

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 is used by the district to support management of student information. Used by Mindex for issue troubleshooting upon request of the district via the BOCES

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2. Data Accuracy/Correction Practices

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

Contacting the school district. If the district requires Mindex to help with updating any information then they can do so via the BOCES who will submit a support request to Mindex.

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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:

AWS has a robust data privacy policy and a shared responsibility model. AWS secures the physical infrastructure and the vendor (Mindex) secures the logical infrastructure (VMs, etc.)
<https://aws.amazon.com/compliance/shared-responsibility-model/>

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4. Security Practices

- a. Where is the data stored? (described in such a manner as to protect data security)
AWS
- b. The security protection practices taken to ensure data will be protected include:

All data is encrypted at rest and in transit per Ed Law 2-d. Above and beyond NIST CSF, Mindex aligns to NIST 800-53 r5, the national recommendation for critical infrastructure such as Healthcare and Financial systems. You can read more about our approaches here:
<https://www.mindex.com/schooltool/data-security-and-cloud-hosting>

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5. Contract Lifecycle Practices

- a. The agreement expires _____
- b. When the agreement expires,
 - i. How long will the student [or teacher or principal] data be retained?
Data will be disposed within 30 days of contract expiry or termination
 - ii. How will the student data be disposed of?
Data is securely wiped from all infrastructure

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6. Encryption Practices

- a. Data encryption is applied in accordance with Education Law 2-d 5(f)(5)
Yes No

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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

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Mindex Technologies, Inc. _____

Company Name
Marc C Fiore President

Print Name and Title
Marc C Fiore

2/9/2024
Date