Written Data Retention Policy

IMPACTER Education Corp. · Cal. Bus. & Prof. Code §22584(d)(5) · Privacy Policy §8 · OCT 2026

This is IMPACTER's written data retention policy for student information under Cal. Bus. & Prof. Code §22584(d)(5). It is also Section 8 of our Privacy Policy, and it is available to any student, parent, guardian, education rights holder, or school personnel.

Why We Collect It

To deliver the service your school engaged: asking for a student's spoken or written reflection, transcribing it and scoring it against a published rubric, reporting results to the school, and measuring growth over time.

Why We Keep It

So students and staff can review a response beside its result, so growth can be measured across administrations, and so the school can meet its own documentation needs, such as counseling and MTSS follow-up, IEP and Section 504 records, and program records such as CYBHI. These are student work and evaluative results, the category §22584(d)(4)(B) recognizes.

How Long

Responses, transcripts, scores, and indicators: no longer than your school keeps the same kind of record, and never longer than twelve months after last educational use. If your school's period is shorter, yours controls (§22584(d)(5)(B)). Your school may choose end-of-year deletion or text-only administration.

Audio and video recordings: the same schedule as their transcripts, deleted together with them. A school that wants no recordings chooses text only.

Account and roster information: for the length of the school's agreement, then deleted with the school's data.

Backups: 35 days, then purged automatically.

Deidentified information: only as long as it is used as described on this page, never reidentified, and removed from future releases when a school says no.

Deletion On Request

We delete a student's information within 60 days of a request from the school or district, and confirm in writing (§22584(d)(2)). A parent, guardian, education rights holder, or former student

aged 18 or older may ask us to delete it once the student has been unenrolled for at least 60 days (§22584(d)(3)). Write to dataintegrity@impacterpathway.com.