



How are we supporting you to be GDPR compliant?

Everything you need to know,
from data retention, to consent and security



At Pupil Asset we have always taken data privacy seriously. We have embraced the new EU GDPR legislation and how it reinforces existing data protection law. We should all want and expect to know who is holding data about us as individuals, how they are using it and why?

We should also expect to be asked for our explicit consent as to what data about us is held, how it is used and how long it is retained? Ultimately, we have the right to be forgotten...

Our Data Privacy Statement Scope

All Data Subjects whose personal data is collected, in line with the requirements of the GDPR. This privacy notice encompasses the responsibilities and remit of Pupil Asset when acting as Data Processor for customers subscribing to our cloud-based services *and* data held and used by Pupil Asset to communicate with our customers and honour contractual obligations.

Responsibilities

The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to Data Subjects prior to Pupil Asset collecting/processing their personal data.

The Data Controller should ensure that All Employees/Staff who interact with Data Subjects are responsible for ensuring that this notice is drawn to the Data Subject's attention and their consent to the processing of their data is secured.

Who are we?

Pupil Asset Limited is based in Norwich, Norfolk. We were incorporated in July 2010, company number 07310870.

Pupil Asset

Conisford Court
26-36 Rose Lane
Norwich
NR1 1PN

We supply cloud-based services to schools, academies, Multi-Academy Trusts (MAT), free schools, International schools, local authorities and other education-focussed providers.

Our services include Pupil Asset Tracker, MIS (Management Information System) and Website.

Pupil Asset acts in the capacity of Data Processor when providing our cloud-based services, acting on behalf of and under the explicit instruction of the Data Controller.

Our Chief Privacy Officer and data protection representatives can be contacted directly at:

E: CPO@pupilasset.com
T: 01603 631 436

We're processing data on your behalf

We provide education Management Information System (MIS), Assessment Tracking and Website services to you.

These are all cloud services where we, at Pupil Asset, act as the Data Processor.

The data processed by the Pupil Asset cloud services on behalf of the customer, acting as Data Controller, is segregated at a high-level into categories as follows:

- Statutory / Legal
- Safeguarding
- Optional

Data objects may reside in more than one category.

A comprehensive list of data objects and items, their purpose and the way in which they are processed is also available.

The personal data we would like to process, through the use of our cloud-based subscription services, on behalf of the Data Controller are:

Personal data type	Category	Source
Parental / Responsible contact information including name, address, home telephone, mobile and email.	Safeguarding / Statutory and/or Legal / Optional	Data Controller
Pupil information including name, address, DoB, gender, family relationships & contacts, attendance, assessments & achievements, health & wellbeing, ethnicity, religion, SEN, Pupil Premium, FSM, disability and vulnerability markers.	Safeguarding, Statutory and/or Legal / Optional	Data Controller
Staff / User information including name, gender, DoB, address, contact information, NI number, ethnicity, qualification, qualification route, disability and attendance.	Statutory and/or Legal	Data Controller

The personal data we collect will be used for the following purposes:

- Identification
- Safeguarding
- Statutory Returns e.g. Pupil / Workforce Census
- Monitoring and management of attendance, behaviour and assessment & learning progress

Our legal basis for processing for the personal data:

- Under instruction of the Data Controller

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Not applicable

The special categories of personal data concerned are:

- Ethnicity
- Religion
- Medical conditions & allergies

The personal data we would like to hold and process for customer contractual obligations and communications are:

Personal data type	Category	Source
Name	Optional	Data Subject
Contact Information	Optional	Data Subject

The personal data we collect will be used for the following purposes:

- Identification
- Communication

Our legal basis for processing for the personal data:

- Contractual

Any legitimate interests pursued by us, or third parties we use, are as follows:

- News and product updates
- Direct marketing (by Pupil Asset and only if you have opted in)

The special categories of personal data concerned are:

- Not applicable

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Pupil Asset to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting Pupil Asset in writing at CPO@pupilasset.com.

Disclosure

Pupil Asset will not pass on your personal data to third parties.

Retention period

Pupil Asset will process personal data for the duration of the contract between the Data Controller and Pupil Asset and will store the personal data for a maximum of six months post-contractual termination and six months for backup and recovery purposes.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Pupil Asset refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain.

We're also helping you to deliver GDPR and here's how



We thought it would be helpful to provide you with an overview of the practical features we've designed and developed to help your school be compliant - and ease the effort and burden on you.

These features extend our robust privacy and security settings, infrastructure and business processes:

- Subject Access Request - a one-click report which details all of the information held within Pupil Asset about Parents and Contacts, Staff, or Students.
- Anonymisation - switch to Anonymise mode to access the full functionality of Pupil Asset without revealing subject identifying data such as name, DoB, medical conditions, allergies, etc.
- User Profiles - extending the user access and privacy options available to roles within your organisation.
- Two-Factor Authentication - you may already be familiar with this: as well as the usual username/password, an SMS code sent to your mobile provides an additional level of security.
- Data Security and Backup - find out more

Also, our compliance with ISO/IEC 27001:2013 Information Security Management, adoption onto the UK Government Crown Commercial Services G-Cloud framework and DfE Data Privacy certification should give you that extra layer of comfort and warmth - part and parcel of being with a leading innovator in educational technology.

To learn more about the main elements of GDPR, take a look at this resource: www.eugdpr.org



Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Pupil Asset, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Pupil Asset data protection representatives.

The details for each of these contacts are:

	Supervisory authority contact details	[Chief Privacy Officer (CPO)] / [GDPR Owner] contact details
Contact Name:	Information Commissioner's Office (ICO)	Michael Pickett
Address line 1:	Wycliffe House	Conisford Court
Address line 2:	Water Lane	26-36 Rose Lane
Address line 3:	Wilmslow	Norwich
Address line 4:		Norfolk
Address line 5:	SK9 5AF	NR1 1PN
Email / Web:	https://ico.org.uk/global/contact-us/	CPO@pupilasset.com
Telephone:	0303 123 1113	01603 631 436

Privacy statement

Read more about how and why we use your data here at <https://www.pupilasset.com/useful-information/privacy-policy>

Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This section of the privacy notice relates only to the <http://www.pupilasset.com> public facing website and tells you how we, Pupil Asset, will collect and use your personal data for cookies, requests for assistance, sales enquiries and subscriptions.

Why does Pupil Asset need to collect and store personal data?

In order for us to provide you with a service we need to collect personal data for correspondence purposes, including responses to requests e.g. quotes, news and updates, support and access to subscriptions. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes Pupil Asset would contact you for additional consent.

Will Pupil Asset share my personal data with anyone else?

We will not share your data with any third party organisations. In the exceptional circumstance that we should need to do so, we will ask for your explicit consent. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service that they provide to you. When they no longer need your data to fulfil this service, they will dispose of the details in line with Pupil Asset procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Pupil Asset use the personal data it collects about me?

Pupil Asset will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Pupil Asset is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Pupil Asset contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that Pupil Asset holds about me?

Pupil Asset, at your request, can confirm what information we hold about you and how it is processed. If Pupil Asset does hold personal data about you, you can request the following information:

- Identity and the contact details of the person, or organisation, that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the Chief Privacy Officer and / or Data Protection Officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Pupil Asset or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.

- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Pupil Asset accepts the following forms of ID when information on your personal data is requested:

- Official recorded email address, name and contract number (if applicable).

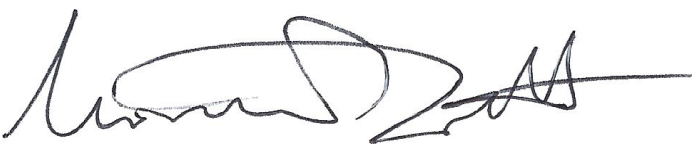
Contact details of the Chief Privacy Officer / GDPR Owner:

Chief Privacy Officer / GDPR Owner contact details	
Contact Name:	Michael Pickett
Address line 1:	Conisford Court
Address line 2:	26-36 Rose Lane
Address line 3:	
Address line 4:	Norwich
Address line 5:	NR1 1PN
Email:	CPO@pupilasset.com
Telephone:	01603 631 436

Document Owner and Approval

The Chief Privacy Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff and is published at <http://www.pupilasset.com/>

Signature: 

Date: 21st May 2018

Change History Record

Issue	Description of Change	Approval	Date of Issue
0.1.1	Initial issue	Lee Tayler	26/04/2018
0.1.2	Publication	James Leeds	09/05/2018
2.0	Publication	James Leeds	21/05/2018