



## Arrupe Virtual Learning Institute Site Privacy Policy

Last updated: December 2023

The Arrupe Virtual Learning Institute operates <https://arrupevirtual.org> and <https://courses.arrupevirtual.org> (the “Sites”). This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Sites. We use your Personal Information only for providing and improving the Sites. By using the Sites, you agree to the collection and use of information in accordance with this policy.

### Information Collection And Use

While using the Sites, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information includes but is not limited to your name and email address (“Personal Information”).

We obtain this information either through the direct registration of persons on our sites, or through the partner schools with whom we work to provide coursework and other programs to students and users. This information is held in strictest confidence and is not shared with any third party outside of those hosting services, content providers, and application services with whom we work.

### We do NOT

We do not sell your personal information.

We do not use or share your information for any advertising or marketing purposes that is not specifically related to the educational services we provide.

We do not disclose “Directory Information” as defined in the Family Educational Rights Privacy Act (FERPA) to any external entities beyond those supporting our programmatic endeavors as described below.

We do not collect or process your data for any purposes that are not legally required or necessary for legitimate educational interest.

### Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Sites (“Log Data”). This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Sites that you visit, the time and date of your visit, the time spent on those pages and other statistics. We use this data solely for the purposes of engaging directly with those utilizing our sites and services. Since our services include programming delivered to students of our member schools, certain types of student information will be shared with school officials. Only information deemed to possess a legitimate educational interest will be shared.

### Cookies

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from web sites and stored on your computer’s hard drive. Like many sites, we use “cookies” to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of the Sites.

## Protection of Data

AVLI's best protection of sensitive student information starts with the limitations we place on the data we collect. We only require select "directory information" from students that includes name, email address, phone number, grade level, and host school. Other information that students may share includes one or more personal photos and a person's gender. Parent email addresses are also collected to assist with communication efforts. As a general practice, we do NOT collect or retain social security numbers, birthdates, social media account information, or home addresses.

Access to personal information is limited to those actively engaged in programmatic pursuits, and all personal information, grades, and transcripts are electronically held in firewall protected storage solutions.

## Retention of Data

We do not retain personal data beyond what is reasonably necessary to ensure the continuation of programs and services to our member schools, their students, parents, and staff.

## The Arrupe Virtual Learning Institute Uses Moodle as our Learning Management System

### Moodle uses Integrated Services

You may be given the option to access or register for the Service through the use of your user name and passwords for certain services provided by third parties (each, an "Integrated Service"), such as through the use of your Google account, or otherwise have the option to authorize an Integrated Service to provide Personal Data or other information to us. By authorizing us to connect with an Integrated Service, you authorize us to access and store your name, email address(es), and basic profile information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us, and make changes as appropriate. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service.

### Third Party Providers

AVLI uses third party hosting and technology resources to meet the programmatic needs of students. Such providers require access to shared login credentials and limited personal information including student names and email addresses.

### How Moodle Uses Google

With your login, Moodle will use Google to [upload](#), [download](#), update, and delete files in Google Drive, to create, access, update, and delete native Google documents in Google Drive, and to manage files and documents in your Google Drive (e.g., search, organize, and modify permissions and other [metadata](#), such as title).

### Privacy Policy Updates

We may update our privacy policy from time to time in response to changing technical and/or legal conditions. We ask that you periodically check this policy for updates. Most of these updates will not change the types of personal data we process, the purpose or our legal obligations for disclosure or retention requirements that would be considered a material change.

## Notification of Rights under FERPA for Secondary Schools

As a virtual learning institute through which students from across the United States and other jurisdictions take online courses, Arrupe Virtual Learning Institute (AVLI) has a primary relationship with schools. As such, our grade sharing is primarily for their purposes, rather than those of individual students. When grade sharing with students occurs it is through AVLI's Course Management System or through their designated email addresses. AVLI's Course Management System is password protected and ensures student privacy, as per FERPA requirements.

AVLI ascribes fully to the mandate of The Family Educational Rights and Privacy Act (FERPA).

The Family Educational Rights and Privacy Act (FERPA) affords parents and students who are 18 years of age or older ("eligible students") certain rights with respect to the student's education records. These rights are:

1. The right to inspect and review the student's education records within 45 days after the day the school principal receives a request for access.

Parents or eligible students who wish to inspect their child's or their education records should submit to Arrupe Virtual's Chief Academic Officer (CAO) a written request that identifies the records they wish to inspect. An official with AVLI will make arrangements for access and notify the parent or eligible student of the time and place where the records may be inspected. These records will have been submitted to the school through AVLI's primary relationship, and so the records may be accessed additionally through contact with school officials.

2. The right to request the amendment of the student's education records that the parent or eligible student believes are inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA.

Parents or eligible students who wish to ask AVLI to amend their child's education record should write to Arrupe Virtual's Chief Academic Officer, clearly identify the part of the record they want changed, and specify why it should be changed. If AVLI decides not to amend the record as requested by the parent or eligible student, the CAO will notify the parent or eligible student of the decision and of their right to a meeting regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the parent or eligible student when notified of the right to a hearing.

3. The right to provide written consent before AVLI discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent.

One exception, which permits disclosure without consent, is disclosure to school officials with legitimate educational interests. A school official is a person employed by the student's school or school district as an administrator, supervisor, instructor, or support staff member (including health or medical staff and law enforcement unit personnel) or a person serving on the school board. A school official also may include a volunteer, contractor, or consultant who, while not employed by the school, performs an institutional service or function for which the school would otherwise use its own employees and who is under the direct control of the school with respect to the use and maintenance of PII from education records; or a parent, student, or other volunteer assisting another school official in performing his or her tasks.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.

Upon request, we may disclose results to the school and appropriate officials while the school might then disclose education records without consent to officials of another school or school district in which a student

seeks or intends to enroll, or is already enrolled if the disclosure is for purposes of the student's enrollment or transfer.

4. AVLI does not sell, share or disclose personal student information to any organization beyond the sharing of academic reporting with schools, including student metadata from on-site activity.

5. There exists the right to file a complaint with the U.S. Department of Education concerning alleged failures by the Arrupe Virtual Learning Institute to comply with the requirements of FERPA. The name and address of the Office that administers FERPA are:

Family Policy Compliance Office  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202  
Notice of Directory Information

The Family Educational Rights and Privacy Act (FERPA) requires that the Arrupe Virtual Learning Institute, with certain exceptions, obtain your consent prior to the disclosure of personally identifiable information from your child's educational records. However, appropriately designated "directory information" may be disclosed without written consent, unless you have advised Arrupe Virtual Learning Institute to the contrary. The primary purpose of directory information, which is information that is generally not considered harmful or an invasion of privacy if released.

Directory information can also be disclosed to outside organizations without a parent's prior written consent. Outside organizations include, but are not limited to, companies that manufacture class rings or publish yearbooks, school Parent Teacher Associations (PTAs) that facilitate PTA outreach and development of school directories, and school libraries, to facilitate creation and mailing of free library cards for their students. Arrupe Virtual Learning Institute does not have relationships with these types of organizations; however, release of information to the student's school and/or district may be used for the above. The district also may provide directory information to area news organizations to highlight student accomplishments relating to their participation in Arrupe Virtual programming.

The following information is designated by FERPA as directory information (though much of this information is not collected, retained, or used by AVLI):

- Student name (collected)
- Grade (collected)
- School (collected)
- Participation in officially recognized activities and sports
- Weight and height of members of athletic teams
- Parent/guardian name
- Address
- Telephone listing (collected)
- Email address (collected)
- Photograph (collected)
- Honors and awards received
- Date of birth
- Dates of attendance (collected)