

Schools Educational Software Ltd (SESL) and GDPR Statement

Schools Educational Software Ltd (SESL) helps schools of all sizes work more easily and collaboratively, with intuitive software designed to make a difference. This statement outlines SESL approach and commitment to GDPR and DPA 2018 compliance. Schools Educational Software Ltd is a subsidiary of The Key Support Services Ltd.

The General Data Protection Regulation ("GDPR"), which came into force on 25 May 2018, is a regulation which is intended to strengthen and unify data protection for individuals within the European Union. It has introduced new responsibilities for Controllers and Processors, increased the rights of data subjects and has far tougher sanctions than the current Data Protection Act, which it supersedes. The GDPR has been incorporated into UK law as the Data Protection Act 2018 ("DPA 2018").

SESL has always taken its responsibilities towards data protection seriously. SESL is the Controller for some sets of data such as consumer customers. It is also the Processor for customers, suppliers and other third parties; managing and processing their personal data. Both these roles see increased accountability and compliance under the GDPR.

SESL will continue to review its approach to GDPR and DPA 2018 compliance in accordance with any guidance issued by the ICO in the future.

Q. Where is my data stored?

A. The legal framework for where data is stored is set out in the Terms and Conditions for individual products and services, as well as SESL's Privacy Policy, which are accessible via <u>www.integris-education.com/terms</u> web site.

Q. Can our data be accessed from outside the EU?

A. As set out in the Privacy Policy, SESL's provision of the products or services to you may require the transfer of Data to a sub-processor (including Affiliates) which may be located outside of the United Kingdom and the European Economic Area ("EEA"). One such sub-processor is an Affiliate of The Key Support Services Ltd, TKey Education Solutions Private Ltd which is located in India ("TKey India"). TKey Education Solutions Private Ltd have signed the International Data Transfer Agreement issued by the Information Commissioner for transfer of personal data. Further details can be found within the individual product Terms and Conditions.

Q. How long does SESL retain customer data?

SESL retains customer data in accordance with contractual requirements, its Privacy Policy and product Terms and Conditions. In addition, specific products allow customers to determine and implement their own data retention periods for their data. Further details regarding backup retention can be found on the individual product help pages.

Q. How will SESL respond to a Subject Access Request (SAR) from a customer?

Where a data subject makes a SAR, or a Controller asks SESL to support them in responding to a SAR, the response will be determined by a number of factors, e.g. the nature of the data to be retrieved and the type of system or systems in which the data is stored. SESL's SAR process takes account of the revised timescales and obligations under the GDPR.

Q. Does SESL share customer data with third parties?

A. Customer data is shared with third parties where this is required by contracts, or is necessary to

For the purposes of this statement, "SESL" means Schools Educational Software Ltd (Reg No. 14130331) Registered Office: 8th floor, HYLO, 103-105 Bunhill Row, London, United Kingdom, EC1Y 8LZ



provide specific services. The details of where data is shared is set out in the Privacy Policy and in product Terms and Conditions.

Q. How can Integris help my school meet GDPR Compliance?

Integris' approach to data protection management is designed to be compliant with data protection legislation, including both the Data Protection Act and GDPR. Integris has a range of functionality that can help you with your GDPR compliance which is outlined on our help page https://help.integris-education.com/gdpr-compliance

Contact:

If you have any questions or comments please contact our Data Protection Officer:

Schools Educational Software Ltd Data Protection Officer 8th Floor HYLO 103-105 Bunhill Row London EC1Y 8LZ United Kingdom Email: <u>dpo@arbor-education.com</u>