JustWrite Ohio — Student Data Privacy Packet (Ohio SB 29 / ORC 3319.326)

Kenton City Schools — Write-A-Thon (Names, Grades & JW Username Only) Effective Date: October 29, 2025

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District Contact

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Provider Contact

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1) NDPA Exhibit G Addendum — JustWrite Ohio (Names, Grades & JW Username)

JUSTWRITE OHIO - NDPA EXHIBIT G (OHIO SB 29) ADDENDUM

District: Kenton City Schools ("District")

Provider: JustWrite Ohio ("Provider")

Event/Service: JustWrite Write-A-Thon (the "Service")

1) Scope & Defined Data

- Student Data Elements: (a) first and last name; (b) grade level; and (c) a JustWrite-issued account username/email constructed from a district/school code + first initial + last name (no personal student email addresses). No other identifiers are collected by Provider for this Service.
- Purpose: To enable student participation in the District-approved Write-A-Thon, including roster setup, grade grouping, account provisioning, and tallying pages/pledges.

2) Ownership; FERPA

- Ownership: All Student Data are and remain the sole property of the District.
- FERPA: To the extent applicable, Student Data are "education records," and Provider acts as a "school official" with legitimate educational interests solely for the Purpose above.
- 3) No Sale / No Commercial Use / No Advertising
- Provider shall not sell, license, disclose, or otherwise use Student Data for any advertising, marketing, profiling, or other commercial purpose. No targeted or behavioral advertising using Student Data.
- 4) Security & Access
- Safeguards: Administrative, technical, and physical safeguards aligned with industry standards; encryption in transit and at rest where reasonably available.
- Least-Privilege: Access limited to personnel necessary to perform the Service, who are bound by confidentiality obligations; access changes are logged.

5) Use Limitations

• Student Data shall be used solely to perform the Service for the District and for no other secondary or unrelated purpose. No combination with third-party datasets except as required to deliver the Service.

6) Data Disclosure

• No disclosure to third parties except (i) as required by law with prompt written notice to the District (unless legally prohibited).

7) Breach / Security Incidents

- Provider will notify the District without unreasonable delay after confirming an incident that compromises the confidentiality, integrity, or availability of Student Data, and will cooperate to meet Ohio and federal notice requirements.
- 8) Retention; Deletion or Return
- Retention: Student Data are retained only for the duration needed to deliver the Service.
- Deletion/Return: Within ninety (90) days of event close or contract termination, Provider will permanently delete or return all Student Data and, upon request, provide written certification of deletion.
- 9) Inspection / Records
- Upon reasonable notice, Provider will make available documentation evidencing compliance with this Exhibit G, including security controls and deletion certification.
- 10) Term; Termination
- This Exhibit G is effective as of the Effective Date on the cover and continues for the duration of the Service. Either party may terminate for material breach if uncured within thirty (30) days of written notice.
- 11) Governing Law; Order of Precedence
- Governing law: Ohio. In the event of conflict between this Exhibit G and any other agreement between the parties relating to Student Data, this Exhibit G controls to the extent of the conflict.

Third-Party Platform (Disclosure Only)

Students may use a JustWrite-issued email account to authenticate to a fundraising platform for the District-approved event. The platform receives only (i) the JustWrite email address and (ii) the student's first name and school for page identification; it does not receive district student IDs, personal email addresses, dates of birth, addresses, grades, or student work. This paragraph is a disclosure and does not make such platform a party to this Agreement.

SIGNATURES

District (Kenton City Schools)

Name/Title: Andy Emerine, Director of Technology

Address: Central Office, 222 W Carrol St, Kenton, OH 43326

Email: emerine.andy@kentoncityschools.org

Date: 10/29/2025

Provider (JustWrite Ohio)

Ву:_____

Name/Title: Michael Nelson, Executive Director

Address: PO Box 6502, Toledo, OH 43612

Phone/Email: 419-654-1843 • michael.nelson@justwriteohio.org

Date: October 29, 2025

2) One-Page Data Map — JustWrite (Names, Grades & JW Username)

JUSTWRITE WRITE-A-THON — ONE-PAGE DATA MAP (NAMES, GRADES & JW USERNAME)

District: Kenton City Schools

Provider: JustWrite Ohio

Data Elements

- Student first name, last name, and grade level.
- JustWrite-issued account username/email derived from a district/school code + first initial + last name (used only for access; not a personal email).

Purpose

• Enable student participation in the District-approved Write-A-Thon; create limited-scope access credentials; group participants by grade; tally pages and pledges.

Data Flow

- District shares names/grades with JustWrite → JustWrite provisions roster and issues a JW username/email per naming convention.
- Public Display: Full usernames/emails are not displayed publicly. If public-facing recognition is used, District may choose (a) first name + last initial or (b) district alias/ID.

Access & Security

- Access limited to named JustWrite event administrators.
- Technical safeguards: unique logins; least-privilege roles; encryption in transit/at rest; periodic access review; incident response plan.

Retention & Deletion

- Retained only for the duration of the fundraiser and reconciliation.
- All Student Data and JW-issued accounts deleted or returned within 90 days of event close or agreement termination; deletion certificate available upon request.

No Commercial Use

No ads, marketing, profiling, cross-context behavioral advertising, or sale of Student Data.

Contacts

• District Notices: Andy Emerine, Director of Technology — Central Office, 222 W Carrol St, Kenton, OH 43326 — emerine.andy@kentoncityschools.org

• Provider (Privacy/Security): Michael Nelson, Executive Director — PO Box 6502, Toledo, OH 43612 — 419-654-1843 • michael.nelson@justwriteohio.org