PRIVACY POLICY

DismissalHub Comprehensive Student & Family Data Privacy Policy

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At DismissalHub, we are deeply committed to protecting the privacy and security of students, parents, and school staff. This Comprehensive Privacy Policy explains how we collect, use, store, and protect information within the DismissalHub platform, including our Administrative Dashboard, Staff Portal, and Parent Portal.

DismissalHub operates in strict compliance with the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy Protection Act (COPPA), and Texas state student privacy laws (including Texas Education Code Chapter 32). DismissalHub acts legally as a "School Official" under FERPA, meaning all student data remains under the direct control, ownership, and governance of the respective School District.

1. Information We Collect

We only collect the minimum necessary data required to facilitate a safe, efficient, and secure student dismissal process.

- **From School Administrators & Staff:** Name, school-issued email address, assigned grade/classroom, and system login credentials.
- **From Parents & Authorized Guardians:** Name, contact information (email/phone as provided by the school), and unique system numbers assigned to vehicle RFID tags.
- **From Students:** Student name, grade, homeroom teacher, and automated dismissal logs (timestamp of when the student was scanned and cleared to leave).
- **Temporary Operational Data:** Optional temporary photos of IDs taken at pickup, custody records, and internal school-to-parent messages.

2. What DismissalHub Does Not Do

To ensure absolute privacy and maintain the trust of families and school districts, our platform implements strict architectural limits:

- We DO NOT use cameras for automatic license plate reading (LPR).

- We DO NOT use tracking codes or third-party advertising scripts anywhere inside the platform.
- We DO NOT use traditional tracking cookies; authenticated sessions are kept securely on the device itself.
- We NEVER sell, rent, or trade student or parent data to third parties.
- We NEVER use student or parent data for targeted advertising, marketing, or commercial profiling.

3. Data Storage, Location, and Security

- **Data Sovereignty:** All student, staff, and parent data is stored on secure servers located in the United States.
- **Encryption in Transit:** All traffic runs over HTTPS with a minimum of TLS 1.2 encryption managed via Cloudflare. Unencrypted HTTP requests are automatically redirected to HTTPS.
- **Encryption at Rest:** Backups, documents, medical notes, ID photos, and message attachments are encrypted with AES-256. The database itself is kept on an encrypted disk.
- **Cryptographic Isolation:** Encryption keys for highly sensitive operational files (medical notes, custody records, and ID photos) are managed separately from the primary database and general backups.
- **Security Framework:** DismissalHub's information security program aligns with the CIS Critical Security Controls, Implementation Group 1.
- **Hardware Security:** Physical RFID driveway readers and staff mobile devices operate exclusively as endpoints and do not store student rosters, parent names, or any Personally Identifiable Information (PII) locally on the physical hardware.

4. Data Isolation and Configurable Access Control

- **Multi-Tenancy Isolation:** DismissalHub enforces strict logical database isolation. Every incoming API request undergoes robust server-side token validation to prevent cross-family or cross-district data leakage.
- **Access Logging:** Every time authorized school staff open a restricted document, custody record, or ID photo, the system logs who opened it and the exact time. The school decides how long these records are kept.
- **Parent Portal:** Parents can exclusively access data tied to their own verified family profile. Parent sessions automatically expire based on the school's safety configuration (set to 30 minutes by default) to protect family information on mobile devices.

- **Staff & Admin Portals:** Access is strictly restricted to authorized school personnel. To prevent unauthorized access on shared school-issued devices, automated inactivity timeouts are enforced server-side. School administrators can customize these intervals at any time via the Admin Dashboard, with secure recommended defaults established at 10 minutes for Administrators and 15 minutes for Staff.
- **Session Revocation:** If a district administrator terminates or revokes an account's access, all active sessions associated with that account across all devices are instantly invalidated.

5. Data Integration & Provisioning

- **Standardized Rostering:** DismissalHub supports automated, secure student rostering through the OneRoster standard protocol.
- **Flat File Alternative:** For districts not utilizing OneRoster, secure manual provisioning is supported via encrypted CSV imports handled through the authenticated Admin Panel.

6. Data Retention and Destruction

All student records and family data remain the sole property of the School District. Data is retained and automatically purged according to strict operational lifecycle schedules:

- **Photos of IDs taken at pickup:** Automatically and permanently deleted after 15 days.
- **System Messages:** Automatically deleted from active logs when the current school year closes.
- **Inactive Families:** All associated family records are deleted six months after they formally leave or unenroll from the school.
- **Contract Termination:** Upon contract termination or at the explicit written request of the district, DismissalHub will permanently and securely delete or return all remaining student and family data in accordance with our Texas National Data Privacy Agreement (TX-NDPA) commitments.

7. Contact Us

For any privacy-related inquiries, data audits, or to exercise data rights under FERPA, please contact your school administration or reach out to our privacy team at:

> VD Solutions LLC
> Austin, Texas
> Email: Contact us
> Website: dismissalhub.com