

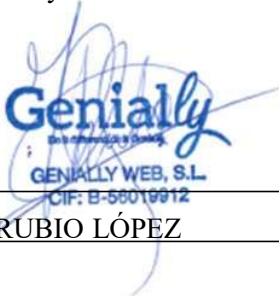
EXHIBIT "E"

GENERAL OFFER OF PRIVACY TERMS

1. Offer of Terms

Provider offers the same privacy protections found in this DPA between it and the LEA to any other school district ("Subscribing LEA") who accepts this General Offer through its signature below. The Provider agrees that the information on the next page will be replaced throughout the Agreement with the information specific to the Subscribing LEA filled on the next page for the Subscribing LEA. This General Offer shall extend only to privacy protections and Provider's signature shall not necessarily bind Provider to other terms, such as price, term, or schedule of services, or to any other provision not addressed in this DPA. The Provider and the Subscribing LEA may also agree to change the data provide by LEA to the Provider to suit the unique needs of the Subscribing LEA. The Provider may withdraw the General Offer in the event of: (1) a material change in the applicable privacy statutes; (2) a material change in the services and products subject listed in the Originating Service Agreement; or three (3) years after the date of Provider's signature to this Form. Provider shall notify the LEA in the event of any withdrawal so that this information may be transmitted to the Subscribing LEAs.

GENIALLY WEB SL



BY: _____ Date: 20/06/2019 _____

Printed Name: JUAN RUBIO LÓPEZ Title/Position: CEO

2. Subscribing LEA

A Subscribing LEA, by signing a separate Service Agreement with Provider, and by its signature below, accepts the General Offer of Privacy Terms. The Subscribing LEA's individual information is contained below. The Subscribing LEA and the Provider shall therefore be bound by the same terms of this DPA.

BY: *Kerry Clery* Date: 12/5/19
Kerry Clery (Dec 5, 2015)

Printed Name: Kerry Clery Title/Position: Assistant Superintendent

SCHOOL DISTRICT NAME: Westford

DESIGNATED REPRESENTATIVE OF LEA:

Name	<u>Julie Baudreau</u>
Title	<u>Director of Digital Learning</u>
Address	<u>23 Depot Street</u>
Telephone Number	<u>9786925560</u>
Email	<u>jbaudreau@westfordk12.us</u>

COUNTY OF LEA: Middlesex

OPTIONAL: EXHIBIT “F”
DATA SECURITY REQUIREMENTS

Having robust data security policies and controls in place are the best ways to ensure data privacy. Please answer the following questions regarding the security measures in place in your organization:

1. Does your organization have a data security policy? Yes No

If yes, please provide it.

2. Has your organization adopted a cybersecurity framework to minimize the risk of a data breach? If so which one(s):

____ ISO 27001/27002

____ CIS Critical Security Controls

____ NIST Framework for Improving Critical Infrastructure Security

____ Other: _____

3. Does your organization store any customer data outside the United States? Yes No

4. Does your organization encrypt customer data both in transit and at rest? Yes No

5. Please provide the name and contact info of your Chief Information Security Officer (CISO) or the person responsible for data security should we have follow-up questions.

Name: _____

Contact information: _____

6. Please provide any additional information that you desire.






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Final Audit Report

2019-12-05

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