



DATA PRIVACY PLAN



Plan Highlights



Lifetouch complies with federal, state, and local data security and privacy requirements.

As a service provider of staff and student photography for the schools we serve, Lifetouch acknowledges its obligations under the federal Family Educational Rights and Privacy Act (FERPA), as well as applicable state laws.



Lifetouch uses a variety of safeguards to protect School Data. Lifetouch has implemented a variety of physical, technical, and organizational security measures to help protect School Data from unauthorized access and use. These safeguards are in place and focus on our facilities, networks, personnel, and enterprise-wide policies.



Lifetouch limits the disclosure of student data to authorized recipients. Lifetouch limits disclosure of student data to the individuals and organizations that have a legitimate interest in the data or who help Lifetouch fulfill our contracts with schools and districts.



Lifetouch sets strict security requirements for our third-party vendors. Lifetouch does not use third-party contractors to photograph students or manufacture our products. However, Lifetouch may use vendors to help provide our services (for example, data management). All Lifetouch vendors who have access to School Data are required to implement the same data privacy commitments.



Lifetouch has robust privacy and security training programs for all employees who handle School Data. Lifetouch has a robust internal team of dedicated privacy professionals, including the Lifetouch Privacy Office and the Lifetouch Information Security Office, who is responsible for ensuring that Lifetouch employees abide by all relevant laws when handling School Data.



Lifetouch has a comprehensive response plan for managing data security and privacy incidents and notifying our schools and regulators. The Lifetouch Privacy Office and Lifetouch Information Security Office work in tandem to maintain a robust incident management program designed to ensure compliance with all statutory and contractual breach notification obligations.



Lifetouch securely disposes of school data when it is no longer needed. School Data is securely destroyed on demand by the school, or in the ordinary course of business when no longer needed to provide school services. Families who purchase products or services from Lifetouch will still have access to their images.

▶ Read our privacy notice at <https://lifetouch.com/privacy/>