

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

The eDynamic Learning LLC (eDynamic) has been engaged by the City School District of Albany (School District) 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 eDynamic Learning LLC will provide the district with educational records including PII required to administer student progress in eDynamic Learning courses in the Learning Management System (Agilix Buzz).

The eDynamic Learning LLC 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 implementing, regularly reviewing and enforcing contractual obligations with subcontractors. Those contractual obligations include but not limited to:

1. Limitations on data use and disclosure (PII cannot be sold; access to PII is limited to system administrators and can only be used to provide the service; PII cannot be disclosed outside of specific exceptions outlined in FERPA)
2. Specific administrative controls that contractors must have in place that are consistent with eDynamic Learning administrative control policies (privacy training, background checks, password policies, breach notification obligations)
3. Data retention policy that accommodates right to be forgotten
4. Data security and encryption requirements

eDynamic Learning LLC 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 application databases hosted on Amazon AWS. eDynamic and its subcontractors follow recommended security best practices, prescribed by industry standards and hosting provider.

Parents may challenge the accuracy of PII held by eDynamic Learning by contacting School District that remains to be in control of data at all times. The School District can reach out to eDynamic for any privacy related enquiries at [privacy@edynamiclearning.com](mailto:privacy@edynamiclearning.com).

eDynamic will take reasonable measures to ensure the confidentiality of PII by implementing the following (*describe the following, as applicable*):

1. Password protections include:
  - a. Internal administrative password policies
  - b. Two-actor authentication for AWS access for admins
  - c. Optional Single Sign on features available to district users to authenticate students and teachers (SAML or CAS)

- d. Ability for district users to configure various minimal password policies for district users
2. Administrative procedures include:
  - a. Regular contract reviews
  - b. Scheduled Security reviews
  - c. Background checks on employees
  - d. Privacy training for employees that have access to customer PII
3. Encryption while PII is in motion and at rest:
  - a. We employ various encryption protocols to ensure data is encrypted in motion and at rest. This includes but not limited to: SL/TLS, AES256, encrypted storage volumes for encryption at rest
4. Firewalls:
  - a. Various types of network protection mechanism including:
    - DMZ Networks/ Firewalls;
    - Load balancers,
    - Network restricted access to databases
5. Other:
  - a. Managed Detection and Response Service (MDR), to reduce likelihood and reduce impact of cybersecurity attacks
  - b. Web applications include input validation, output encoding and other OWASP top best practices to protect against vulnerabilities

The contractor's agreement with the district begins on 01/01/2021 and ends on 01/01/2022. Once the contractor has completed its service to the district, records containing student PII will be hard deleted (destroyed) from all eDynamic systems and backups, within 90 days of the School District's verified written request for deletion. District is also able to export (return) any required student data using Buzz Reports and Agilix Buzz API.

CFO

*Bryan McGrath*

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Authorized Representative  
(insert name of contractor)

Feb 4, 2021

\_\_\_\_\_  
Date

**Bryan McGrath**

eDynamic Learning






# City School District of Albani - Third Party Contract Supplement PII Feb4

Final Audit Report

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