

ACCESS 7 EDUCATIONAL SERVICES

Data Privacy & Security Plan

& Parents' / Students' Bill of Rights for Data Privacy & Security

Last Updated: [October 9, 2025]

INTRODUCTION

Access 7 Educational Services ("Access 7") values the trust placed in us by school districts, students, and families. We are committed to safeguarding sensitive student data in compliance with applicable federal, state, and local laws, including (where applicable) FERPA (Family Educational Rights and Privacy Act) and relevant state student-data privacy statutes.

To fulfill these obligations, Access 7 has implemented a data protection and cybersecurity program aligned with recognized frameworks (e.g. NIST Cybersecurity Framework) and industry best practices. This document describes our commitments, safeguards, and rights afforded to students and families.

Article I: Privacy & Security of Personally Identifiable Information (PII)

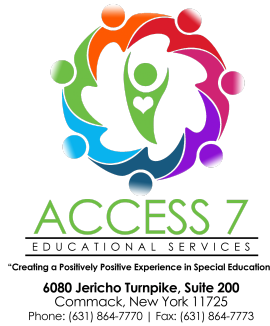
1. Purpose of Data Use

Access 7 will use student data only for purposes consistent with its contracts with school districts or agencies (e.g. delivery of educational services, reporting, analytics, support). We will not use PII for unauthorized or secondary commercial purposes.

(Access 7 will use student data only for purposes consistent with its contracts with school districts or agencies (e.g., delivery of educational services, reporting, analytics, support). We will not sell or release PII for any commercial purpose, including targeted advertising, or for unauthorized or secondary commercial purposes.)

2. Security Safeguards & Controls

To protect the confidentiality, integrity, and availability of PII, Access 7 employs



administrative, technical, and physical safeguards, including (but not limited to):

- Encryption of data in transit and at rest
- Network firewalls, intrusion detection/prevention, and secure network segmentation
- Multi-factor authentication (MFA) for system access
- Role-based access controls (granting access only to personnel with a legitimate educational interest)
- Regular vulnerability assessments, penetration testing, and security audits

3. Access Controls & Authorization

- Access to student PII is restricted to Access 7 employees, agents, or subcontractors who need the data to perform their duties.
- Field staff or third parties needing access must be pre-authorized.
- Passwords must meet complexity requirements, be changed periodically, and previous passwords cannot be reused.
- Session timeouts, account lockouts, and logging of access events are enforced.

4. Training & Awareness

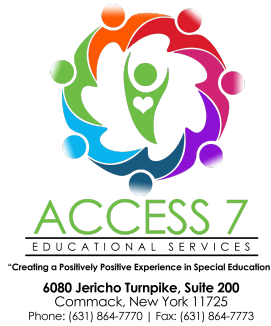
- All Access 7 employees, officers, and relevant subcontractors receive mandatory training on data privacy, FERPA, state student-privacy laws, and cybersecurity awareness (e.g. phishing, social engineering).
- Training is conducted at least annually (or more often, as needed).
- Personnel must attest to completion of training and abide by Access 7's policies and procedures.

5. Subcontractors & Third-Party Agreements

- When Access 7 engages subcontractors or third-party service providers that will access or handle PII, those parties must enter into written agreements imposing substantially similar data protection obligations as those in this plan.
- Third parties must undergo training and abide by these confidentiality, security, and breach-notification provisions.
- Access 7 will monitor and audit compliance of any subcontractors.

6. Incident Response & Breach Notification

- Access 7 maintains a formal Incident Response Plan (IRP) to address suspected or confirmed data security incidents.
- Upon confirmation of a reportable incident, Access 7 will notify the relevant educational



agency (or school district) without unreasonable delay and assist with investigations, forensic analysis, and notifications to affected parties or regulators, as required by law.
- Access 7 maintains an Incident Response Team led by a designated Information Security Officer (ISO).

Article II: Supplemental Information & Parents' / Students' Rights (Per Applicable State Laws)

1. Name of Contractor

Access 7 Educational Services

2. Purpose(s) for Access to PII

To provide educational services, supports, analytics, progress reporting, intervention planning, and other services as required under contract with the educational agency or district.

3. Types of PII Accessed

Examples include: student name, date of birth, educational records, assessment scores, progress reports, teacher observations, special education data, behavioral data, attendance, and any other PII necessary to deliver contracted services.

4. Use of Subcontractors

☐ Access 7 will not use subcontractors

☒ Access 7 may use subcontractors under strict written agreement terms

5. Data Retention & Secure Destruction

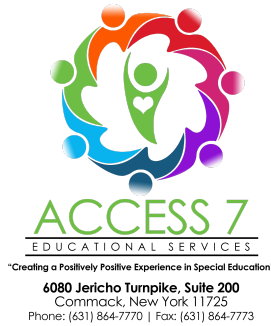
- Access 7 shall retain PII only as long as necessary to fulfill contractual obligations and as permitted by law.

- Upon end-of-contract or expiration of retention periods, Access 7 will securely delete or destroy PII using methods that prevent data reconstruction (e.g. cryptographic wipe, shredding, secure degaussing).

- Access 7 will maintain and, upon request, provide certification of data destruction.

6. Data Transition to Educational Agency

- If requested, Access 7 shall transition student PII and records to the educational agency in



a structured electronic format.

- After transition or approval from the agency, Access 7 will proceed with secure destruction.

7. Access, Inspection, Amendment & Challenge Rights

- Parents or eligible students may request access to, inspect, or obtain copies of records held by Access 7 consistent with FERPA and applicable state law.
- If a record is believed to be inaccurate or misleading, a request for amendment may be submitted.
- If the agency declines to amend, the parent/student has the right to a hearing.
- Access 7 will assist the district/agency in facilitating such requests.

8. Complaints / Inquiries / Contact Information

Questions, concerns, or complaints regarding Access 7's data practices may be directed to:

Access 7 Educational Services
6080 Jericho Turnpike, Suite 200, Commack NY 11725
631.864.7770
info@access7online.com

9. Changes to This Privacy Plan

Access 7 reserves the right to update or amend this Data Privacy & Security Plan as needed. Material changes will be communicated to partner educational agencies and, where applicable, affected parents or students.

GENERAL DISCLAIMERS & LEGAL NOTES

- This document is intended as a supplement to, and not a substitute for, contract provisions, state and federal law, regulatory requirements, and district policies.
- In the event of conflict, the applicable law or contract terms shall control.
- Access 7 will cooperate with educational agencies, auditors, and governmental authorities in enforcement or oversight activities relating to data privacy and security.