

## Legends of Learning Data Privacy and Security Plan

1. **Implementation of Data Security and Privacy Requirements:** Throughout the lifecycle of developing the Legends of Learning web product and service, our approach to ensuring data security and privacy compliance is proactive and comprehensive. We continually assess and adapt our security measures to meet evolving requirements. This includes regular audits and reviews to identify potential vulnerabilities and risks, ensuring compliance with changing data protection regulations.
2. **Administrative, Operational, and Technical Safeguards:** To safeguard Personally Identifiable Information (PII), we've put in place a robust combination of administrative, operational, and technical safeguards. Our administrative safeguards involve stringent access controls, effective data classification, and ongoing training initiatives. Operationally, we maintain data backup and recovery procedures, while technically, we employ encryption, robust firewall protection, and vigilant intrusion detection systems. These measures collectively ensure that PII remains confidential, intact, and available when needed during the use of our web product and service.
3. **Training for Employees and Subcontractors:** We prioritize the continuous education of our employees, officers, and subcontractors who are directly involved in providing our SaaS solution. Our training programs focus on keeping them well-informed about federal and state laws governing PII confidentiality. This training is kept up to date to ensure that our team is always aware of the latest regulations and best practices in data protection.
4. **User Agreements and Written Commitments:** Our procedures are designed to maintain high standards of data security and privacy during the use of our web product and service. We ensure that all employees and subcontractors are committed to following comprehensive written agreements that outline their responsibilities and obligations concerning data security and privacy.
5. **Management of Data Security and Privacy Incidents:** In the event of data security or privacy incidents involving PII during the use of our web product and service, we have a well-established incident response plan in place. This plan covers every step, from identifying breaches and unauthorized disclosures to immediate containment, notification of affected parties, and reporting incidents to the necessary authorities, as mandated by applicable regulations.
6. **Data Transition:** When it becomes necessary to transition data because it is no longer needed for the use of our web product and service, we take this process seriously. It involves either securely transferring data or, if needed, securely deleting it in accordance with our stringent data destruction practices, as described below.
7. **Secure Destruction Practices and Certification:** Our data destruction practices adhere to industry standards and best practices. We provide certification to validate the thorough and irreversible destruction of PII when it is no longer needed during the use of our web product and service. This certification includes details of the method used for destruction and confirms compliance with applicable regulations.
8. **Alignment with Applicable Policies:** We ensure that our data security and privacy program and practices align with relevant policies during the use of our web product and

service. We regularly review and update our practices to align with any changes in policies or the regulatory landscape.

9. **NIST Framework Alignment:** Our data security and privacy practices are closely aligned with the NIST Cybersecurity Framework (CSF) v1.1. To identify, protect, respond to, and recover from data security and privacy threats, we maintain an inventory of assets, implement robust access controls and encryption, conduct regular risk assessments, provide ongoing training, and have a well-documented incident response plan. We communicate promptly with stakeholders during incidents, continuously improve recovery plans, and ensure clear governance. These measures collectively ensure data security and privacy throughout its lifecycle, in line with the NIST CSF v1.1 principles.

Our commitment is to maintain a high level of data security and privacy during your use of our web product and service, with a focus on protecting PII.