

# Information on Rights of Subjects of Government Data

---

## Policy Statement

---

Sourcewell Technology (“SWT”) provides educational products and services to school districts and related education entities. In connection with such services, SWT hosts educational data, including student data shared with SWT by its school district customers. SWT also maintains data about its employees and business partners. SWT’s adoption of this policy satisfies the requirement set forth in Minn. Stat. §13.025, subd. 3 to prepare a written policy of the rights of data subjects under Minn. Stat. §13.04.

## Right to know what data is kept about you and how it is classified

---

- Upon request, you may be informed about what data is kept about you and whether it is classified as public, private, or confidential. You have the right to see data about yourself that is classified as public, private, or confidential. If SWT maintains data about you that is classified as confidential, you will be told that the information exists, but you will not be able to access the data.
- To access public or private data on yourself, you can make a written request to the Data Request Contacts listed in the following section.
- If you are requesting information on yourself, please be as specific as possible. If you have an employee or student ID number, please include that in your request (if you do not have that information, please include a birthdate or the last 4 digits of your SSN).
- If we do not have the data, we will notify you in writing within ten (10) business days after we receive your request.
- If we have the data, but the data are confidential or private data that are not about you, we will notify you within ten (10) business days receipt of your request and state which specific law says you cannot access the data.
- If we have the data, and the data are public or private about you, we will respond to your request within ten (10) business days after we receive your request by either sending you copies of the information or making arrangements for you to access the data. In some cases, there may be charges for copies of the data we have on you. We will work with you to pay any charges in advance of receiving the data.
- After we have provided you with access to data about you, we do not have to show you the data again for six (6) months unless there is a dispute or we collect or create new data about you.

- The Minnesota Government Data Practices Act ("MGDPA") does not require us to create or collect new data in response to a data request if we do not already have the data, or to provide data in a specific form or arrangement if we do not keep the data in that form or arrangement. In addition, we are not required to respond to questions that are not specific requests for data.
- Private data on you will only be shared with you, with someone who has your written permission, with SWT staff who need the data to do their work, and as permitted by law or court order.
- There is no charge to view data about yourself, but if you are requesting copies of data, there might be a charge for copies. You will be told about any charges in advance.
- Upon request, you will be informed of the content and meaning of the public or private data that is maintained on you.

## Data Request Form

All data requests must be in writing. SWT uses the Data Request Form available at <http://www.sourcewelltech.org>. If you do not use the Data Request Form, your request should:

- State that you are making a request for public data under the MGDPA (Minnesota Government Data Practices Act, Minnesota Statutes, Chapter 13).
- Include whether you would like to inspect the data, have copies of the data, or both.
- Provide a clear description of the data you would like to inspect or have copied.

You are not required to identify yourself or explain the reason for your data request. However, you may need to provide us with some personal information for practical reasons (for example: if you want us to mail copies to you, you need to provide us with an address or P.O Box). If we do not understand your request and have no way to contact you, we cannot respond to your request.

## Data Practices Contacts

---

Data Request Forms or other written requests must be directed to the following SWT contacts:

### Responsible Authority

Corey Tramm, Chief Technology Officer

1667 Snelling Ave. N.

St. Paul, MN 55108

Direct: 651-999-6502

Email: [corey.tramm@sourcewelltech.org](mailto:corey.tramm@sourcewelltech.org)

## Data Practices Compliance Official

Susan Mussell, Chief Legal Officer

1667 Snelling Ave. N.

St. Paul, MN 55108

Direct: 651-999-6216

Email: susan.mussell@sourcewelltech.org

## Data Practices Designee

Ryan Coutier, Principal Security Architect/ Principal Enterprise Architect, CISSP®

1667 Snelling Ave. N.

St. Paul, MN 55108

Direct: 651-999-6822

Email: ryan.cloutier@sourcewelltech.org

## Right to data notice when private or confidential data is collected from you

---

If you are asked to supply private or confidential data about yourself, you must be told of the intended use of the data, whether you are legally required to provide the data, any known consequences of giving or withholding the data, and which other agencies or persons are authorized by law to receive the data. This notice is commonly known as the Tennessee Warning.

## Right to challenge the accuracy or completeness of data about you

---

- If you think that data maintained by SWT about you is inaccurate or incomplete, you may file a data challenge to try and have the data changed.
- Accurate means that the data are reasonably correct and do not contain factual errors; complete means that the data describe the history of your contact with SWT in a complete way. This procedure is not a substitute for any grievance process available to either data subjects or employees.
- To make a data challenge, write to the Data Contact Resources and state clearly that you are making an accuracy or completeness challenge; identify the data you are challenging, and what you think should be done. You will receive a decision within thirty (30) days whether SWT agrees with your challenge. If we agree, your data will be amended appropriately. If SWT disagrees or believes that your request has to do with something other than the accuracy or completeness of the data, the challenge will be denied.
- If your challenge is denied, you have the right to file an appeal with the Commissioner of the Minnesota Department of Administration. Your appeal must be in writing and filed within sixty (60) days after SWT's decision.

- If you believe that public or private data that SWT maintains about you is inaccurate or incomplete, you have the right to include a statement of disagreement with the data. If the disputed data is released to a third party, SWT will include your statement of disagreement with the data.

## Right to have your data protected

---

- SWT is required under the MGDPA to protect your data. We have established appropriate safeguards to ensure that your data is safe. Our policies can be found at <http://www.sourcewelltech.org>.
- In the event of an unfortunate "security incident" or "privacy incident" as defined in such policies, SWT will ensure that you are notified as required by law.