GREEN EYE CREATIVE

Compliance & Data Privacy

How AYRT and TTC handle student, applicant, and institutional data

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AYRT — Education & Academic Integrity

FERPA

AYRT is built to operate within the Family Educational Rights and Privacy Act (FERPA), the federal law governing student education records. Under FERPA's "school official" exception, an institution may share student data with a vendor like AYRT when:

- AYRT performs a service the institution would otherwise perform itself
- AYRT remains under the institution's direct control regarding use of the data
- AYRT uses the data only for the authorized purpose — never for marketing, and never to train or improve AI models
- AYRT does not re-disclose student data without authorization

Green Eye Creative will sign a written Data Processing Agreement with any institution or department that asks for one, confirming these terms.

What AYRT stores

- **About the student:** the name and the Student ID the school assigns, and an optional parent or guardian email.
- **About the writing session:** the submitted writing; keystrokes, corrections and time spent writing; how many times the student left the page or full-screen; and any pasted or dragged-in text that was blocked and flagged.
- **About the teacher:** name, email, and the assignments they create.

Nothing else is collected. AYRT does not send student writing to any AI service.

Who can see it

- **The teacher** who created the assignment sees their own students' sessions and nothing from other teachers.
- **The student** sees their own numbers after submitting, compared only with their own earlier work, never with classmates.
- **Certificate check page:** anyone holding a certificate's code can confirm it is real. That page shows first name and last initial, the assignment, the teacher's name, the date, and the session numbers. It never shows the writing itself or the Student ID.

Student & Parent Transparency

Every AYRT session is disclosed, not covert. Students know what is recorded and why. AYRT only records while the assignment page is open, and never runs in the background or without the student's knowledge. This is a deliberate design choice: proof of authorship only has value when it is earned openly, not extracted quietly.

State Student Privacy Laws

Beyond FERPA, AYRT is designed to be compatible with state student data laws, including California's SOPIPA, Illinois's SOPPA, and New York's Ed Law 2-d. As AYRT expands into new states, Green Eye Creative reviews applicable state requirements before deployment.

Biometric Data (Layer 9 — Audio) PLANNED · NOT YET AVAILABLE

AYRT does not capture voice or any biometric data today. If the optional audio layer is offered in the future, it will follow these rules:

- Explicit, written, opt-in consent before any voice capture begins
- Students told what is captured, how long it is kept, and how to have it deleted
- Voice data never shared with third parties and never used to train AI models
- In states with biometric privacy laws (e.g., Illinois BIPA, Texas CUBI), meeting the stricter standard, not the minimum

TTC (Turing True Check) — Hiring & HR

Automated Employment Decision Tool (AEDT) Awareness

TTC produces a signal report, not a hire/no-hire decision. A person always makes the final call. Green Eye Creative recognizes TTC may fall within the definition of an "automated employment decision tool" under laws like NYC Local Law 144, Illinois HB 3773, and Colorado SB 205 when used on candidates in those jurisdictions.

Because compliance obligations under these laws generally sit with the employer using the tool, Green Eye Creative provides clients with documentation to meet their own obligations, including:

- A clear description of what TTC measures and how (power-verb monotony, burstiness scoring, quantification patterns — never protected-class characteristics)
- Confirmation that TTC output is a screening signal for human review, not an automated adverse-action decision
- Support for client-side bias audits and candidate notice requirements where applicable

What TTC Does Not Do

TTC does not consider, infer, or score on the basis of race, gender, age, disability, national origin, or any other protected characteristic. It analyzes only textual, stylistic patterns in submitted documents.

No outside AI

TTC's analysis runs on Green Eye Creative's own rules. Submitted text is not sent to any outside AI service.

General Data Practices — Both Products

No training on customer data	Nothing submitted through AYRT or TTC is used to train, fine-tune, or improve any AI model.
No sale of data	Ever, to anyone, for any reason.
Data minimization	Only what is needed for the stated function is collected (see "What AYRT stores").
Deletion on request	Institutions and individuals can request deletion by email, subject to the institution's own record-retention obligations.

This page describes Green Eye Creative's practices and is not a substitute for a signed Data Processing Agreement or legal advice. To request a DPA, a deletion, or a copy of your institution's data, contact spencer@greeneyecreative.com.
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