ZOOM INFORMATION REGARDING K-12 SCHOOLS PRIVACY INFORMATION

The full ZOOM Statement is available at https://zoom.us/privacy.

Last updated: July 2020

Zoom

Zoom provides a video communications platform to K-12 Account Users on behalf of and at the direction of the School Subscriber. For purposes of FERPA, Zoom is considered a "school official" and may receive Student User personal information through its contractual agreements because Zoom is performing a service that furthers a "legitimate educational interest" (*i.e.*, the provision of educational services in a remote setting). Zoom maintains Student User personal information on behalf of, and at the direction of, the School Subscriber and does not use the Student User personal information for other purposes except as permitted by applicable law, including FERPA and applicable agreements with School Subscribers.

Zoom is responsible for following the directions of the School Subscriber. For example, on a School Subscriber's instructions, Zoom may provide reports containing personal information relating to the K-12 Account and its users (including Student Users) to that School Subscriber. Please visit our Zoom and FERPA Compliance webpage for additional information.

Residents of the European Economic Area (EEA) and the UK should review our Privacy Statement for additional information regarding how Zoom addresses European privacy rights.

Information ZOOM Data Collection

From the K-12 Account User

When creating a K-12 Account under the direction of a School Subscriber, the K-12 Account User must provide certain information, such as:

- K-12 Account User's first and last name;
- school or district name;
- job title;
- password;
- school-issued e-mail address; and
- information about the school's location.

From Student Users

Zoom may receive personal information contained in "Customer Content." Customer Content is any data a K-12 Account User uploads to the Zoom communication platform connected with use of the Service. For example, features that allow meeting hosts or co-hosts to record meetings locally or to Zoom's cloud, allow K-12 Account Users to display or upload information that may be seen by other users of that K-12 Account, allow meeting participants to share files, allow hosts or co-hosts to create meeting transcripts, or allow meeting participants (including Student Users) to communicate in-meeting via chat and create chat logs. *Such Customer Content may include personal information that is part of an "educational record" as*

defined by FERPA. Zoom accesses Customer Content only upon the documented request of a School Subscriber, or if required by law.

Automatically Collected Information

Zoom collects certain personal information *automatically* through the use of a K-12 Account including:

- Information about the use of the Zoom platform, including type and frequency of actions taken, number of logs-in or meeting entries, date and time, duration, quantity, quality, network connectivity, other platform performance metrics, and feature usage information, including use of video and screen sharing; and
- Information about a user's device, network, and internet connection, such as IP address(es), MAC address, other device ID, device type, operating system type and version, type of camera, microphone and speaker, and client version.

Use of Personal Information

Zoom uses personal information collected from and about Student Users only as needed to deliver the functionality of the Zoom platform, operate the business (including to enhance or improve the Zoom Services), and as directed by School Subscribers. For Student Users, this means that:

- Zoom never sells Student User personal information
- Zoom does not use Student User personal information to deliver behavioral advertising.
- There are no third-party advertising or analytics cookies on Zoom's product pages.

Regarding cookies, Zoom publishes two types of webpages: product and marketing. A product webpage enables a Student User to click on a hyperlink and join a Zoom meeting. Zoom's product webpages serve only third-party cookies that are necessary for technical support and to deliver the service. There are no advertising or analytics cookies on our product webpages.

Marketing webpages, such as www.zoom.us, are designed to encourage sales of Zoom subscriptions. They are directed at a general audience over the age of 16. We designed the Student User experience so that a Student User never needs to visit our marketing webpages to use our Services under a K-12 Account. Zoom provides further information on its use of third-party cookies on its marketing webpages in its cookie policy.

Sharing Personal Information

We do not share personal information with companies, organizations, or individuals outside of Zoom unless one of the following circumstances applies:

- With Consent.
- We will share personal information with companies, organizations, or individuals outside of Zoom when we have K-12 Account User consent (as applicable) and in compliance with applicable laws (including FERPA as applicable).
- With or As Directed by School Subscribers.

School Subscribers have access to personal information (including Student User information) connected with their K-12 Account(s). School Subscribers may also direct us to share personal information with others.

To Provide ZOOM Services

ZOOM provides personal information to third-party service providers to help us provide the Service. Such service providers are prohibited from using personal information for any reason other than to provide the contracted-for services, and in compliance with appropriate privacy and security obligations.

With Other Meeting Participants

ZOOM may share personal information collected during a Zoom meeting with other participants of the same meeting during the use of the Service. *For example, video and audio recordings, chat messages and other content shared by a Student User during a meeting, which may contain personal information of Student Users, may be available to all other participants in that meeting, as well as to any K-12 Account Users who host or co-host that meeting and the K-12 Account Administrator.*

For Certain Corporate Transactions

ZOOM may share personal information where, whether for strategic or other business reasons, Zoom decides to sell, buy, merge, or otherwise reorganize its businesses. In such transactions, ZOOM may disclose or transfer personal information to actual purchasers or receive personal information from sellers. Student User personal information will remain subject to this K-12 Privacy Statement unless it is changed by a successor entity.

For Legal Reasons

ZOOM shares personal information outside of Zoom if ZOOM believes that access, use, preservation or disclosure of the information is reasonably necessary to:

- comply with any applicable law, regulation, legal process or enforceable governmental request.
- enforce applicable provisions of the Terms of Service and Acceptable Use Policy, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Zoom, our users or the public as required or permitted by law, including to help prevent the loss of life or serious injury of anyone.

For more information about data ZOOM discloses in response to requests from law enforcement and other government agencies, please see our Guidelines for Government Requests.

Third Parties

Zoom does not share personal information with third parties other than as described herein, or as required by law, except at the direction and on behalf of a School Subscriber.

Security

Maintaining the confidentiality, security, and integrity of students' personal information is a top priority. ZOOM uses appropriate technical and organizational measures designed to help protect personal information from unauthorized access, use, or disclosure. Customer Content is encrypted in transit between any devices running a Zoom client and at rest when in permanent

storage in the Zoom Cloud. ZOOM has also taken steps to minimize the risk that meetings that include Student Users are not disrupted by uninvited participants. Examples include enabling meeting passwords and virtual waiting rooms by default for K-12 Accounts and configuring default screen-share settings to limit in-meeting content sharing. For guidance on how to secure virtual classrooms, please review "Best Practices for Securing Your Classroom" and "How to Keep Uninvited Guests Out of Your Zoom Event."

Report a User

All K-12 Accounts have the "Report a User" feature enabled by default. The "Report a User" feature is available to the meeting host or co-host via the Security icon on the meeting taskbar. If an unwelcome participant joins the meeting, the host or co-host can select "Report a User," which automatically takes a screenshot of the reported user(s) and their shared content (if any) and creates a report. The feature then sends the report to Zoom's Trust & Safety Team. A member of the Trust & Safety Team will review the report and investigate the reported user(s) for violation of our Terms of Service. Confirmed offending users will have their accounts terminated, and, where appropriate, we will notify relevant law enforcement authorities.

Data Retention

Zoom retains K-12 Account Users' and Student Users' personal information for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes.

Access and deletion of information

If a Student User or their parent would like to request to access, review, refuse further collection of or delete a Student User's personal information, they must contact their school subscriber with his or her request. **Because Zoom is required to comply with contractual confidentiality obligations related to Student Users' data, we are not able to respond to parental or student requests directly**.

School Subscribers may direct requests to access, delete or restrict further collection or use of a Student User's personal information to privacy@zoom.us. Zoom also deletes information associated with K-12 Accounts upon receiving a valid deletion request from a School Subscriber or automatically following the termination of the K-12 Account. K-12 Account Users can delete their content

K-12 Account Users may access or request deletion of their personal information in the same manner as set forth in our Privacy Statement.

Additional Rights of California and European Users

If you are a resident of the State of California or the European Users, please refer to our Privacy Statement and our California Privacy Rights Statement for additional information on the rights that you may have and how you can exercise those rights.

How to Contact ZOOM

Zoom Video Communications, Inc.
55 Almaden Blvd, Suite 600.
San Jose, CA 95113
1.888.799.9666
privacy@zoom.us