



Administration Building
951 Hoffman Street
Elmira, NY 14905

Phone: (607) 735-3000
www.elmiracityschools.com

Release and/or Sharing of Student Data Form

Third-Party Contractors requesting access to student data and/or teacher or principal data ("data") must complete this form to ensure the confidentiality and security of data as required by Board of Education policy and all applicable local, state, and federal laws. Attach addendums to the questions if more space is needed

Contractor/Company Name INTER-STATE STUDIO AND PUBLISHING Co.
Representative Name and Title Dina Stegall-Mangiamela
Contractor Phone Number 585-544-2610 (office) 585-721-0016 (cell)

1. Describe the data that is being requested and/or stored:
STUDENT NAME, ~~EMAIL~~ PARENT EMAIL ADDRESSES

2. Exclusive purposes of the use of the data:
TO SEND PROOF IMAGES OF STUDENT SCHOOL, SPORT, SENIOR AND/OR GRADUATION IMAGES TO PARENTS

3. Will any third-party subcontractors have access to the data? Yes No
If yes, how will you ensure that subcontractors, and any persons or entities that the third party subcontractor may share the data with, will abide by data protection and data security requirements?
PLEASE SEE OUR PRIVACY POLICY PDF THAT IS ~~HERE~~ INCLUDED.

4. What happens to the data upon expiration of the agreement or relationship with the District?
ALL DATA IS PURGED

5. How would a parent, student, eligible student, teacher or principal challenge the accuracy of the data that is collected or stored?
PARENTS, STUDENTS OR DISTRICT EMPLOYEES CAN GIVE OUR OFFICE A CALL TO VERIFY OUR PROCESSES. WE WILL ALSO PROVIDE OUR WRITTEN POLICY ON DATA.

6. Describe where the data will be stored so as to protect data security and the security protections that will be taken to ensure such data will be protected, including whether such data will be encrypted and if so, how?
PLEASE SEE INCLUDED PDF FILE THAT IS INCLUDED IN THIS EMAIL ~~REGARDS~~ INREGARDS TO OUR PRIVACY POLICY

Authorized Signature Dina Stegall-Mangiamela Date 7/10/2020

FOR DISTRICT USE ONLY

Date Received 7/20/2020
Received By JEM

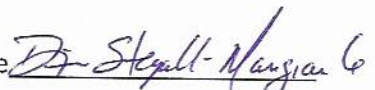
APPENDIX TO PARENTS' BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY

Supplemental Information Regarding Third-Party Contractors

In the course of complying with its obligations under the law and providing educational services to District residents, the Elmira City School District may enter into agreements with certain third-party contractors. Pursuant to these agreements, third-party contractors may have access to "student data" and/or "teacher or principal data," as those terms are defined by law and regulation.

For each contract or other written agreement that the District enters into with a third-party contractor where the third-party contractor receives student data or teacher or principal data from the District, the following information will be included in the contract, Data Protection Agreement, or Terms of Service/Privacy Policy Contract Addendum with this Bill of Rights:

- 1) The exclusive purposes for which the student data or teacher or principal data will be used by the third-party contractor, as defined in the contract;
- 2) How the third-party contractor will ensure that the subcontractors, or other authorized persons or entities to whom the third-party contractor will disclose the student data or teacher or principal data, if any, will abide by all applicable data protection and security requirements, including but not limited to those outlined in applicable laws and regulations (e.g., FERPA; Education Law Section 2-d);
- 3) The duration of the contract, including the contract's expiration date, and a description of what will happen to the student data or teacher or principal data upon expiration of the contract or other written agreement (e.g., whether, when, and in what format it will be returned to the District, and/or whether, when, and how the data will be destroyed);
- 4) If and how a parent, student, eligible student, teacher, or principal may challenge the accuracy of the student data or teacher or principal data that is collected;
- 5) Where the student data or teacher or principal data will be stored, described in a manner as to protect data security, and the security protections taken to ensure the data will be protected and data privacy and security risks mitigated; and
- 6) Address how the data will be protected using encryption while in motion and at rest.

Name Dina Stegall Mangiameli Title Territory Manager Signature 

Company Name Inter-State Studio Product Name School Photography

By signing above, you agree to comply with the terms of the Elmira City School District Parents' Bill of Rights for Data Privacy and Security, to the extent the foregoing provisions are applicable to your company.



General Audience Privacy Policy

Effective Date: June 23, 2020

At Inter-State Studio & Publishing Co., our purpose is to help our customers capture, preserve, and share life's important moments through professional and personal photography, and personalized products. We are equally committed to respecting your privacy.

This Privacy Policy ("Policy") explains how Inter-State Studio & Publishing Co. ("Inter-State," "we," "our," or "us") collect and use personal information, and the choices you can make. This Policy applies to your use of Inter-State.com and our other general audience websites, applications and services that link to this Policy. This Policy also addresses information we collect from you when you schedule an appointment to be photographed by Inter-State at one of our events, when you contact one of our customer service representatives, or when you respond to a survey or enter a contest or sweepstakes that we administer.

We encourage you to read this Privacy Policy in its entirety before using our services. By creating an online account, using our services, or making a purchase with any of our brands, you acknowledge that you have read and agree to this Privacy Policy.

If you are an educator, parent, or student, and Inter-State is providing school photography services to your school or organization, please see our Policy titled Pre K-12 Educators and Parents

What personal information do we collect? How do we use that information?

We collect various types of personal information when you register with any of our websites, mobile sites or mobile applications (our "Sites and Apps"); purchase any products or services from us; schedule an appointment to be photographed; visit or are photographed at one of our offices, studios, or on-site photography locations; contact one of our customer service representatives; or complete a survey or enter a contest or sweepstakes that we sponsor. This information may be collected directly from you (for example, when you complete our forms or enter your information on our websites to make a purchase) or indirectly through your device or browser when you visit our Sites and Apps.

We use your information to fulfill product orders, to customize and improve the advertising and content you see, to offer suggestions for personalized products based on your content, to deliver marketing communications and promotional materials that you may be interested in, to contact you and provide customer service, to protect the security or integrity of our databases or websites, to detect and prevent fraud or illegal activity, to take precautions against liability, to detect and remediate violations of our Terms of Use or other misuse of our Sites and Apps, to develop and improve our products and services, and for internal operational purposes.

The following chart describes what categories of personal information we may collect, how we collect that information from you, the business purposes for which we generally use such information, and which types of trusted third-party service providers we may share that information with:

Information Type	Source	Purpose	Third-Party Sharing
Direct Identifiers (Customer Name, Postal Address, Phone Number, E-mail Address)	Provided directly by customer	Maintaining and servicing your account Providing customer service Processing and fulfilling your orders Processing payments on your orders Advertising and marketing our products to you Detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity	Product creation and order fulfillment vendors Marketing and advertising services Surveys, sweepstakes, and contests Payment and chargeback processors Mailing and shipping services

Student Information (Student Name, Teacher, Grade, Uniform Number, etc.)	Provided directly by customer	Maintaining and servicing your account Processing and fulfilling your orders	Product creation
Payment information (credit card information, only last four digits are stored, checks)	Provided directly by customer	Processing payments on your orders Detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity	Payment and chargeback processors Fraud prevention and site security
Purchase information (purchase date, purchase totals, product types)	Provided directly by customer	Providing customer service Processing and fulfilling your orders Processing payments on your orders Analytics to improve our products and services Advertising and marketing our products to you	Product creation and order fulfillment vendors Payment and chargeback processors
Digital Identifiers (IP Address, Cookies, Website Browsing and Interaction Activity, Other Device or Browser Identifiers)	Collected indirectly from customer's browser or device	Enhancing your user experience Analytics to improve our products and services Advertising and marketing our products to you Detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity	Marketing and advertising service providers Website performance and analytics vendors Fraud prevention and site security
Website login credentials	Provided directly by customer	Maintaining and servicing your account Providing customer service Processing and fulfilling your orders Detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity	None
Inferences about customer preferences and characteristics	Inferred from information provided by customer and information collected indirectly from customer's browser or device	Enhancing your user experience Analytics to improve our products and services Advertising and marketing our products to you	Marketing and advertising service providers Website performance and analytics vendors

In addition to any personal information that you might provide when you do things like buy our products and services or create an account with our brands, we may also have access to other information about you if you interact with our brands via social media, if you're photographed by Inter-State, or in certain other situations.

Social Media

If you log into your account with us through a social media site, we will also have access to certain information from that site, such as your name, account information and profile photo, in accordance with the site's account verification procedures. Also, if you interact with content on our social media profiles (for example, if you "like" or share a post from one of our Facebook, Twitter, or Instagram accounts), those social media sites may share information about you with us, including your public profile, e-mail address and friend list. If you choose to "like" or share content, information about you may be publicly displayed on the social network,

depending on your privacy settings. You should review the privacy policy of that social media site and check your privacy settings through that site. If you post information on a social media or another third-party service that references our brands or our products and services (e.g., via a Twitter hashtag), we may publish your post on our social media accounts or websites.

Professional Photography by Inter-State

Inter-State provides professional photography services to organizations across the United States. When an organization you (or your child) are affiliated with (for example, your child's sports league, your university, your employer, or your place of worship) engages Inter-State to photograph you (or your family members), that organization may provide basic roster information about the people who will be photographed to help us facilitate Picture Day and process and fulfill product orders. We limit the information we collect to only what is necessary for Picture Day and other related purposes authorized by your organization (such as creating a yearbook). We collect this basic information to match names to the pictures we take and for efficient distribution within the organization. We may also receive your email address in order to deliver Picture Day-related communications on behalf of your organization. In those cases, we do not retain or use your contact information for any other purpose unless you become our customer by purchasing our products, or if you opt in to receive updates and promotional offers from us.

We may also collect your information in order to incorporate it into other items that we are providing to your organization. Your organization controls how much, or how little, information is used in producing these items, and your organization is solely responsible for obtaining any consents necessary for Inter-State to provide its services and produce those items. If you have any questions about what information your organization shares with Inter-State for Picture Day or for use in any products provided to your organization, please contact your organization directly.

If your child's Pre K-12 school engages Inter-State for school Picture Day, see the section titled For Pre K-12 Educators and Parents for more information.

Cookies

We and our service providers collect information about how you use our services – for example what web or mobile pages you have viewed – to analyze trends, generate analytics, provide a better user experience, improve our products and services, detect and prevent fraud or security incidents and gather broad demographic information for aggregate use. Our Sites and Apps use pixel tags, web beacons, and similar tracking technologies (collectively referred to as "Cookies") that are created when you use our online services and are stored on your computer or mobile device.

Cookies help us offer convenient features like storing the contents of your shopping cart until you are ready to check out, remembering your login and account settings, recognizing your browser when you visit, customizing your current and future visits, and providing you with information about products that interest you. Cookies help us personalize your experience and save time during checkout. We also use the information we collect to compile statistics about our visitors and their use of our site to monitor site traffic, develop marketing programs, and improve our website design and content.

We use the information collected by our third-party service providers using Cookies to analyze and track data, improve our services, determine the popularity of certain content, and better understand our users' online activity. Our service providers may also show you advertisements for our products and services on other websites, and may combine this information with other information those service providers have gathered about your visits to those other websites so that the advertisements you receive are more likely to be of interest to you.

Other Sources

We may also obtain data that is publicly available or from third party sources, such as address verification services, to improve the accuracy of and add to what we know about our customers and prospective customers. We may combine this publicly available information with your personal information for the purposes described in this policy.

Employment

In addition to information collected from our customers, we and our service providers also collect certain information from candidates who apply for a job with Inter-State to contact you about your application and evaluate your qualifications for the position, including your name, phone number, e-mail address, postal address, education information, and employment information.

How do we share your information with third parties?

We do not sell, license or share the personal information we collect with unaffiliated third parties for their marketing purposes. We may share personal information in the following situations.

Service Providers

We sometimes use third-party service providers to act on our behalf, for example to help us fulfill your product orders, process payments, enhance and personalize your shopping experience with us, or to deliver our advertisements. Our service providers may receive your name and contact information, payment information, photos and other content you upload to our Sites and Apps,

information about purchases you've made, cookies and other device identifiers, IP address, and website browsing and interaction activity. These service providers are only allowed to use your information in connection with the specific service they provide on our behalf.

Law Enforcement, Mergers, and Other Situations

We may be required to share your personal information in other, limited circumstances. For example, we may be required to share certain information to respond to a subpoena or similar judicial process, to comply with state, federal or local laws, to protect the security or integrity of our databases or website, to take precautions against liability, in the event of a corporate reorganization or, to the extent required by law, to provide information to law enforcement agencies.

Additionally, your information may be transferred to another organization if, for example, we transfer the ownership or operation because we have merged with or have been acquired by another organization, or if we liquidate our assets. In those cases, the new company's use of your information will still be subject to this policy, and the privacy preferences you have expressed to us. If for any reason this policy and your preferences can no longer be honored, your school administration will be given a choice of whether their data is transferred to the new controlling organization.

We may also share Inter-State school photographs with law enforcement in accordance with our Operation Child ID® community child safety program. See the section titled [What is Operation Child ID® - A Community Child Safety Program by Inter-State Studio](#) in our General Audience Privacy Policy for more information.

Does our website collect information from children?

Our Sites and Apps are intended for use by general audiences and are not targeted directly at children. We will not knowingly collect personally identifiable information from children. If we become aware that a child under the age of 13 has provided personal information through our websites or apps, we will remove their personally identifiable information from our files. If a parent or guardian becomes aware that their child has provided such information through our websites or apps, the parent or guardian should contact us in writing at issnet@inter-state.com (<mailto:issnet@inter-state.com>) so that we may respond appropriately.

What options do you have to limit our collection and use of your personal information?

You have choices about how your information is collected and used. You can notify us of your preferences when you create an account with us, and if you would like to review, correct or delete your account information on our Sites and Apps, you can do so by logging in to your account or by contacting us directly. There may be times when we are unable to fulfill your request – for example, if providing access to your personal information would reveal confidential commercial or proprietary information or personal information about someone else (and we cannot separate your data), if we are prohibited by law from disclosing the information, or if we have a legal obligation to retain certain data. We may require additional personal information from you for the purposes of verifying your identity and rights.

If you are a resident of California, please see our section titled Supplemental Notice to California Residents to learn more about your rights.

Opting out of Marketing Communications

If you no longer want to receive marketing communications from us, you can unsubscribe by following instructions contained in the messages you receive, by changing your marketing preferences through your Account Settings, or by contacting us through our Help page. We reserve the right to send you certain communications relating to the services we provide, such as service announcements and administrative messages (for example, communications related to a pending order, an unresolved customer service issue, or a policy update). We do not offer you the ability to opt-out of receiving those communications.

Cookie Options

If you don't want our Sites and Apps to collect information using Cookies, you can change your web browser settings to reject Cookies from the site or to alert you before a cookie is placed on your computer. Each browser is different, so you should check your browser's "Help" menu to learn how to change your cookie preferences. Please note that cookie-based opt-outs only apply to the specific computer and browser on which the opt-out cookie is applied. If you accept a cookie, you can delete it at any time through your web browser. If you choose not to accept Cookies, though, you will not be able to enjoy all the features available to our registered users.

The Network Advertising Alliance ("NAI") and the Digital Advertising Alliance ("DAA") offer opt-out tools to help you manage your choices for participating companies that use Cookies for Interest-Based Advertising and cross-app advertising. For more information about these tools please visit: NAI Opt-Out Page (<https://www.google.com/url?q=http://optout.networkadvertising.org/?c%3D1&sa=D&ust=1594146272424000&usg=AOvVaw0bHmhfjW082PBw8CsRQUH>) and DAA Opt-Out Page.

(<https://www.google.com/url?q=http://optout.aboutads.info/?c%3D2%26lang%3DEN&sa=D&ust=1594146272425000&usg=AOvVaw1rrxfvIRnWIGXYTscS4YH>).

You can also opt out of Google

cookies by installing Google Analytics' opt-out browser add-on (https://www.google.com/url?q=https://tools.google.com/dlpage/gaoptout&sa=D&ust=1594146272425000&usg=AOvVaw2ZpTaYNj-rWBj0_4taR1np) and/or the Google Advertising Cookie opt-out browser add-on. (<https://www.google.com/url?q=https://tools.google.com/dlpage/optoutplugin/eula.html&sa=D&ust=1594146272426000&usg=AOvVaw1hP2VUaY3GZvyl7EPbkw2h>) "Do Not Track" is a preference you can set in your web browser to let the sites you visit know that you do not want them collecting information about you. Our sites do not currently respond to "Do Not Track" settings.

How do we keep your information secure?

Although no website, application, database, or system is completely secure or "hacker proof," we have safeguards in place to protect against unauthorized access and disclosures of the personal information we control. At the most basic level, we restrict physical access to our servers to only those people responsible for their operation. As a matter of process, we provide training to our staff on current security measures and we contract for routine penetration testing by outside experts. And at the deeper technical layer, we utilize current best practices from coding and encrypted data transport to real-time monitoring of our firewall and intrusion detection systems. Despite these measures, however, we cannot guarantee that our information security safeguards will never be compromised.

Our Sites and Apps may be linked to other websites or may contain links to other websites. This Privacy Policy only applies to our Sites and Apps, and we are not responsible for the privacy practices, security standards, or content of other sites. You should check the privacy policies of those sites before providing your personal information to them.

How do we make updates to this policy?

As we implement new technology and introduce new services or otherwise change our privacy practices, or in response to changes in applicable laws or regulations, we may modify this Policy. If we ever modify this Privacy Policy in a material way, we will notify our customers via email. Changes to our Policy will become effective when posted and your continued use of our websites, mobile applications, and/or other services following such notice acknowledges your acceptance of such updated terms.

How can you contact us with questions about your privacy or this Policy?

For further information regarding this website privacy statement or related policies and procedures, please contact: issnet@inter-state.com (<mailto:issnet@inter-state.com>).

Supplemental Notice to California Residents

Effective Date: January 1, 2020

If you are a California resident, California law may apply to how we collect and use your personal information, and what rights you have in some circumstances. The following terms supplement our Privacy Policy and explain the rights of California residents.

For information about what categories of personal information we may collect from our customers, the sources of that information, the purposes for collecting and using that information, and what types of third party service providers we may share that information with, please see our section titled What personal information do we collect? How do we use that information?

California residents have the following rights:

- The right to request information about personal information that we have collected about that customer in the 12 months preceding the customer's request (including the categories of information collected, the source of that information, the business purpose of that collection, the categories of third parties with whom that information is shared, and the specific pieces of personal information collected about that particular customer);
- The right to receive requested information in a readily-usable format if provided electronically;
- The right to request that we delete any personal information about the consumer that we have collected (although we may be entitled to retain some information for certain purposes);
- The right to opt-out of "sales" of personal information to third parties, if applicable; and
- The right to freely exercise your rights without being denied goods or services.

We cannot respond to your request to access or delete information unless we are able to both verify your identity or authority to make the request and confirm the personal information relates to you and/or your household. If you have an account on any of our Sites and Apps, we will verify your identity by having you log in to your account. If you do not have an account on our Sites and Apps, we will attempt to verify your request by asking you to provide identifying information that we will match to information in our files. We will only use information you provide in your request for the purpose of verifying your identity or authority to make the request. You can also designate an authorized agent to make a request on your behalf. Your agent will need to provide a Power of Attorney authorizing the agent to act on your behalf, or will need to complete the same verification procedures that would be required for a request submitted by you directly, and provide information that allows us to verify your authorization. We may deny

deletion requests in whole or in part as permitted or required by applicable law. We do not charge a different price or rate or provide a different level or quality of goods or services based on your exercising your CCPA rights. We do not sell personal information.

To exercise your rights under California law, please send an email to issnet@inter-state.com (<mailto:issnet@inter-state.com>).

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, you may request and obtain removal of content or information you have publicly posted on such site. To make such a request, please send an email with the subject line "California Minor Content Removal Request" to issnet@inter-state.com (<mailto:issnet@inter-state.com>). Please specify in your request which website or application your request relates to and the specific information or content that you would like removed. Please note that your request does not ensure complete or comprehensive removal of the content or information, because, for example, some of your content may have been reposted by another visitor to our websites.

Does Inter-State use my photos in advertisements?

No, Inter-State does not use your photos in our advertisements.

Inter-State Studio Professional Photography

The following frequently asked questions relate to Inter-State professional photographs taken in portrait studios, schools, businesses and other organizations that Inter-State serves.

Does Inter-State use my photos for marketing?

Not without permission of the photo subject. Inter-State is proud of its work as a professional photographer, and from time to time we request permission from our customers to display their photos as samples of our work. Inter-State does not use its customers' photographs in marketing or advertising materials to third parties without first obtaining a photo release from the photo subject (or, in the case of a minor, the photo subject's parent or legal representative).

Does Inter-State share my child's school photos with my child's school?

Yes – schools and preschools across the United States entrust Inter-State to photograph students and staff as part of the time-honored tradition of Picture Day. Inter-State provides those photos to the school for use in the school yearbook, student IDs, classroom seating charts and other school-related purposes. Inter-State also offers the photographs for purchase by parents.

How long does Inter-State keep photos? What are my options?

When Inter-State is engaged by a school or other organization as its official photographer, the photos we capture for that organization are deleted in the ordinary course of business within a reasonable time after we have fulfilled our contractual obligations, with the exception of photos associated with customers who elect to purchase from us (Inter-State Customers). If you are an Inter-State Customer, our goal is to make the photos we create available to you for years to come, and we will endeavor to retain a digital copy of one or more of your current and future source photos for you to claim and archive in your Inter-State account indefinitely, if you choose to do so. For example, if you purchase your child's first grade school photo, and Inter-State photographs your child the following year, we may associate that photo with you and make the digital image available to you to purchase and store in your Inter-State account.

If you wish, you can take steps to have your photos deleted from our systems earlier, by contacting us at issnet@inter-state.com (<mailto:issnet@inter-state.com>). We may require certain information from you to validate your request before deletion. Please be aware, however, that Inter-State may deny your request and retain your photos under certain limited circumstances – for example, if we have a contractual commitment to a school or other organization you are affiliated with (such as providing yearbook photos or the yearbook itself), if doing so would violate a law or court order, or if it would be unreasonably burdensome. Also, please be aware that, if you shared your photo with other purchasers, your photo deletion request will not affect any photos retained in others' photo libraries or those purchasers' archiving preferences.

Do I need an Inter-State account to purchase school photos?

No. You may purchase traditional printed school photos from Inter-State for delivery to you through your child's school or by contacting us at issnet@inter-state.com (<mailto:issnet@inter-state.com>).

What is Operation Child ID® - A Community Child Safety Program by Inter-State Studio?

The Amber Alert system has been established to find missing children through the broadcast of the child's photograph and description on television or radio as quickly as possible. A current photo and detailed information is an essential part of the process in locating a child. Inter-State Studio provides complimentary Operation Child ID downloads to families for each Pre K-12 student photographed, at no extra cost and regardless of whether the family has purchased photographs. If a child is missing, the parent or guardian of that child can provide local law enforcement their child's Operation Child ID. This document contains instructions on how law enforcement, at the request of the parent or guardian, can request an Inter-State photograph of the child to aid in search efforts. Inter-State Studio does not share its photographs with law enforcement unless a parent or guardian has expressly requested us to do so or on an exceptional basis pursuant to legal process. An Operation Child ID download is available by entering a unique order

code at [inter-state.com/ID \(https://www.google.com/url?q=http://inter-state.com/ID&sa=D&ust=1594146272434000&usg=AOvVaw0QzF1cTcy880ex5Xv8rgUx\)](https://www.google.com/url?q=http://inter-state.com/ID&sa=D&ust=1594146272434000&usg=AOvVaw0QzF1cTcy880ex5Xv8rgUx). Or, an Operation Child ID can be downloaded for any picture saved to an Inter-State Account, which can be accessed at any time. The ID download contains your child's name and photo with additional space to write in up-to-date personal information. The document grants permission to scan or copy the photo for distribution to broadcast media or any other use related to finding the missing child.

Pre K-12 Educators and Parents Privacy Policy

Effective Date: June 23, 2020

At Inter-State Studio & Publishing Co., our purpose is to help our customers capture, preserve, and share life's important moments through professional and personal photography, and personalized products. We are equally committed to respecting your privacy.

This Privacy Policy ("Policy") explains how Inter-State Studio & Publishing Co. ("Inter-State," "we," "our," or "us") collects and uses student information for the use and benefit of the schools and school districts for their administrative and educational purposes.

We encourage you to read this Privacy Policy in its entirety before using our services. By creating an online account, using our services, or making a purchase with any of our brands, you acknowledge that you have read and agree to this Privacy Policy.

How do we share your information with third parties?

We may share personal information in the following situations.

Service Providers

We sometimes use third-party service providers to help us fulfill your product orders. These providers may receive some or all of your school provided information, but they are only allowed to use your information in connection with the specific service they provide on our behalf, and never for their own marketing purposes.

We only share information when absolutely necessary, and then with only trusted service providers to the school market and providers we know to have privacy practices in line with our own and/or the Student Privacy Pledge.

Law Enforcement, Mergers, and Other Situations

We may be required to share your personal information in other, limited circumstances. For example, we may be required to share certain information to respond to a subpoena or similar judicial process, to comply with state, federal or local laws, to protect the security or integrity of our databases or website, to take precautions against liability, in the event of a corporate reorganization or, to the extent required by law, to provide information to law enforcement agencies.

Additionally, your information may be transferred to another organization if, for example, we transfer the ownership or operation because we have merged with or have been acquired by another organization, or if we liquidate our assets. In those cases, the new company's use of your information will still be subject to this policy, and the privacy preferences you have expressed to us. If for any reason this policy and your preferences can no longer be honored, your school administration will be given a choice of whether their data is transferred to the new controlling organization.

We may also share Inter-State school photographs with law enforcement in accordance with our Operation Child ID® community child safety program. See the section titled [What is Operation Child ID® - A Community Child Safety Program by Inter-State Studio](#) in our General Audience Privacy Policy for more information.

How do we keep your information secure?

Although no website, application, database, or system is completely secure or "hacker proof," we have safeguards in place to protect against unauthorized access and disclosures of the personal information we control. At the most basic level, we restrict physical access to our servers to only those people responsible for their operation. As a matter of process, we provide training to our staff on current security measures and we contract for routine penetration testing by outside experts. And at the deeper technical layer, we utilize current best practices from coding and encrypted data transport to real-time monitoring of our firewall and intrusion detection systems. Despite these measures, however, we cannot guarantee that our information security safeguards will never be compromised.

Our Sites and Apps may be linked to other websites or may contain links to other websites. This Privacy Policy only applies to our Sites and Apps, and we are not responsible for the privacy practices, security standards, or content of other sites. You should check the privacy policies of those sites before providing your personal information to them.

How do we make updates to this policy?

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Effective Date: January 1, 2020

If you are a California resident, California law may apply to how we collect and use your personal information, and what rights you have in some circumstances. The following terms supplement our Privacy Policy and explain the rights of California residents.

For information about what categories of personal information we may collect from our customers, the sources of that information, the purposes for collecting and using that information, and what types of third-party service providers we may share that information with, please see our section titled *What personal information do we collect? How do we use that information?*

California residents have the following rights:

- The right to request information about personal information that we have collected about that customer in the 12 months preceding the customer's request (including the categories of information collected, the source of that information, the business purpose of that collection, the categories of third parties with whom that information is shared, and the specific pieces of personal information collected about that particular customer);
- The right to receive requested information in a readily-usable format if provided electronically;
- The right to request that we delete any personal information about the consumer that we have collected (although we may be entitled to retain some information for certain purposes);
- The right to opt-out of "sales" of personal information to third parties, if applicable; and
- The right to freely exercise your rights without being denied goods or services.

We cannot respond to your request to access or delete information unless we are able to both verify your identity or authority to make the request and confirm the personal information relates to you and/or your household. If you have an account on any of our Sites and Apps, we will verify your identity by having you log in to your account. If you do not have an account on our Sites and Apps, we will attempt to verify your request by asking you to provide identifying information that we will match to information in our files. We will only use information you provide in your request for the purpose of verifying your identity or authority to make the request. You can also designate an authorized agent to make a request on your behalf. Your agent will need to provide a Power of Attorney authorizing the agent to act on your behalf, or will need to complete the same verification procedures that would be required for a request submitted by you directly, and provide information that allows us to verify your authorization. We may deny deletion requests in whole or in part as permitted or required by applicable law. We do not charge a different price or rate or provide a different level or quality of goods or services based on your exercising your CCPA rights. We do not sell personal information.

To exercise your rights under California law, please send an email to issnet@inter-state.com (<mailto:issnet@inter-state.com>).

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, you may request and obtain removal of content or information you have publicly posted on such site. To make such a request, please send an email with the subject line "California Minor Content Removal Request" to issnet@inter-state.com (<mailto:issnet@inter-state.com>). Please specify in your request which website or application your request relates to and the specific information or content that you would like removed. Please note that your request does not ensure complete or comprehensive removal of the content or information, because, for example, some of your content may have been reposted by another visitor to our websites.

Does Inter-State use School/Student/Staff photos in advertisements?

No, Inter-State does not use your photos in our advertisements.

Inter-State Studio Professional Photography

The following frequently asked questions relate to Inter-State professional photographs taken in portrait studios, schools, businesses, and other organizations that Inter-State serves.

Does Inter-State use my photos for marketing?

Not without the permission of the photo subject. Inter-State is proud of its work as a professional photographer, and from time to time we request permission from our customers to display their photos as samples of our work. Inter-State does not use its customers' photographs in marketing or advertising materials to third parties without first obtaining a photo release from the photo subject (or, in the case of a minor, the photo subject's parent or legal representative).

Does Inter-State share my child's school photos with my child's school?

Yes – schools and preschools across the United States entrust Inter-State to photograph students and staff as part of the time-honored tradition of Picture Day. Inter-State provides those photos to the school for use in the school yearbook, student IDs, classroom seating charts, and other school-related purposes. Inter-State also offers the photographs for purchase by parents.

How long does Inter-State keep photos? What are my options?

When Inter-State is engaged by a school as its official photographer, the photos we capture are deleted in the ordinary course of business within a reasonable time after we have fulfilled our contractual obligations, with the exception of photos associated with parent/customers who elect to purchase from us. Unless purchased by a parent/customer, we retain school photos only as long as necessary to satisfy our obligations to the schools we serve.

If you wish, you can take steps to have your photos deleted from our systems earlier, by contacting us at issnet@inter-state.com (<mailto:issnet@inter-state.com>). We may require certain information from you to validate your request before deletion. Please be aware, however, that Inter-State may deny your request and retain your photos under certain limited circumstances – for example, if we have a contractual commitment to a school or other organization you are affiliated with (such as providing yearbook photos or the yearbook itself), if doing so would violate a law or court order, or if it would be unreasonably burdensome. Also, please be aware that, if you shared your photo with other purchasers, your photo deletion request will not affect any photos retained in others' photo libraries or those purchasers' archiving preferences.

Specific to Pre K-12 Educators and Parents

Since 1933, Inter-State has been a trusted provider of school services, providing photography services to schools and families across the United States. Inter-State photographs children by agreement with the schools we work with. We offer time-honored Picture Day products to the families of children we photograph while fulfilling a necessary role at no charge to the school.

In preparation for Picture Day, Inter-State requires certain basic information from your child's school record, such as name, grade, and homeroom teacher name. Below are a number of Frequently Asked Questions ("FAQs") regarding the basic information that Inter-State needs in order to provide its photography services. These FAQs are intended to provide answers to questions that you may have about Inter-State's use of such information and to demonstrate Inter-State's commitment to your child's privacy and security.

What student personal data does Inter-State receive from schools?

The information we need for Picture Day depends upon the specific services and deliverables Inter-State is providing your school. We limit the information we collect to only that which is necessary for Picture Day and related authorized school purposes. We collect the basic information in advance of Picture Day to match names to the pictures we take and for efficient distribution within the school. We may receive your email or mailing address in order to deliver Picture Day-related communications on behalf of the school. In such cases, we do not retain or use your contact information for any other purpose unless you opt-in to receive updates and promotional offers from us.

In addition, the information may be incorporated into other items that we are providing to your school. For example, if Inter-State is producing student ID cards, we need the student ID number to do the job. Our yearbook image product includes images of students sorted by name, grade and other classifying data per your school's requirements. Schools ultimately decide how much, or how little, information is used in producing School Service Items. Inter-State never has access to sensitive information, such as grades or attendance data, from your child's record.

How does Inter-State use the information it receives from schools?

As part of our agreement with your child's school, Inter-State provides various services that support the school's administrative needs, which may include student ID cards for lunch, library and transportation purposes and digital images for the school to use for student recognition, awards, teacher tools, yearbooks, memory books, and class composites. These services are provided throughout the school year. Inter-State uses the basic information that it collects solely as necessary to produce such items for the

school, to deliver Picture Day-related notices on behalf of your school, and to provide you opportunities to purchase your child's school pictures.

- **Inter-State does not sell, trade, or share student data collected from your child's school with third parties for their marketing purposes, nor do we use such data in ways that are unrelated to the purposes authorized by the school.**

Inter-State retains the basic information it collects from schools only as necessary and permissible to promote the sale of school pictures to parents, to retrieve the images to supply picture orders, and to support the school for an approved administrative purpose. Once such data is no longer needed for school-specific purposes, it is securely destroyed. Unless purchased by a parent/customer, we retain school photos only as long as necessary to satisfy our obligations to the schools we serve.

While retained or any reason, it remains under Inter-State's control and treated as confidential information.

Family Educational Rights & Privacy Act ("FERPA")

In its role as the official school photographer, Inter-State photographs all students who appear at the camera on Picture Day, and we rely on your child's school or district to obtain any parental consent necessary for us to do the work they engaged us for. Our photographers reasonably presume that they are permitted to photograph each individual who appears at the camera for that purpose. If you are a parent who does not want your child to participate in your school's Picture Day, you must pre-arrange with the school not to have your child photographed.

Inter-State acknowledges its obligations as a service provider to your school for student and staff photography pursuant to the federal Family Educational Rights and Privacy Act ("FERPA"). Your school retains the authority to control Inter-State's use of the information it provides to Inter-State and to require its return or destruction at any time.

What are my options as a parent?

Parents have the right to access any data we have on them or their children in order to review or correct it. We will honor a parent's image/data deletion and/or modification request, subject to verification, and authorization of the school when deletion would impact our ability to deliver an item or service requested by the school.

We generally recommend these requests be handled through the school, but requests for access, modification/deletion not affecting an item or service requested by the school, or any questions about your personal data may also be directed to issnet@inter-state.com (<mailto:issnet@inter-state.com>).

If you choose to purchase your child's school photos from Inter-State, the personal information you provide to us will be treated as customer information and used as described in our General Audience Privacy Policy

Note to Schools and Parents about Inter-State Pre K-12 Applications

Some Inter-State-provided websites, applications, and online services are designed for the use and benefit of the schools and school districts for administrative and educational purposes and used by or at the direction of teachers or other school or district employees. Applications include the InfoSpot Portal for school administrators and our Inter-State-offered Yearbooks applications and online tools.

With respect to our support Applications, Inter-State will:

- not collect or use student personal data beyond what is needed for authorized school purposes;
- not sell or rent student personal data;
- not use or share student personal data for advertising or similar commercial purposes, such as behavioral targeting of advertisements to students;
- not build a personal profile of a student, other than for supporting authorized educational or school purposes or as authorized by the parent, guardian, or student of appropriate age;
- require that our vendors with whom student personal data is shared to deliver the school service, if any, are obligated to implement these same commitments for student personal data.

A school, through its authorized representative, may elect to allow students to contribute to the school yearbook using an Inter-State Yearbook application. In accordance with the Federal Children's Online Privacy Protection Act of 1998 (COPPA, 15 U.S.C. § 6501 et seq.), we will never knowingly solicit, nor will we accept, personally identifiable information from users known to be under thirteen (13) years of age without the consent of their educational institution or the child's parent or guardian.



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