



**Coherent Cyber Education, LLC
Cyber Workforce
Privacy Policy**



Coherent Cyber Education, LLC. (CCE) respects your privacy and is committed to protecting your privacy through our compliance with this privacy policy (this "Policy"). This Policy represents the privacy practices used in our web domain, coherentcyber.education, and its affiliated web domains including cyberworkforce.com, prismlearning.cloud, and demo.prismlearning.cloud.

Coherent Cyber Education employs commercially reasonable security measures that comply, in Coherent Cyber Education's reasonable discretion and interpretation, with all applicable Federal and State laws and regulations regarding data privacy and security. These measures include appropriate administrative, physical, and technical safeguards to secure data from unauthorized access, disclosure, alteration, and use. Neither Coherent Cyber Education nor its successors or assigns shall have any liability for the breach of its privacy and security measures or the integrity of its hosting services unless caused by the willful misconduct of Coherent Cyber Education.

For those who utilize CCE, we collect the following user provided information as applicable to the user:

- First Name
- Last Name
- School Email Address
- Personal Email Address (Out-of-School learners only)
- School/District Name
- School/District Contact Information
- Out-of-School Learner Contact Information

In order to utilize CCE, users must use an enrollment code that assigns them to a site in our system. For academic institutions utilizing third-party, single sign-on applications, such as Clever, the administrator of the application must choose to share this information with CCE for us to gain access.

Please note that we recognize all data collected regarding teachers and learners is the property of the district or the independent learner that prides the data. All data collected is utilized for educational purposes only.

What Do Teachers and Learners Do On CCE?

CCE is a platform with pre-built courses and lessons that focus on Career and Technical Education Cybersecurity career preparation. We have two account access types, Teachers and Learners, each with unique roles:

Teacher:

- Teachers are invited to join the system by creating an account using the teacher's first and last name and email address (unless the district is utilizing a single-sign on application such as Clever). The teacher then uses the pre-assigned campus enrollment code. Upon login, the teacher will establish their own unique password which is only known by the individual user. The email address must be unique in the CCE database to be registered.



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- After registering, teachers are then granted course licenses by CCE. Teachers can then create classrooms, typically one for each section of learners, and assign their respective course curricula. Then teachers can assign learners to their respective classrooms.
- Courses consist of lessons. Lessons consist of videos and slideshows, lesson plans, project-based learning activity instructions, ancillary learning items such as vocabulary terms and interactive activities and assessments which are automatically graded. Teachers can also view course grades reports which display grades for individual activities or for overall modules. The grade reports are displayed as percentages. Through the Course Progression screen, teachers can view each assessment individually, including which questions were answered correctly and incorrectly by each learner.
- All materials that are submitted by learners to teachers are completed through the interactive assessments that are pre-built, meaning learners cannot complete a project (for example, a slideshow of the proper safety procedures in a science lab) and upload the project for the teacher to view and grade. Therefore, no user-generated content (by either the teacher or the learner) is sent through the system. If this changes, we will update this Policy to indicate the changes.

In-school Learners

- Learners are set-up in the system by first creating an account with their first name, last name, and email address. Then, learners are assigned to their classroom by the teacher (unless the district is utilizing a single sign-on application such as Clever). The teacher provides a campus enrollment code for the account creation and sends the learners to <https://prismlearning.cloud> to complete the registration process. The registration process consists of the learner entering the proper campus enrollment code and creating a password. The learner email address must be unique in the CCE database to be registered.
- After registering, teachers can enroll learners in a classroom, granting learners access to the courses, lessons and lesson assets (i.e. videos, slideshows, interactive activities and assessments) the teacher chooses to display to the learners. The learners will also have access to view the grades of the assignments completed on CCE.
- As stated above, all materials that are submitted by learners to teachers are completed through the assessments that are pre-built, meaning learners cannot complete a project (for example, a slideshow of the proper safety procedures in a science lab) and upload the project for the teacher to view and grade. Therefore, no user-generated content (by either the teacher or the learner) is sent through the system. If this changes, we will update this Policy to indicate the changes.

Out-of-School Learners

Learners that are currently not affiliated with an academic institution and would like to engage with our products and services as an individual may do so. The following is applicable to these learners:

- Learners are set-up in the learning management system by first creating an account at <https://prismlearning.cloud> using their first name, last name, and email addresses. Learners will be placed in the appropriate classroom by entering the enrollment code provided to them.



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Learners will be able to create their own password but their email address will serve as the username. The username will be unique in the CCE database.

- After registering, learners will have access to the courses, lessons and lesson assets (i.e. videos, slideshows, interactive activities and assessments) for the course registered for and any preceding courses. The learners will also have access to view the grades of the assignments completed on CCE.
- As stated above, all materials that are submitted by learners are completed through the assessments that are pre-built, meaning learners cannot complete a project (for example, a slideshow of the proper safety procedures in a science lab) and upload the project for view and grade. Therefore, no user-generated content (by either the teacher or the learner) is sent through the system. If this changes, we will update this Policy to indicate the changes.

What Data Do We Collect and Why Do We Collect It?

As stated above, we collect limited personal information on each user. In addition to this data, we may collect information about the device you use to access our services, such as browser type or operating system, primarily for security and operational purposes.

Geolocation data, collected through your IP address and other data from sensors on or around your device, are used to validate user access through their educational institution. This information depends in part on your device and account settings. Depending on these settings, this may include precise location data. Users are encouraged to review their device and browser settings to better understand what information they are providing.

To facilitate the learner's experience with our educational material, we collect information about your activity in our services, such as lessons, labs, quizzes and exams you access. This helps track progress and support the educational experience.

We also utilize cookies. These are small files stored on your device that help keep you logged in and maintain your session. The cookies we utilize include:

Load Balancer – we utilize a load balancer which sorts our traffic to the most available server for quicker service. This cookie is meant to keep users on the same server between visiting different pages.

Microsoft Azure AD B2C – used to authenticate your account login and password. Cookies maintain your session during and after your current session.

Most web browsers are set to accept cookies by default. You can usually choose to set your browser to remove or reject browser cookies. Keep in mind that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services (particularly login).

How Do We Protect Your Data?

CCE uses encryption to protect all data according to risks. Encryption is applied to stored data and transmitted data. Passwords are not stored in the database. In addition, all team members with access



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to personal information and data are required to undergo a thorough background check and must also complete professional development programs on data security practices.

In the event of a security breach resulting in unauthorized release of personal data, we will notify affected districts impacted by the breach.

Who Do We Share Your Data With?

Limited data is shared only with trusted third parties. All parties' privacy practices have been reviewed, vetted, and approved by us. Data is only shared for troubleshooting purposes. What third parties are utilized:

AWS – cloud hosting for our content, ranges, and LMS.

Help Scout – used to assist with providing customer support for teachers and admins.

What Do We Not Do With Your Data?

We do not sell data or any other personal information to any third parties. The only exception to this is in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all the company's assets, personal information, and data may be transferred. In addition, we do not use data to engage in targeted advertising from third parties.

How Long Do We Keep Data?

In the event a district decides not to renew their CCE access, data is stored for 7 years unless otherwise requested by the district. This ensures courses customized by teachers will not be lost during inactivity period. However, a district can delete organization data at any time by sending an email request to support@cyberworkforce.com or written request to:

Coherent Cyber Education, LLC
C/O Customer Support
4241 Potomac
Dallas, TX 75205

To avoid accidental deletion of data, we will confirm the deletion of data with the designated contact for the district.

Can Learners or Guardians Review Personal Information in CCE?

Learners and guardians can request to review and, if needed, correct any personal information in CCE. They can do this by contacting support@cyberworkforce.com.

FERPA and COPPA

CCE adheres to the rules of FERPA and COPPA regarding all applicable services provided by the organization. CCE recognizes the importance of controlling personally identifiable information (PII) and reviews controls and capabilities for protecting this data on a regular cadence.



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CCE FERPA Policy

The Family Educational Rights and Privacy Act of 1974 (FERPA) requires that educational services strictly protect the privacy rights of all learners who are using or have used our services. This includes parents of learners under the age of 18 years old using the service.

By practice and application, learners (defined as users) have the right to:

- Inspect and view their records.
- See amendment of education records that are believed to be inaccurate, misleading or otherwise in violation of privacy rights.
- Consent to PII disclosures contained in educational records (except under 34 CFR 99.31)
- File with the Department a complaint concerning alleged failures by the educational agency or institution to comply with the requirements of FERPA under 34 CFR parts 99.63 and 99.64.

To exercise your right to review and/or correct records, as well as requesting amendment, refer to <https://www.cyberworkforce.com/privacy-policy> Section "Can Learners or Guardians Review Personal Information in CCE?"

CCE COPPA Policy

The Children's Online Privacy Protection Act (COPPA) is a U.S. federal law that addresses data protection regulations for children under the age of 13. Related to COPPA, CCE does not market or direct its site or services for purchase by individual learners under the age of 18. These services do not allow learners to register directly with CCE. A learner under the age of 18 must be invited to participate by their district, school, teachers or administrators who have subscribed to associated services to obtain access, or as registered for services by their legal parent or guardian. The data collected and the purpose for data collection is described in this Policy.

To exercise your right to review and/or correct records, as well as requesting amendment, refer to <https://www.cyberworkforce.com/privacy-policy> Section "Can Learners or Guardians Review Personal Information in CCE?"

How Do Learners Retain or Transfer User Generated Content?

As stated above, there is no learner-generated content in CCE at this time. If the features of CCE change to include learner-generated content (i.e. projects, activities, essays, etc.) then this Policy will change to include the proper procedures for learners to retain the content and/or transfer the content to a personal account.

Does CCE Utilize Any Third-Party Links?

In our lesson plans, there may be links to other websites to provide the user with optional external resources for the topic to supplement the lesson. We do not data share or engage in advertising agreements with any third-party hyperlinks that may be included in the educational content. Please note, by clicking on a third-party site, you are leaving Cyberworkforce.com and will be sent to the site you selected. Because of this, we cannot guarantee that they will follow the same privacy practices as CCE. Please review the privacy statements of any links before providing information.



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How Do We Update this Policy?

With changes in laws and regulations regarding personal information, we do update this Policy as the need arises. It is our policy to post any changes we make to this Policy on this page.

Contact Information

To ask questions or comment about this Policy and our privacy practices, contact us at:

Coherent Cyber Education, LLC.
C/O Customer Support
4241 Potomac
Dallas, TX 75205
support@cyberworkforce.com
214-813-1532