

Data Privacy FAQ for Parents

Since 1936, Lifetouch National School Studios Inc. (“Lifetouch”) has been a trusted provider of school services, providing portrait and photography services to schools and families throughout North America. Lifetouch is privileged to photograph children by agreement with our school hosts. We offer time-honored Picture Day products to the families of children we photograph while fulfilling a necessary role at no charge to the school.

In preparation for Picture Day, Lifetouch requires certain basic information from your child’s school record, such as name, grade and homeroom teacher name. Below are a number of Frequently Asked Questions (“FAQs”) regarding the basic information that Lifetouch needs in order to provide the portrait and photography services. These FAQs are intended to provide answers to questions that you may have about Lifetouch’s use of such information and to demonstrate Lifetouch’s commitment to your child’s privacy and security.

What student information does Lifetouch receive from schools?

The information we need for Picture Day depends upon the specific services and deliverables Lifetouch is providing your school. We limit the information we collect to only that which is necessary for Picture Day and related authorized school purposes. We collect the basic information in advance of Picture Day to ensure a perfect name-image match for each portrait and for efficient distribution within the school. We may receive your email or mailing address in order to deliver Picture Day-related communications on behalf of the school. In such cases, we do not retain or use your contact information for any other purpose unless you opt in to receive updates and promotional offers from us.

In addition, the information may be incorporated into other items that we are providing to your school. For example, if Lifetouch is producing student ID cards, we need the student ID number to do the job. Our yearbook image product includes images of students sorted by name, grade and other classifying data per your school’s requirements. Schools ultimately decide how much, or how little, information is used in producing School Service Items. Lifetouch never has access to sensitive information, such as grades or attendance data, from your child’s record.

How does Lifetouch use the information it receives from schools?

As part of our agreement with your child’s school, Lifetouch provides various services that support the school’s administrative needs, which may include student ID cards for lunch, library and transportation purposes and digital images for the school to use for student recognition, awards, teacher tools, yearbooks, memory books and class composites. These services are provided throughout the school year. Lifetouch uses the basic information that it collects solely as necessary to produce such items for the school, to deliver Picture Day-related notices on behalf of your school, and to provide you opportunities to purchase your child’s portraits.

Lifetouch **will not** sell or license your child’s data to third parties.

Lifetouch retains the basic information it collects from schools only as necessary and permissible to promote the sale of portraits to parents, to retrieve the images to supply picture orders and to support the school for an approved administrative purpose. Once such data is no longer needed for such purposes, it is securely destroyed. While retained, it remains under Lifetouch’s control and treated as confidential information.

Is it permissible for schools to provide basic information to Lifetouch without my permission?

Yes, for the limited purpose described in these FAQs and subject to compliance with state and federal law and school policy. Lifetouch acknowledges its obligations as a service provider to your school for student and staff photography pursuant to the federal Family Educational Rights and Privacy Act (“FERPA”). Your school retains the authority to control Lifetouch’s use of the information it provides to Lifetouch and to require its return or destruction at any time. We will honor a parent’s image deletion request, subject to verification and authorization of the school when deletion would impact our ability to deliver an item or service requested by the school.

How does Lifetouch protect School Data?

A comprehensive set of IT policies consistent with the Software & Information Industry Association’s *Best Practices for the Safeguarding of Student Information Privacy and Security for Providers of School Services* governs information systems practices and procedures throughout the Lifetouch enterprise. We employ a variety of physical, technical and organizational security measures to help protect confidential information, including the basic information we receive from schools, from unauthorized access, use and disclosure. Lifetouch produces portrait packages and items to be delivered to the school within its own U.S.-based photo labs. To the extent we engage service providers to assist in fulfilling our obligations, we require compliance with strict confidentiality and security measures.

Lifetouch is greatly concerned about child safety and we take great pride in our SmileSafe Kids® child safety program. The SmileSafe Kids program was developed in 2004 in partnership with the National Center for Missing and Exploited Children (NCMEC), to provide to parents a picture ID card for their children that might be used by the parent in the event the child is missing. The card is a useful resource for parents in everyday situations – for example, to show store personnel in the event a child becomes lost while shopping.

Moreover, in the devastating event of actual child abduction, the SmileSafe Kids ID card may be used to facilitate 24x7 transfer of a high-quality portrait to NCMEC to assist in search efforts, but only if requested by the parent and confirmed by law enforcement that an open case exists. As of June 2014, this program has assisted in the recovery of 51 missing children and has been recognized by privacy authorities as a praiseworthy example of “Privacy by Design.”