

EXHIBIT A - Bill of Rights for Data Security and Privacy
Cheektowaga-Sloan Union Free School District

PARENTS' BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY

The Cheektowaga-Sloan Union Free School Client 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 Client 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 records.
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 following website <http://www.nysed.gov/student-data-privacy/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.

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/student-data-privacy/form/report-improper-disclosure>.

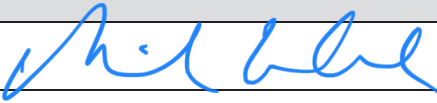
| CONTRACTOR | |
|----------------|--|
| [Signature] |  |
| [Printed Name] | Nicholas Gaehde |
| [Title] | President |
| Date: | 27-April-2023 |

EXHIBIT B

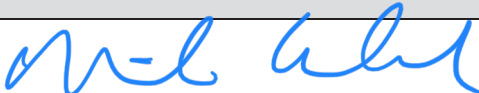
BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY -

SUPPLEMENTAL INFORMATION FOR CONTRACTS THAT UTILIZE PERSONALLY IDENTIFIABLE INFORMATION

Pursuant to Education Law § 2-d and Section 121.3 of the Commissioner's Regulations, the Educational Agency (EA) is required to post information to its website about its contracts with third-party contractors that will receive Personally Identifiable Information (PII).

| | |
|---|--|
| Name of Contractor | Lexia Learning Systems LLC |
| Description of the purpose(s) for which Contractor will receive/access PII | For the operation of Lexia's literacy skills development software-as-a-service. |
| Type of PII that Contractor will receive/access | <p>Check all that apply:</p> <p><input checked="" type="checkbox"/> X Student PII</p> <p><input type="checkbox"/> APPR Data</p> |
| Contract Term | <p>Contract Start Date 08/01/2023</p> <p>Contract End Date 07/31/2024</p> |
| Subcontractor Written Agreement Requirement | <p>Contractor will not utilize subcontractors without a written contract that requires the subcontractors to adhere to, at a minimum, materially similar data protection obligations imposed on the contractor by state and federal laws and regulations, and the Contract. (check applicable option)</p> <p><input checked="" type="checkbox"/> X Contractor will not utilize subcontractors.</p> <p><input type="checkbox"/> Contractor will utilize subcontractors.</p> |
| Data Transition and Secure Destruction | <p>Upon expiration or termination of the Contract, Contractor shall:</p> <ul style="list-style-type: none"> Securely transfer data to EA, or a successor contractor at the EA's option and written discretion, in a format agreed to by the parties. Securely delete and destroy data. |

| | |
|---|---|
| | |
| Challenges to Data Accuracy | Parents, teachers or principals who seek to challenge the accuracy of PII will do so by contacting the EA. If a correction to data is deemed necessary, the EA will notify Contractor. Contractor agrees to facilitate such corrections within 21 days of receiving the EA's written request. |
| Secure Storage and Data Security | <p>Please describe where PII will be stored and the protections taken to ensure PII will be protected: (check all that apply)</p> <p><input checked="" type="checkbox"/> X Using a cloud or infrastructure owned and hosted by a third party.</p> <p><input type="checkbox"/> Using Contractor owned and hosted solution</p> <p><input type="checkbox"/> Other:</p> <p>Please describe how data security and privacy risks will be mitigated in a manner that does not compromise the security of the data:</p> <p>Lexia Learning Systems LLC is ISO-27001 certified. We have a robust information security management systems (ISMS) which includes all of the management clauses of that ISO-27001 security framework and the 114 controls found in Annex A of the framework. Some highlights of our ISMS are:</p> <ul style="list-style-type: none"> • 30 security policies including Information Security Policy, Acceptable Use Policy, Security Incident Response Policy and Procedure, Vendor Risk Management Policy, etc. • User access management processes and procedures. • Encryption of data at rest and in transit. • Use of firewalls. • Immutable daily backups. • Business continuity plans. • Disaster recovery plans. • Security training for all employees and contractors. • Change Management Process. • Vulnerability management program with scans of network, dynamic application security testing (DAST). |
| Encryption | Data will be encrypted while in motion and at rest. |

| CONTRACTOR | |
|----------------|--|
| [Signature] |  |
| [Printed Name] | Nicholas Gaehde |
| [Title] | President |

| | |
|--------------|---------------|
| Date: | 27-April-2023 |
|--------------|---------------|