

Beginning with Children

EDUCATION NETWORK

PARENTS' BILL OF RIGHTS FOR PRIVACY AND SECURITY

Community Partnership Charter Schools Education Corporation (operating as Beginning with Children Charter School 2 and Community Partnership Charter School) continuously partner with external organizations to support our learning. As a parent or guardian of a student in our schools, you and your child have rights as it pertains to the collection and use of data. Please read below for a summary of your rights and our guarantee of privacy and security. For more information on your rights, please visit:

<https://www.nysenate.gov/legislation/laws/EDN/2-D>

Your Rights:

Both state and federal laws protect the confidentiality of information that may be used to identify your child. Such information is known as “personally identifiable information.” Under New York education law, if you are a parent or legal guardian of a child at our school, you have the following rights regarding the privacy and security of your child’s personally identifiable information and data:

- Your child’s personally identifiable information cannot be sold or released for any commercial purposes.
- If your child is under age 18, you have the right to inspect and review the complete contents of your child’s education records.
- Safeguards must be in place to protect your child’s personally identifiable data when it is stored or transferred. These safeguards must meet industry standards and best practices, such as data encryption, firewalls, and password protection.
- You have the right to make complaints about possible breaches of student data and to have such complaints addressed.

Complaints regarding potential breaches of student data must be directed to the School Network’s Senior Director of Operations and Compliance, Pascale Artamin. Such complaints must be submitted at the following address:

Community Partnership Charter School Education Corporation
ATTN: Pascale Artamin, Senior Director of Operations and Compliance
185 Broadway, Floor 2
Brooklyn, NY 11211

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Complaints can also be made via email to: partamin@bwcf.org. All complaints will be managed in the manner set forth below.

Complaint procedures:

Parents, eligible students (18 years or older), teachers, and other CPCSEC employees may submit a complaint regarding a breach or unauthorized release of personally identifiable information in writing to the designated Compliance Office indicated above.

Upon receipt of such a complaint, the Senior Director of Operations and Compliance shall:

- 1) Promptly acknowledge the receipt of the complaint;
- 2) Promptly conduct an investigation and issue a report of findings to the complainant;
- 3) Determine whether notice of an unauthorized release of PII must be provided to government agencies and/or private individuals pursuant to either state or federal data privacy laws, and shall send such notice if required;
- 4) Take any necessary remediations and precautions to protect personally identifiable information in accordance with state and federal laws and CPCSEC's Data Security and Privacy Policy; and
- 5) Maintain a record of all complaints of breaches or unauthorized releases of student data and their disposition in accordance with applicable data retention policies.

Additional information:

You can find a complete list of the types of student data elements collected by New York State at www.nysed.gov/data-privacy-security. For more information, you may also contact the New York State Education Department Chief Privacy Officer at: 89 Washington Avenue, Albany, NY 12234; by email at privacy@nysed.gov; or by telephone at 518-474-0937.

Any complaints directed to the CPCSEC Senior Director of Operations and Compliance may also be directed to the NYSED Chief Privacy Officer at the methods above.

In addition, please see the appendix below and visit our school websites at www.bwccs2.org, www.cpcsschool.org, or www.communityhighschoolbk.org to learn more about our Supplemental Agreement Regarding Data Privacy and Security with Third-Party Contractors.

APPENDIX

SUPPLEMENTAL INFORMATION REGARDING THIRD-PARTY CONTRACTORS

In the course of complying with its obligations under the law and providing educational services, Community Partnership Charter Schools Education Corporation has entered into agreements with all third-party contractors who may access your student's personally identifiable information. Each contract with a third-party contractor that may access student PII, or certain teacher or principal data, will include the following information:

- 1) The exclusive purposes for which the student data or teacher/principal data will be used;
- 2) How the third-party contractor will ensure that the subcontractors, persons, or entities that the third-party contractor may share protected data with, if any, will abide by data protection and security requirements;
- 3) When the agreement expires and what happens to the protected 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 PII or protected teacher/principal data if collected; and
- 5) Where the student data or teacher/principal data will be stored, and the security protections taken to ensure such data will be protected, including whether such data will be encrypted.