

## Data Security and Privacy Plan

*As per the Agreement between the undersigned and the Hewlett-Woodmere Union Free School District, this plan must be completed by the Service Provider within 10 days of execution of the Agreement.*

### 1. Exclusive Purposes for Data Use

- a. Please list the exclusive purposes for which the student data [or teacher or principal data] will be used by the service provider include.

The data is used exclusively to assess student progress according to their IEP goals.

Initial SS

### 2. Data Accuracy/Correction Practices

- a. Parent [student, eligible student, teacher or principal] may challenge the accuracy of the data by...

Parents or school officials may challenge information by contacting the program directly by calling (631) 608-5012 or emailing thughes@northwell.edu.

Initial SS

### 3. Subcontractor Oversight Details

- a. This contract has subcontractors: Yes \_\_\_\_\_ No  \_\_\_\_\_  
b. Describe how the contractor will ensure subcontractors abide by data protection and security requirements, including but not limited to those outlined in applicable state and federal laws and regulations:

Subcontractors are not used.

Initial BS

4. Security Practices

- a. Where is the data stored? (described in such a manner as to protect data security)  
See below.
- b. The security protection practices taken to ensure data will be protected include:

a) Information is initially collected on paper which are then scanned and saved to Northwell's secure, HIPAA compliant, Office 365 SharePoint Online site. Once the documents are scanned, the paper copies are shredded.

b) SharePoint Online is within Northwell's tenancy and is protected with Microsoft's security controls, including firewalls, intrusion detection/prevention, and other security technologies. Access to the site is limited to those users who are specifically authorized, access is logged, and account lockout features are in place.

5. Contract Lifecycle Practices

- a. The agreement expires June 30, 2021<sup>AC</sup>
- b. When the agreement expires,
  - i. How long is the student data [or teacher or principal data] retained?  
Data is retained for 7 years.
  - ii. How is the student data disposed? Files are deleted after the 7 year retention period.

6. Encryption Practices

- a. Data encryption is applied in accordance with Education Law 2-d 5(f)(5)  
Yes  No  Initial BS

7. Training Practices

- a. Annual training on federal and state law governing confidentiality is provided for all officers, employees, or assignees who have access to student [or teacher or principal data]  
Yes  No  Initial BS

Company Name  
Brian Brinowicz

Print Name and Title

Signature of Provider  
Brian Brinowicz

Date  
1/20/2021

Return to:  
XXXXXX