

# Circle-In Privacy Policy

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## Effective Date

March 9, 2025

## Introduction

Circle-In ("we", "our", "us") provides software tools that help sports teams understand player development, team dynamics, and behavioral performance through structured surveys and analytics dashboards.

Circle-In is an educational technology platform designed for use by school athletic programs and operates as a school-directed service provider.

We are committed to protecting the privacy of schools, coaches, and players who use the Circle-In platform. This Privacy Policy explains how information is collected, used, stored, and protected when using Circle-In applications and services.

Circle-In operates in compliance with applicable federal and Illinois state laws governing student data privacy, including the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy Protection Act (COPPA), and the Illinois Student Online Personal Protection Act (SOPPA), 105 ILCS 85/.

## 1. Information We Collect

Circle-In collects limited information necessary to provide its services to schools and teams.

### Account Information

- Player name (or identifier assigned by the school)
- Team affiliation
- School affiliation
- Login credentials
- Role designation (player, coach, administrator)

### Survey and Performance Data

- Player self-assessments
- Team sentiment data
- Pre-game and post-game survey responses
- Player development inputs
- MVP selections
- Team performance perceptions

#### System Usage Data

- Login timestamps
- Device type
- Application usage logs

Circle-In does not collect sensitive personal data such as financial information, health records, or precise location information.

## 2. How We Use Information

Circle-In uses collected information solely to operate the platform and deliver insights to the participating school and team.

Information is used to:

- Generate individual player dashboards
- Generate team analytics and aggregated reports
- Allow coaches to monitor team behavioral trends
- Support player development conversations
- Maintain system security and performance

## 3. FERPA Compliance

Circle-In operates as a school official and/or service provider under the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g.

Circle-In:

- Processes student data only for the purpose of providing services to the participating school
- Does not disclose education records to third parties without appropriate consent or a lawful exception
- Maintains data security standards consistent with FERPA requirements
- Supports schools in meeting their FERPA obligations to students and families

Schools retain control of education records and are responsible for ensuring appropriate access, disclosure, and parental rights as required by law.

## 4. Data Isolation Between Schools

Circle-In operates using containerized data environments.

- Each school's data is stored separately from other schools
- Schools cannot access, view, or query data belonging to other schools
- Coaches and administrators only access data from teams they are authorized to manage

## 5. Player Data Privacy

Circle-In protects player privacy through several safeguards:

- Individual player data is anonymized within system analytics
- Players cannot see other players' personal responses
- Players only access their own personal information and responses

Players may see team-level aggregated data such as:

- Average survey scores
- Team trend metrics
- Aggregated team sentiment
- MVP voting totals

Aggregated data is presented in a way that does not allow individual players to be identified.

## 6. Children's Privacy (COPPA and SOPPA)

Circle-In may be used by student-athletes under the age of 18 as part of their school athletic programs. Circle-In does not provide services to individuals under the age of 13. The platform is intended for student-athletes aged 13 and older. Schools are responsible for ensuring that no participant under the age of 13 is enrolled in the platform.

Circle-In collects personal information from minors only through the school as the operator and institutional supervisor not directly from children. Schools act as the responsible party for obtaining any required parental or guardian consent prior to student participation.

In compliance with the Illinois Student Online Personal Protection Act (SOPPA), 105 ILCS 85/, Circle-In:

- Does not sell or rent student data
- Does not use student data for targeted advertising
- Does not build profiles on students for purposes unrelated to the educational or athletic purpose for which data was collected
- Supports school operators in meeting their obligations under SOPPA

## 7. Third-Party Service Providers

Circle-In uses vetted third-party infrastructure providers to operate the platform. These providers may process data on Circle-In's behalf and are subject to data processing agreements requiring them to protect data consistent with this Privacy Policy.

Current infrastructure providers include:

- Amazon Web Services (AWS) - cloud hosting and storage
- SurveyPlanet / Fillout - survey data collection
- Apache Superset - analytics dashboards

Circle-In does not sell, rent, or distribute school or player data to any third party for commercial purposes.

## **8. Data Sharing**

Circle-In does not sell, rent, or distribute school or player data to third parties for any commercial purpose.

Data is only shared with:

- The participating school
- Authorized coaches and administrators
- The individual player whose data it is
- Approved sub-processors operating under data processing agreements

## **9. Data Ownership**

Schools retain ownership and control of their team's data.

Schools may:

- Manage coach and player access
- Remove users
- Request deletion of player accounts

If a school removes a player account, that player's access to Circle-In is terminated.

## **10. User Rights**

Players and schools may request:

- Access to personal data associated with an account
- Correction of inaccurate data
- Deletion of player accounts

Requests should be submitted through the participating school administrator or by contacting Circle-In directly.

## **11. Data Retention**

Circle-In retains data for up to three (3) years from the date of collection, or until the school requests deletion, whichever occurs first. This retention period supports longitudinal player development analysis. Upon expiration of the retention period, data will be securely deleted or anonymized in accordance with applicable law.

Schools may request deletion of player accounts or team data at any time. Upon verified request, Circle-In will remove relevant data within 30 days.

## **12. Data Security**

Circle-In takes appropriate technical and organizational measures to protect data, including:

- Secure authentication controls
- Role-based access permissions
- Encrypted data transmission
- Segregated data storage environments

Login credentials are securely stored using industry-standard encryption and authentication practices.

In the event of a data security incident affecting school data, Circle-In will notify affected schools without unreasonable delay and cooperate with schools in meeting applicable legal notification obligations.

## **13. Data Processing Location**

Circle-In systems are hosted in the United States. By using the Circle-In platform, users acknowledge that data may be processed and stored on servers located in the United States.

## **14. Changes to This Policy**

Circle-In may update this Privacy Policy from time to time to reflect improvements to the platform or changes in legal requirements. Updated policies will be posted within the application and on the Circle-In website.

## **15. Contact Information**

Circle-In

Email: [circleinteam@gmail.com](mailto:circleinteam@gmail.com)

Website: <https://www.circlein.team>