



ROPES & GRAY LLP
2099 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20006-6807
WWW.ROPESGRAY.COM

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Edward McNicholas
T +1 202 508 4779
Edward.McNicholas@ropesgray.com

Attorney General Raúl Labrador
Attorney General's Office
Consumer Protection Division
P.O. Box 83720
Boise, ID 83720
consumer_protection@ag.idaho.gov

Re: Data Incident

Dear Attorney General Labrador:

We write on behalf of our client, PowerSchool, which is a technology service provider to school district/school customers in your state, to provide additional context and details with respect to the recent security incident at PowerSchool described in a formal notification provided to you today. As described more fully in our formal notification, on December 28, 2024, PowerSchool became aware of a cybersecurity incident, which appears to have occurred between December 19 and December 28, 2024, pursuant to which personal information of state residents was exfiltrated. The personal information at issue varies by individual (students and teachers) but includes some combination for any given individual of name, date of birth, social security number, limited medical alert information, and contact information.

For the majority of its customers, PowerSchool hosted the data that was exfiltrated on PowerSchool's cloud environment ("hosted customers"). PowerSchool estimates that approximately 84 percent of its customers in your state are hosted customers. The remaining percentage of PowerSchool customers in your state maintain their data "on-premises," meaning those customers host the data on systems under their control ("on-prem customers"). The formal notification PowerSchool provided today was made on behalf of PowerSchool and its hosted customers who have not opted out of having PowerSchool provide this notice ("Covered Customers"). The number of state residents reported by PowerSchool is an approximated total of the data subjects for the Covered Customers which had information involved that triggers your state's data breach notification statute.

PowerSchool's notice excludes (a) hosted customers who have opted out and may determine to submit their own notifications and (b) "on-prem customers". Data subjects associated with on-prem customers are not included in PowerSchool's notice because PowerSchool does not have access to relevant data, which resides on those customers' internal systems. As a result, the information provided in today's formal notification may not fully describe the extent of the data breach, but PowerSchool sought to provide timely reporting of information currently at its disposal. PowerSchool will either provide future notifications or support notification efforts that on-prem customers undertake, in each case as the customer determines

that notification is necessary based on the evaluation of whether the exfiltrated on-prem customer data would require any such notification.

Sincerely,

A handwritten signature in black ink that reads "Edward R. McNicholas". The signature is written in a cursive style with a large, prominent initial "E".

Edward McNicholas