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December 18, 2023

Southern Westchester Board of Cooperative Educational Services
17 Berkley Drive
Rye Brook, New York 10573

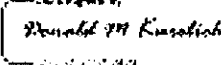
To Whom It May Concern:

Brightly Software, Inc. does not require access to, collection of, or the housing of, protected data as defined by Section 2-d of NY Education Law. This includes student, principal, and teacher PII. Part 121 of the Regulations of the NY Commissioner of Education defines the Student Data and Teacher or Principal Data protected by Section 2-d of NY Education Law as follows:

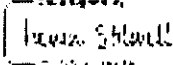
(m) Personally identifiable information, as applied to student data, means personally identifiable information as defined in section 99.3 of Title 34 of the Code of Federal Regulations implementing the Family Educational Rights and Privacy Act, 20 U.S.C 1232g, and as applied to teacher and principal data, means personally identifiable information as such term is defined in Education Law §3012-c (10).

(q) Student Data means personally identifiable information from the student records of an educational agency.

(r) Teacher or Principal Data means personally identifiable information from the records of an educational agency relating to the annual professional performance reviews of classroom teachers or principals that is confidential and not subject to release under the provisions of Education Law §§3012-c and 3012-d.

Executed by:


Donald M. Kurelich
December 18, 2023

Executed by:


Kevin Stilwell
December 18, 2023