

Naples Central School District

Parents' Bill of Rights for Data Privacy and Security

The Naples Central School District seeks to use current technology, including electronic storage, retrieval, and analysis of information about students' education experience in the district, to enhance the opportunities for learning and to increase the efficiency of our district and school operations.

The Naples Central School District seeks to ensure that parents have information about how the District stores, retrieves, and uses information about students, and to meet all legal requirements for maintaining the privacy and security of protected student data and protected principal and teacher data, including Section 2-d of the New York State Education Law.

To further these goals, the Naples Central School District has posted this Parents' Bill of Rights for Data Privacy and Security.

1. A student's personally identifiable information cannot be sold or released for any commercial purposes.
2. Parents have the right to inspect and review the complete contents of their child's education record. The procedures for exercising this right can be found in the [Naples policy manual, policy 5676](#) entitled Family Educational Rights and Privacy Act (FERPA).
3. State and federal laws protect the confidentiality of personally identifiable information, and safeguards associated with industry standards and best practices, including but not limited to, encryption, firewalls, and password protection, must be in place when data is stored or transferred.
4. A complete list of all student data elements collected by the State is available at <http://www.nysed.gov/data-privacy-security/student-data-inventory> and a copy may be obtained by writing to: Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234
5. Parents have the right to have complaints about possible breaches of student data addressed.
 - Parents may make a written report of a possible breach of student data to the District Data Protection Officer by email at dpo@naplescsd.org, by completing [the online digital form](#), or by US Mail at Naples CSD, Data Privacy Officer/Ben Pursell 136 North Main Street, Naples, NY 14512.
 - Complaints may also be directed in writing to the Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234, by email to privacy@nysed.gov, by telephone at 518.474.0937, or by submitting the form at: <http://www.nysed.gov/data-privacy-security/report-improper-disclosure>.

In the course of complying with its obligations under the law and providing educational services to District residents, Naples Central School District has entered into agreements with certain third-party contractors. Pursuant to such agreements, third-party contractors may have access to "student data" and/or "teacher or principal data," as those terms are defined by law.

Each contract the District enters into with a third party contractor where the third party contractor receives student data or teacher or principal data will include this Bill of Rights along with the following information:

1. The exclusive purposes for which the student data or teacher or principal data will be used;
2. 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;
3. The duration of the contract including when the agreement expires and what happens to the student data or teacher or principal data upon expiration of the agreement;
4. 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
5. Where the student data or teacher or principal data will be stored (described in such a manner as to protect data security), and the security protections taken to ensure such data will be protected, including whether such data will be encrypted.
6. Address how the data will be protected using encryption while in motion and at rest.

A list of third party contractors is available at the following links: [Vendor contracts held by Naples, state-wide vendor contracts.](#)