

Charter School Leaders
Data Protection Officers

FROM: Louise DeCandia, Chief Privacy Officer

DATE: June 7, 2023

Commercial and Marketing

This memorandum provides general guidance regarding WKH WHUPV 'FRPPHU
DQG 'PDUNHWLQJ LQ (GLXFDWLRQ Education that agency can avoid the
use of student data for such purposes.

Education Law § 2 -d (3) (b) (1) states that: 'D VWXGHQW V SHUVRQDOO
LQIRUPDWLRQ 3,, FDQQRW EH VROG RU UHOHDVHG IRU DQ

2) Is the educational agency selling or releasing student data?