



Sawyer STREAM Academy
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STUDENT DATA PRIVACY POLICY

Protection, Use, Access, and Stewardship of Student Information

School	Sawyer STREAM Academy
Legal Organization	Sawyer Scholastics, LLC
Policy Owner	Executive Director
Approved By	Dr. Robert E. Sawyer
Effective Date	1 August 2026
Review Cycle	At least annually and whenever legal, operational, or technology changes require revision

This policy applies to student information maintained by Sawyer STREAM Academy in admissions, instruction, assessment, communication, student support, academic records, technology systems, and school operations.



1. Purpose

Sawyer STREAM Academy recognizes that student information is entrusted to the school for legitimate educational purposes. The Academy is committed to protecting the confidentiality, integrity, accuracy, and appropriate availability of that information while ensuring that authorized personnel can use it to support instruction, student services, communication, safety, and required school operations.

This policy establishes the principles and procedures governing the collection, access, use, disclosure, storage, correction, retention, and disposal of student data. It is designed for a distance-learning environment in which information may be created and transmitted through a student information system, learning management system, assessment tools, communication platforms, cloud services, and other approved educational technologies.

2. Scope

This policy applies to all administrators, employees, teachers, contractors, consultants, volunteers, partner-school personnel, and service providers who are authorized to create, receive, access, process, transmit, or store student information on behalf of Sawyer STREAM Academy.

It applies to information concerning applicants, enrolled students, former students, and, where applicable, parents or legal guardians. It covers information maintained in electronic, paper, audio, video, photographic, and other recorded formats.

3. Governing Principles

Sawyer STREAM Academy follows a data-minimization approach. The Academy seeks to collect only information that is reasonably necessary for enrollment, placement, instruction, assessment, student support, communication, safety, legal compliance, and institutional improvement.

Student information is used only for authorized purposes, accessed only by persons with a legitimate need, protected through reasonable administrative and technical safeguards, and retained only as long as required by school policy or applicable law. Decisions about student data are guided by the best interests of students, respect for families, and the Academy's Culture of Care.

4. Categories of Student Information

Student information may include identifying and contact information; demographic information; enrollment and withdrawal records; attendance and participation information; grades, transcripts, course history, assessments, projects, and academic progress; communications with students and families; student support and advising records; technology usage and access logs; disciplinary or academic-integrity records; health, accommodation, or emergency information voluntarily provided to the school; and other information required for legitimate educational or administrative purposes.

The Academy distinguishes between permanent academic information and temporary or operational information. Permanent records include verified information of enduring educational importance, such as enrollment dates, courses completed, credits, grades,



attendance, graduation status, and transcript information. Temporary records may include information that changes over time, such as current contact details, teacher comments, intervention notes, support records, and technology logs.

5. Collection and Notice

Information is collected directly from students, parents or guardians, prior schools, partner schools, authorized educational service providers, and school personnel. When practical, families are informed about the purpose for which information is requested and whether providing it is required for enrollment or participation.

The Academy does not knowingly request sensitive information that is unrelated to a legitimate educational, safety, or administrative purpose. Optional information is identified as such when appropriate.

6. Authorized Use

Student data may be used to process applications; determine placement; deliver instruction; record attendance and participation; evaluate learning; issue grades, reports, transcripts, and diplomas; provide academic guidance and student support; communicate with students and families; administer school programs; protect student safety; investigate policy violations; improve curriculum and services; fulfill contractual responsibilities; and meet applicable legal or reporting obligations.

Student data will not be sold. It will not be used for unrelated commercial advertising or profiling by Sawyer STREAM Academy. Educational technology providers may process information only for approved school purposes and under applicable agreements, terms, or privacy protections.

7. Access and Role-Based Permissions

Access to student information is limited according to professional responsibility and legitimate educational need. Administrators may access records necessary for school operations and oversight. Teachers may access information needed to teach and support assigned students. Student-support personnel may access information necessary to provide approved services. Technology personnel may access information only to maintain systems, resolve technical issues, protect security, or perform authorized data administration.

Parents or legal guardians may request access to records concerning their minor child, subject to identity verification and any limitations required by law. Eligible students may exercise rights applicable to their own records. Students are permitted to view information made available to them through approved school systems.

8. Parent and Student Requests

Parents, legal guardians, and eligible students may request access to student records, ask for clarification, and request correction of information they believe is inaccurate or misleading. Requests should be submitted through an official school communication channel and must provide enough information to identify the record in question.



The Academy will verify the requester's identity and authority before releasing or changing records. Requests are reviewed by authorized personnel. If a requested correction is not made, the school may permit the requester to submit a written statement explaining the concern for inclusion with the disputed record, when appropriate.

9. Disclosure of Student Information

Student information is not disclosed outside Sawyer STREAM Academy without appropriate authorization unless disclosure is permitted or required for a legitimate educational, safety, contractual, or legal purpose. Written consent will be obtained when required.

Permitted disclosures may include transfers to another school at the request of the family; disclosures to approved service providers performing school functions; disclosures to accreditation evaluators under confidentiality expectations; disclosures necessary to address a health or safety emergency; disclosures required by court order, subpoena, or law; and disclosures to government or educational authorities when legally required.

Before information is disclosed, the Academy considers the identity of the recipient, the purpose of the request, the minimum information necessary, and any confidentiality or security conditions that should apply.

10. Technology Systems and Service Providers

The Academy uses approved digital systems to support learning and administration. Before adopting a system that will handle student information, the Academy considers the provider's educational purpose, data practices, access controls, security features, support, reliability, and ability to meet the Academy's requirements.

Where feasible, provider agreements or terms should address permitted use, confidentiality, security, breach notification, data return or deletion, and restrictions on commercial use. Staff members may not independently upload student information to unapproved applications or services.

11. Security Safeguards

Sawyer STREAM Academy uses reasonable safeguards appropriate to the nature of the information and the school's online environment. Safeguards may include unique user accounts, strong passwords, role-based permissions, multi-factor authentication where available, secure transmission, system updates, backups, access logging, limited administrator privileges, staff training, incident reporting, and vendor review.

Users are responsible for protecting their credentials, securing devices, avoiding unauthorized sharing, and promptly reporting suspected loss, compromise, or inappropriate access. Confidential student information should not be sent through personal accounts or stored on unapproved devices or services.

12. Communication, Video, and Recorded Learning

Online classes, meetings, student work, and school events may involve audio, video, chat, screen sharing, or recordings. The Academy will provide notice or obtain permission when



required. Recordings are created only for approved educational or operational purposes and are shared only with authorized audiences.

Students, families, and staff may not record, copy, publish, or redistribute another person's image, voice, work, personal information, or private communication without authorization.

13. Data Breach and Privacy Incident Response

Any person who suspects unauthorized access, disclosure, alteration, loss, or destruction of student information must report the concern promptly to school leadership. The Academy will assess the incident, contain the risk, preserve relevant evidence, determine what information and individuals may be affected, coordinate corrective action, and make notifications when required.

Corrective action may include credential resets, access suspension, vendor coordination, system remediation, recovery from backups, policy enforcement, additional training, and revision of procedures.

14. Retention and Secure Disposal

Student records are retained according to their educational importance, operational need, contractual requirements, and applicable law. Permanent academic records are preserved in a manner intended to support future verification of enrollment, course completion, grades, credits, graduation, and transcript requests.

When records are no longer required, they are disposed of securely. Electronic records are deleted using appropriate methods, and paper records containing confidential information are destroyed so that the information cannot reasonably be reconstructed.

15. School Closure or Transfer of Records

If Sawyer STREAM Academy permanently ceases operations, the Academy will arrange for the preservation and transfer of permanent student records in accordance with applicable requirements and will communicate available record-request procedures to affected families whenever reasonably possible.

16. Staff Responsibilities and Training

All personnel with access to student information are expected to understand and follow this policy. Orientation and periodic training address confidentiality, appropriate use, secure communication, password and account protection, reporting of incidents, and the handling of records in the online environment.

Failure to follow this policy may result in loss of access, corrective action, termination of employment or services, and any other response required by contract, policy, or law.

17. Family and Student Responsibilities

Families and students share responsibility for protecting privacy. They should maintain accurate contact information, safeguard account credentials, use school systems appropriately, avoid sharing private records publicly, and report suspected account compromise or privacy concerns promptly.



Parents and students should review the privacy terms of personal devices, internet services, and third-party applications they choose to use outside the Academy's approved systems.

18. International and Cross-Border Considerations

Because Sawyer STREAM Academy serves students in multiple locations, student information may be accessed or processed across jurisdictions through approved cloud-based systems. The Academy applies this policy consistently to all students and considers relevant contractual, legal, and practical requirements when selecting systems or responding to data requests.

Families are encouraged to inform the Academy when local requirements may materially affect the processing or transfer of a student's information.

19. Complaints and Questions

Questions, access requests, correction requests, and privacy complaints should be submitted to Sawyer STREAM Academy through an official school communication channel. Concerns are reviewed by the Executive Director or an authorized designee. The Academy will document the concern, review relevant information, communicate its findings, and take corrective action when warranted.

20. Review and Continuous Improvement

This policy is reviewed at least annually and whenever significant changes occur in law, school operations, technology systems, service providers, or identified risks. Review may include incident trends, access practices, vendor performance, stakeholder feedback, system changes, and recommendations from leadership or external reviewers.

Revisions are approved through the Academy's governance process and communicated to personnel, students, and families as appropriate.

21. Responsibility Matrix

Role	Primary Responsibility	Examples of Evidence
Executive Director	Policy approval, oversight, legal and operational review, incident escalation	Approval records, annual review, incident decisions
Academic Directors	Appropriate academic use, staff guidance, curriculum and assessment practices	Training records, course review, access approvals
Teachers and Staff	Confidential handling, minimum necessary access, accurate records, prompt reporting	Acknowledgments, access records, communication samples



Role	Primary Responsibility	Examples of Evidence
Technology Support	Account controls, system configuration, backups, technical incident response	System logs, support records, security reviews
Students and Families	Credential protection, accurate information, appropriate system use, prompt reporting	Signed acknowledgments, orientation completion, requests

22. Implementation Evidence Maintained by the Academy

To demonstrate implementation, Sawyer STREAM Academy maintains evidence appropriate to its operations, which may include:

- Current approved policy and revision history;
- Staff privacy and security training records;
- Role-based user access records and account review documentation;
- Student and family acknowledgments or orientation records;
- Approved technology and service-provider inventory;
- Privacy and security review records for educational systems;
- Access, correction, transfer, and disclosure request records;
- Incident reports, response documentation, and corrective actions;
- Record-retention and secure-disposal documentation; and
- Annual policy review and improvement records.

23. Policy Acknowledgment

The undersigned acknowledge that they have received or been provided access to the Sawyer STREAM Academy Student Data Privacy Policy and understand the responsibilities applicable to their role.

Name	
Role / Relationship to Student	
Signature	
Date	
Student Name, if applicable	