

Extempore and FERPA

This document summarizes our data privacy practices and how they relate to the main Federal Law protecting a student's data privacy: The Family Educational Rights and Privacy Act (FERPA).

For detailed information on Extempore's privacy practices, please review [our privacy policy](#).

What data does Extempore collect about your Students?

Extempore only collects First Name, Last Name, and Email address from our users. This information is part of a subset of education record information FERPA designates for special treatment, called "directory information" (20 U.S.C. § 1232g(a)(5); 34 C.F.R. § 99.37).

Please note that Extempore does not validate either the names or email addresses used to sign up as a student: a school might choose to use the same email address for all students, or use pseudonyms for first and last names, for example.

Besides directory information, Extempore collects student recordings as well as any feedback or grade assigned by the teacher to those recordings. These are considered "Educational Records" under FERPA.

Is this information disclosed to third parties?

Extempore uses third parties to provide services to you: for example, we use Amazon Web Services to host our data, Apple and Google to host our mobile apps and your LMS to host your grades (if you choose to integrate).

Information is only shared with third parties in order to provide you and your students with the Extempore services. Information is **never** shared for marketing purposes. FERPA allows protected information to be shared only for the reason it was provided (20 U.S.C. § 1232g(b)(1)(A); 34 C.F.R. § 99.31(a)(1)), which in our case is to serve you and for the continuous improvement of Extempore, so our products are more useful to you and your students.

How is student data used?

FERPA requires that institutions use student information only for the purposes the educational institution provided it to them (**20 U.S.C. § 1232g(b)(4)(B); 34 C.F.R. § 99.33.**)

The main use of student data in Extempore is to enable teachers to grade and provide feedback to their students. Additionally, we use student data and usage logs to develop and improve the Extempore product and the user experience.

Do I have a right to review or correct the data?

Yes, FERPA requires educational institutions receiving federal funding to grant parents and eligible students certain rights regarding their education records and FERPA PII, including rights to Access, inspect,

and review (20 U.S.C. § 1232g(a)(1)) and to challenge and correct the contents (20 U.S.C. § 1232g(a)(2); 34 C.F.R. § 99.20).

You can email your school administration at any time to review and edit your data. You can also email privacy@extemporeapp.com if you have any questions.

Can a student opt out of your data collection?

Students can email privacy@extemporeapp.com at any time to opt out. It's important to notice, however, that since all collected data is used to provide the services, opting out will render the student's account unusable within Extempore.

When is student data deleted?

Teachers can delete all student data responses from the Extempore system by archiving the class. This destroys all student recordings in the system.

You can email your school administration at any time to request that your records be deleted.

Will data collected be used for Marketing purposes?

The Protection of Pupil Rights Amendment (PPRA) allows parents and eligible students to opt out of marketing activities and the commercial use of their student data, including third-party use. (20 U.S.C. § 1232h(c).)

Extempore does not use any student or teacher data for marketing purposes, so there is no need to opt out.

Is there advertising within Extempore?

California's Student Online Personal Information Protection Act (SOPIPA) (Cal. Bus. & Prof. Code § 22584) (20 U.S.C. § 1232h(c).) prohibits EdTech companies from engaging in advertising on the service.

There is no advertising anywhere within Extempore.