

## **BrightArrow Technologies, Inc.**

### **Policy to Ensure the Security of Information Flow with Customers**

Upon the request for information that could require revealing private information about a customer, BrightArrow's Support Agent will always ascertain the identity of person requesting such information.

If the inquiry is via email, then the agent checks the customer's record in our Customer Database to ensure that email is authorized and determines the level of access. If the request does not exceed the defined level of access, the requested information is provided. If it does exceed the level of access, BrightArrow asks person with the support request to instead person in our Customer Database reach out to us for the information, or to confirm to us the person reaching out as the appropriate authority.

If the inquiry is by telephone, BrightArrow asks the person's name and school (or school district) for their identity. We look them up in our Customer Database to ensure they are authorized and review the Caller ID to make sure they are who they say they are. If we are not 100% certain of their identity, we ask them to email us to ensure their email address matches the email we have on record. If the identity of the person is still not 100% ascertained, and if the information they are requesting is confidential, we will continue asking for evidence such as further email confirmation from a person already authorized in our database.

We will not give away passwords, or private information such as parent/student phones or emails, over the phone. If a password is not working, we will look it up to see if there is a structural reason (such as a slight variation in the login name or password) but will not correct that information over the phone. If information such as a password needs to be given to a customer, we will use a tool like "OneTimeSecret" to email the person who was already determined as having rights to that information.

In an emergency, we will make special accommodations to help expedite the identification process, but at no point will we bypass it. These accommodations might include reaching out to other members of the BrightArrow support team if they have additional information that will help ensure proper identification of the caller.

In summary, if the person reaching support is asking our Support Agent to reveal confidential information, BrightArrow takes the necessary steps to ensure that they have pre-established permissions to acquire that information. If they don't, it will be up to the caller to work with the person in their organization who does have those permissions.

**Policy Approved by BrightArrow's Board of Directors**

**Last Reviewed in 2022**