resources	Privacy Trust Center
Contact Us	RingCentral Privacy: privacy@ringcentral.com

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