d. Associated student(s)[children].

13. Respondent's publicly posted privacy [illegible]
   a. "RST [Respondent] will not sell, or [illegible] otherwise use or [illegible] disclose [illegible] education re[illegible] for [illegible] targeted advertising or [illegible] within it[illegible] product [illegible] institution."[2]

14. Respondent [illegible] contacted by [illegible] HESR [illegible] Central School District until after De[illegible]ember 14, 2023 with [illegible] Privacy [illegible]

15. The Department finds [illegible] d(5)[illegible](2), 8 NYCRR Sections 121.6, (a)(6), and [illegible] education records for a[illegible] purpose other than [illegible] required third-party contractors that rece[illegible] administrative, technical, and physical safeguards [illegible] protect PII, and notify educational agencies of a breach without unreasonable delay.

16. Respondent acknowledges [illegible] informed of the Depa[illegible] position and to avoid the burden and [illegible] of further [illegible] proceedings, hereby waives any right to a hearing as may [illegible] consents to the issuance of this Order [illegible] Respondent consents to and agrees not to [illegible] the Department [illegible] validity of this Order or its terms [illegible] Department by educational agencies as a result of this b[illegible] not an admission of the facts alleged or of liability by Respondent [illegible]

IT IS HEREBY ORDERED, pursuant to the applicable provisions of the Education [illegible] and 8 NYCRR Part 121.

1. The [illegible] amount of $100,000 will be paid by certified check to the New York State [illegible] Commissioner of **Taxation** and [illegible] of a civil penalty [illegible] described above. Respondent [illegible] pay the civil penalty under this Or[illegible]

2. Within ninety (90) days of [illegible] effective date of this Order, Respondent will [illegible] training, at its own expense, on the federal and State laws and regulations governing confidentiality of [illegible] access to such data. This training shall minimally [illegible] encompass FERPA and New York Education Law Section 2-d.

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[2] https://[illegible] nity%20it's%20products

For Respondent:

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(signature of Respondent)

CE

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Title

July 9,

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Date

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the same in his/her/their capacity
the individual(s), or t
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Notary Public

D Albany N

New York State Education Department

By