

Accelerate Learning Inc. (“ALI”)

Student Information Privacy Policy AS-4.1

Policy Statement: ALI has adopted this policy to ensure that student information is protected as required by state and federal laws.

1. Pupil records continue to be the property of, and under the control of, the licensing Education Agency.
2. All information collected or provided, will not be sold, re-sold or used for targeted advertising, and will be handled in accordance with the Family Educational Rights and Privacy Act (“FERPA”), and will not be provided, transmitted or used outside of ALI.
3. ALI will not use any information in the pupil record for any purpose other than those required or specifically permitted by the contract.
4. ALI may track, collect, and store data regarding how teachers and students use the Content and STEMscopes System for purposes of analyzing usage of these resources, providing feedback to users, continuing to improve the quality and effectiveness of the product. Internal data is stored as accumulated statistics, which does not permit personal identification of students or teachers. Such unidentifiable statistics may be disseminated for scholarly research and publications intended for the improvement of teaching and learning.
5. ALI’s System requires minimal pupil information.
 - a. The system does not store pupil data related to the Free and Reduced Lunch status or ethnicity.
 - b. The Education Agency determines how much and the content of the information it submits to the system. Student ID, School ID, Student Name and Grade Level are the only required fields. If an Education Agency wishes to implement automatic assignment of students to sections within the ALI System; fields Course ID and Teacher ID are required with the Course Period being an optional field. Any changes to this information are logged, as the system provides and maintains the student information.
6. Education Agency data integration with ALI:
 - a. Districts are able to enter their data directly into the system or merge through many different file submission and API methods that are supported. These tasks are completed by the Education Agency’s staff, using the user id and password assigned by the Education Agency.
 - b. Files submitted to the system, are prepared by the Education Agency’s personnel.
 - c. File submissions are facilitated through a private, secure file transfer protocol (“SFTP”) area not shared with any other resource.
 - d. All actions can be performed without the assistance of ALI staff.

- e. If a district has a firewall issue, needs assistance with how to automate the SFTP submissions, or any other circumstance, ALI's technical staff is trained to provide the Education Agency with assistance.
 - f. ALI allows an Education Agency to control the amount of student information provided, where only the required fields need be provided.
7. Student Access Credential Information
- a. The Education Agency provisions student User IDs and Passwords required for all users.
 - b. Single Sign On ("SSO"): If an Education Agency utilizes an identity management solution, ALI will work with the Education Agency staff to implement this integration into the STEMscopes platform.
8. ALI's cloud service provider is CBTS. This infrastructure has SSAE 18 and PCI DSS Level 3 certifications. Audits comply with International Organization for Standardization (ISO) 27001/2 and with the Statement on Standards for Attestation Engagements (SSAE) No. 16, Reporting on Controls at a Service Organization.
- a. Data Center Physical Security Program is in place and undergoes an annual PCI audit.
 - b. Conditioned UPS power, via multiple redundant APC UPS units.
 - c. Uninterrupted and automatic transfer of power via high capacity Automatic Transfer Switch from UPS to generator. Two diesel generators
 - d. 48 hour run capability before refueling, with re-supply agreements with diesel providers.
 - e. CBTS Employee access to customer systems is strictly controlled as required by SOC 1 Control 2.2 and SOC 1 Control 6.19.
9. Disaster/Recovery
- a. Backups are performed daily at the application and user levels.
 - b. Multiple backups are stored at the primary and secondary locations.
 - c. Primary location facilitates automatic failover.
10. Data Retention/Exportation after Service Termination
- a. ALI certifies that a pupil's records shall not be retained or available to ALI upon completion of the terms of the contract.
 - b. ALI will delete all client information. This will include production and backup data repositories.
 - c. When this action is completed, the Education Agency's assigned system administrator will receive an email this task has been completed.
 - d. The Education Agency may request their data to be exported and provided to them for their own internal use.
11. Breach of Information
- a. If a breach of student information occurs, ALI will notify the assigned Education Agency staff by email and phone. The details of a breach will be provided as they are discovered.