



Attorneys at Law

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February 5, 2025

General Counsel
PowerSchool Group, LLC
150 Parkshore Drive
Folsom, CA 95630

Re: Middletown Public Schools

Dear Sir/Madam:

Please be advised this office represents the Middletown Public School District regarding a reported data breach on or about December 28, 2024.

As of this date, PowerSchool has informed the school district that certain PII of parents and the students and possibly employees of the District have been compromised. The district has not received any definitive information relative to the extent of the breach or specifically the individual's data that may have been released.

As you know, on Page 9 Section 6 of PowerSchool's Student Data Privacy Agreement with Middletown, the laws of Rhode Island determine PowerSchools' responsibility. This letter serves as a reminder of your obligations under the Rhode Island law in the event of the data breach affecting our school's districts data. As the breach affects personal identifiable information of Rhode Island residents you are required to comply with the Rhode Island Identity Theft Protection Act of 2015. A copy of this statute is enclosed for your convenience.

In the event of the data breach, you must take certain action including.

1. Notifying affected Rhode Island residents within forty-five (45) after confirming the breach and determining the required information for notification.
2. If the breach affects more that five hundred (500) residents you are also obligated to notify the Rhode Island Attorney's General office and major credit reporting agencies about the timing content and distribution of notices as well the approximate number of individuals affected. Additionally, you provide notification to both the district and the individuals affected and said notice should include a brief

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description of the incident and how it occurred; the number of individuals affected; the type of information breached; the date or estimated range date of the breach; the date the breach was discovered; and information about remediation services offered. Additionally, you should provide the individuals affected details as to how they may follow a police report or request a security freeze on their credit.

3. Finally, you have a continuing obligation to cooperate with Rhode Island law enforcement in their investigation of the breach.

Please ensure that the proper procedures are in place to comply with these requirements. Failure to provide proper notification may result in liability under state law. We trust you will take these obligations seriously and act promptly in this reported data breach. You should provide notification to the Attorney General's office at the following address: RI Office Attorney General 150 South Main Street. Providence, RI 02903, Phone- 401-274-4400. Please provide us with a copy of any notifications that you have, or you intend to provide with the RI office of the Attorney General.

Also, please provide this office with a detailed status report updating us on the information requested above so we may also provide those affected in the Middletown School district with a parallel notice. Lastly, please provide us with information relative to insurance carriers including general liability coverage and cyber insurance coverage and the extend of such coverage.

We look forward to working with you to ensure the rights of our family, students and employees are protected.

Thank you for your help in this matter.

Sincerely,

Benjamin M. Scungio, Esq.

BMS/rn

Enclosure

cc: RI Attorney General's Office

Russ F. Goodin, Director of Claims for RI Interlocal Trust