

EXHIBIT B

BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY - SUPPLEMENTAL INFORMATION FOR CONTRACTS THAT UTILIZE PERSONALLY IDENTIFIABLE INFORMATION

Pursuant to Education Law § 2-d and Section 121.3 of the Commissioner's Regulations, the Educational Agency (EA) is required to post information to its website about its contracts with third-party contractors that will receive Personally Identifiable Information (PII).

Name of Contractor	Character Strong, LLC
Description of the purpose(s) for which Contractor will receive/access PII	A comprehensive solution for character development, bullying prevention, and student safety.
Type of PII that Contractor will receive/access	Check all that apply: ☒ Student PII ☐ APPR Data
Contract Term	The Contract commences on the Effective Date (as defined in the Contract) and expires or terminates in accordance with the terms thereof.
Subcontractor Written Agreement Requirement	Contractor will not utilize subcontractors without a written contract that requires the subcontractors to adhere to, at a minimum, materially similar data protection obligations imposed on the contractor by state and federal laws and regulations, and the Contract. (check applicable option) ☐ Contractor will not utilize subcontractors. ☒ Contractor will utilize subcontractors.
Data Transition and Secure Destruction	Upon termination of this DPA, Contractor shall transfer PII agreed to by the Parties to the EA. Subject to any retention requirements necessary to comply with applicable law, Contractor shall ensure that PII is securely deleted and/or destroyed in a manner that does not allow it to be retrieved or retrievable, read or reconstructed. Contractor shall provide EA or member BOCES with a written certification of the secure deletion and/or destruction of PII held by the Contractor or Subcontractors.
Challenges to Data Accuracy	Parents or eligible students can inspect Student Data held by the Contractor by contacting the student's district of residence regarding procedures for requesting amendment of education records under the

	Family Educational Rights and Privacy Act (FERPA). Teachers or principals may be able to challenge the accuracy of APPR data provided to Contractor by following the appeal process in their employing school district's applicable APPR Plan.
Secure Storage and Data Security	Please describe where PII will be stored and the protections taken to ensure PII will be protected: (check all that apply) ☒ Using a cloud or infrastructure owned and hosted by a third party. ☐ Using Contractor owned and hosted solution ☐ Other:
Encryption	Contractor or if applicable its subcontractors must encrypt PII at rest and in transit as specified in Section 13402(H)(2) of P.L. 111-5 and in accordance with applicable New York laws and regulations.

CONTRACTOR	
[Signature]	<i>John Geiselman</i>
[Printed Name]	John Geiselman
[Title]	Vice President, Cyber Security
Date:	June 30, 2026