

**NORMAN HOWARD SCHOOL
DATA SECURITY AND PRIVACY
PARENTS' BILL OF RIGHTS**

In accordance with the requirements of New York Education Law § 2-d, The Norman Howard School ("School") provides a Parents' Bill of Rights with respect to maintaining the privacy and security of student data.

1. A student's personally identifiable information (PII) cannot be sold or released for any commercial purposes.
2. The School assures that the confidentiality of electronically stored PII is protected using safeguards that comport with industry standards and best practices, including but not limited to, encryption, secure firewalls, and password protection when student data is stored or transferred.
3. Parents have a right to inspect and review the complete contents of the student's educational record, including portions of the record that are stored electronically, even when the record is maintained by a third-party contractor.
4. Parents have a right to review a complete list of all student data elements collected by the New York State Education Department ("NYSED"), published on NYSED's website at <http://www.p12.nysed.gov/irs/sirs/documentation/NYSEDstudentData.xlsx>. Parents may obtain a copy of this list by writing to the Office of Information & Reporting Services, New York State Education Department, Room 863 EBA, 89 Washington Avenue, Albany, NY 12234.
5. Parents have the right to file written complaints with the School about possible privacy breaches of student data by the School's third-party contractors or their employees, officers, or assignees, or with NYSED. Complaints to the School may be submitted to the School's Data Protection Officer, Nick Fagnoli, and can be submitted via email at nfagnoli@normanhoward.org or by mail at Nick Fagnoli, Data Protection Officer, The Norman Howard School, 275 Pinnacle Road, Rochester, New York 14623.
6. Complaints to NYSED should be directed in writing to the Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany NY 12234, emailed to CPO@mail.nysed.gov.

If The Norman Howard School enters into a third-party contract in which the service provider receives student data or teacher or principal data in order to provide a needed service for the school, supplemental information shall be developed and provided to

parents that states:

7. The exclusive purposes for which the student data or teacher or principal data will be used;
8. 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;
9. When the agreement expires and what happens to the student data or teacher or principal data upon expiration of the agreement;
10. 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
11. Where the student data or teacher or principal data will be stored and the security protections taken to ensure such data will be protected, including whether such data will be encrypted.

If you have any further questions or concerns, please contact the School's Data Protection Officer, Nick Fagnoli, via email at nfagnoli@normanhoward.org or by mail at Nick Fagnoli, Data Protection Officer, The Norman Howard School, 275 Pinnacle Road, Rochester, New York 14623.