



BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY -

SUPPLEMENTAL INFORMATION FOR CONTRACTS THAT UTILIZE PERSONALLY IDENTIFIABLE INFORMATION

Pursuant to Education Law § 2-d and Section 121.3 of the Commissioner’s Regulations, The Summit Center (“Summit”) is required to post information to its website about its contracts with third-party contractors that will receive Personally Identifiable Information (PII).

Name of Contractor	Shutterfly Lifetouch, LLC (Lifetouch)
Description of the purpose(s) for which Contractor will receive/access PII	Shutterfly Lifetouch, LLC (“Lifetouch”) is a trusted provider of school services, offering portrait and photography services to schools and families throughout North America since 1936. In preparation for Picture Day, Lifetouch requires certain roster information from Summit (“School Data”). This data is used to produce and deliver portrait-based products and services needed for Summit’s administrative purposes and/or for use in the school yearbook (the “School Service Items”), to deliver Picture Day notices on behalf of our schools, and to provide parents of students opportunities to purchase portraits. Lifetouch does not use School Data for any unauthorized purposes. As one of the original signatories of the Student Privacy Pledge, Lifetouch is committed to maintaining the security of student data and offering transparency to the schools and families that we serve. Our Privacy Policy and Data Security and Privacy Plan outlines how Lifetouch protects School Data in compliance with local, state, and federal privacy law.
Type of PII that Contractor will receive/access	Check all that apply: <input checked="" type="checkbox"/> Student PII <input type="checkbox"/> APPR Data
Contract Term	School year Contract length: one year, with annual renewals

Subcontractor Written Agreement Requirement	<p>Contractor will not utilize subcontractors without a written contract that requires the subcontractors to adhere to, at a minimum, materially similar data protection obligations imposed on the contractor by state and federal laws and regulations, and the Contract. (check applicable option)</p> <p><input type="checkbox"/> Contractor will not utilize subcontractors.</p> <p><input checked="" type="checkbox"/> Contractor will utilize subcontractors.</p> <p>While Lifetouch does not use third-party contractors to photograph students or manufacture the products we crate for our schools and families, Lifetouch does use several vendors to help provide our services (for example, service providers who assist us with data management).</p> <p>When engaging a new third-party vendor, our information security team completes a brief assessment to determine whether the vendor will have access to any School Data. If so, the team completes a brief assessment to determine whether the vendor will have access to any School Data. If so, the team completes an in-depth security questionnaire to evaluate the vendor’s information security practices. All Lifetouch vendors who have access to School Data are required to implement the same data privacy commitments that Lifetouch hold our own business to. Each of these vendors then signs an Information Security Addendum, in addition to their contract with us, that sets out exactly what is required to keep School Data safe.</p>
Data Transition and Secure Destruction	<p>Upon expiration or termination of the Contract, Contractor shall:</p> <ul style="list-style-type: none"> • Securely transfer data to Summit, or a successor contractor at Summit’s option and written discretion, in a format agreed to by the parties. • Securely delete and destroy data. <p>School Data is securely destroyed on demand by the school, or in the ordinary course of business when no longer needed to provide school services (typically 18 months following Picture Day), whichever occurs first. School Data storage devices are decommissioned in accordance with the National Institute of Standards and Technology (NIST) SP 800-88 Guidelines for Media Sanitation. Devices and media containing School Da</p>
Challenges to Data Accuracy	<p>Parents, teachers or principals who seek to challenge the accuracy of PII will do so by contacting Summit. If a correction to data is deemed necessary, Summit will notify and facilitate any needed corrections with Lifetouch.</p>
Secure Storage and Data Security	<p>Please describe where PII will be stored and the protections taken to ensure PII will be protected: (check all that apply)</p> <p><input checked="" type="checkbox"/> Using a cloud or infrastructure owned and hosted by a third party.</p> <p><input checked="" type="checkbox"/> Using Contractor owned and hosted solution</p> <p><input type="checkbox"/> Other:</p>

	Please describe how data security and privacy risks will be mitigated in a manner that does not compromise the security of the data:
Encryption	Data will be encrypted while in motion and at rest. Lifetouch systems enable secure transmission of School Data from and to the Lifetouch network with encryption technologies.