

## What is the General Data Protection Regulation? (GDPR)

The GDPR is a new regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union, aiming to give control back to citizens and residents over their personal data.

The GDPR comes into effect from 25th May 2018.

## Taking data security and privacy seriously

At EducationCity, we take data security and privacy extremely seriously and believe that the GDPR is an important step forward for clarifying and enabling individual privacy rights, as such we are committed to maintaining compliance with the GDPR.

We have undertaken an external independent GDPR audit and worked to action any points highlighted from this to ensure data handling best practice is being followed.

We also have a number of key policies that cover in detail how we handle and manage data on behalf of our customers. Links to the policies can be found below: -

- [Terms & Conditions](#)
- [Privacy Policy](#)
- [Cloud Software Services for Schools](#)

We have also compiled a list of Frequently Asked Questions in order to assist you with any due diligence work you may need to carry out.

Thank you for trusting us with your business and please be assured that we will always take the security and privacy of our customers data very seriously.



**Richard Whalley**  
CEO, EducationCity Ltd

## Frequently Asked Questions

### Are you registered with the Information Commissioners Office (ICO)?

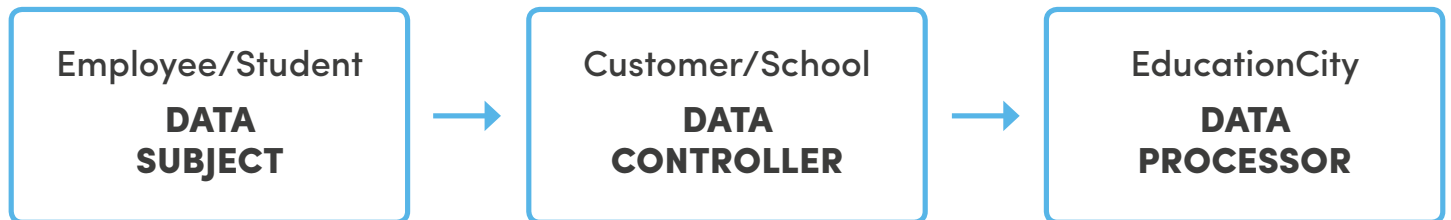
Yes, our registration number is Z2184575.

### What legal, regulatory and contractual requirements do you operate under?

EducationCity complies with all legal, regulatory and contractual requirements related to information security and adopts UK law guidelines, industry standards and best practice for information security.

### Is EducationCity a data processor or a data controller?

For our Customers, we act as a data processor, meaning that we process your personal data on your behalf, in accordance with our Terms & Conditions.



### Have you appointed a Data Protection Officer (DPO)?

Yes, our DPO is our Chief Technical Officer, Graham Lyden.

### Will I be notified in the case of a breach?

Under the GDPR, EducationCity is required to report data breaches to the ICO within 72 hours. As part of our information security incident management procedure, appropriate communications will be made, including notifications to all affected parties.

### How do you handle subject access requests (SAR)?

EducationCity act as a Data Processor on behalf of its Customers so we are not able to process SARs on your behalf. If we receive a SAR from one of your employees/students we will forward the request to you.

### How do you process data portability requests?

EducationCity act as a Data Processor on behalf of its Customers so we are not able to process data portability requests on your behalf. We provide you with tools inside EducationCity to extract information in commonly used file formats.

### Do you share my data with anyone?

EducationCity has a strict policy of not sharing any information about teachers/students with anyone outside the organisation. EducationCity will not share data with third parties unless explicit instruction is given by the school in question, for example, to integrate with a VLE provider, and we will never sell user information or data collected from our website.

### Where is my data stored?

EducationCity stores data on our secure database servers, located in the UK. The servers are

housed in secure data centres, trusted and used by many of the country's leading organisations. Physical access to our servers is strictly limited to data centre staff, our own IT staff and accompanied external contractors when needed, in order to maintain the servers.

### **How have you documented the Personal Data you hold?**

EducationCity has completed a full company wide information classification assessment, this allows us to understand the data in every part of our business (both our own data and that entrusted to us), the highest level of protection required for each of these data sets and how we can further implement controls to reduce the likelihood of an incident impacting these assets in the future.

### **What training do your staff go through?**

EducationCity develops and provides ongoing security awareness training for all staff and actively promotes the key principles of information security.

### **How do you comply the requirements of the GDPR principles?**

There are 6 principles within the GDPR framework, these are:

- **Lawfulness, fairness and transparency**

We will process any personal data we collect in a fair, lawful and transparent manner; and in accordance with individuals' rights.

As a Customer of EducationCity we will only process the personal data you enter into the system in accordance with our [Terms & Conditions](#).

- **Purpose limitations**

We will only collect personal data for specified, explicit and legitimate purposes. Data we collect will not be used for any other purposes other than what you as the data subject(s) has been made aware of.

As a Customer of EducationCity we will only process the personal data you enter into the system in accordance with our [Terms & Conditions](#).

- **Data minimisation**

We will only collect personal data that is needed, adequate and relevant for the specific purpose. As a Customer of EducationCity you are responsible for ensuring that the data you hold about your employees/students is limited to what is needed, adequate and relevant for the specific purpose.

- **Accuracy**

To the best of our ability we will ensure that any personal data we collect is accurate, kept up to date and correct.

As a Customer of EducationCity you are responsible for ensuring that the data entered into the system about your employees/students is accurate and kept up to date. Our systems are designed to maintain a high level of integrity, meaning that your data will remain as entered and unchanged.

- **Storage limitations**

As a Customer of EducationCity you are responsible for ensuring that personal data entered into your system is removed when no longer needed. If you choose to close your account we will securely delete all personal data held in the system on your behalf in accordance with our [Privacy Policy](#).

- **Integrity and confidentiality**

We will process all personal data we collect in a manner that protects it against unwanted modification, disclosure or unlawful processing.

We take a risk-based approach to ensure that our systems have the appropriate technical and organisational controls to safeguard the integrity and confidentiality of all personal data.