

## **Data Privacy and Security Policy**

Global Concepts Charter School (“the School”) acknowledges its responsibility to adopt appropriate administrative, technical and physical safeguards and controls to protect and maintain the confidentiality, integrity and availability of its data, data systems and information technology resources.

Application: The policy applies to School employees, interns, volunteers, and consultants, and third-parties who receive or have access to School’s data and/or data systems.

This policy encompasses all systems, automated and manual, including systems managed or hosted by third parties on behalf of the School and it addresses all information, regardless of the form or format, which is created or used in support of the activities of the School.

This policy shall be published on the School website and notice of its existence shall be provided to all officers and employees of the School.

Data Protection Officer: The School appoints Jason Zuba as its Data Protection Officer. The Data Protection Officer is responsible for the implementation of this policy.

Standard: The School will utilize the National Institute of Standards and Technology’s Cybersecurity Framework 1.1 (NIST CSF or Framework) as the standard for its Data Privacy and Security Program.

### Data Privacy and Security:

- It is the School’s policy to provide all protections afforded to parents and persons in parental relationships, or students where applicable, required under the Family Educational Rights and Privacy Act, the Individuals with Disabilities Education Act, and the federal regulations implementing such statutes. Therefore, the School shall ensure that its contracts require that the confidentiality of student data or teacher or principal data be maintained in accordance with federal and state law and this policy;
- Every use and disclosure of personally identifiable information by the School shall benefit students and the educational agency (e.g., improve academic achievement, empower parents and students with information, and/or advance efficient and effective school operations);
- Personally identifiable information shall not be included in public reports or other public documents.

Agreements with Third Party Contractors: For each contract entered into by the School with a third-party contractor where student, teacher or principal personally identifiable information is shared, the School will ensure that the contractor maintains a security and privacy plan that complies with the requirements of NYS Education Law Section 2-d, and shall include the School’s Parents Bill of Rights in the contract.

Complaints of Breach or Unauthorized Release of Personally Identifiable Information: Parents, eligible students, and staff should bring any complaints regarding breaches or unauthorized releases of student, teacher or principal personally identifiable information to the attention of the School's Data Protection Officer. Complaints must be made in writing and must be submitted to Jason Zuba, Data Protection Officer, Global Concepts Charter School, 1159 Abbott Road, Buffalo, NY 14220; or by email to [jzuba@globalccs.org](mailto:jzuba@globalccs.org).

Upon receipt of a complaint, the School will promptly acknowledge receipt, commence an investigation, and take the necessary precautions to protect personally identifiable information. Upon the completion of the investigation, the School will share its findings with the complainant. Results will be generally be shared within 60 days of the complaint, unless additional time is necessary, or where a response may compromise security or impede a law enforcement investigation.

The School will maintain a record of all complaints of breaches or unauthorized releases of student data and their disposition in accordance with applicable data retention policies, including the Records Retention and Disposition Schedule ED-1.

Complaints can also be submitted to the Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234; by email to [privacy@nysed.gov](mailto:privacy@nysed.gov); or by telephone at 518-474-0937.