



# MackinVision Privacy Policy

## About This Privacy Policy

Mackin Book Company d/b/a Mackin Educational Resources (“Mackin”) has developed this privacy policy to inform students, parents, and educators of policies and procedures regarding the collection, use, and disclosure of personally identifiable information and non-personal information we receive from users of the MackinVision library management system, the MackinVision asset management system, and other Mackin websites where this policy is located (collectively “MackinVision”).

## Why We Collect, Hold and Use Personal Information

Mackin uses Student Information for the sole purpose of providing user access to and operation of MackinVision. Student Information shall mean personally identifiable information of a student and their “education records” as defined in the Family Educational Rights and Privacy Act (FERPA) 20 U.S.C. § 1232g and Personally Identifiable Information as defined in the Children’s Online Privacy Protection Act of 1998 (COPPA) 15 U.S.C. § 6501-6506. Student Information shall not include anonymous information which does not enable identification of an individual student, or de-identified information for which all personally identifiable information has been removed and an individual student is not identifiable.

## Personal information We Collect and Hold

Mackin may collect the following types of personal information from administrators for the purpose of creating user accounts: first name, middle name, last name, username/alias, student number, password, school, grade, email, graduation year, patron type, and user role.

## Other Information We Collect and Hold

Personal information may be stored in MackinVision through the standard operation of the platform. Your platform is hosted in an environment where we may have access to system data and log files.

We may request data which contains personal information to be supplied to us to facilitate delivery of a service such as a data conversion.

We may collect your personal information from a third party when we are appointed to act as your authorized representative for the purpose of administering or managing the supply of products or services which you require.

## FERPA Compliance

Mackin takes numerous measures to maintain the security and confidentiality of all student records and comply with requirements of the Family Educational Record Privacy Act (FERPA) applicable to the educational records of students. We will not use any information provided for the creation and maintenance of students' accounts for any purpose other than preserving seamless access to licensed materials, and we will not disclose such information to any third party unless required by law. Any Student Information collected online or otherwise is used solely for the contracted purposes of the MackinVision systems. Mackin will not use or sell Student Information for the purposes of marketing to students.

## COPPA Compliance

Mackin complies with the provisions of the Children's Online Privacy Protection Act (COPPA). COPPA imposes restrictions on how websites collect information from children 13 and under. The key goals of COPPA are to place parents in control over what information is collected from their children online and to protect children while recognizing the dynamic nature of the Internet.

Students are not required to enter first names, last names, or email addresses when creating personal accounts in MackinVision. An alias, password and patron type are the minimum requirements. The decision to include optional data is at the discretion of administrators. Information collected is used for the sole purpose of providing access to and usage of the MackinVision systems. Mackin will not require children to disclose more information than is reasonably necessary to participate in an activity as a condition of participation in the MackinVision systems.

Parents can review their children's personal information, ask to have it deleted, and/or refuse to allow Mackin any further collection or use of their children's information by directing their request in writing to:

Mackin Educational Resources  
3505 County Road 42 West  
Burnsville, MN 55306

## Sharing of Student Information

User accounts may be created by the district, Mackin, or Softlink America Incorporated on behalf of Mackin. The district has many options for communicating Student Information for the creation of MackinVision accounts. The information may be shared by automation through APIs, LDAPS or SSO; by sending a CSV file of Student Information through automated SFTP import capabilities; or by sending it in a variety of file formats.

Student Data that is no longer required for the purpose of delivering a service will be destroyed. Automated Student Information uploads are protected by encryption.

Student data will not be shared for purposes other than to deliver MackinVision to customers.

# Third Party Service Provider Statement

Mackin partners with Softlink America Incorporated (“Softlink”) to provide access to and support of the MackinVision systems. Student Information is shared with Softlink to perform services including, but not limited to, onboarding, data migration, authentication, and other user-related activities on behalf of Mackin. Softlink will not use nor disclose Student Information for any purpose other than the operation of the MackinVision systems.

## Sub-Processor Statement

Amazon Web Services is used to hold and store student data necessary for Mackin to provide MackinVision services to the customer.

## Where We Store Data

Where we provide services to host MackinVision in the cloud, data is stored in data centers within the US all of which comply with ISO 27001, ISO 9001, ISO 27018 and IRAP.

## How We Protect Personal Information

We protect personal information that we hold from misuse, interference and loss, and from unauthorized access, modification or disclosure using both physical and electronic security measures which include secure premises, locked cabinets, secured databases, password access, anti-virus software and firewalls.

We destroy or de-identify personal information in a secure manner when we no longer need it for any of our purposes unless we are authorized or required by law to retain it.

## Our Data Protection Processes

All employees who have access to data are trained annually to ensure they are aware of their responsibilities and best practices. A range of general data security measures are in place and these are available on request. MackinVision also leverages the resources provided by Open Web Application Security Project (OWASP) to perform:

- Developer induction, and subsequent yearly training covering awareness of the current OWASP top 10, along with understanding of the mitigations currently in place within Softlink products.
- Regular audits assessing MackinVision against online threats, guided by the OWASP top 10.

An annual Data Protection Impact Assessment (DPIA) is completed on all data collection methods. This is also done for any new methods of data collection or other large projects that occur between these annual assessments.

In addition to practices outlined above, additional practices could include:

- a. processing personal information only where this is strictly necessary for legitimate organizational purposes;

- b. collecting only the minimum personal information required for these purposes and not processing excessive personal information;
- c. providing clear information to individuals about how their personal information will be used and by whom;
- d. only processing relevant and adequate personal information;
- e. processing personal information fairly and lawfully;
- f. maintaining an inventory of the categories of personal information that we process;
- g. keeping personal information accurate and, where necessary, up to date;
- h. retaining personal information only for as long as is necessary for legal or regulatory reasons or for legitimate organizational purposes;
- i. respecting individuals' rights in relation to their personal information, including their right of access;
- j. only transferring personal information outside the originating region in circumstances where it can be adequately protected;
- k. the application of the various exemptions allowable by data protection legislation;
- l. developing and implementing an Information Management System to enable the policy to be implemented;
- m. where appropriate, identifying internal and external stakeholders and the degree to which these stakeholders are involved in the governance of our data management.
- n. the identification of workers with specific responsibility and accountability for the Personal Information Management Systems.
- o. The regular training of staff who may have access to Personally Identifiable Information on best data security and privacy practices.
- p. promptly notifying customers in the event that any unauthorized person has obtained or attempted to obtain personally identifiable information.

## Disposal of Student Information

Mackin does not routinely delete stored Student Information unless specifically requested by the district or managing agency. However, Mackin will dispose of or return any Student Information to the district upon request at contract end.

## Disclosure of Student Information

Mackin does not disclose information collected from children or administrators for account creation to any third party unless required by law or court order.

## How We Update This Privacy Policy

We may update this Privacy Policy from time to time to take into account changes in our information handling practices by publishing an amended Privacy Policy on our Website. Customers are directed to check the latest policy via notifications within the MackinVision systems. You may review the most recent version of this Privacy Policy available on our website.

## Date Last Modified

This Privacy Policy was last reviewed and/or modified on November 18, 2025. If/when substantive changes are made, we will make reasonable efforts to notify customers. Please contact us with questions or comments about this policy by email: [compliance@mackin.com](mailto:compliance@mackin.com).