

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

**Lightspeed Solutions, LLC dba Lightspeed Systems (“Lightspeed Systems”)** 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).

Lightspeed Systems will provide the district with the requested Lightspeed Systems service and data will be used for the purpose for which it was collected and to fulfill contractual obligations

Lightspeed Systems 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 conducting comprehensive pre-engagement and ongoing vendor assessments for all our sub-contractors, to ensure that they have the proper data privacy & security practices. Thereafter, we enter into written agreements with our sub-contractors which bind them to strict data privacy and security standards. . Lightspeed Systems, 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 secure data centers located in the United States, which hold SOC 2, HIPPA, PCI DSS and ISO 27001 certifications. Lightspeed Systems has a process in place to log, monitor, and respond to events and anomalies in its systems and solutions. Data backup and recovery solutions are also in place.

Parents may challenge the accuracy of PII held by Lightspeed Systems by contacting Lightspeed Systems Privacy Department

Attention: Data Protection Officer  
2500 Bee Cave Road, Building One Suite 350,  
Austin, TX 78746  
Email: [privacy@lightspeedsystems.com](mailto:privacy@lightspeedsystems.com)  
Tel: 737.205.2500

Please note that Lightspeed Systems does not have direct contact with Parents, and will fulfill all Data Subject Access Requests (DSARs) through verified requests from the School.

Lightspeed Systems will take reasonable measures to ensure the confidentiality of PII by implementing the following:

- Password protections:
  - Lightspeed Systems has implemented a Password Policy, which requires strong password controls, and restricted access to administrative accounts.
- Administrative procedures:
  - All Lightspeed Systems employees undergo background checks and sign a non-disclosure agreement before hire. They are also required to undertake privacy and security training, which covers privacy practices and the principles that apply to

employee handling of personal information, including the need to place limitations on using, accessing, sharing and retaining personal information.

- Lightspeed Systems reviews its systems against the CIS Controls and NIST Frameworks, and any identified risks or gaps are addressed accordingly.
- Lightspeed Systems has a designated Data Governance team that holds quarterly meetings to ensure data integrity.
- The following policy documents have been instituted and implemented across the organization: Security Policy, Incident Response Plan, Vulnerability Remediation Policy, Patch Policy, IT Standards Policy, Data Classification Policy, Data Deletion Policy, Vendor Assessment Policy, Vendor Security Standards Verification Procedure, Password Policy, Clean Desk Policy, Privacy Inquiry Policy, Data Governance Policy, Building Access Policy and PIA & DPIA Procedure.
- Lightspeed Systems has a written Incident Response Plan which details the processes for detecting, reporting, identifying, analyzing, and responding to Security Incidents impacting Lightspeed Systems networks and Customer Data.
  - If Lightspeed Systems learns of a data breach, Lightspeed Systems will follow our Incident Response Plan and notify our customers without undue delay.
- Encryption while PII is in motion and at rest – Data is encrypted in transit and at rest.
- Firewalls are in place at all office and data centers. These are monitored and regularly updated.
- Other: Please see our [Security & Compliance](#) page for more details on our data privacy and security practices.

The contractor's agreement with the district begins on 06/10/2021 and ends on 08/10/2021. Once the contractor has completed its service to the district, and upon receiving a verified request from the District, records containing student PII will be destroyed according to our Data Deletion Policy or returned in CSV format

**BY LIGHTSPEED SYSTEMS**



---

Signature

Gregory Funk, VP Corporate Controller  
Authorized Representative

10-Jun-2021

---

Date