

# Instrux Music – FERPA Compliance Guidelines

**Effective Date:** Feb 19, 2026

**Applies to:** Schools, districts, educators, administrators, parents, and eligible students

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## Overview

The Family Educational Rights and Privacy Act (FERPA) is a federal law that protects the privacy of student education records.

When a school or district contracts with Instrux Music (operated by Rivo, Inc.), we act as a **“school official” with a legitimate educational interest** under FERPA. We process student information solely:

- For educational purposes
- Under the direct control of the school or district
- In accordance with written agreements and applicable law

Instrux Music does not use student data for advertising, profiling, analytics resale, AI training, or commercial exploitation.

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## 1. Role as a School Official

Instrux Music qualifies as a FERPA “school official” when:

- We are formally contracted by a school or district
- We receive student data only to provide instructional technology services
- We operate under the school’s direct control regarding use and maintenance of education records

Student data remains the property of the school or district.

Instrux Music does not independently determine educational purpose, curriculum decisions, grading, or student evaluation standards.

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## 2. Data Collected Under FERPA

Instrux Music collects only the minimum information necessary to operate the platform.

When a school sets up student accounts, the platform may process:

- Student name (or limited identifier/alias)
- Instrument or music proficiency level
- Lesson scheduling data
- Instructor-entered lesson notes
- Uploaded educational materials (e.g., PDFs or links)
- Parent/guardian contact email (if provided by the school)
- Basic technical data (e.g., device/browser type for security)

### **Instrux Music does NOT:**

- Record lessons
- Store audio or video of sessions
- Archive live classroom interactions
- Collect Social Security Numbers
- Require full legal names unless determined by the school
- Collect home addresses or unnecessary sensitive identifiers

All live instruction occurs in real time only and is not recorded or stored by the platform.

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## 3. Use of Student Data

Student data is used exclusively to:

- Provide access to live music instruction
- Facilitate lesson scheduling and communication
- Support instructional progress tracking
- Maintain account functionality and platform security
- Provide administrative visibility to authorized school personnel

Student data is not used for marketing, advertising, or unrelated analytics.

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## 4. Data Security Measures

Instrux Music implements industry-standard safeguards to protect FERPA-covered data, including:

- Encryption in transit (TLS)
- Encryption at rest (where applicable)
- Role-based access controls
- Secure authentication procedures
- Limited internal access on a need-to-know basis
- Vendor agreements requiring confidentiality and data protection
- Administrative logs for monitoring access

While no system is 100% secure, we maintain reasonable and appropriate safeguards aligned with educational technology standards.

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## **5. Access, Review, and Correction of Records**

FERPA grants parents and eligible students the right to:

- Review and inspect education records
- Request correction of inaccurate or misleading information

Because Instrux Music operates under school control:

- Schools remain the primary point of contact for FERPA record requests
- Instrux Music will assist schools in fulfilling record access, correction, or export requests upon written instruction

Requests may be directed through the school or to:

[privacy@instruxmusic.com](mailto:privacy@instruxmusic.com)

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## **6. Data Sharing and Redisclosure**

Instrux Music will not redisclose student education records except:

- As directed by the school or district
- To contracted service providers necessary to operate the platform (under strict confidentiality agreements)
- In response to a lawful subpoena, court order, or legal obligation

If legally permitted, the school will be notified prior to disclosure.

Instrux Music does not sell, rent, or commercially distribute student data.

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## 7. Data Retention and Deletion

Instrux Music retains student data only for as long as necessary to provide the contracted services or as required by law.

Because the platform does not record or store live sessions, retained data is limited to:

- Account information
- Lesson notes
- Uploaded materials
- Administrative metadata

Upon termination of a school contract:

- Access to the platform will be disabled
- Student data will be deleted within thirty (30) days unless otherwise requested by the school
- Schools may request bulk export or deletion of data at any time

Data deletion requests should be directed to:

[privacy@instruxmusic.com](mailto:privacy@instruxmusic.com)

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## 8. School Responsibilities

Schools and districts are responsible for:

- Determining whether parental notice or consent is required
  - Maintaining FERPA compliance policies internally
  - Providing instructions regarding record retention or deletion
  - Ensuring that uploaded materials comply with copyright and educational use laws
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## 9. Updates to These Guidelines

Instrux Music may update these FERPA Compliance Guidelines to reflect legal or operational changes. Updated versions will be posted with a revised effective date.

