



## **Data Privacy and Security Statement for Parents/Guardians**

PEAR is deeply committed to ensuring student data security and privacy in accordance with local, state, and federal regulations and district policies of the schools and programs we work with.

Building a student data collection system with strong security requires a holistic and systematic approach. Our goal is to make sure you have the information you need to feel confident in our ability to provide your school or program with a secure assessment platform.

PEAR contracted with cybersecurity experts at [Jemurai](#) to review our policies and procedures and has adopted a set of policies aligned to [NIST CSF](#). Every PEAR staff member is trained in our security policies and industry best practices. Additionally, staff who process and analyze student data complete a research ethics training (Collaborative Institutional Training Initiative: [CITI](#)).

PEAR is providing the following statement on data privacy and security for parents:

1. PEAR offers parental consent templates and guidance to your student's school or program as part of the use of PEAR's surveys when consent is required by your school/program (Parental consent is required for the administration of the Holistic Student Assessment).
2. PEAR will never sell or release a student's personally identifiable information (PII) for any commercial purpose. PII, as defined by Education Law § 2-d and FERPA, includes direct identifiers such as a student's name or identification number, parent's name, or address; and indirect identifiers such as a student's date of birth, which when linked to or combined with other information can be used to distinguish or trace a student's identity.
3. Parents/guardians have the right to inspect and review the complete contents of their student's data collected by PEAR. This right of inspection of records is consistent with the federal Family Educational Rights and Privacy Act (FERPA). Parents should contact their student's school/program for information on accessing their student's data.
4. PEAR adheres to state and federal laws such as NY Education Law § 2-d; the Family Educational Rights and Privacy Act ("FERPA") at 20 U.S.C. 1232g (34 CFR Part 99); Children's Online Privacy Protection Act ("COPPA") at 15 U.S.C. 6501-6502 (16 CFR Part 312); that protect the confidentiality of a student's identifiable information.
5. PEAR uses safeguards associated with industry standards and best practices including but not limited to encryption and password protection when student PII is stored or transferred.



6. If requested by the school/program, student data can be permanently deleted after it has been reported back to the school/program.
7. Parents/guardians should reach out directly to their school/program if they have concerns about possible breaches and unauthorized disclosures of PII. PEAR staff can also be contacted by email at [privacy@pearinc.org](mailto:privacy@pearinc.org).
8. Our clients will be notified in accordance with applicable laws and regulations if a breach or unauthorized release of PII occurs.
9. PEAR staff who handle PII have received training on applicable state and federal laws, policies, and safeguards associated with industry standards and best practices that protect PII.
10. PEAR addresses statutory and regulatory data privacy and security requirements in contracts with vendors that receive PII.