



HD Tech Holdings Inc. Classroom Surveillance Policy

Effective Date: March 17, 2025

Purpose

To enhance the safety and security of students and staff, HD Tech Holdings Inc. implements video and audio surveillance in all classrooms of our afterschool programs. This policy ensures compliance with New York State laws while maintaining transparency and fairness for all employees, students, and parents.

Scope

This policy applies to all current and future employees, students, parents, guardians, and visitors involved in HD Tech Holdings Inc.'s afterschool programs within New York State.

Policy Details

1. Installation of Surveillance Cameras

- Effective March 17, 2025, surveillance cameras with audio and video recording will be installed in all classrooms.
- Cameras will be positioned to monitor classroom activities without infringing on areas where individuals have a reasonable expectation of privacy, such as restrooms or changing areas.

2. Notification and Consent

Current Employees:

- All current employees must review and sign the acknowledgment form before returning to work after March 17, 2025.
- Employees who fail to sign the acknowledgment will not be permitted to return to work and may be placed on administrative leave until compliance is met. Continued refusal may be considered voluntary resignation.

New Employees:

- All new employees hired after March 17, 2025, will receive written notification of electronic monitoring, including audio and video recording, during the hiring process.

Parents and Guardians:

- Parents/guardians will be notified in writing about the surveillance policy and must provide consent for their child to be recorded.
- This policy follows FERPA (Family Educational Rights and Privacy Act), ensuring transparency regarding student educational records.

3. Surveillance Hours & Usage

- Surveillance will be operational during all program hours and will not be used for personal monitoring, casual observation, or non-program-related activities.
- Cameras will not be used for employee performance evaluations unless related to security incidents, misconduct investigations, or legal matters.

4. Audio Recording Compliance

- New York is a one-party consent state, meaning audio recording is legal if at least one person involved consents (New York Penal Law Section 250.05).
- However, HD Tech Holdings Inc. is obtaining explicit consent from all employees and parents/guardians to ensure transparency and fairness.

5. Data Storage & Access

- All audio and video recordings will be securely stored for up to 60 days, unless extended due to ongoing legal or security investigations.
- Access to recordings is strictly limited to authorized personnel only, including:
 - HD Tech Holdings Inc. Leadership
 - HR and Compliance Officers
 - Legal Counsel (if required)
 - Law Enforcement (with an official request and approval by management)
- Unauthorized access or sharing of recorded footage is strictly prohibited and may result in disciplinary action or termination.

6. Compliance with FERPA & Employee Rights

- Recordings containing student activity that are maintained by HD Tech Holdings Inc. qualify as educational records under FERPA.
- Parents or eligible students have the right to request access to view recordings related to their child.

7. Employee Responsibilities

- Employees must conduct themselves professionally knowing that classroom activities are subject to audio and video monitoring.
- Tampering with, disabling, or obstructing the surveillance system is strictly prohibited and will result in immediate disciplinary action, up to termination.

8. Privacy Considerations

- Surveillance respects individual privacy rights while ensuring compliance with all applicable laws.
- Cameras will not be placed in restrooms, changing areas, or any area where there is a reasonable expectation of privacy.

9. Complaint & Review Process

- If an employee or parent disagrees with the surveillance usage, they may submit a written request for review to the Program Director within 10 business days.
- All complaints will be reviewed by senior management and legal counsel before a final decision is made.

10. Opt-Out Requests & Special Accommodations

- Employees or parents with documented concerns (e.g., religious beliefs, medical reasons, special circumstances) may request an exemption in writing.
- All opt-out requests will be reviewed on a case-by-case basis and require administrative approval.

11. Emergency Situations & Law Enforcement Requests

- In legal or emergency situations, law enforcement may request footage.
- Such requests must be approved by company leadership, unless immediate access is legally required under exigent circumstances.

12. Signage Requirement for Transparency

- All classrooms with surveillance will have a posted notice stating:

“This classroom is monitored by audio and video recording for safety and security purposes.”