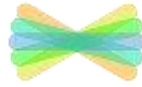


Data Protection Impact Assessment



Seesaw

Seesaw Communication Home/School

STEP 1: IDENTIFY THE NEED FOR A DPIA

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal.

Summarise why you identified the need for a DPIA.

Seesaw is our home/school communication platform where we communicate with parents and share learning from the classroom.

It will record pupil data (names and class and parents email addresses and names. It also pulls information regarding pupils and staff from the Arbor MIS.

STEP 2: DESCRIBE THE DATA PROCESSING IN MORE DETAIL

NATURE OF THE DATA PROCESSING

How will you collect, use, store and delete the data?

The data will be collected on the Seesaw system; this will be able to be viewed by the Admin User which is the Headteacher.

The data will be stored on our server within the building and will not be taken out of the building at any times.

From the Seesaw GDPR statement for schools:

Seesaw complies with the GDPR and allows residents of the EU, UK, and Switzerland to exercise their rights described in that regulation. The purposes for which Seesaw collects your information, the categories and specific types of information, and our practices and policies regarding the processing of your information are described in this Privacy Policy and our [Data Processing Agreement](#). If you have

	<p><i>specific questions about how Seesaw is compliant with the GDPR, please see our GDPR page or contact help@seesaw.me.</i></p>
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STEP 2: DESCRIBE THE DATA PROCESSING IN MORE DETAIL

What is the source of the data?

- Ability to share learning with parents/carers
- The ability to delete data in a managed manner (Headteacher only)
- Ability to communicate directly and quickly with parents/carers

Will you be sharing the data with anyone? (You might find it useful to create to a flow diagram)

Data source will be from people who enter it on the Seesaw app voluntarily.

What types of processing are involved that can be identified as potentially high risk?

This data will not be shared with anyone outside of each school site and will not be accessible remotely.

SCOPE	
<p>What is the nature of the data, and does it include special category or criminal offence data?</p> <p>How much data will you be collecting and using?</p> <p>How often?</p> <p>How long will you keep it?</p> <p>How many individuals are affected?</p> <p>What geographical area does it cover?</p>	<p>The data is basic: name, email – staff, parents and pupils).</p> <p>Data will be collected at the start of each academic year and if a new pupil joins the school.</p> <p>All pupils data will be destroyed and deleted from the app once they leave the school.</p> <p>The school follows good practice in terms of data retention as set out in the schools data retention policy.</p> <p>180 pupils are likely to be on the data platform.</p> <p>The age range will be from EYFS to Year 2.</p> <p>HOW DOES SEESAW USE THIS INFORMATION?</p> <p>We use this information to:</p> <ul style="list-style-type: none"> • Allow you to access and use the Service by verifying your identity and storing your Journal Content, Activities, and Messages. • Provide support to teachers, school administrators, and Family Members. • Provide school administrators with information about how Seesaw is performing in their school(s). • If you've enabled notifications, notify you about activity on and updates to your account or your student's account. • Research, understand, and analyse user trends to improve and develop new features for our products. • Promote and advertise the Services and enhancements to Seesaw relevant for teachers, schools, and families. • Investigate, prevent, and detect activities on our service that we believe may violate the law, applicable regulations, or Seesaw policies. We may, at the request of a school, investigate accounts to determine whether they comply with school policies. <p>You can withdraw consent for the collection of your Personal Information at any time, but you will no longer be able to use Seesaw.</p> <p>The geographical area it covers is Northamptonshire.</p>

CONTEXT	
<p>What is the nature of your relationship with the individuals?</p>	<p>School pupils, school staff and parents/carers.</p>

<p>Do they include children or other vulnerable groups?</p>	<p>Yes.</p>
<p>How much control will they have over the processing?</p>	<p>They (or a responsible adult) will enter the information voluntarily into the system to sign up for a family log in to the Seesaw app so they can direct message their child's class teacher and view the learning their child has completed in school.</p>
<p>Would they expect you to use their data in this way?</p>	<p>Yes for safeguarding. We also have a Parents/Carers Code of Conduct for using the Seesaw app.</p>
<p>Have there been prior concerns or previous security flaws to do with this type of processing?</p>	<p>No.</p>
<p>Is it novel in any way?</p>	<p>No.</p>
<p>What is the current state of technology in this area and are there any current issues of public concern that you should factor in?</p>	<p>No.</p>

PURPOSES	
<p>What do you want to achieve?</p> <p>What is the intended effect on individuals?</p> <p>What are the benefits of the processing for you, and more broadly?</p>	<p>Ensure learning is shared with parents/carers so it can be celebrated. Use in EYFS to evidence towards the EYFS Early Learning Goals.</p> <p>For SEN pupils, we use the Seesaw app to share IEP evidence and IEP's with parents/carers.</p> <p>Ensure home/school communication is clear, succinct and supportive of the relationship between parents/carers and staff.</p>

STEP 3: CONSULTATION PROCESS	
Explain how you will consult with relevant stakeholders	
<p>When and how will you seek individuals' views on your data processing activity?</p> <p>If you feel it's not appropriate to consult with relevant stakeholders, how can you justify this decision? (Make sure you always record any decision not to consult)</p> <p>If you are consulting, who else within your organisation do you need to involve?</p> <p>Do you need any of your data processors or any other third parties to help with the consultation?</p> <p>Do you plan to consult information security experts, or any other experts?</p>	<p>Stakeholders/employees are aware of the system being used and its usage.</p> <p>A parental code of conduct has been produced and shared with all parents/carers so we are clear regarding the behaviour we expect from parents, whilst using the Seesaw app.</p> <p>As above.</p> <p>InMat are aware of the Seesaw platform being used as our comms provider.</p> <p>No.</p> <p>No.</p>

STEP 4: ASSESS NECESSITY AND PROPORTIONALITY

Describe how you will make sure you comply with data protection law, and keep the processing proportionate to what you actually need

What is your lawful basis for processing the data in this way?

To maintain high levels of home/school communication and to share and celebrate pupils' achievements. To comply with GDPR.

Does the processing actually achieve your purpose?

Yes.

Is there a less intrusive way to achieve the same outcome?

No.

How will you ensure the data is good quality and limited to what is necessary?

People can only complete what they are asked.

HOW DOES SEESAW USE THIS INFORMATION?

What information will you give individuals about how their data is used?

We use this information to:

- Allow you to access and use the Service by verifying your identity and storing your Journal Content, Activities, and Messages.
- Provide support to teachers, school administrators, and Family Members.
- Provide school administrators with information about how Seesaw is performing in their school(s).
- If you've enabled notifications, notify you about activity on and updates to your account or your student's account.
- Research, understand, and analyze user trends to improve and develop new features for our products.
- Promote and advertise the Services and enhancements to Seesaw relevant for teachers, schools, and families.
- Investigate, prevent, and detect activities on our service that we believe may violate the law, applicable regulations, or Seesaw policies. We may, at the request of a school, investigate accounts to determine whether they comply with school policies.

How will you help to support their rights under the UK GDPR?

What measures do you take to ensure processors and other third parties comply with data protection law?

How do you safeguard any international transfers of the data?

You can withdraw consent for the collection of your Personal Information at any time, but you will no longer be able to use Seesaw.

Reassure them that their details are held securely, only ask for the minimum amount of data.

From the Seesaw GDPR statement:

SEESAW AND GDPR

Seesaw complies with the GDPR and allows residents of the EU, UK, and Switzerland to exercise their rights described in that regulation. The purposes for which Seesaw collects your information, the categories and specific types of information, and our practices and policies regarding the processing of your information are described in this Privacy Policy and our [Data Processing Agreement](#). If you have specific questions about how Seesaw is compliant with the GDPR, please see our [GDPR page](#) or contact help@seesaw.me.

HOW DOES SEESAW USE THIS INFORMATION?

We use this information to:

- Allow you to access and use the Service by verifying your identity and storing your Journal Content, Activities, and Messages.
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- Provide school administrators with information about how Seesaw is performing in their school(s).
- If you've enabled notifications, notify you about activity on and updates to your account or your student's account.
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You can withdraw consent for the collection of your Personal Information at any time, but you will no longer be able to use Seesaw.

STEP 4: ASSESS NECESSITY AND PROPORTIONALITY

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STEP 5: IDENTIFY AND ASSESS RISKS

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm (remote, possible or probable)	Severity of harm (minimal, significant or severe)	Overall risk (low, medium or high)
A privacy breach caused by technical issues or human error, where individuals are at risk of discrimination, identity theft, fraud, loss of confidentiality, reputational damage, physical or emotional harm	Possible	Minimal	Low
Poor processes or inadequate due diligence leading to non-compliance with the UK GDPR, resulting in financial or reputational damage to the school	Remote	Significant	Low

STEP 6: IDENTIFY MEASURES TO REDUCE RISK

For risks identified as medium or high, identify additional measures you will take to reduce or eliminate the risk

Risk	Options to reduce or eliminate risk	Effect on risk (eliminated, reduced or accepted)	Residual risk (low, medium or high)	Measure approved (yes or no)
A privacy breach caused by technical issues or human error, where individuals are at risk of discrimination, identity theft, fraud, loss of confidentiality, reputational damage, physical or emotional harm	Firewall in place to prevent hacking into server and therefore the Seesaw app. Reports should be restricted to the main office and shredded once finished with.	Reduced	Low	Yes
Poor processes or inadequate due diligence leading to non-compliance with the UK GDPR, resulting in financial or reputational damage to the school	GDPR policy in place. GDPR training undertaken by main all staff. Training renewed annually.	Reduced	Low	Yes

STEP 7: SIGN OFF AND RECORD OUTCOMES

	Name, position and date	Actions
Measures approved by:	Dawn Chapman –	
Residual risks approved by:	N/A	If accepting any residual risk, consult the ICO before going ahead with the project
DPO advice provided:	Becky Clark - Plumsun	See Saw are registered with the ICO, therefore they should be compliant, read the data sharing agreement to ensure you are happy that data can be erased when requested, and review how long data is kept

STEP 6: IDENTIFY MEASURES TO REDUCE RISK

Summary of DPO advice:

See Saw are registered with the ICO, therefore they should be compliant with GDPR law. We suggest that the data sharing agreement is read to ensure you are happy that data can be erased when requested, and review how long data is kept on the system if you choose a different provider for the service.

DPO advice accepted or overruled by:

N/A

If the advice was overruled, explain why:

N/A

Consultation responses reviewed by:

N/A

If your decision is not the same as individuals' views, explain why, and why you have decided to continue with the processing: N/A

This DPIA will be kept under review by (name and position):

Dawn Chapman - COO

Date:

Appendix 1 – Seesaw Privacy Notice

1. INTRODUCTION

Seesaw's mission is to create an environment where students can be their best. Protecting your privacy is fundamental to our mission and business. This Privacy Policy governs the use of Personal Information collected by our websites at seesaw.me, the Seesaw Applications, and any other online or offline offerings (collectively "the Seesaw Service", "the Service", "Seesaw", "we", "us", or "our"). This includes, for example, personally identifiable information that we collect when you create an account ("Account Information"), content added to class journals ("Journal Content"), activities teachers create ("Activities"), and messages ("Messages") sent via Seesaw.

In order to use Seesaw, you must create an account and agree to this Privacy Policy. If you don't agree with this Privacy Policy, you cannot use Seesaw. You can contact us anytime with questions about this policy at help@seesaw.me.

For purposes of this Privacy Policy, "Personal Information" means any information about an identifiable individual or information that can be used to identify an individual, and includes "Personal Data" as that term is defined under the European Union General Data Protection Regulation ("GDPR"). "Student Data" means any personal information, metadata, or content directly attributable to a student user.

2. CHANGES TO OUR PRIVACY POLICY

Seesaw may from time to time make changes to this Privacy Policy to account for changes to our practices or applicable law. If we make changes to this Privacy Policy that materially affect your rights, we will notify you by email about these changes, and post a notice to our service, or otherwise contact you as required under applicable law. Your continued use of the Services following notification by Seesaw means you thereby agree to the new Privacy Policy.

3. SEESAW AND FERPA

Data collected by Seesaw includes Student Data from education records that are subject to the Family Educational Rights and Privacy Act, "FERPA", ("FERPA Records"), including student names, parent or guardian (collectively, "Family Member") names, Messages, and Journal Content. To the extent that Student Data includes FERPA Records, you designate Seesaw as a "School Official" (as that term is used in FERPA and its implementing regulations) under the direct control of the school with regard to the use and maintenance of the FERPA Records and Seesaw agrees to comply with FERPA.

4. SEESAW AND COPPA

The Children's Online Privacy Protection Act protects personal information belonging to a child younger than 13. How we collect information from users under 13, the types of information we collect, and the reasons for collecting this information are described in Sections 7, 8, and 9, respectively. We do not require users younger than 13 to disclose more information than is reasonably necessary to use the Services.

We use a handful of analytics providers in relation to all users, including users under 13, to help us improve the Services. These third-party service providers do not use your data for any purpose other than to provide the Services. You can view a list of Seesaw's third-party service providers and review their privacy policies here: <https://web.seesaw.me/subprocessor>. If you have questions about our third-party service providers, you can contact us at help@seesaw.me.

Information for parents or guardians on how to correct, edit, download, update, or delete data about your student can be found in Sections 17 and 18 below.

5. SEESAW AND GDPR

Seesaw complies with the GDPR and allows residents of the EU, UK, and Switzerland to exercise their rights described in that regulation. The purposes for which Seesaw collects your information, the categories and specific types of information,

and our practices and policies regarding the processing of your information are described in this Privacy Policy and our [Data Processing Agreement](#). If you have specific questions about how Seesaw is compliant with the GDPR, please see our [GDPR page](#) or contact help@seesaw.me.

6. WHO DOES SEESAW COLLECT INFORMATION FROM?

We collect information from individuals who create accounts on Seesaw, which includes teachers, students, and Family Members. We also collect limited log data from all visitors to our marketing website.

7. HOW DOES SEESAW OBTAIN MY INFORMATION?

We receive information from the information that you and others provide, from your device(s), and from third-party services. The categories of sources from which we've collected or received information include:

- **You:** We collect the content, communications, and other information you provide when you use Seesaw.
- **Other people:** We collect information that other people provide when they use Seesaw, such as when a teacher adds a parent's phone number to send updates about a student's work.
- **Your device(s):** We collect information from and about the computers, phones, and other web-connected devices you use with Seesaw.
- **Third-Parties:** When you create a Seesaw account using a third-party service (e.g. Google or Clever), we access the name, profile picture, and email address (if available) provided by these services.

8. WHAT INFORMATION DOES SEESAW COLLECT?

Account Information: When you create an account on Seesaw we collect your name, email address, password, and optional profile picture. Seesaw may also collect your phone number if you enter it in your Account Settings. Teachers using Seesaw may add a Family Member's email or phone number to Seesaw in order to send messages or updates about school work. We do not collect student phone numbers.

Students are not permitted to create an account by themselves but must be invited to a Seesaw class by a teacher or school administrator. Where students have permission to use Seesaw, Seesaw collects personally identifiable information that is necessary to provide the Service, including a student's name, email address, and optional profile picture. This information may be entered by a teacher or the student or populated from the student's account with a third-party sign-in service, such as their Google account.

Users can make changes to their profile, messaging preferences, and other account details in Account Settings.

Journal Content: Seesaw collects content that is added to a class or student journal. This content may include photos, audiovisual content (including from your device's camera, microphone, or photo/video library), drawings, files, notes, hyperlinks, and other ways of documenting student learning. We regularly add types of information that can be uploaded to a Journal, and these are all covered by this Policy. We also collect comments on posts in the class and student journals, including text and voice recordings. Journal Content that is uploaded by a student or teacher may be considered a student education record as defined by FERPA.

Messages: Seesaw collects all messages that are sent and received in Seesaw. Messages may include text, audio, video, photos, drawings, files, notes, hyperlinks, or other information.

Activities: Teachers may use Seesaw to create activities to use with their students. Activities may include text or voice instructions for how to complete the activity, an example of a correct response, or a template for students to edit.

Activity Author Profiles: Teachers who choose to publish their activities to the Community Activity Library or the Activity Library managed by their school or district can also create an Activity Author Profile. This includes the name and profile picture they choose to publish on their Author Profile, as well as their school name and location.

Communications: Seesaw collects any information you send to us directly, such as email, phone, or chat communications, or through your responses to our optional surveys.

Information from your Google Account or other Third-Party Sign-in Service: Seesaw allows school administrators, teachers, Family Members, and students (after being invited by a teacher) to sign up for and log into our service using a Google or Clever Account. Teachers can also create student accounts on behalf of students in their class. When you create a Seesaw account using one of these Third-Party Services, we use the name, profile picture, and email address (if available) provided by these services. Seesaw does not share your information with these services.

Log Data: When you use Seesaw or visit our website, we receive log data such as your IP address, cookie identifiers, browser type, operating system, device information and identifiers, and your mobile carrier. In addition, we may receive or collect additional information such as the referring web page, referring search terms, pages visited, and other information about your interactions with Seesaw.

9. HOW DOES SEESAW USE THIS INFORMATION?

We use this information to:

- Allow you to access and use the Service by verifying your identity and storing your Journal Content, Activities, and Messages.
- Provide support to teachers, school administrators, and Family Members.
- Provide school administrators with information about how Seesaw is performing in their school(s).
- If you've enabled notifications, notify you about activity on and updates to your account or your student's account.
- Research, understand, and analyze user trends to improve and develop new features for our products.
- Promote and advertise the Services and enhancements to Seesaw relevant for teachers, schools, and families.
- Investigate, prevent, and detect activities on our service that we believe may violate the law, applicable regulations, or Seesaw policies. We may, at the request of a school, investigate accounts to determine whether they comply with school policies.

You can withdraw consent for the collection of your Personal Information at any time, but you will no longer be able to use Seesaw.

10. DOES SEESAW ALLOW THIRD-PARTY ADVERTISING OR SHARE DATA FOR ADVERTISING THIRD-PARTY PRODUCTS?

No. Our business model is straightforward: we charge for optional, additional features on top of our free product and we have no interest in advertising third-party products or services within Seesaw. We never display third-party ads, share data for advertising or marketing third-party products or services, or allow data collection by third-party advertisers or data brokers to use for their own purposes. We also do not allow in-app purchases for student accounts.

11. IN WHAT LIMITED CIRCUMSTANCES MAY SEESAW NEED TO SHARE MY INFORMATION?

We share data with third parties in the limited circumstances detailed below:

- We use a small number of third-party service providers in order to operate and improve Seesaw – for example, a data center operator that manages our servers or a notification service that helps us send you messages about your account. These services need access to your Personal Information in order to work (i.e. your email address is required to send you an email), but are contractually obligated to meet our strict security standards, maintain the accuracy of the data they collect, and must only use Personal Information in identifiable form for purposes of providing the Seesaw service. When these third-party services transfer the Personal Information (Personal Data, as that term is defined in the GDPR) of EU, UK, or Swiss residents, we take steps to comply with the GDPR in order to protect your data privacy and security. A list of our third-party service providers can be [found here](#).
- We may provide school administrators with information about how Seesaw is performing in their school(s).
- Seesaw may disclose your information to a third party to comply with applicable laws or regulations, or a valid legal request - including to meet national security or law enforcement requirements. If we are compelled to release your data, we will do our best to provide you with advance notice by email, unless we are prohibited from doing so by law.

- Seesaw may disclose student Account Information, Journal Content, and Messages to the child's school or district upon request, including as required by FERPA.
- By default, Activities teachers create are private to their account. Optionally, teachers may choose to publish Activities they create to the Community Activity Library or the Activity Library managed by their school or district. In these cases, the activity and the teacher's Activity Author Profile will be shared publicly (in the case of the Community Library) or with other teachers at their school or district. No student responses to Activities are ever shared in the Community Activity Library or the school or district Activity Library.
- We may share activities published to the public Community Activity Library with teachers who we think may be interested in using them with their class.
- We may disclose or transfer your Account Information and Journal Content in connection with the sale, merger, bankruptcy, sale of assets, or reorganization of our company. You will be notified via email or some other means as required by law of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your information (including the right to delete your information). The promises in this Privacy Policy will apply to your data as transferred to the new entity. If Seesaw goes out of business without a successor, Seesaw will delete your information.

12. DO YOU COLLECT DATA ABOUT [BLANK]?

We've listed all the data we collect in Section 8 above ("What Information Does Seesaw Collect?"). We intentionally limit our data collection to only what we need to provide the Seesaw service for you.

13. WHO CAN VIEW CONTENT POSTED IN SEESAW?

Student work is private to the classroom by default. Users cannot view a student's Journal Content or Messages in Seesaw unless they are the teacher or school administrator or invited to Seesaw by the teacher or school administrator. Teachers control who can access a student's account by authorizing specific people to connect to that student's account. Teachers decide whether families can view, like, share, or comment on their student's work and whether students can view, like, and comment on classmates' work. Teachers can turn on settings that require teacher approval of student work, allowing teachers to moderate and, when necessary, remove content shared by students before it is posted. Teachers may also choose to publish some class content to a public class web page managed by Seesaw. In addition to controlling what student work is published, teachers have the option to password protect the public class web page.

Teachers also control whether or not students or Family Members can save Seesaw content to their device or get a link to specific Journal Content. However, Seesaw cannot prevent all forms of sharing (e.g. by taking a screenshot and posting to social media), so it is important that teachers only grant access to authorized parties and discuss their policies with families.

School administrators can access all Journal Content and Messages shared in their Seesaw organization, including Messages that have been edited or deleted.

14. DO YOU WORK WITH THIRD-PARTY ANALYTICS SERVICES?

Seesaw is constantly improving, and we use aggregate data about how Seesaw is used -- for example what buttons you click on or what pages you visit -- to inform those decisions.

To help us analyze this data, we use a small number of third-party services such as Google Analytics. For more information, please visit Google's Privacy Policy. To learn more about how to opt out of Google Analytics' use of your information, please click [here](#).

15. HOW DO YOU USE COOKIES?

Cookies are small text files that we transfer to your web browser that allow us to identify your web browser and store information about your account. We use these cookies to keep you logged into Seesaw, customize your Seesaw experience, understand how you use Seesaw, and promote Seesaw to relevant teachers and schools. You can choose to remove or disable cookies via your browser settings. Please be aware that Seesaw may not work properly if you disable or decline all cookies.

16. HOW DOES SEESAW HANDLE ABANDONED ACCOUNTS?

Seesaw reserves the right to permanently delete accounts that have not been accessed by the account holder for a period of more than one year. Seesaw will permanently delete an account that has not been accessed by the account holder for more than seven years, except where we are required to keep the information for legal or compliance purposes. Prior to permanently deleting an abandoned account, Seesaw will attempt to notify the account holder by email.

17. HOW TO VIEW, CORRECT, EDIT, EXPORT, OR UPDATE YOUR PERSONAL INFORMATION

You have the right to access, correct, or download for transport to a similar service any of your Personal Information collected by Seesaw, where permitted under applicable law. If you are an administrator, teacher, or Family Member you can update the information associated with your Seesaw account directly by logging into your Seesaw account and viewing the Account Settings tab on your profile. If you are a parent or guardian and want to correct, edit, download, or update information about your child, please work directly with your teacher or school, or you can contact us at help@seesaw.me.

18. ACCOUNT SUSPENSION AND TERMINATION

If you would like to delete your Seesaw account or delete your child's Seesaw account, follow [these steps](#) or contact help@seesaw.me. If you request that your account or any content submitted to Seesaw be deleted, Seesaw may still retain information as needed to provide customer support and prevent accidental deletion, or as required or permitted by law. If you terminate your account, all of your data will be unavailable to you immediately, but be aware that Messages and Journal Content with others in which you participated will remain available to those other users.

If your school or district has purchased Seesaw for Schools and the school or district ends their contract with Seesaw and requests deletion of accounts, we will attempt to notify impacted users by email or another method and provide the option for users to establish or maintain an account with Seesaw for the purpose of storing student-generated content.

If you are a teacher or school administrator within the US, please be aware that FERPA requires Seesaw to retain student education records once a valid request to inspect those records has been made.

19. HOW DOES SEESAW KEEP YOUR DATA SAFE?

Seesaw takes protecting your security and privacy seriously and we've put a number of measures in place to protect the integrity of your information, including the use of access-controlled data centers, routine 3rd party security audits, restricted employee access to user information, and data encryption in transit. For more information, please read this [article](#).

In the event of a security breach, Seesaw will notify affected account holders within the amount of time required by law so that you can take steps to keep your data safe.

[Seesaw | Where learning happens](#)

23. CONTACT INFORMATION

If you have any questions or feedback about this Privacy Policy, please contact help@seesaw.me. You can reach Seesaw by mail at:

Seesaw Learning, Inc.

180 Montgomery Street, Suite 750

San Francisco, CA 94104

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