

# DATA PRIVACY

Know how children's information is being collected and used

## CHECKLIST

Item	Description	Notes
<b>#1. What agreement does the app or platform have?</b>	<p>Apps and platforms may have different types of agreements. One type is between the tech company and the Centre (Business to Business or B2B) and another type is between the tech company and families (Business to Consumer or B2C).</p> <p>Check which type of agreement the app or platform has. Even if it is a B2C agreement, then the Centre plays an important role in mediating this agreement and ensuring the tech company is collecting and using personal data in safe and ethical ways. Follow the questions below to assess this.</p>	
<b>#2. What privacy assessments has the app or platform completed?</b>	<p>Check whether the app or platform has had privacy assessments done.</p> <ul style="list-style-type: none"><li>• Does it have a <a href="#">Safer Tech 4 Schools</a> (ST4S) badge or has it been assessed against the ST4S framework?</li><li>• Has it been reviewed on Common Sense Media's guide to <a href="#">educational apps</a>?</li><li>• What does the <a href="#">Google Play</a> and the <a href="#">App store</a> tell you about the data that is collected and used by the app?</li></ul>	
<b>#3. What does the privacy policy tell you about data collection?</b>	<p>Privacy policies provide information on (1) what personal information is collected, (2) how this information is used, (3) who this information is shared with, (4) how the information is processed and (5) your rights/what you can do with the data.</p> <p>Use the "Find" function to scan the privacy policy for key words like:</p> <ul style="list-style-type: none"><li>• "Personal information/data"</li><li>• "Sensitive information/data"</li><li>• "Cookies" and/or "Tracking pixels"</li><li>• "Third party"</li><li>• "Sharing" and/or "Processing"</li></ul>	

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	<ul style="list-style-type: none"> <li>• “Rights”</li> <li>• “Child”</li> </ul> <p>If these words appear, read the section carefully. Does it say anything about who or what might collect and use the personal information shared?</p> <p>Who owns the data that is collected by the app? <i>For example, with popular sleep tracker app Huckleberry, it is unclear what data is owned by the company or you. The Terms of Use state that all data generated by the product is owned by the company while information you provide (e.g. profile pic) is owned by you but in using the app, you grant them the license to use this data.</i></p> <p>Can you explain to a parent what happens to the children's data? Children's personal information should ideally not be used beyond service provision and limited improvement of the product.</p>	
<b>#4. Can you trial or pilot the app or platform?</b>	<p>Can you opt out if the app/platform is not working to plan?</p> <p>If a trial is not available, can you discontinue using the app/platform if it is not having the desired effect?</p>	
<b>#5. Are there fees, hidden costs, or additional charges associated with the app or platform?</b>	<p>Pay particular attention to apps that have a “freemium” business model you might have free access to part of the app, but then have to pay a lot of money for more advanced functionality (which may well be the part you need most).</p> <p>Be aware of free apps, the cost may not be financial, it may be the collection of private data.</p>	
<b>#6. Can families at your Centre or school opt out from using the platform?</b>	<p>Can you opt out from sharing data with different parties (i.e. other education centres or third parties)? Some families may feel uncomfortable or unable to use some digital platforms. They have a right to opt out from using app or platform <i>without</i> their child's educational experiences being compromised.</p>	