MathKEYmatics Security Policy

National Training Network, LLC

Effective Date: September 2025

1. Purpose

This Security Policy establishes the safeguards and practices that National Training Network, LLC ("NTN") implements to protect the confidentiality, integrity, and availability of data processed by MathKEYmatics, a browser-based math instruction and assessment platform for grades 1–8.

The policy is designed to ensure compliance with applicable federal and state student data privacy laws, including the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy Protection Act (COPPA), and state-specific requirements such as SOPIPA and SOPPA.

2. Scope

This policy applies to:
• All data collected, stored, processed, or transmitted by MathKEYmatics.
• All NTN employees, contractors, and service providers with access to MathKEYmatics systems or data.
• All participating schools, districts, and authorized users (teachers, administrators, and students).

3. Data Classification

MathKEYmatics processes the following types of information:
• Student Data: Identifiable information (e.g., names, usernames, grade level, assessment results) classified as confidential.
• Teacher/Administrator Data: Professional contact information and account credentials, classified as restricted.
• System Data: Logs, metadata, and aggregated/de-identified data used to improve performance, classified as internal.

4. Security Controls

4.1 Access Management
• User accounts are provisioned by authorized school or district representatives.
• Access is role-based (student, teacher, administrator).

• Passwords must meet minimum complexity standards and be stored using industry-standard hashing.
• Multi-factor authentication (MFA) is required for administrative access.

4.2 Data Protection
• All data in transit is encrypted using TLS 1.2 or higher.
• All data at rest is encrypted using AES-256 or equivalent.
• NTN maintains strict segregation of customer data across environments.
• Student data is not shared with third parties except as authorized by the school/district for educational purposes.

4.3 Infrastructure & Network Security
• MathKEYmatics is hosted in a secure cloud environment with firewalls, intrusion detection, and regular vulnerability scanning.
• NTN applies security patches and updates promptly.
• Access to production systems is limited to authorized technical staff following least-privilege principles.

4.4 Application Security
• Secure coding practices are followed, including OWASP guidelines.
• Regular application penetration testing and code reviews are performed.
• Session timeouts and automatic logouts are enforced for inactive users.

4.5 Monitoring & Incident Response
• NTN continuously monitors systems for suspicious activity.
• A formal incident response plan is in place, including notification procedures for schools and districts within [X] business days of a confirmed breach.
• Logs are retained for security and auditing purposes in compliance with applicable laws.

5. Compliance with Student Privacy Laws
• FERPA: NTN acts as a "school official" with legitimate educational interest, using data only for authorized educational purposes.
• COPPA: For students under 13, schools provide verifiable parental consent on parents' behalf.
• State Laws (SOPIPA, SOPPA, etc.): NTN does not sell, lease, or trade student data, and will not use it for targeted advertising.

6. Data Retention & Destruction
• Data is retained only for the duration of the school or district's license term.
• Upon contract termination, NTN will, upon request, return or securely delete all student

data within 60 days.

• Backups are destroyed on a rolling schedule in compliance with retention policies.

7. Employee & Contractor Security

• NTN requires background checks for employees handling sensitive data.

• All staff receive annual training on data privacy and security practices.

• Contractors are bound by confidentiality and data protection agreements.

8. Business Continuity & Disaster Recovery

• NTN maintains a disaster recovery plan with redundancy and regular backups.

• Recovery time objectives (RTO) and recovery point objectives (RPO) are defined and tested periodically.

• Schools and districts will be notified of any significant disruptions.

9. Policy Review & Updates

This Security Policy will be reviewed annually and updated as necessary to reflect changes in law, technology, or organizational practices. Significant updates will be communicated to schools and districts.

10. Contact Information

For questions regarding this Security Policy or data protection practices, contact:

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