

## **LEGITIMATE INTEREST STATEMENT**

Legitimate Interest is one of the bases that PowerSchool uses in processing personal data in certain circumstances where relevant privacy law permits – such as under the European General Data Protection Regulation, 2018, the Indian Digital Personal Data Protection Act, 2023, etc. In doing so, PowerSchool internally conducts a Legitimate Interest Assessment (LIA) of a processing activity to determine if Legitimate Interest is a viable basis for such processing.

We assess the specific legitimate interest(s) being pursued by PowerSchool concerning the processing, and your interests (including fundamental rights and freedoms) which require protection of personal data. In the course of the assessment, we address issues such as the nature and purpose of the processing activities, and conduct a balancing test that targets the nature of the processing itself, the impact of the processing to you (as data subjects), and your reasonable expectations concerning the processing.

Where the result of the LIA shows that your interests, rights, and freedoms are overridden by our interest, we seek other bases for processing (such as consent, performance of contractual duties, etc.) aside from Legitimate Interest. As PowerSchool works with government agencies to ease the administration of education in government participating schools, PowerSchool come in contact with the personal data of students' (who may be considered a "child" under relevant laws), and thus take necessary measures to process, and protect these personal data where Legitimate Interest is the basis for processing. We take steps to ensure that the processing in these instances is always within the Legitimate Interest we originally set out, and the rights of all parties involved.