

Swift Start — Privacy Policy

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1. Who we are

Swift Start is a childcare management mobile and web application owned and operated by **RoundUp LLC**, an Oregon limited liability company located at PO Box 7102, Springfield OR 97475 ("we," "us," "our"), and offered under the Swift Start brand for Swift Start early learning centers. This policy describes what information we collect, how we use it, and your rights — with special attention to information about children, which we handle under the Children's Online Privacy Protection Act ("COPPA").

If you have questions, contact us at privacy@roundupece.com or write to the address above.

2. Quick summary

- We collect information about you and your child to help your child's center provide care and keep you informed.
- We never sell your child's information. We never use your child's information for advertising.
- We share information only with service providers that need it to run the app (Stripe for payments, AWS for hosting and AI features, etc.), and we require them to use it only to provide their service to us. Section 5 lists every one of them.
- Some app features use AI. When they do, your child's name is replaced with a placeholder before the request is sent, and your child's information is never used to train an AI model. See Section 5.
- You can review, correct, export, or delete your child's information at any time from **Settings -> My child's data** in the app, or by emailing privacy@roundupece.com.
- For users under 13, we collect personal information only after we have your verifiable parental consent.

3. Information we collect

From you (the parent or guardian)

- Name, email, phone, mailing address.
- Login credentials (we store a hash of your password, never the password itself).
- Payment method details (handled and stored by Stripe — we never see your card number).
- Messages you send to staff and other authorized users.
- Notification preferences and app settings, including SMS opt-in status.
- Device information: device type, OS version, and a device identifier used to deliver push notifications.

About your child

- Name, date of birth, room/classroom assignment (e.g., Debut, Little Loves, Evermores).
- Allergies, dietary restrictions, immunization records, and other health information your child's center asks you to provide.
- Emergency contacts and pickup-authorized adults.
- Attendance records (check-in / check-out times).
- Daily care logs (feeding, nap, diaper / bathroom, mood).

- Developmental observations and portfolio entries.
- Photos and videos taken by staff, subject to the media permissions you set.
- Incident reports (injuries, illnesses, behavior).
- Messages exchanged between you and staff about your child.

Automatically

- App usage data: which features you use, screen views, button taps. **This data does not include your child's name or identifier.** Identifiers are hashed before transmission.
- Crash reports and performance diagnostics. These contain device and OS info but not personal information about your child.

From your center's previous software

If your center moved to this app from another childcare system (for example Procare, Brightwheel or Lillio), a center administrator can import the roster they exported from it. That import can carry your child's name and date of birth, their classroom, allergies, and guardian contact details — the same information the center already held about you in that system. Importing does not email anyone, and it does not create an account for you; a center administrator invites families separately.

4. How we use your information

We use the information described above to:

- Run the app's core features (attendance, daily reports, messaging, billing).
- Deliver photos and updates from your child's care team.
- Send you push notifications and, where you have opted in, SMS messages (check-in/out, daily updates, billing reminders).
- Process payments through Stripe.
- Improve the app, fix bugs, and develop new features.
- Comply with state childcare licensing laws (ratio monitoring, incident reporting, etc.).

We do not use your child's information for advertising, profile-building beyond the app's care features, or sale to third parties.

5. Who we share information with

We share information only with:

Stripe

Purpose: Payment processing

What they receive: Your payment method, billing email, invoice amounts

Amazon Web Services (AWS)

Purpose: Cloud hosting and processing — storage for photos, files, records, and curriculum documents (Amazon S3), reading text from scanned licensing forms (Textract), and delivering our email (SES)

What they receive: Data the app stores, scanned forms, and the email we send you

AWS End User Messaging

Purpose: SMS delivery (opt-in only)

What they receive: Your mobile number and the message content you opted into

AWS Bedrock (AI features)

Purpose: Generating lesson plans, development summaries, newsletters, search results and translations

What they receive: The text of the request, which can include a child's age, allergies, developmental milestones and behavior-incident notes. **Children's names are replaced with placeholders before the request is sent**, and the request is refused outright if that replacement cannot be verified. The AI is not used to make decisions about your child, and your child's information is not used to train any AI model.

Sentry

Purpose: Crash and error diagnostics

What they receive: Crash reports and device diagnostics, with personal fields removed before sending

New Relic

Purpose: Mobile app performance monitoring

What they receive: Interaction traces, network timings, device and app version. Collected only where you have opted in to analytics; off by default

Expo

Purpose: Push notification delivery and app updates

What they receive: Your device's push token, the content of notifications about your child, and standard app-update-check requests

Microsoft Entra ID

Purpose: Staff single sign-on — staff accounts only, never parents or children

What they receive: Staff work email and sign-in identity

Apple / Google

Purpose: App distribution and push notification delivery (APNs / Firebase Cloud Messaging)

What they receive: Standard platform telemetry and push routing

Optional integrations your center's director can connect. The app also offers integrations that are off until a center administrator connects an account with that provider. When (and only when) your center connects one, it receives:

Intuit QuickBooks / Xero / Sage

Purpose: Accounting export

What they receive: Family name and billing email, invoice amounts and tuition periods

Mailchimp (incl. its Mandrill service)

Purpose: Center newsletters and announcements

What they receive: Parent name and email, plus tags such as classroom or enrollment status — **never your phone number**

DocuSign / Dropbox Sign

Purpose: Electronic signatures on enrollment and consent documents

What they receive: Signer name, email, and the document being signed

Merge / Rippling / Gusto

Purpose: Staff payroll, HR, and timekeeping — staff only, never parents or children

What they receive: Staff names, work emails, and timesheets

Canva / Adobe Express

Purpose: Design tools for center newsletters and flyers

What they receive: The staff account that connects them and the designs staff edit

Slack / Microsoft Teams

Purpose: Alerting the center's own staff channel when a classroom is short-staffed or an incident is logged

What they receive: The center's name, a classroom name, and how many children and staff are in that room — or that an incident was logged and in which room. **Never your child's name, never a staff member's name, and never what happened.** The channel belongs to your center, in its own workspace

Google Calendar / Outlook / Apple Calendar

Purpose: Publishing the center calendar so staff and families can subscribe to it

What they receive: Event titles, times and locations from the center's calendar — for example "Picture day" or "Closed for Labor Day". **No information about you or your child.** Whoever subscribes receives it through their own calendar provider

Verizon ThingSpace

Purpose: Classroom environment sensors, where installed

What they receive: Sensor device identifiers and readings — no personal information

Utility lookups that carry no personal information. To show weather and air quality for your center, the app contacts Apple WeatherKit, Open-Meteo, and AirNow (EPA) with the center's location only — never yours or your child's. The food-program barcode scanner looks up scanned product barcodes against Open Food Facts and UPCitemdb. Like any internet request, these reveal the requesting device's network address, but they carry no information about you or your child.

We require every recipient to use your information only to provide their service to us, to apply appropriate security measures, and not to use it for their own purposes. We do not permit any of them to sell it or use it for advertising.

Product analytics. We do not use a product-analytics service. The app used to include one; it was removed in August 2026 rather than kept switched off. If we ever add one, we will update this policy before it is enabled and will not send information that identifies your child.

We do **not** share information with advertisers or data brokers. We do **not** share your mobile number or SMS consent with third parties for their own marketing.

We may disclose information if required by law, in response to valid legal process, or to protect the safety of children in our care.

If the company is sold, merged, or transferred, your information will be transferred under the same protections described in this policy.

6. Children's privacy (COPPA)

We collect personal information directly from children only as part of the care services your child's center provides — for example, photos taken by a teacher, attendance recorded at drop-off, or observations of your child's development.

We collect this information only **after a parent or legal guardian has accepted this Privacy Policy and we have verifiable parental consent.** The current consent record is captured during account creation in the app and re-confirmed when this policy materially changes.

Your rights as a parent

You have the right to:

- **Review** what information we hold about your child.
- **Refuse to permit further collection** of your child's information.
- **Request deletion** of all or part of your child's information.
- **Change media permissions** (whether staff may take photos / videos and how broadly they may be shared).

To exercise any of these rights, open **Settings -> My child's data** in the app, or email privacy@roundupece.com. We will respond within 5 business days and complete most requests within 30 days.

Withdrawing consent may limit your center's ability to provide some services (e.g., we can't send you daily photos if photo permission has been withdrawn). Your center will work with you on alternatives.

How we obtain verifiable parental consent

When you accept a parent invite, we present this Privacy Policy, the Terms and Conditions, and a parental-consent acknowledgement. You must affirmatively confirm that you are the child's parent or legal guardian and are 18 or older.

Today, verifiable parental consent is obtained through this in-app affirmation at account creation. If we adopt a stronger verification method in the future (such as a signed consent form or a credit-card verification step), we will update this section and notify you before the change takes effect.

7. Education records (FERPA)

If your child's center receives federal funding (e.g., Head Start, CCDF), your child's records may also be governed by the Family Educational Rights and Privacy Act ("FERPA").

Under FERPA you have the right to:

- Inspect and review your child's education records.
- Request that the school correct records you believe are inaccurate or misleading.
- Restrict disclosure of personally identifiable information from education records.

Tap **Settings -> My child's data** to inspect what we hold, or email privacy@roundupece.com to request a correction.

8. How long we keep information

Account profile and contacts

Retention: Until you delete your account, then 30 days for backup purposes

Attendance records

Retention: 3 years (state licensing requirement)

Daily reports and care logs

Retention: 1 year

Health and incident records

Retention: 5 years (liability records)

Developmental observations

Retention: Until your child ages out of the program + 1 year

Photos and videos

Retention: Until your child's enrollment ends + 90 days, then auto-deleted

Messages

Retention: 1 year

Payment records

Retention: 7 years (tax and accounting requirements)

Anonymized analytics

Retention: 2 years maximum

When you delete your account, we permanently remove the categories above on the schedule listed. Some records (financial records, state-licensing records) may be retained longer where the law requires.

9. Your rights

All users

- **Access** what we hold about you and your child.
- **Correction** of inaccurate information.
- **Deletion** of your account and your child's records.
- **Data portability** — a downloadable copy of your data.
- **Withdraw consent** at any time (SMS, media, etc.).

Exercise these rights through **Settings** in the app or by emailing privacy@roundupece.com.

California residents (CCPA / CPRA)

You have additional rights:

- **Know** what categories of personal information we collect (Section 3 above lists them).
- **Correct** inaccurate personal information.
- **Delete** personal information, subject to specific exceptions.
- **Opt out** of "sale" or "sharing" of personal information. **We do not sell or share personal information** as those terms are defined under California law.
- **Limit use of sensitive personal information.**
- **Non-discrimination** for exercising your rights.

To exercise California rights, email privacy@roundupece.com with subject "California Privacy Request."

EU / EEA residents (GDPR)

You have the rights under GDPR Articles 15–22: access, rectification, erasure, restriction of processing, data portability, objection, and rights related to automated decisions.

The lawful bases on which we process your data are: (a) **contract necessity** (we need this information to provide the care service you contracted for); (b) **consent** (for SMS and external photo sharing); (c) **legal obligation** (state licensing record-keeping); (d) **legitimate interest** (security monitoring).

We do not engage in automated decision-making that produces legal effects.

EU residents can lodge a complaint with their national supervisory authority.

10. Security

We use industry-standard safeguards including:

- HTTPS for all data in transit.
- Server-side encryption at rest for stored records (AWS-managed).
- iOS Keychain / Android Keystore for authentication tokens on your device (so even a lost phone doesn't expose your login).
- Role-based access controls so center staff see only the children in their classroom.
- A privacy-curtain overlay that hides app contents when you switch to another app.
- An idle timeout that signs you out automatically.

No security system is perfect. If you suspect your account has been compromised, contact us immediately at security@roundupece.com.

11. Data breach notification

In the event of a data breach involving your or your child's information, we will notify you without unreasonable delay and within the timeframes required by applicable law (72 hours for GDPR, 45 days for Oregon, etc.). Our internal response process is documented and rehearsed.

12. SMS / text messaging

If you opt into SMS, message frequency varies. **Message and data rates may apply.** Reply **STOP** to unsubscribe or **HELP** for help. Opting out of SMS does not remove you from the app or other communications. We do not share your mobile number or consent with third parties for marketing. See <https://www.swiftstart.org/legal-information> for the full SMS terms.

13. Data location and international transfers

The app is operated from and stores data in the United States. If you use the app from outside the U.S., you consent to the transfer of your information to the U.S. for processing. For EU/EEA users, transfers to the U.S. are made under Standard Contractual Clauses with our processors.

14. Third-party links

The app may contain links to external websites or services. This policy does not cover those services; review their own privacy policies before using them.

15. Changes to this policy

We may update this policy from time to time. Material changes will be communicated by: 1. Posting the updated policy at this URL with a new "Last updated" date. 2. Sending a notification through the app. 3. Requiring you to re-acknowledge the policy on next app open.

Continuing to use the app after a material change means you accept the updated policy.

16. Contact

- Privacy questions: **privacy@roundupece.com**
- General support: inquiries@roundupece.com
- Security concerns: security@roundupece.com
- Mailing address: RoundUp LLC, PO Box 7102, Springfield OR 97475
- For California residents: subject your email "California Privacy Request"
- For EU residents: subject your email "GDPR Request"

If you are not satisfied with our response to a privacy concern, you may also:

- File a complaint with the FTC at reportfraud.ftc.gov (children's privacy)
- File a complaint with your state attorney general
- File a complaint with the U.S. Department of Education at the Family Policy Compliance Office (FERPA)
- File a complaint with your national EU supervisory authority (GDPR)

End of policy.