K-12 Privacy Policy Evaluation Request

https://gemini.google.com/app/f8998cd3d891fda3

User prompt: start

Response: To evaluate a technology product for K-12 use, please provide the full text or a direct link to the product's current Privacy Policy and Terms of Service. Performing a complete and accurate assessment against key criteria—including FERPA, COPPA, and CIPA compliance, advertising restrictions, data security, sharing limitations, minor-specific provisions, and AI training data usage—requires reviewing the full, up-to-date documentation.

User prompt: Terms of Service: https://studentreading.net/terms.php Privacy Policy: https://studentreading.net/privacy.php

Response: Privacy Policy Evaluation: Student Reading Log (`studentreading.net`)

This privacy evaluation reviews the Terms of Service and Privacy Policy published by Dearborns Consulting LLC for the **Student Reading Log** (`studentreading.net`).

Non-Negotiable Criteria Evaluation

1. Clear Privacy Policy and Terms of Service

- **Rating:** Compliant
- **Justification:** Both documents are publicly accessible via dedicated URLs (`terms.php` and `privacy.php`) and are written in plain, accessible language.
- **Excerpt:** *"These Terms of Use constitute a legally binding agreement made between you... and Dearborns Consulting LLC, doing business as Student Reading Log... concerning your access to and use of the https://studentreading.net website..."*

2. No Advertising/Marketing Use of Student Data

- **Rating:** Compliant
- **Justification:** The policy explicitly commits that data collected from students is only used for educational purposes and is not repurposed for advertising or marketing.
- **Excerpt:** *"Data collected will not be shared with a third party or used for anything other than the educational purposes of The Student Reading Log."*

3. Data Security Safeguards

- **Rating:** Compliant

- **Justification:** The policy articulates explicit technical and administrative measures, including transport encryption, password hashing, and encrypted backups.
- **Excerpt:** *"All sensitive information is transported securely using encryption (SSL). Passwords are salted and hashed before being stored. All database backups and server backups are encrypted. The server hard drives are also encrypted. The servers themselves are hosted by a world-leading provider in a state-of-the-art facility with 24/7 security and limited access."*

4. Limited Data Sharing

- **Rating:** Compliant
- **Justification:** Data sharing with third parties is prohibited, with narrow standard exceptions limited to corporate successors (mergers/acquisitions) or required law enforcement requests.
- **Excerpt:** *"The Student Reading Log does not release personal information collected or received on the site, be that from a child or adult, to any unrelated third party, with the exception of successors and law enforcement..."*

5. Regulatory Compliance (FERPA, COPPA, CIPA)

- **Rating:** Ambiguous
- **Justification:**
    - **COPPA:** Explicitly addressed. The policy notes that schools consent under COPPA on behalf of parents when setting up accounts.
    - **FERPA & CIPA:** Neither FERPA nor CIPA are explicitly referenced by name in either the Privacy Policy or Terms of Service. While operational workflows (such as school administrative control and parent deletion requests) align with FERPA guidelines, explicit legal designation as a "School Official" under FERPA is absent.
- **Excerpt:** *"COPPA and other laws authorize schools to act in place of the parent or guardian in deciding whether to give consent to the collection and use of student information for educational purposes."*

Additional Criteria Evaluation

Minor-Specific Provisions (Under 18)

- **Special Restrictions Present:** Yes
- **Details:**
    - Children under 13 cannot create their own accounts; account creation is restricted to authorized school administrators and teachers.
    - Students cannot input open personal identification fields beyond tracking books read and responding to set reading prompts.

    - Parents can request information review and account deletion via their child's school or directly from Student Reading Log support within 10 working days.

AI Model Training and Platform Improvements

- **AI Model Training Use:** Not Mentioned / Not Applicable
- **Details:** The documentation does not indicate the use of Generative AI models or retention of student text responses to train artificial intelligence models. The policy states that de-personalized word count statistics are used solely to improve book word-count estimate accuracy within the platform.

Overall Evaluation Summary

The privacy posture of **Student Reading Log** is strong and generally aligned with K-12 data privacy standards. The platform enforces minimal data collection, strict prohibitions on commercial advertising and third-party data sharing, and robust encryption safeguards.

Before full institutional deployment, educational administrators should request a Data Privacy Agreement (DPA) incorporating explicit **FERPA** compliance language to address the absence of explicit FERPA terminology in the public terms.

Sources

1. Privacy Policy - Student Reading Log
2. Terms of Service - Student Reading Log
