

**PARENT BILL OF RIGHTS FOR STUDENT
DATA PRIVACY AND SECURITY
THIRD PARTY CONTRACTOR SUPPLEMENT**

The Tools For Schools, Inc. has been engaged by the City School District of Albany to provide services. In this capacity, the company may collect, process, manage, store or analyze student and/or teacher/principal personally identifiable information (PII).

The Tools For Schools, Inc. will provide the district with Book Creator – online creation and publication of eBooks.

The Tools For Schools, Inc. will ensure that subcontractors or others that the company shares PII with will abide by data protection and security requirements of district policy, and state and federal law and regulations by ensuring that any and all sub-contractors are engaged in such way as to preserve the same obligations and protections outlined in this plan. The Tools For Schools, Inc. by entering into an Agreement with the School District acknowledges it has reviewed the relevant District policies on safeguarding PII, including but not limited to, Policy 8635 and Regulation 8635.

PII will be stored in Google-owned datacenters in the continental US. Detailed information about the administrative, technical and organisational protections can be found here: <https://cloud.google.com/security/>.

The Book Creator terms and privacy policy can be found here: <https://bookcreator.com/privacy-policy/>

Parents may challenge the accuracy of PII held by Tools For Schools, Inc. by contacting the educational agency who will contact Tools for Schools on their behalf.

The Tools For Schools, Inc. will take reasonable measures to ensure the confidentiality of PII by implementing the following (*describe the following, as applicable*):sc

- Password protections
- Administrative procedures
- Encryption while PII is in motion and at rest
- Firewalls

Other:_ All employees are vetted for working with student data.

Regular security audit conducted (quarterly). This includes user access review, information security policy adherence and both static and dynamic application security scans.

Regular penetration tests conducted (at least annually).

Data is encrypted at-rest and in-transit using industry standard mechanisms - see <https://cloud.google.com/security/>

Access to systems that store, process or transmit data is controlled by a role-based access system. Users are authenticated by this system using a strong password and two-factor authentication (not SMS-based).

Regular employee training (internally and by iKeepSafe) to ensure awareness of, and compliance with, COPPA, FERPA, GDPR, NY Education Law 2-d.

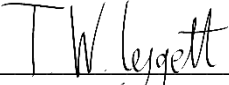
All data is stored in Google-owned datacenters in the continental US. Detailed information about the administrative, technical and organisational protections can be found here: <https://cloud.google.com/security/>.

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All data in flight sent using SSL/TLS. See <https://cloud.google.com/security/encryption-in-transit/> for more details.

Encryption at rest is AES 128/256 provided by Google Cloud: <https://cloud.google.com/security/encryption-at-rest/>.

The contractor's agreement with the district begins on 7/26/2022 and ends on 7/25/2023. Once the contractor has completed its service to the district, records containing student PII will be destroyed by data can be destroyed within 30 days of written request. via the following Data is removed from servers using NIST compliant secure deletion. Certification of deletion available on written request.



Authorized Representative
(insert name of contractor)

7/26/2022
Date