



# Privacy Policy

ProUnitas takes your privacy very seriously. Please read this Privacy Policy carefully, as it contains important information on who we are and how and why we collect, store, use, and share your personal information.

1. Key Terms. The following are key terms used in this Policy:
  - a. “We, us, our” means ProUnitas Inc., a Texas non-profit corporation.
  - b. “PurpleSENSE” means ProUnitas’ data platform used by “Users” to case manage and document their work with students.
  - c. “Student Assistant Form, SAF” means the online form used to capture needs referrals from parents, teachers, and students themselves.
  - d. “User, Users” means any individual who has a license to PurpleSENSE which may include school counselors, social workers, support staff, etc.

## Education Records

2. Education Records we collect about students. We may collect and use the education records of students. “Education Records” means records that are (1) directly related to a student; and (2) maintained by an educational agency or institution or by a party acting for the agency or institution. These records include, but are not limited to the student’s unique ID number, the name of the school the student attends, the student’s first, middle, and last name, the first and last name of the parent or legal guardian of the student, the student’s current grade level, and the student’s course schedule.
3. How education records are collected. We collect education records from a Secure File Transfer Protocol process through the school districts’ Student Information System.
4. How and why we use education records. The Family Educational Rights and Privacy Act (“FERPA”) permits us to use the education records for the purposes authorized by the respective school or district. We use the education records to populate PurpleSENSE for use by school officials.
5. Who we share education records with. We share education records with school officials. Additionally, we share data to some third-party service providers who can see limited educational data.
6. Where education records are held. Education records may be held in a cloud-based database, Amazon Web Services, which feeds into PurpleSENSE daily.
7. How long education records will be kept. We will keep education records for the duration of the relationship with the school district until the relationship dissolves.
8. Your rights under FERPA. Parents and students 18 years or older (“eligible students”) have certain rights regarding the student’s education records.
  - a. Right to inspect and review. Parents or eligible students have the right to inspect their child’s or their education records within 45 days after we receive a written request that identifies the records they wish to inspect. We shall provide the requested records to the student’s school or district, which can confirm the parent’s or eligible student’s identity. The school or district will make access arrangements and notify the parent or eligible student of the time and place where the records may be inspected.

To exercise your right to inspect and review as described in this Privacy Policy, please send a written request that identifies the records you wish to inspect to:

ProUnitas Inc  
Attn: Albert Wei  
1801 Main St., Suite #1300  
Houston, TX 77002

- b. Right to request the amendment of the student's education records. We do not have the authority to amend students' education records. Therefore, parents or eligible students who wish to amend their child's or their education records should write to the student's school principal, clearly identify the part of the record they want to be changed, and specify why it should be changed.
- c. Right to provide written consent before the school discloses personal identifiable information from the student's educational records. Generally, schools must have written permission from the parent or eligible student to release any information from a student's education record. However, FERPA authorizes disclosure without consent to school officials with a legitimate educational interest. The criteria for determining who constitutes a school official and what constitutes a legitimate educational interest are outlined in the school or district's annual notification for FERPA.

The schools and districts that disclose educational records to us have deemed ProUnitas a school official with a legitimate educational interest.

- d. Right to file a complaint with the U.S. Department of Education. Parents or eligible students may file a complaint with the U.S. Department of Education concerning alleged failures by ProUnitas to comply with the requirements of FERPA. The name and address of the Office that administers FERPA are:

Student Privacy Policy Office  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

## **Children's Online Privacy Protection Act (COPPA)**

- 9. District or school's consent. Students can submit a Student Assistance Form to request, among other things, food, clothing, emotional health needs, and academic needs. Students completing a SAF must enter their name, email, and phone number. The student's school district or school has consented to ProUnitas' collection, use, and disclosure of the student information submitted via a SAF. ProUnitas collects the student information for the use and benefit of the school and for no other commercial purpose. Please contact ProUnitas with any questions about Student Assistance Forms.

## Personal Information from Users

10. Personal information we collect from Users. We collect and use the following personal information that identifies, relates to, or describes a particular User.
  - a. First and last name;
  - b. Job title; and
  - c. Email
11. How Users' personal information is collected. We collected this information directly from you or from your employer with your consent (e.g., school district).
12. How and why we use the personal information of Users. We use the personal information to permit Users access to PurpleSENSE. Without this data, Users would not be added to the PurpleSENSE environment. Further, stakeholders may contact Users regarding the Users' role in the school.
13. Who Users' personal information with. We share Users' personal information with third-party service providers who have executed data sharing contracts with the respective school district that shared the students' education records.
14. Where personal information is held. Education records may be held in a cloud-based database, Amazon Web Services, which feeds into PurpleSENSE daily.
15. How long will personal information be kept. We will keep education records for the duration of the relationship with the school district until the relationship dissolves. there is additional information needed from the parent(s)/guardian(s) to move forward with next steps to connect the student to the resource/service. Use this on-hold reason when waiting for an *extended* time period to get a response back and not an expected 3-4 days.

## Miscellaneous

16. Changes to this Privacy Policy. This Privacy Policy was published on 8/17/2022. We may change this Privacy Policy from time to time at our discretion.
17. How to contact us. Please contact ProUnitas by email if you have any questions about this Privacy Policy or the information we hold about you. Our contact details are below:

ProUnitas Inc  
Attn: Albert Wei  
1801 Main St., Suite #1300  
Houston, TX 77002  
awei@prounitas.org