

INTERNATIONAL LEADERSHIP OF TEXAS BOARD POLICY MANUAL

POLICY GROUP 3 – STUDENTS STUDENT DATA PRIVACY

PG-3.5

Sec. 1. PURPOSE

This policy outlines the procedures and guidelines for the collection, use, and protection of student data in compliance with relevant laws and regulations.

Sec. 2. SCOPE

This policy applies to all student data collected, maintained, or used by International Leadership of Texas (“ILTexas”), its employees, contractors, and third-party service providers.

Sec. 3. DATA COLLECTION AND USE

- a) **Consent:** When partnering with commercial websites and online services directed to children that collect, use, or disclose personal information from children, or on whose behalf such information is collected or maintained, ILTexas will obtain written consent from parents or guardians before collecting any personally identifiable information (PII) from students. In accordance with the Children’s Online Privacy Protection Act (“COPPA”), ILTexas is authorized to provide consent for students under the age of 13 when the collection of student information is for the use and benefit of the school and for no other commercial purpose.
- b) **Purpose:** Student data will only be collected for legitimate educational purposes, including but not limited to academic assessment, instruction, and administrative activities, and to comply with legal requirements regarding student information in accordance with applicable federal and state law.
- c) **Privacy:** Student data will be maintained in a private manner consistent with the Family Educational Rights and Privacy Act (“FERPA”) and other applicable law.
- d) **Access Control:** Access to student data will be restricted to authorized personnel with a legitimate educational interest.
- e) **Third-Party Providers:** Before engaging with third-party service providers, ILTexas will ensure that they comply with relevant data protection laws and have adequate security measures in place.
- f) **Data Sharing:** Student data will not be disclosed to third parties except as required by law or with parental consent.

Sec. 4. DATA SECURITY

- a) **Technical Safeguards:** ILTexas will implement appropriate technical measures to protect student data from unauthorized access, disclosure, alteration, and destruction.

**INTERNATIONAL LEADERSHIP OF TEXAS BOARD POLICY
MANUAL
POLICY GROUP 3 – STUDENTS
STUDENT DATA PRIVACY**

PG-3.5

- b) **Encryption:** Student data will be encrypted both in transit and at rest to mitigate the risk of interception or unauthorized access.
- c) **Training:** All employees and contractors who handle student data will receive regular training on data privacy and security best practices.
- d) **Incident Response:** In the event of a data breach or security incident involving student data, ILTexas will promptly notify affected individuals and authorities as required by law.

Sec. 5. DATA RETENTION AND DISPOSAL

- a) **Retention Period:** Student data will be retained only for as long as necessary to fulfill the purposes for which it was collected, or as required by law or regulatory obligations.
- b) **Disposal:** When student data is no longer needed, it will be securely disposed of using methods that render it unreadable and irretrievable.

Sec. 6. PARENT/GUARDIAN RIGHTS

- a) **Access:** Parents or guardians have the right to review and request corrections to their child's educational records, including student data, in accordance with FERPA.
- b) **Opt-Out:** Parents or guardians may opt out of the collection of certain types of student data or the sharing of data with third parties, where permitted by law.

Sec. 7. COMPLIANCE AND OVERSIGHT

- a) **Compliance Officer:** The Superintendent or designee is authorized to designate a compliance officer responsible for ensuring adherence to this policy and relevant data protection laws. The Superintendent or designee, or the designated Compliance Officer, may implement administrative regulations consistent with this policy to facilitate implementation of student data privacy standards.
- b) **Audits and Assessments:** Regular audits and assessments of data privacy practices will be conducted to ensure compliance with this policy and relevant regulations.
- c) **Policy Review:** This policy will be reviewed and updated periodically to reflect changes in technology, legal requirements, and best practices.

Sec. 8. DURATION

This policy shall remain in effect until amended, revised, or rescinded by the Board of Directors.