VICTOR CENTRAL
SCHOOL DISTRICT

953 High Street, Victor, New York 14564 www.victorschools.org p 585.924.3252

Parents Bill of Rights

The Victor Central School District is committed to protecting the privacy and security of student data and teacher and principal data. In accordance with New York Education law Section 2-d and its implementing regulations, the District informs the school community of the following:

1. A student's personally identifiable information cannot be sold or released for any commercial purposes.
2. Parents have the right to inspect and review the complete contents of their child's education record.
3. State and federal laws protect the confidentiality of personally identifiable information, and safeguards associated with industry standards and best practices, including but not limited to encryption, firewalls, and password protection, must be in place when data is stored or transferred.
4. A complete list of all student data elements collected by New York State is available for public review at the website http://www.nysed.gov/data-privacy-security/student-data-inventory or by writing to the Office of Information and Reporting Services, New York State Education Department, Room 865 EBA, 89 Washington Avenue, Albany, New York 12234.
5. Parents have the right to have complaints about possible breaches of student data addressed. Complaints should be directed in writing to Privacy Complaint, Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, New York 12234. Complaints may also be submitted using the form available at the following website http://www.nysed.gov/data-privacy-security/report-improper-disclosure

Company Name: Zaner-Bloser, Inc.

Supplemental Information Regarding Third-Party Contractors

In the course of complying with its obligations under the law and providing educational services, Victor Central School District has entered into agreements with certain third-party contractors. Pursuant to such agreements, third-party contractors may have access to "student data" and/or "teacher or principal data," as those terms are defined by law. Each contract the Victor Central School District enters into with a third party contractor where the third party contractor receives student data or teacher or principal data will include the following information:

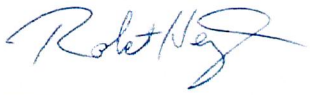
(l) the exclusive purposes for which the student data or teacher or principal data will be used;

(2) how the third party contractor will ensure that the subcontractors, persons or entities that the third party contractor will share the student data or teacher or principal data with, if any, will abide by data protection and security requirements;

(3) when the agreement expires and what happens to the student data or teacher or principal data upon expiration of the agreement;

(4) if and how a parent, student, eligible student, teacher or principal may challenge the accuracy of the student data or teacher or principal data that is collected; and

(5) where the student data or teacher or principal data will be stored (described in such a manner as to protect data security), and the security protections taken to ensure such data will be protected, including whether such data will be encrypted.



Company Signature

VP, Operations

Title

May 31, 2022

Date

Zaner-Bloser, Inc.

Company

TECHNOLOGY SAFEGUARDS – MYZBPORTAL.COM

School data and PII:

MyZBPortal.com collects the following student PII (personally identifiable information):

- Student first name (provided by district/school/institution)
- Student last name (provided by district/school/institution)
- Student ID (provided by district/school/institution)
- IP address
- Student score data (from completing online activities)

We only collect IP addresses for traffic and security monitoring purposes and delete these logs regularly (typically every other month). Schools can also request to delete these IP logs by submitting a request in writing to ZB Customer Experience.

- We do not sell student information.
- We do not target students with advertisements.
- We only request and use student personal information for legitimate business reasons.

Data encryption:

Stored data (i.e. data at rest) is stored securely on an encrypted drive. Data on backup storage is encrypted using AES 256-bit encryption. Data 'in-transit' is encrypted using well-known technologies such as "Secure Sockets Layer (SSL)" or "Transport Layer Security (TLS)". In-transit encryption is end-to-end from the client web browser through our cloud network. These protocols ensure privacy between communicating applications and their users on the Internet. When a server and client communicate, these technologies ensure that no third party may eavesdrop or tamper with any message.

Data retention:

At any time, an account administrator may request to purge school data (such as student and/or teacher information). This action will be performed by a ZB representative. School information will remain on backup storage for disaster recovery purposes for another 15 days, but thereafter will be removed completely from all storage devices. Schools can request to delete school data submitting a request in writing to ZB Customer Experience.

Data access:

Only authorized individuals are provided access to our systems. A username and password must be input and authenticated prior to gaining access to any information. Passwords use one-way salted hashes and technical support does not have access to a user's password. Passwords are **never** transmitted using insecure communication protocols. Access by Company's support personnel is based on "least privileged" and "need to know" basis. While some Company support personnel generate usage reports and have access to data for analytics, none of the resultant data contains Personally Identifiable Information (PII).

System hosting:

Our systems (servers and data) are currently hosted on dedicated machines in secured facilities at a third-party hosting provider located in the United States.

TECHNOLOGY SAFEGUARDS – MYZBPORTAL.COM

Perimeter security:

Firewalls and perimeter detection systems have been designed and deployed to help detect and prevent unauthorized access into our systems.

Vulnerabilities and patching:

We routinely scan our systems for vulnerabilities. The vulnerabilities are reviewed and addressed/patched as appropriate.

Zaner-Bloser, Inc. Security Incident Response Process

The following denotes the high-level steps to be followed when a potential security issue is suspected, reported, or detected. In case of an actual *security incident*, detailed procedures for each of the steps will be carried out based upon the type and/or nature of the incident.

Assessment

- Assess the potential security issue and all pertinent information to determine if the event is an actual security incident.

  Note: This process will stop here if it is determined that the reported issue was not an actual security incident and no breach occurred
- Determine if any *Cardholder Data* is involved
- Create a Security Incident Report Form and document the preliminary findings
- Notify (via email) SIRT at: SIRT@highlights.com and the Information Security Steering committee (ISSC) at: ISSC@Highlights.com that an actual security incident has occurred
- If necessary, notify the user(s) of the affected device, system or network that a problem has occurred and access and/or usage must be limited and/or halted until the problem is resolved
- Document ongoing analysis as appropriate on the Security Incident Response Form

Containment

- If *Cardholder Data* (CHD) is involved:
  - Do not access or alter compromised system(s) (e.g., do not log on to the compromised system(s) and change passwords; do not log in with administrative credentials). The compromised system(s) must be taken offline immediately and not be used to process payments or interface with payment processing systems.
  - Do not turn off, restart, or reboot the compromised system(s). Instead, isolate the compromised systems(s) from the rest of the network by unplugging the network cable(s) or through other means.
  - Preserve all evidence and logs (e.g. original evidence such as forensic image of systems and malware, security events, web logs, database logs, firewall logs, etc.).
  - Await further instruction from the ISSC or the V.P., Government Relations, Information Security and Privacy before proceeding with this process
- If *Cardholder Data* (CHD) is not involved:
  - Determine if it is necessary to disconnect the device from the Internet and/or the network
  - Determine if it is necessary to shut down the affected device, system, or network

    - Preserve all evidence and logs (e.g. original evidence such as forensic image of systems and malware, security events, web logs, database logs, firewall logs, etc.).
- Document and track all actions taken to contain the *security incident* on the Security Incident Response Form

Eradication

- Eradicate the problem that is affecting the device, system or network
- Determine whether disk drives should be cleaned/reformatted
- Ensure that previous device, system, and/or network file backups are not infected and take appropriate action
- Document and track all actions taken to eradicate all issues related to the security incident on the Security Incident Response Form

Restoration

- Decide whether the device, system and/or network needs to be restored from previous uninfected file backups
- Perform recovery procedures/processes as required
- Document and track all actions taken to restore workstation, network, system, etc. to its normal state on the Security Incident Response Form

Communication and Notification

- Communicate the appropriate information to the appropriate senior management personnel regarding the occurrence of the security incident (if a breach occurred)
- As warranted, notify the appropriate external entities (law enforcement, federal agency, state agency, Office of the Privacy Commissioner of Canada, payment card brands, payment card acquirers, customers, etc.) regarding the occurrence of the security incident (if a breach occurred involving credit card information or other personally identifiable information)
- If a user's workstation has to be reimaged due to a security incident, the user's manager will be notified and a copy of the Security Incident Response Form sent to the manager

Closure

- Ensure that the incident response process and the Cardholder Data Security Breach Response Process is updated with all lessons-learned and all appropriate industry developments regarding security incident or security breach response
- Ensure that all documentation, data, and/or information related to the security incident has been captured and is securely stored
- Ensure that all appropriate internal and external communication has been conducted as required