



## PRIVACY POLICY

### Definition of Personal Information

Personal information is defined as any data relating to an identified or identifiable individual.

### Statement of Privacy Principles

In handling client, student and employee personal information, we abide by the following principles:

1. **We will limit the information we collect to that which is necessary to conduct business.**
  - DecisionInsite collects business contact and student information in compliance with applicable laws and ethical business practices, in order to provide products and services, to conduct business, and to administer the StudentView web application.
  - We collect usernames and passwords from our clients for use in the login portion of the DecisionInsite web site.
  - The business contact information we collect is an individual's name, title, business address, email address or telephone number, and any other information our clients voluntarily provide us.
  - The primary information collected from the student record includes the student identification number, home address, grade in school, dates of first enrollment in the district and in the school, and ethnicity. Client may also choose to provide us with additional student "attributes" if deemed necessary. Student names are not a necessary part of the record we collect; however, when provided, we use them to help identify and delete duplicate records and to enable user student list generation.
2. **We promise to use only legal, ethical and professionally accepted practices in collecting data.**
  - We will deliberately limit our use of the data we collect
  - DecisionInsite shall not use or disclose business contact or student information for purposes other than those for which it was collected, except with the consent of the Person or as required by law.
  - We collect student information only for statistical and aggregate querying purposes, the results of which cannot be associated with a specific person.

- At no time shall DecisionInsite divulge any data about particular students or families to which it has access neither during the production of the product nor subsequent to the final creation of the deliverable product.
  - We will not disclose any personal information in a manner that would link the information disclosed to the individual to whom it pertains.
  - DecisionInsite may from time to time use a person's business contact information to contact the person about changes, enhancements or similar notices related to DecisionInsite products and services.
3. **We will apply stringent procedural and technological security safeguards**
- DecisionInsite will protect personal information with physical, electronic and procedural safeguards that are appropriate to the sensitivity of the information, in order to protect it from unauthorized access, release or use.
  - Only DecisionInsite employees who need to know in order to provide products or services to you, or whose duties reasonably so require, are granted access to personal information about individuals.
  - DecisionInsite makes very limited use of "cookies." Cookies are files or file entries placed on your computer's hard drive by a website that allow monitoring of your use of the site. We use cookies only to store a unique session ID so that we can keep each user's session separate from other users.
  - If there is an unauthorized disclosure of either personal student information or District business contact information, DecisionInsite will notify the client, in writing within 24 hours. Notification will include the following elements
    - date of the breach,
    - the types of information that were subject to the breach;
    - general description of what occurred;
    - steps the Vendor is taking to address the breach;
    - the contact person at the vendor who the data holder can contact.
  - DecisionInsite contracts with a third party consultant with an Offensive Security Certified Professional (OSCP) certification to conduct an annual security penetration test. We will make the results available to Districts upon request.
  - **Retention of Data:** DecisionInsite will retain personally identifiable data during the time DecisionInsite is providing services to the District and securely store the aggregated data (data not associated with a person) for a period of 5 years after the expiration of the agreement. After 5 years DecisionInsite will delete all client data in a manner consistent with industry best practices.
4. **We will carefully limit data that may be shared with other vendors or agencies**
- Either while under contract by a School District or after the completion of our work for a School District, DecisionInsite does not and will not sell, rent, or otherwise provide personal information to any third party.
  - DecisionInsite contracts with Amazon Web Services (AWS) for data storage and processing facilities to assist us in administering our web application or providing our products and services. AWS data centers are staffed 24/7 by trained security personnel.

- We may transfer personal information to vendors who have entered into a contract with DecisionInsite in ways that protects the confidentiality of your information and permits the vendor to use it only as reasonably necessary to fulfill its contract with DecisionInsite.
- From time to time School Districts direct DecisionInsite to provide data to District consultants who are working on behalf of the District. These requests must be provided to DecisionInsite in writing by authorized District personnel. DecisionInsite will only provide outside District consultants with aggregated data which cannot be associated with a specific person.
- DecisionInsite may disclose personal information as it believes is reasonably necessary to comply with law, regulation or other governmental authority or to prevent harm to you or others.
- DecisionInsite may disclose personal information upon a transfer or sale to another entity of all or substantially all of DecisionInsite's assets or stock in DecisionInsite's line of business to which this Privacy Policy relates.

**5. Protecting Privacy, a shared responsibility**

- DecisionInsite's StudentView platform is designed to be used by authorized District administrators only. System access should not be granted to individuals not employed by the District or not authorized to access personal information.
- DecisionInsite provides designated District personnel with administrative user rights which allow the client to grant or restrict access. It is the client's responsibility to verify the credentials of the person to whom they are granting access.
- The StudentView system provides a level of access in which personal information is not accessible. We recommend that the number of users with access to personal information be limited.
- If a client should need any assistance with system administration we strongly recommend that the client contact us for additional training.
- Clients should not send personal information to DecisionInsite for upload via email. A secure upload interface is provided for this purpose.

**6. DecisionInsite employees and contractors**

- All DecisionInsite employees and contractors are required to execute a Confidentiality Agreement, in which they agree to abide by the principles laid out in this document.

**7. We will be open concerning our policies and practices**

- DecisionInsite will respond to questions about our Privacy Principles, policies and procedures, and will address privacy complaints about possible privacy violations. To contact DecisionInsite about any privacy policy questions or concerns, direct inquiries to:

DecisionInsite  
 101 Pacifica Suite 380  
 Irvine, CA 92618  
 Tel: 877-204-1392, ext 1001

Email: [privacy@decisioninsite.com](mailto:privacy@decisioninsite.com)

- Parents, legal guardians or students who wish to view or correct personally identifiable information should submit a request in writing to an administrator designated by the District. This request should then be submitted to DecisionInsite. Upon receipt of this request, DecisionInsite will take the appropriate action and respond via District personnel.
- We will provide clients and employees with easily understood information about our policies regarding the collection, use, and disclosure of personal information.
- DecisionInsite reserves the right, in our discretion, to modify this privacy policy from time to time, and will post any revisions on our web site. For material changes to this Privacy Policy that impact the collection, use, disclosure, or retention of personal information, notice will be provided by sending you email at the address we have on file for you with your account prior to any changes.

