

Parents' Bill of Rights for Data Privacy and Security

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Owner	Peter Galbraith, Founder and Data Protection Officer (DPO) — dpo@smagpie.com
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Schools, clubs and coaches use Smagpie Coaching to plan training, send workouts to athletes' watches and follow their progress. When your child is coached on Smagpie, we hold data about them on behalf of the school or organization that rostered them. This Bill of Rights, modeled on New York Education Law § 2-d and 8 NYCRR Part 121, states what every parent and student can expect from us, in every state and country. A law or signed data-privacy agreement that gives you more prevails.

1. Student data is never sold or released for a commercial purpose. Smagpie does not sell, rent, license or trade student personal information to anyone, for any purpose.

2. No advertising, no profiling, no AI training. We do not use student data for marketing, targeted advertising or profiling, and never to train artificial-intelligence models. It is used only to deliver the coaching service the school or organization signed up for. We do not accept athletes under 13.

3. Student data is encrypted in transit and at rest. Data travels between your child's device and Smagpie over TLS 1.2 or higher and is stored encrypted with AES-256 in the United States. Administrative access requires multi-factor authentication and is logged. Payments go through a PCI DSS-compliant processor; Smagpie never sees or stores card numbers.

4. Schools hear about a breach within 72 hours. If a security incident affects student data, we notify the school or organization within 72 hours of confirming it, saying what happened, whose data was involved and what we are doing about it, and we support the school's notice to parents. If the breach is our fault, we reimburse the school's cost of notifying parents.

5. Parents can review, export, correct and delete. State and federal laws protect the confidentiality of student data. Ask the school or organization first; it controls the student's data. If you write to privacy@smagpie.com, we follow the school's instruction for a school-rostered student and tell you whom to contact; for a club or independent athlete, we verify you and act. Parents may:

- **Review** the complete personal information Smagpie holds about their child, and **correct** anything inaccurate (both are self-service in the student's account);
- **Export** it in standard formats (original .fit activity files, CSV and JSON);
- **Delete** the student's account and the records tied to it. Records the law makes us keep (billing, audit) are pseudonymized. Deletion completes within 30 days of a valid request and is confirmed by a signed destruction certificate; when a school's agreement ends, all its student data is destroyed within 60 days of its written notice. Encrypted backups age out within six months and restore deleted data only at the written request of whoever asked for the deletion. The full schedule is in our Data Retention and Deletion Policy at smagpie.com/trust.

6. Service providers work only on our instructions. We rely on a few providers for cloud hosting and storage, transactional email, website delivery and AI-assisted workout drafting (designed to work without student data), and student data is stored in the United States. Each processes data only on our instructions, to deliver its service, under a data processing agreement. The current list is at smagpie.com/trust; we tell schools before a provider changes where practical. Wearable-device vendors (Garmin, Coros, Strava, Intervals.icu) are not service providers: a student or parent connects a device under the vendor's own terms, and we share only what a workout sync needs.

7. You can reach a person, and complaints are answered. Parents: privacy@smagpie.com · Schools and districts: compliance@smagpie.com · Security: security@smagpie.com · Data Protection Officer: Peter Galbraith, dpo@smagpie.com. We acknowledge every inquiry within one business day. A complaint about a possible breach or misuse of student data may be made to the school's data protection officer or directly to us; New York parents may also contact the NYSED Chief Privacy Officer (privacy@nysed.gov).

Approval — Approved by Peter Galbraith, Founder and Data Protection Officer, Smagpie LLC.
Signature: Peter Galbraith · Date: 2026-09-15

Revision history

Version	Date	Author	Change
1.0	2026-09-15	P. Galbraith (DPO)	Initial document