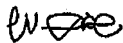


# PARENTS' BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY

SCIO CENTRAL SCHOOL DISTRICT is committed to protecting the privacy and security of student data and teacher and principal data. In accordance with New York Education Law Section 2-d and its implementing regulations, SCIO CENTRAL SCHOOL DISTRICT informs the school community of the following:

1. A student's personally identifiable information cannot be sold or released for any commercial purposes.
2. Parents have the right to inspect and review the complete contents of their child's education record.
3. State and federal laws protect the confidentiality of personally identifiable information, and safeguards associated with industry standards and best practices, including but not limited to encryption, firewalls, and password protection, must be in place when data is stored or transferred.
4. A complete list of all student data elements collected by New York State is available for public review at the following website <http://www.nysed.gov/data-privacy-security/student-data-inventory> or by writing to the Office of Information and Reporting Services, New York State Education Department, Room 865 EBA, 89 Washington Avenue, Albany, New York 12234.
5. Parents have the right to submit complaints about possible breaches of student data addressed. Complaints should be directed in writing to SCIO CENTRAL SCHOOL DISTRICT Data Privacy Officer, 3968 Washington Street Scio, NY 14880 or by using the form available at the following website: <https://caboces.org/resources/new-york-state-education-law-2d/report-an-improper-disclosure/>. Complaints may also be directed in writing to Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, New York 12234 or by using the form available at the following website: <http://www.nysed.gov/data-privacy-security/report-improper-disclosure>

IN WITNESS WHEREOF, the parties hereto have executed this agreement as of the day and year first written above.



\_\_\_\_\_  
Authorized Vendor Signature

15 October 2020

\_\_\_\_\_  
Date



\_\_\_\_\_  
Authorized SCIO CENTRAL SCHOOL DISTRICT  
Signature

10/15/2020

\_\_\_\_\_  
Date

## VENDOR INFORMATION REGARDING DATA PRIVACY AND SECURITY

Vendor: Wakelet Ltd

Product: Wakelet

Collects:  Student Data  Teacher or Principal Data  Does not collect either

Educational agencies including Cattaraugus-Allegany-Erie-Wyoming BOCES are required to *post information about third-party contracts on the agency's website* with the Parents Bill of Rights. To that end, please complete the table below with information relevant to NYS Education Law 2-d and Part 121.3 of the Commissioner's Regulations. Note that this applies to all software applications and to mobile applications ("apps").

### Part 1: Exclusive Purposes for Data Use

The exclusive purposes for which the student data (or teacher or principal data) will be used by the third-party contractor:

- *As necessary to fulfil our Rules and Terms of Service*
- *To provide the Service, including updating, securing, troubleshooting and providing support*
- *To improve, develop and personalise the Service*
- *To send the User information including confirmations, technical notices, updates, security alerts, and support and administrative messages*
- *To identify specific Users in our system*
- *To comply with applicable laws, including website accessibility laws that may require transcription of audio or other methods to make User content available on the Service*

### Part 2: Subcontractor Oversight Details – Select the appropriate option below.

This contract has no subcontractors.

This contract has subcontractors. As such, the third-party contractor will take the following steps to ensure that any subcontractors, assignees, or other agents who see, or receive, this protected data are contractually required to obey the same data protection and security requirements that the third-party contractor is required to obey under state and federal law:  
n/a

### Part 3: Contract Lifecycle Practices

The contract expires on n/a (please see Wakelet privacy policy clause 6 for data retention details) unless renewed or automatically extended for a term pursuant to the agreement. When the contract expires, protected data will be deleted by the contractor, via shredding, returning of data, mass deletion, and upon request, may be exported for use by Sa before deletion.

### Part 4: Student Educational Records / Improper Disclosure

A. For information on FERPA (Family Educational Rights and Privacy Act), which is the federal law that protects the privacy of student education records, visit the U.S. Department of Education FERPA website.

B. A complaint or report of improper disclosure may be completed by submitting the Improper Disclosure Report form.

### Part 5: Security Practices

A. Protected data provided to the contractor will be stored: (include *where* and *how*)

**On secure servers (please see attached product profile for more information.**

B. The security protections taken to ensure data will be protected that align with the NIST Cybersecurity Framework and industry best practices include:

- *Our web infrastructure provider AWS is compliant with NIST 800-53. This covers physical infrastructure, data centers and much of the networking and data infrastructure. <https://aws.amazon.com/compliance/nist/>*
- *We have been through a security audit by a third party and have an active bug bounty*

*program.*

- *We have strict access controls and internal policies on access to data, and all data is encrypted at rest and over public networks.*
- *We have active logging and monitoring on our infrastructure.*
- *We have tested internal response and data recovery policies and procedures including but not limited to off-site backups and multi datacenter storage.*

**Part 6: Encryption Practices**

By checking this box, contractor certifies that data encryption is applied in accordance with NYS Education Law Section 2-d 5(f)(5).