

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

The Honest Game Corporation 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 Honest Game Corporation will provide the district a license to use its SaaS product to evaluate School District's complete course guide and validate against the School District's current list of NCAA approved core courses. The Company will evaluate student academic data and provide a College Athletic Report on Eligibility (CARE®) to map out each student's plan towards NCAA and NAIA Qualifier status.

The Honest Game Corporation 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 all data is kept private and secure. The Company agrees to take appropriate administrative, technical, and physical safeguards reasonably designed to protect the security, privacy, confidentiality, and integrity of School District Data. The Company shall ensure that School District Data are secured and encrypted to the greatest extent practicable during use, storage and/or transmission. The Honest Game Corporation 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.

The Company agrees to store and process the School District Data in a manner that is no less protective than those methods used to secure the Company's own data. The Company agrees that School District Data will be stored on equipment or systems located within the United States.

Parents may challenge the accuracy of PII held by Honest Game Corporation by contacting Joyce Anderson, COO, 312.847.4711, 222 W. Merchandise Mart Plaza, Chicago, IL 60654.

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

- Password protections – The Honest Game Corporation offers Google Single Sign On, Clever Single Sign On and users may set their own unique password to log in using a district provided email address.
- Administrative procedures – each student's PII is private and protected. Only accounts identified by the district may have access to student PII, or only Honest Game Corporation key employees who must have access to student PII in order to provide software or services.
- The Company agrees to take appropriate administrative, technical, and physical safeguards reasonably designed to protect the security, privacy, confidentiality, and integrity of School District Data. The Company shall ensure that School District Data are secured and encrypted to the greatest extent practicable during use, storage and/or transmission.

- The Company agrees that it will implement and maintain security procedures and practices that, at a minimum, are designed to protect covered information from unauthorized access, destruction, use, modification, or disclosure that based on the sensitivity of the data and the risk from unauthorized access: (i) use technologies and methodologies that are consistent with the U.S. Department of Commerce’s National Institute of Standards and Technology’s Framework for Improving Critical Infrastructure Cybersecurity Version 1.1. and any updates to it; or (ii) maintain technical safeguards as they relate to the possession of covered information in a manner consistent with the provisions of 45 C.F.R. 164.312.

The contractor’s agreement with the district begins on May 1, 2023 and ends on April 30, 2024. Once the contractor has completed its service to the district, records containing student PII will be destroyed by September 1, 2024 in a secure manner and in such a manner that it is permanently irretrievable in the normal course of business. The only exception to the requirements is if the Company has express written consent from a student’s parent or legal guardian consenting to the maintenance of the covered information. In such case, the Company agrees to send written evidence of parental/guardian consent for any data maintained.



\_\_\_\_\_  
Joyce C. Anderson  
Authorized Representative  
(insert name of contractor)

\_\_\_\_\_  
4/25/23  
Date