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May 1, 2018

TO THE HONORABLE MEMBERS OF THE SCHOOL COMMITTEE:

Approval of Revisions to the Website Privacy Policy

Recommendation: That the School Committee approve the revisions to the Website Privacy Policy as detailed in the attached document.

Description: These revisions to the Website Privacy Policy are being presented to align the policy with current best practices relevant to website security and privacy practices.

This is the first reading of these proposed revisions to the Website Privacy Policy.

Supporting Data: Attached redline of revisions to Cambridge Public Schools Website Privacy Policy.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "KS" with a stylized flourish.

Kenneth N. Salim, Ed.D.  
Superintendent of Schools

**WEBSITE PRIVACY POLICY**

The following policy applies only to the use of the Cambridge School Committee and Cambridge Public Schools' websites. As users navigate the Cambridge School Committee and Cambridge Public Schools' websites, the user will see links that, when clicked, will take the user to other websites external to the Cambridge School Committee and Cambridge Public Schools. The Cambridge School Committee and the Cambridge Public Schools each strongly suggest that users read the privacy policies for any external site that the users visit through a link appearing at this site. In addition, users should also review the Cambridge School Committee and Cambridge Public Schools' websites disclaimer, to learn about the terms of use of the websites.

**Website Privacy.** At the Cambridge School Committee and Cambridge Public Schools' websites, the Cambridge School Committee and Cambridge Public Schools attempt to protect the privacy of users to the maximum extent possible. However, because some of the information that is received through these websites are subject to the provisions of Massachusetts General Laws chapter 66, section 10, the Commonwealth of Massachusetts' public records law, the Cambridge School Committee and Cambridge Public Schools cannot ensure absolute privacy. Information that users provide to either the Cambridge School Committee and/or to the Cambridge Public Schools through these websites may be made available to members of the public under the Commonwealth of Massachusetts' public records law pursuant to a public records request that is made by a member of the public. This website privacy policy informs users of the information that the Cambridge School Committee and the Cambridge Public Schools collect from users at these websites, what is done with the information collected, to whom the information may be disseminated, and how users can access it. Based on this information, users can make an informed decision about their use of this website and whether to share personally identifiable information with either the Cambridge School Committee and/or the Cambridge Public Schools through these websites.

**Personally Identifiable Information.** The term "personally identifiable information" means any information that could reasonably be used to identify a user, including ~~his/her~~ user's name, address, telephone number, e-mail address, ~~his/her~~ child's name, Social Security number, date of birth, or any combination of information that could be used to identify either the user and/or ~~the user's~~ his/her child.

**Information Voluntarily Provided by the User.** The Cambridge School Committee's website collects voluntary information from the user through surveys posted on the website and/or through e-mails that the user sends directly to the Cambridge School Committee. As a result, the Cambridge School Committee's website may collect personally identifiable information the user voluntarily submits, such as name, address, e-mail address or telephone number, so that the Cambridge School Committee may contact the user for follow up to ~~the user's~~ his/her question, concern or recommendation. Any e-mail messages sent by the user to the Cambridge School

Committee website will contain personally identifiable information such as the user's e-mail address and any other information the user chooses to give to the Cambridge School Committee to help the Cambridge School Committee answer your inquiry.

The Cambridge Public Schools' website also collects voluntary information from users through surveys posted on the website and/or through e-mails that the user sends directly to any employees of the Cambridge Public Schools. As a result, the Cambridge Public Schools' website may collect personally identifiable information that users voluntarily submit, such as name, e-mail address or telephone number, so that the appropriate employee of the Cambridge Public Schools may contact the user for follow up to the user's question, concern or recommendation. Any e-mail messages sent by the user to the Cambridge Public Schools' website will contain personally identifiable information such as the user's e-mail address and any other information the user chooses to give an employee of the Cambridge Public Schools to help the Cambridge Public Schools answer the user's inquiry.

**Information Automatically Collected and Stored by these Websites.** The Cambridge School Committee and Cambridge Public Schools' websites each use "session cookies" to allow visitors to interact with the websites and to use online applications. "Session cookies" do not allow either the Cambridge School Committee and/or the Cambridge Public Schools to personally identify a visitor. These cookies are stored only on the user's computer and may be deleted by the user.

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The Cambridge School Committee and Cambridge Public Schools' websites do collect and store a visitor's "Internet Protocol ("IP") address," (which does not identify the user as an individual) indefinitely, as well as information about the date and time of a user's visit, whether a file a user has requested exists, and how many "bytes" of information were transmitted to the user over the Web from either the Cambridge School Committee or Cambridge Public Schools' website. The Cambridge School Committee and Cambridge Public Schools' websites use a user's IP address to assess the frequency of visits to the websites and the popularity of its various pages and functions. The Cambridge School Committee and Cambridge Public Schools will not attempt to match any personally identifiable information that a user provides to either the Cambridge School Committee or Cambridge Public Schools with a user's IP address, unless there are reasonable grounds to believe that doing so would provide information that is relevant and material to a criminal investigation.

The Cambridge Public Schools also will post on its website information regarding any specific vendors that it uses in connection with the operation of its websites to collect and process data in order to make its online websites easier to use. In these cases, the Cambridge Public Schools also will post a link to the vendor's website where it explains how the vendor collects and processes data. The Cambridge Public Schools also will include a statement that a website user may control information that is shared by their web browser when interacting or visiting sites by checking the "help" feature or "account settings" of their own web browser to learn how to use these features.

**Dissemination of a User's Personally Identifiable Information.** The Cambridge School Committee and Cambridge Public Schools do not sell any personally identifiable information collected through these websites or submitted to the Cambridge School Committee and/or Cambridge Public Schools in conjunction with using functions on these websites, and there is no direct or online public access to the information. However, once a user voluntarily submits personally identifiable information to either the Cambridge School Committee or Cambridge Public Schools related to the user's use of the portal, its dissemination is governed by the Commonwealth of Massachusetts' public records law, Commonwealth of Massachusetts' Fair Information Practices Act, Commonwealth of Massachusetts' student records law and other applicable laws and regulations, including but not limited to, the federal Family Educational Rights Privacy Act. **For this reason, part or all of the information a user sends to either the Cambridge School Committee and/or the Cambridge Public Schools may be provided to a member of the public in response to a public records request pursuant to a public records request that is made by a member of the public.**

In addition, the information that a user voluntarily submits to the Cambridge School Committee will be disclosed only to members of the Cambridge School Committee or those individuals designated by the Cambridge School Committee with a "need to know" for purposes of fulfilling their job responsibilities. The information will be used for such purposes as; answering the user's questions, responding to any requests for assistance, generating summary statistics about usage, auditing applications and detecting fraud, aiding in the planning, design and development of the Cambridge School Committee's website, and fulfilling the Cambridge School Committee's legal obligations. Where appropriate, the Cambridge School Committee may provide the information submitted by a user through an e-mail to the person or company that is the subject of the user's inquiry, or to the Cambridge Public Schools or a federal, state or local government agency responsible for the matters referred to in the user's communication. Additionally, where appropriate and with the user's agreement, the Cambridge School Committee may release the information without a public records request having been received.

Moreover, the information that a user voluntarily submits to the Cambridge Public Schools will be disclosed only to employees of the Cambridge Public Schools, or those under contract with the Cambridge Public Schools with a "need to know" for purposes of fulfilling their job responsibilities. The information will be used for such purposes as; answering the user's questions, responding to any requests for assistance, generating summary statistics about usage, auditing applications and detecting fraud, aiding in the planning, design and development of the Cambridge Public Schools' website, and fulfilling the Cambridge Public Schools' legal obligations. Where appropriate, the Cambridge Public Schools may provide the information submitted by the user through an e-mail to an employee of the Cambridge Public Schools to the person or company that is the subject of the user's inquiry, or to the Cambridge School



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Committee or a federal, state or local government agency responsible for the matters referred to in the user's communication.

The Cambridge School Committee and the Cambridge Public Schools also will collect and aggregate the information the user provides through surveys for purposes of market research to improve these websites and/or to improve the operations of the Cambridge Public Schools.

**A User's Access and Opportunity to Correct.** The "Public Records Law" and the "Fair Information Practices Act" provide users certain rights to get information about ~~themselves him or her~~ that is in the records of the Cambridge School Committee and/or Cambridge Public Schools. To learn more about the circumstances under which a user can get and correct this information, please read these laws.

**Security.** Because e-mails sent to the Cambridge School Committee are not encrypted, users should not send messages containing information that a user considers highly sensitive to this website. The Cambridge School Committee uses standard security measures to ensure that information provided by a user, including a user's personally identifiable information, is not lost, misused, altered, or unintentionally destroyed. The Cambridge School Committee also uses software to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Except for authorized law enforcement investigations, no attempts are made to identify individual users or their usage habits.

Additionally, because e-mails sent to employees of the Cambridge Public Schools are not encrypted, users should not send messages containing information that a user considers highly sensitive to this website. The Cambridge Public Schools uses standard security measures to ensure that information provided by a user, including a user's personally identifiable information, is not lost, misused, altered, or unintentionally destroyed. The Cambridge Public Schools also uses software to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Except for authorized law enforcement investigations, no attempts are made to identify individual users or their usage habits.

**Policy changes.** The Cambridge School Committee will post substantive changes to this policy at least thirty (30) days before such changes take effect. Any information the Cambridge School Committee and/or Cambridge Public Schools collects under the current website privacy policy will remain subject to the terms of this website privacy policy. After any changes take effect, all new information the Cambridge School Committee and/or Cambridge Public Schools collects, if any, will be subject to the new policy.

**Contact Information.** For questions about privacy while using either the Cambridge School Committee and/or Cambridge Public Schools' websites, please contact the Web Administrator at [webadmin@cpsd.us](mailto:webadmin@cpsd.us).

**Definitions:**

**Cookies** are files that a website can place on a user's computer. A cookie file contains unique information that a website can use to track such things as a user's password, lists of web pages a user has visited, and the date when a user last looked at a specific web page, or to identify a user at a particular website. A cookie file allows the website to recognize a user as the user clicks through pages on the website and when a user later revisits the website. A website can use cookies to "remember" a user's preferences, and to record a user's browsing behavior on the web. Although a user can prevent websites from placing cookies on a user's his/her computer by using the browser's preference menu, disabling cookies may affect a user's ability to view or interact with some websites.

An **"Internet Protocol Address" or "IP Address"** is a series of numbers that identifies each computer and machine connected to the Internet. An IP address enables a server on a computer network to send a user the file that the user he/she has requested on the Internet. The IP address disclosed to the Cambridge School Committee and/or Cambridge Public Schools may identify the computer from which the user is accessing the Internet, or a server owned by the user's Internet Service Provider. Because it is machine-specific, rather than person-specific, an IP address is not, in and of itself, personally identifiable information.

*Adopted: Act 5, 2009*