



### Data Privacy Policy

This data privacy policy is issued and adopted by CoBro Consulting, LLC (CoBro Consulting) regarding data required for program evaluation and reporting for the U.S. Department of Education federal educational grants.

Through the duration of formally contracted services between CoBro Consulting and various educational institutions and state agencies, CoBro Consulting staff will have access to confidential information related to participants of the educational programs. Access to such information is necessary for CoBro Consulting to provide services as specified in our various contracts.

It is hereby recognized that CoBro Consulting staff will maintain the confidentiality of individual data records at all times while such information is in their possession. Only the assigned programmer and research analyst will have access to personal identifying information for the purpose of preparing, formatting, analyzing, transferring, and/or uploading data for program evaluation purposes. All discussions, deliberations, records and information generated or maintained in connection with these activities shall not be disclosed to any unauthorized person.

CoBro Consulting hereby agrees not to divulge any information or records concerning any student or program participant without proper authorization in accordance with state and federal law and interagency agreements. Data received from institutions and agencies will be used for research purposes only, and only reported in aggregate form. CoBro Consulting recognizes that any discussion of, or release of, information concerning current or former students and/or program participants of education grant programs to any unauthorized person is forbidden and may be grounds for legal action.

CoBro Consulting hosts all client data on Microsoft Azure Cloud. All such data is encrypted at rest and in transit. All confidential data processed, stored, and/or transmitted by CoBro is maintained in a secure manner that prevents the interception, diversion, or other unauthorized access to said data. All of our computer systems and servers require the use of secured passwords to access computer databases used to store or transmit the data. We implement secure practices for assigning passwords and encrypting data to maintain the integrity of the systems used to process, store, or transmit data provided under our contract agreements.

Additionally, Microsoft Azure Cloud is our Data Center Provider. CoBro Consulting technicians follow Microsoft Azure FERPA Implementation Guide to set up their cloud network, data storage, back ups, and disaster recovery processes. Detailed information can be found at the following website: <https://gallery.technet.microsoft.com/Azure-FERPA-Implementation-441b6b71> . The FERPA Implementation Guide for Microsoft Azure whitepaper provides insight into how Microsoft meets its compliance obligations on the platform and presents best practices and security principles that are aligned to the Family Educational Rights and Privacy Act, International Organization for Standardization (ISO) 27001, Microsoft's Security Development Lifecycle (SDL), and operational security for online security.

CoBro technicians perform a weekly vulnerability scan via the Azure Security Center. At the conclusion of each scan, a security status report is generated that also includes suggestions regarding steps we can take to make our cloud services even more secure as technology advances and more cyber security tools and strategies are developed. To this end, CoBro technicians convene monthly meetings to determine appropriate additional tools and strategies for implementation.

Further, CoBro Consulting staff will maintain the confidentiality of any and all program participant data received from institutions, agencies, and/or program staff or representatives. To ensure the continued confidentiality and security of the data processed, stored, or transmitted under this agreement, CoBro Consulting shall maintain the established system of safeguards that, at minimum, include the following:

- a. Established procedures and systems ensure all participant records are kept in secured facilities and access to such records is limited to CoBro Consulting personnel who are authorized to have access to said data.
- b. All designated CoBro Consulting staff involved in the handling, transmittal, and/or processing of data provided under this agreement are required to execute a Confidentiality Statement requiring said personnel to maintain the confidentiality of all program participant related personally identifiable information. Moreover, all CoBro staff are periodically required to complete relevant online cybersecurity courses which contain end-of-course tests they must pass.
- c. Procedures and systems, such as good practices for assigning passwords, are maintained to ensure the integrity of the systems used to process, store, or transmit data provided under this agreement.
- d. Procedures and systems are established to ensure that all confidential data processed, stored, and/or transmitted under the provisions of this Statement of Confidentiality shall be maintained in a secure manner that prevents the interception, diversion, or other unauthorized access to said data.
- e. The procedures and systems developed and implemented to process, store, or transmit data provided under this Statement of Confidentiality shall ensure that any and all disclosures of confidential student data comply with all provisions of the “Family Educational Rights and Privacy Act” relating to the privacy rights of students.
- f. All client data hosted and secured by CoBro Consulting is owned by that client. At the end of our contracted work with each client, we provide the client the opportunity to safely download all of their data maintained by CoBro, using secure FTP processes. For audit documentation purposes, our policy is to maintain such data for three years after contract expiration for each client, unless otherwise specified by each individual client. After the three years, all client data maintained by CoBro Consulting is destroyed, using industry standard procedures.

CoBro Consulting hereby agrees to abide by the above conditions.