



December 31, 2019

To the attention of the designated representative of the LEA:

This letter represents a memorandum of understanding with regards to the physical location of Xello student data.

As of the 2020 school year, Xello student data is physically stored in a secure data center operated by Cogent Communications located at:

*245 Consumers Road, Suite 300
North York, Ontario, Canada
M2J 1R3*

We understand that data residency is a concern for clients outside of Canada and are working towards a solution for US clients whereby data will be stored in a US-based Azure region. Our target date for this is the start of the 2021 school year; however, we cannot, at this time, provide a firm date until further investigation is completed.

Although Xello student data is physically stored in Canada, our organization is still bound by the laws and regulations pertaining to the district's jurisdiction. For Montana, this means Xello is bound by FERPA, the Montana Data Privacy Agreement, and the Montana Pupil Online Personal Information Protection Act.

As an organization that places security at the forefront of our business, we have a number of security controls to ensure the confidentiality of student data. These include, but are not limited to:

Physical Controls:

- Environmental control (constant temperature and humidity maintenance, particulates filtration), fire suppression systems, redundant power sources and UPS backup.
- Round the clock physical security (card entry, video monitoring of the facilities).



- Data center access logs.

Technical Controls:

- Logging and auditing of network access.
- Firewall & endpoint protection.
- Network segregation.
- Encrypted data in transit through the use of TLS 1.2
- Password hashing.

Administrative Controls:

- Utilization of the principle of least privilege.
- Vulnerability testing.
- Security awareness training.
- Criminal background checks on all employees.
- NDA's required for all employees.

If you have any questions or concerns about the privacy of student data, please reach out to privacy@xello.world or contact me directly.

Sincerely,

Ben Pierce
Director
Data Services

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