

Addendum D

Parents Bill of Rights for Data Privacy and Security

The District will publish its Parents' Bill of Rights for Data Privacy and Security (Bill of Rights) on its website. Additionally, the District will include the Bill of Rights with every contract or other written agreement it enters into with a third-party contractor under which the third-party contractor will receive student data or teacher or principal data from the District.

The District's Bill of Rights will state in clear and plain English terms that:

- a. A student's personal identifiable information (PII) cannot be sold or released for any commercial purposes;
- b. Parents have the right to inspect and review the complete contents of their child's education record;
- c. State and federal laws protect the confidentiality of PII, and safeguards associated with industry standards and best practices, including but not limited to encryption, firewalls, and password protection, must be in place when data is stored or transferred;
- d. A complete list of all student data elements collected by the state is available for public review at the following website <http://www.nysed.gov/student-data-privacy/student-data-inventory> or by writing to the Office of Information and Reporting Services, New York State Education Department, Room 865 EBA, 89 Washington Avenue, Albany, New York 12234; and
- e. Parents have the right to have complaints about possible breaches of student data addressed. Complaints should be directed in writing to Privacy Complaint, Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, New York 12234. Complaints may also be submitted using the form available at the following website <http://www.nysed.gov/student-data-privacy/form/report-improper-disclosure>. Parents can also send their written complaint to the Sullivan BOCES Data Protection Officer at 15 Sullivan Avenue, Suite 1, Liberty New York 12754

Addendum E

PARENTS' BILL OF RIGHTS - SUPPLEMENTAL INFORMATION ADDENDUM

1. **EXCLUSIVE PURPOSES FOR DATA USE:** The exclusive purposes for which “student data” or “teacher or principal data” (as those terms are defined in Education Law Section 2-d and collectively referred to as the “Confidential Data”) will be used by Amatrol, Inc. **the “Vendor”**) are limited to the purposes authorized in the contract between the Vendor and Sullivan County BOCES (**the “BOCES”**) dated 12/4/2025 (**the “Contract Date”**).

2. **SUBCONTRACTOR OVERSIGHT DETAILS:** The Vendor will ensure that any subcontractors, or other authorized persons or entities to whom the Vendor will disclose the Confidential Data, if any, are contractually required to abide by all applicable data protection and security requirements, including but not limited to, those outlined in applicable State and Federal laws and regulations (e.g., Family Educational Rights and Privacy Act (“FERPA”); Education Law § 2-d; 8 NYCRR § 121).

3. **CONTRACT PRACTICES:** The Contract commences and expires on the dates set forth in the Contract unless earlier terminated or renewed pursuant to the terms of the Contract. On or before the date the Contract expires, protected data will be exported to the BOCES in: (choose one)

<input checked="" type="checkbox"/>	The agreed upon format to BOCES (or)
<input type="checkbox"/>	Will be destroyed by the Vendor as directed by the BOCES

4. **DATA ACCURACY/CORRECTION PRACTICES:** A parent or eligible student can challenge the accuracy of any “education record”, as that term is defined in the FERPA, stored by the BOCES in a Vendor’s product and/or service by following the BOCES’s procedure for requesting the amendment of education records under the FERPA. Teachers and principals may be able to challenge the accuracy of APPR data stored by BOCES in the Vendor’s product and/or service by following the appeal procedure in the BOCES’s APPR Plan. Unless otherwise required above or by other applicable law, challenges to the accuracy of the Confidential Data shall not be permitted.

5. **SECURITY PRACTICES:** Confidential Data provided to the Vendor by the BOCES will be stored In the USA via Amazon Web Services AWS (**Insert Location**). The measures that the Vendor takes to protect Confidential Data will align with the NIST Cybersecurity Framework, including but not necessarily limited to, disk encryption, file encryption, firewalls, and password protection.

6. **ENCRYPTION PRACTICES:** The Vendor will apply encryption to the Confidential Data while in motion and at rest at least to the extent required by Education Law Section 2-d and other applicable law.

Addendum F

VENDOR'S DATA SECURITY AND PRIVACY PLAN

Current Status

Amatrol currently has VPAT documentation for our LMS and online content and is committed to transparency regarding our accessibility compliance. To enhance the accuracy and credibility of our accessibility reporting, we have partnered with A11y Is, LLC, a professional digital accessibility consulting firm, to conduct an independent, comprehensive assessment of our digital properties.

This engagement includes:

- Professional WCAG 2.2 AA accessibility audits conducted by certified accessibility experts using both automated tools and manual testing with assistive technologies
- An updated, professionally-validated Accessibility Conformance Report (ACR) using the VPAT format that reflects our current compliance status
- Identification of specific accessibility gaps and detailed remediation recommendations
- Creation of a strategic accessibility roadmap for ongoing compliance and continuous improvement

Timeline

Our accessibility assessment project is currently underway with the following detailed timeline:

Phase 1: Discovery and Assessment

Comprehensive WCAG 2.2 AA accessibility audits to be complete by end of November, 2025
Amatrol LMS interface
Selected course contents and interactive elements

Course quizzes and examinations

Phase 2: Analysis and Documentation

- Detailed accessibility issues documentation
- Accessibility Conformance Report (ACR) using VPAT format due early December, 2025

Phase 3: Strategic Planning

- Accessibility Action Plan (phased remediation approach) due end of December, 2025
- Strategic Accessibility Roadmap (long-term sustainability plan) due end of December, 2025

Amatrol has not yet completed a SOC 2 audit, and we have not selected an auditor at this time. However, SOC 2 compliance is a top priority for our organization, and we are actively preparing for this process.

Amatrol recognizes the importance of SOC 2 for ensuring the security, availability, and confidentiality of customer data. Our team is currently laying the groundwork to engage a qualified auditor and begin the formal audit process in the very near future.

Once an auditor has been selected, we will also have an Engagement Letter from the auditing firm. Amatrol will share this Engagement Letter with our customers as part of our commitment to transparency.

While we do not yet have a SOC 2 report to share, we are committed to achieving certification and will provide updates as milestones are reached. Our goal is to complete the audit as soon as possible and share the results with our customers promptly.

If you have any questions about our security practices or upcoming SOC 2 efforts, please feel free to reach out.

Amatrol appreciates your trust and partnership as we move forward with this important initiative.

