DPA EXHIBIT 2 - Education Law § 2-d Bill of Rights for Data Privacy and Security and Supplemental Information for Contracts that Utilize Personally Identifiable Information

Parents (including legal guardians or persons in parental relationships) and Eligible Students (students 18 years and older) can expect the following:

1. A Student's Personally Identifiable Information (Student PII) cannot be sold or released for any Commercial or Marketing purpose. Student PII, as defined by Education Law § 2-d and the Family Educational Rights and Privacy Act ("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. Please see FERPA's regulations at 34 CFR § 99.3 for a more complete definition.

2. The right to inspect and review the complete contents of the student's education record stored or maintained by an educational agency. This right may not apply to Parents of an Eligible Student.

3. State and federal laws such as Education Law § 2-d; the Regulations of the Commissioner of Education at 8 NYCRR Part 121, FERPA at 12 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); Protection of Pupil Rights Amendment ("PPRA") at 20 U.S.C. § 1232h (34 CFR Part 98); and the Individuals with Disabilities Education Act ("IDEA") at 20 U.S.C. § 1400 et seq. (34 CFR Part 300); protect the confidentiality of Student PII.

4. Safeguards associated with industry standards and best practices including, but not limited to, encryption, firewalls and password protection must be in place when Student PII is stored or transferred.

5. A complete list of all student data elements collected by New York State Education Department ("NYSED") is available at www.nysed.gov/data-privacy-security/student-data-inventory and by writing to: Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234.

6. The right to have complaints about possible breaches and unauthorized disclosures of Student PII addressed. (i) Complaints should be submitted to the NYS Education Department at www.nysed.gov/data-privacy-security/report-improper-disclosure, by mail to: Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234; by email to privacy@nysed.gov; or by telephone at 518-474-0937.

7. To be notified in accordance with applicable laws and regulations if a breach or unauthorized release of Student PII occurs.

8. NYSED workers that handle Student PII will receive training on applicable state and federal laws, policies, and safeguards associated with industry standards and best practices that protect PII.

9. NYSED contracts with vendors that receive Student PII will address statutory and regulatory data privacy and security requirements.

Supplemental Information

Pursuant to Education Law § 2-d and § 121.3 of the Regulations of the Commissioner of Education, the NYS Education Department ("NYSED") is required to post information to its website about its contracts with third-party contractors that will receive Student PII and/or Teacher and/or Principal APPR data ("APPR Data"), collectively referred to as PII.

Name of Contractor	Suntex International Inc
Description of the purpose(s) for which Contractor will receive/access PII	The First In Math Online program provides grade appropriate and standards aligned content for students in grades K through 5 in New York State. When schools or school districts elect to implement the program, student enrollment data will be provided by the district. Data will be synced with FIM in order to create class/sections for teacher and student access.
Type of PII that Contractor will receive/access (Write Yes or N/A on the lines next to each item)	__x__ Student PII _____ APPR Data
Contract Term	Contract Start Date: __March 2021_____ Contract End Date: ___June 2025_____
Subcontractor Written Agreement Requirement (Write Yes or N/A on the lines next to each item)	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) _____ Contractor will not utilize Subcontractors. __x__ Contractor will utilize Subcontractors.
Data Transition and Secure Destruction	Upon expiration or termination of the Contract, Contractor shall: • Securely transfer data to NYSED, or a successor contractor at NYSED's option and written discretion, in a format agreed to by the parties**.** • Securely delete and destroy data.
Challenges to Data Accuracy	Parents, teachers, or principals who seek to challenge the accuracy of PII will do so by contacting NYSED. If a correction to data is deemed necessary, NYSED will notify Contractor. Contractor agrees to facilitate such corrections within 21 days of receiving NYSED's written request.

Secure Storage and Data Security (Write Yes or N/A on the lines next to each item)	Please describe where PII will be stored and the protections taken to ensure PII will be protected: (check all that apply) __x__ Using a cloud or infrastructure owned and hosted by a third party. _____ Using Contractor owned and hosted solution _____ Other: Please describe how data privacy and security risks will be mitigated in a manner that does not compromise the security of the data: Data will be stored within the Atlanta Data Center of Aptum Technologies, 106 Jefferson Street, Suite 300, San Antonio TX 78205 (Formerly Cogeco-Peer1), a top-tier and leading hosting provider. Multiple approaches to data security include physical security (CCTV, biometric access control, on-site guards), network and application protection, including DDoS protection, hardware firewalls, load balancer, and access through VPN only. The next layer of security includes alert logic monitoring and McAfee enterprise anti-virus. Web Site access is only allowed using SSL (2048 bit). The environment is kept lean, installing only the necessary applications and features, and is kept up to date with the latest security patches.
Encryption	Data will be encrypted while in motion and at rest.
Certification	Contractor certifies that Contractor will comply with applicable State and Federal laws, rules, and regulations.

Contractor's Name	Suntex International Inc
Signature	Nan Ronis
Printed Name	Nan Ronis
Title	Executive VP
Date	02/24/2021