

# CPSI Application and Service Privacy Policy

## INTRODUCTION

CPSI Ltd. has dedicated over 25 years to K-12 student data collection and network account creation. Although we have many products names, they all operate under this basic premise: we create an out of the box configurable data hub that can collect data from various sources and provide it to other applications for the purpose of reducing redundant data entry and errors that can happen when busy people at a school don't have time to enter student information in multiple applications.

CPSI is not an application or data hosting company. Our core business is K-12 data collection, validation, active directory account creation, and student data privacy. We believe that K-12 organizations should make their own informed decision about where student data resides. In an effort to make this Policy a bit more readable, unless the context indicates otherwise, we refer to:

- Schools, school districts, states and other K-12 entities that purchase CPSI products collectively as "schools" or "organizations"
- each authorized educator or school official as "you" or "your"

The value of CPSI's software is the ability to accept, validate, store, and present data to other applications that need information relating to students and staff. In other words, when organizations use our software, they are providing and accessing information relating to the students entrusted to them, and are in turn entrusting that information to us to pass to other approved software. We take your trust seriously and we make every effort to protect the data entrusted to our applications by using data standards developed specifically for K-12. This includes who has access to that data within our company and how we are authorized by you to access it.

## SCOPE OF POLICY

This document describes the types of information that you may provide to us as we collect data that you may provide to any other party who has a legitimate need for the data. In support of the [Student Privacy Pledge](#), we have attempted to cover the topics of the pledge in this privacy policy.

## ROLE OF ORGANIZATION AND SCHOOL OFFICIALS

CPSI relies solely on our customers to authorize and provide the data we collect with our applications. You act as our partner to ensure that only the appropriate student data is collected and who is allowed access to the data. For example, we are highly mindful of special education and student discipline information and who can have access. In addition we are developing a K-12 data governance process to protect K-12 personally identifiable information (PII) that encrypts student data down to the student record level in an effort to ensure the appropriate use of student information that has been entrusted to a school. This includes unintentional actions or consequences that may happen due to insufficient data governance or data privacy practices.

In cases where FERPA guidelines apply, access to certain student data remains the legal responsibility of the school official to make an appropriate decision. We work with our customers to make a determination before data is provided to any other party who has a legitimate need for the data. In addition, we have the capability to create business rules to remove any inappropriate data from a record before it is transmitted to another party.

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## INFORMATION ABOUT STUDENTS

The privacy of PII data in student records includes information, such as a student's name or identification number that can be used to distinguish or trace an individual's identity, either directly or indirectly through linkages with other demographic information.

FERPA generally requires that educational institutions and agencies that receive certain federal funds (for example, public schools) get prior consent from a parent before disclosing any education records regarding that student to a third party. Consequently, schools or education agencies act on behalf of the parent or guardian and may require that we sign an appropriate data sharing agreement before data is collected.

Unless a school official expressly instructs otherwise, CPSI does not share or reuse PII from education records for any purpose. In addition, we do not use student PII to target students or their families for advertising or marketing efforts or sell rosters of student PII to third parties. We will not build a personal profile of a student other than for supporting authorized educational/school purposes or as authorized by the parent/student

In the case of our merger or acquisition by another entity, we will provide them with the tools to maintain a student's PII with the same commitments for the previously collected student personal information.

## THIRD-PARTY INFORMATION COLLECTION

As mentioned earlier the data collected by CPSI applications may be passed to third party providers. These providers may, like us, use automatic information collection technologies to enable automate student access. These providers are authorized by your organization to collect and keep PII confidential and to only in use it in order to fulfill your responsibilities.

We will make an effort to inform organizations that we require our partner vendors with whom student personal information is shared in order to deliver the educational service, if any, are obligated to implement these same commitments for the given student personal information. The decision remains with our customer of how to address PII security for data we pass to a third party.

## HOW WE USE YOUR ORGANIZATION INFORMATION

We will use information that you, as a school official, provide to us (as applicable), including:

- provide services you may request from us
- give you notices about your services, including license expiration and renewal notices
- carry out our rights and responsibilities under agreements between us and your organization

## DISCLOSURE AND RETENTION OF PII

Except as expressly set forth below and under the *Third-Party Information Collection* heading above, and only in those limited circumstances, we will not disclose any PII relating to students, parents or school officials to third parties without the consent of the school official.

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We may disclose PII to vendors that provide or support elements of a school's student information system as an effort to troubleshoot a situation. In all cases, these providers will be bound by obligations to keep PII confidential and to use it only for the purposes for which we disclose it to them.

Our software may disclose PII to fulfill the purpose for which you provide it. For example, if you give us a parent's email address associated with a student's record, we will transmit that address to the appropriate application as identified by a school official.

Finally, although we outlined earlier in this Policy what constitutes PII, we also want to be clear what information is not PII. Once PII, whether relating to a school official, parent or student has been de-identified, that information is no longer PII. PII may be de-identified through aggregation or various other means by our applications.

The U.S. Department of Education has issued [guidance on de-identifying PII in education](#) records. In order to allow us to proactively address customer needs, we anticipate using de-identified information to improve our products and services. We will use reasonable de-identification approaches to ensure that in doing so, we are not compromising the privacy or security of the PII you entrust to us.

By the end of the summer of 2015, we will be releasing our newest product offering, code-named *Data Steward* (we are still working on its official name). This tool will run on any MS SQL database or data warehouse. The Data Steward will help educational organizations to discover and identify PII and guide them through the complicated process of deciding what data needs governed as well as govern the outgoing data by masking PII data to make it invisible to users and applications who are not allowed to see it. This solution will help organizations keep their student data private through the definition of roles for data usage and the creation of PII markers on certain data for privacy purposes determined by the organization's legal department, FERPA, and School Board.

## DATA SECURITY AND RETENTION

We have created a comprehensive security program, including the Data Steward described above that is reasonably designed to protect the security, privacy, confidentiality, and integrity of student personal information against risks – such as unauthorized access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information.

We have implemented measures designed to secure PII from accidental loss and from unauthorized access, use, alteration and disclosure using K-12 data standards as our guide. Among other things, PII is encrypted in transit to and from our applications using SSL technology. In addition, all PII is stored on local organization secure servers behind firewalls. Additional safeguards can be discussed with our technical staff through the contact information listed below.

As a software application that stores PII, it is our policy to limit the exposure and storage of PII for enrolled students in your organization. We will work with your organization to establish a PII policy for students who are no longer enrolled in your organization consistent with student record retention policies.

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## CHANGES TO OUR DATA PRIVACY POLICY

We will not make material changes to this policy without providing prominent notice to our customers and allowing them choices before data is used in any manner inconsistent with terms they were initially provided; and not make material changes to other policies or practices governing the use of student personal information that are inconsistent with contractual requirements.

## CONTACT INFORMATION

You can and should ask questions about this Policy and our privacy practices. You should always feel free to contact us at:

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