Washington County School District
121 West Tabernacle Street
Saint George, Utah 84770
435-673-3553

Administrative Letter N004

Personal Data Collection Notice

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Section 1: Educational Data Collection, Privacy Practices, and Advertising Use

As part of our compliance with the Family Educational Rights and Privacy Act (FERPA) and Utah Code Annotated (U.C.A.) **§63A-19-402**, the Washington County School District provides the following information regarding the collection, use, and protection of educational data:

1. **Data Collected**: Contact and educational information are collected for purposes including educational services, student support, compliance with regulations, and enhancing classroom resources.
2. **Purpose**: Data is used to meet educational objectives and operational needs.
3. **Advertising**: Parent contact information may be used by the district foundation to distribute advertising content from local sponsors. However, **no contact information is ever sold or shared with advertisers.** All communications are managed internally to protect privacy. Advertising revenue directly supports classroom materials, supplies, and equipment.
4. **Directory Information**: Under FERPA, certain information such as student names, grade levels, and participation in activities may be shared unless opted out in writing. The district also routinely discloses names, addresses, and phone numbers to military recruiters and institutions of higher education unless a written opt-out request is submitted. For details on FERPA, please see our FERPA Notice.
5. **Disclosure for Legal, Safety, or Service Reasons**: All disclosures of educational records are governed by **FERPA** and may only be released as permitted under FERPA guidelines. This includes disclosures required by court orders, in cases of health and safety emergencies, for state and federal audits and evaluations, or to contractors engaged by the district to provide services such as technology services or educational platforms.
6. **Third-Party Contracts**: The district adheres to **U.C.A. §53E-9**, which governs the use of educational data by third parties. All contracts with vendors are reviewed to ensure compliance with state law, requiring strict data protection measures and prohibiting unauthorized use of student information.

7. **Security**: Data is protected using robust security measures, including encryption and controlled access, to prevent unauthorized use or exposure. All district employees complete annual training on data security and privacy to address potential risks and ensure compliance with laws.
8. **Amendment of Records**: Legal guardians and eligible students have the right to request the amendment of educational records they believe are inaccurate or misleading. To do so, please refer to our FERPA Notice for detailed procedures.
9. **Consequences of Refusal to Provide Data**: Providing personal data is essential for the district to offer educational services and access. If you choose not to provide the requested information, the district may be unable to deliver the applicable services or access.

For questions, contact **privacy@washk12.org**.

Section 2: Non-Educational Data Collection and Privacy Practices

The Washington County School District provides the following notice regarding the collection and use of **non-educational data**, including but not limited to **employee, applicant, and general public information**:

1. **Data Collected**:
    - **Employees and Applicants**: The district collects personal data, including contact information, employment history, qualifications, Social Security numbers, biometric information (such as fingerprints), and other relevant data necessary for employment purposes.
    - **All Individuals**: The district may collect names and contact information from individuals who interact with the school board or district. This includes:
        - **Public Board Meetings**: Individuals who sign up to provide public comments at school board meetings submit their names as part of the public record.
        - **Direct Communications**: Individuals who reach out to the district with comments or concerns may voluntarily provide their contact information.
        - **Use of District Services**: When members of the public use district services, including school buildings, internet connections, and other district-operated facilities, the district collects contact information and other necessary data to validate their identity and log their interactions. This includes:

            - **Security camera footage** to monitor activity within district properties.
            - **Internet traffic logs** when individuals access the district's networks, websites or infrastructure. The district maintains detailed security logs for all access and login activity to protect district services, detect malicious activity, and prevent unauthorized access.
            - **Facility usage logs** for tracking visitors, event participation, or access to district-provided services.
            - **Website Tracking and Logs**: District websites may use limited tracking technologies, such as cookies or similar mechanisms, strictly for purposes related to security, performance, and compliance. These technologies help ensure that district web services remain available, reliable, and protected against misuse. The district does

not directly employ advertising cookies. District websites may contain links or utilize technologies on external sites that use their own tracking or analytics technologies, which are governed by the privacy practices of those third-party providers.

2. **Purpose**:
    - **Employees and Applicants**: Collected information is used for recruitment, hiring, payroll, benefits administration, background checks, performance evaluations, compliance with legal obligations, and contractor-provided services.
    - **All Individuals**: Collected information is used for:
        - Maintaining required records of public meetings.
        - Responding to individuals who contact the district with comments or concerns.
        - **Protecting district services and property**, including monitoring building access, maintaining security records, ensuring network security, and ensuring compliance with district policies regarding facility and technology use.

- **Data is also used to meet educational objectives and operational needs.**

- **Security**: Data is protected using robust security measures, including encryption and controlled access, to prevent unauthorized use or exposure. All district employees complete annual training on data security and privacy to ensure best practices are followed.
- **Third-Party Contracts**: The district adheres to **U.C.A. §62G-2**, which governs the use of non-educational data by third parties. Contracts with vendors are carefully reviewed to ensure compliance with state law, requiring stringent safeguards and prohibiting the misuse of personal data.
- **Disclosure**:

    - **Employees and Applicants:**
        - Data may be disclosed to third parties only when legally required, such as for background checks, tax reporting, regulatory compliance, or to contractors engaged by the district to provide services, such as payroll, benefits management, or technology services.
        - Data may be disclosed to the Utah Professional Practices Advisory Commission (UPPAC) when applicable, as governed by District Policy.

    - **All Individuals**:
        - Information collected from individuals engaging with the district may be disclosed when required by law, such as maintaining public records of board meetings or ensuring compliance with security protocols.
        - Data may be disclosed to state and federal agencies when required by law or Utah Administrative Rule.
        - Data may be disclosed to the public when required under the Government Records Access and Management Act (GRAMA).
        - Data may be disclosed to law enforcement when applicable, as governed by District Policy.

- **Amendment of Records**: Individuals or their legal guardians have the right to request the amendment or correction of their personal data if they believe it is inaccurate or incomplete. To initiate this process:

    - Submit a request in writing to the District's Records Officer (Business Administrator) that includes:

        - A clear description of the data to be amended or corrected;
        - The reason for the amendment or correction;

        - Any supporting documentation.

- **Consequences of Refusal to Provide Data**: Providing personal data is essential for the district to offer certain services or access. If you choose not to provide the requested information, the district may be unable to deliver the applicable services or access.

  For questions, contact **privacy@washk12.org**.