Attachment A – Parents' Bill of Rights for Data Security and Privacy

Delaware-Chenango-Madison-Otsego BOCES
Parent's Bill of Rights for Data Privacy and Security

DCMO BOCES Parents' Bill of Rights for Data Privacy and Security

DCMO BOCES seeks to use current technology, including electronic storage, retrieval, and analysis of information about students' education experience in the district, to enhance the opportunities for learning and to increase the efficiency of our district and school operations.

DCMO BOCES seeks to insure that parents have information about how the District stores, retrieves, and uses information about students, and to meet all legal requirements for maintaining the privacy and security of protected student data and protected principal and teacher data, including Section 2-d of the New York State Education Law.

To further these goals, DCMO BOCES has posted this Parents' Bill of Rights for Data Privacy and Security.

(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. The procedures for exercising this right can be found in Board Policy 601. You may access this Policy from the District's website.
(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 the State is available at http://www.p12.nysed.gov/irs/sirs/documentation/NYSEDstudentData.xlsx and a copy may be obtained by writing to the Office of Information & Reporting Services, New York State Education Department, Room 863 EBA, 89 Washington Avenue, Albany, New York 12234.
(5) Parents have the right to have complaints about possible breaches of student data addressed. Complaints should be directed in writing to the Chief Privacy Officer, New York State Education Department, Room 863 EBA, 89 Washington Avenue, Albany, New York 12234.

For EdClub, Inc

By: Mohsen Attarpour Date: 2/22/2024
Name: Mohsen Attarpour
Title: Authorized Person

Supplemental Information About This Contract

CONTRACTOR NAME	EdClub, Inc
PRODUCT NAME	TypingClub
PURPOSE DETAILS	The exclusive purpose for which Vendor is being provided access to Protected Information is to provide the product or services that are the subject of this Contract to BOCES and Participating School Districts. The product or services are used to teach users skills such as touch typing, digital citizenship, spelling and vocabulary (among others).
SUBCONTRACTOR DETAILS	~~This contractor will not use subcontractors.~~ ~~*OR*~~ Vendor represents that it will only share Protected Information with subcontractors if those subcontractors are contractually bound to observe the same obligations to maintain the privacy and security of Protected Information as are required of Vendor under this Contract and all applicable New York State and federal laws.
DATA DESTRUCTION INFORMATION	The agreement expires 08/31, 20 25. Upon expiration of this Contract without a successor agreement in place, Vendor shall, upon request, assist BOCES in exporting all Protected Information previously received from, or then owned by, BOCES or a Participating School District. Vendor shall thereafter securely delete and overwrite any and all Protected Information remaining in the possession of Vendor or its assignees or subcontractors (including all hard copies, archived copies, electronic versions or electronic imaging of hard copies of shared data) as well as any and all Protected Information maintained on behalf of Vendor in secure data center facilities. Vendor shall ensure that no copy, summary or extract of the Protected Information or any related work papers are retained on any storage medium whatsoever by Vendor, its subcontractors or assignees, or the aforementioned secure data center facilities.
DATA ACCURACY INFORMATION	In the event that a parent, student, or eligible student wishes to challenge the accuracy of Protected Information that qualifies as student data for purposes of Education Law Section 2-d, that challenge shall be processed through the procedures provided by the student's district of enrollment for amendment of education records under the Family Educational Rights and Privacy Act (FERPA). In the event that a teacher or principal wishes to challenge the accuracy of Protected Information that qualifies as teacher or principal Protected Information for purposes of

	Education Law Section 2-d, that challenge shall be processed through the appeal process, if any, in the APPR Plan of the employing educational agency.
SECURITY PRACTICES	The data is stored in the continental United States (CONUS) or Canada. Vendor will maintain administrative, technical, and physical safeguards that equal industry best practices including, but not necessarily limited to, disk encryption, file encryption, firewalls, and password protection, and that align with the NIST Cybersecurity Framework 1.0. Vendor will use encryption technology to protect data while in motion or in its custody from unauthorized disclosure using a technology or methodology specified by the secretary of the U S. Department of HHS in guidance issued under P.L. 111-5, Section 13402(H)(2).