



Don Johnston Incorporated Data Procedures for Organizational Licenses

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1. Data Destruction Policy

Organizational Licenses: Upon completion of the terms of service agreement, and in the case that the pupil has no active grants, all records are automatically removed in 30 days and 65 days within all backups. Deletion of data shall be in such a manner that it is permanently irretrievable in the normal course of business.

2. Data Storage and Encryption

- All data is located in geographically discrete locations within the United States.
- AWS hosts all data, and is an ISO 27001 certified provider. In the event that payment is processed online, we use Stripe, a PCI Service Provider Level 1, to process such payments.
- Data at Rest - All data at rest is encrypted with AES-256 encryption algorithm.
- Data in Transit - All data being transmitted is protected with Secure Socket Layer and password hashing.

3. Sub-Contractors

- Comply with all Security Policies and Procedures.
- Participate in formal annual risk assessment.
- All activities of third party associates are monitored.
- AWS has the most stringent physical safeguards that has earned it ISO 27001 compliance, a Department of Defense Impact Level 4 Provisional Authorization, over 400 National Institute of Standards and Technology security controls, and a PCI DSS Level 1 certification among other security standards and therefore we do not do specific monitoring or specific training for this organization.
- Attend annual training and participate in ongoing design for security.



4. Request for Review of Personally Identifiable Information (PII) for Parent, Legal Guardian or Eligible Pupil

The Parent, Legal Guardian or Eligible Pupil will contact the district license administrator or another staff designated by the school district.

The school district can use the tools built in to review data and make changes. Changes to student sign in or deleting student data can be addressed by the district directly.

If other data needs to be corrected, the district will contact their Implementation Specialist to address needed changes. The district will verify the request from the parent, legal guardian or eligible pupil. Don Johnston will require written confirmation of the request from the district and from the parent, legal guardian or eligible pupil to make any changes to an individual student.

Don Johnston's Implementation Specialist can also support the district in understanding the tool to meet these needs.

5. Data Transfer-Organization

The Organization has access to the data throughout the life of the subscription. It is the Organization's responsibility to download all data prior to expiration. Data will not be transferred in any other methodology. This approach provides access at all times to the organization and eliminates the need to create additional security measures for transferring data.

6. Breach Notification

Don Johnston will promptly notify the Organization when there has been an unauthorized release, disclosure or acquisition of student data. Such notification will include the following steps:

- a) Notification by Don Johnston to the Organization's designated Web Administrator.
- b) Notification will include known information on what happened, when it happened, the extent of data affected and what actions are being taken to mitigate and identify the disclosures

7. Data Transfer: Student-generated content

Students can transfer pupil-generated content to a personal account under the following conditions:

1. Organizational account must be active or within 30 days of termination.
2. Student has an active account outside of the Organization.
3. Request for transfer form fully completed.



Complete this form and send to legal@donjohnston.com from the License Administrator's email.

Request to Transfer Student Generated Content

I represent and warrant that I am authorized on the behalf of _____
[Organization's Name] to request the transfer of Student Generated Content. Please transfer the
following contact(s).

Transfer From: (email address)	Transfer To: (email address)

Signature: _____ (License Administrator)
 Name: (print) _____
 Title: _____
 Organization: _____
 Date: _____

Signature: _____
 (Legal Guardian of Student or Student if over 18 years old or New License Administrator)
 Name: (print) _____
 Title: _____
 Organization: _____
 Date: _____



8. Purpose of Data Collection

Snap & Read Universal is a Text Reader to read aloud materials as well as support students in comprehending materials. Description of Services are also covered in the Terms of Service and the Privacy Policy located at: <https://snapandread.com/tos>

Co:Writer is a Word Prediction, Speech to Text and Translation tool to support struggling writers. Description of Services are also covered in the Terms of Service and Privacy Policy located at: <https://cowriter.com/tos>

uPAR (Universal Protocol for Accommodations in Reading) is a data tool to help educators match students to reading accommodations. Description of Services are also covered in the Terms of Service and Privacy Policy located at: <https://login.donjohnston.net/tos/privacy-policy/par>

Word Bank Universal extracts words, places, people, facts and dates into a meaningful format. Description of Services are also covered in the Terms of Service and Privacy Policy located at: <https://wordbank.io/tos>