

### 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.

School Meter does not collect or store any student, teacher, or principal Personally Identifiable Information (PII) as defined by Education Law 2-d. Nor does School Meter collect or store student private educational records or confidential teacher or principal performance data. Data included in School Meter services are from public data sources such as the NYS School Report Card and ESSA Financial Transparency reports. These sources provide aggregated data that follow data suppression rules to ensure student and staff confidentiality. School Meter users are designated by the subscribing district and may include administrators, teachers, or other district staff. School Meter stores user contact information to assist with supporting users and resetting passwords.

Initial BT

2. Data Accuracy/Correction Practices

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

Not applicable. School Meter does not collect or store any student, teacher, or principal Personally Identifiable Information (PII) as defined by Education Law 2-d. Nor does School Meter collect or store student private educational records or confidential teacher or principal performance data. If a user suspects that there is an error in School Meter's publicly sourced data, they should contact School Meter support staff at support@schoolmeter.com or call 914-736-6599.

Initial BT

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:

Not applicable. Dark Horse does not use subcontractors for School Meter Services.

Initial BT

4. Security Practices

- a. Where is the data stored? (described in such a manner as to protect data security)  
Commercial cloud systems (e.g. AWS, GCS) and on encrypted storage at Dark Horse offices.
- b. The security protection practices taken to ensure data will be protected include:

School Meter does not collect or store any student, teacher, or principal Personally Identifiable Information (PII) as defined by Education Law 2-d. Data included in School Meter services are from public data sources. These sources provide aggregated data that follow data suppression rules to ensure student and staff confidentiality. School Meter is a password-protected site. Communication between a user and the School Meter site is via HTTPS, a widely used secure communication mechanism.

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5. Contract Lifecycle Practices

- a. The agreement expires 06/30/2026
- b. When the agreement expires,
  - i. How long will the student [or teacher or principal] data be retained?  
School Meter does not collect or store PII data.
  - ii. How will the student data be disposed of?  
School Meter does not collect or store PII data.

Initial BT

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

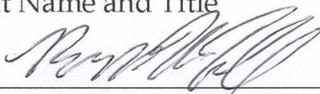
Initial BT

Dark Horse Systems, Inc. \_\_\_\_\_

Company Name

**Bruce Toll, President** \_\_\_\_\_

Print Name and Title

 \_\_\_\_\_

Signature of Provider

05/06/2025

Date