

Data Security and Privacy Plan

1. Exclusive Purposes for Data Use

- a. Please list the exclusive purposes for which the student data [or teacher or principal data] will be used by the service provider.

Data elements stored are used for the reporting/tracking/completing of GCN tutorials.

Access Control to only those with Educational Interests:

Data and information stored on GCN is not sold in any way. Access is limited to GCN staff, end- users and organization administrators working on behalf of end-users, as part of the GCN service.

Initial CMB

2. Data Accuracy/Correction Practices

- a. Parent [student, eligible student, teacher or principal] may challenge the accuracy of the data by...

The data contained on GCN is provided either by the contracted organization or directly from the end-user during the course of the session, however this data and any logs of the creation of this data (within 6 months) can be requested for accuracy verification. Please contact data@gcntraining.com for such inquiries.

Initial CMB

3. Subcontractor Oversight Details

- a. This contract has subcontractors: Yes ☒ No ☐
- b. Describe how the contractor will ensure subcontractors abide by data protection and security requirements, including but not limited to those outlined in applicable state and federal laws and regulations:

All GCN staff are trained in the proper use of transferring and retaining of PII data. Subcontracting agencies are provided only the information needed to conduct their specific capacities, however in the case that increased access is required GCN will ensure or provide the necessary training as needed.

Initial CMB

4. Security Practices

- a. Where is the data stored? (described in such a manner as to protect data security)

Secure off-site Cloud Services

- b. The security protection practices taken to ensure data will be protected include:

All electronic information is stored within devices accessible only to GCN Staff or subcontracting agencies working on the behalf of GCN. The physical locations wherein information is stored remain under the full control of GCN Staff or the subcontracting agencies.

Encryption in Motion (HIPAA Compliant): All cloud services used for the transmission of PII utilize SSAE 16 audited data centers and use AES 256-bit encryption (SSL/TLS protocols) to comply with HIPAA standards.

Initial CMB

5. Contract Lifecycle Practices

- a. The agreement expires
- Upon written request

- b. When the agreement expires,

- i. How long will the student [or teacher or principal] data be retained?

Up to 10 years

- ii. How will the student data be disposed of?

Data wipe, backups/retention cleared after 3 daysInitial CMB

6. Encryption Practices

- a. Data encryption is applied in accordance with Education Law 2-d 5(f)(5)

Yes ☒ No ☐Initial CMB

7. Training Practices


- a. Annual training on federal and state law governing confidentiality is required for any officers, employees, or assignees who have access to student [or teacher or principal] data

Yes ☒ No ☐Initial CMBGlobal Compliance Network, Inc

Company Name

Craig M Boyles, Director of Operations

Print Name and Title



Signature of Provider

03/25/2024

Date