

29-3-18

Exemplar Education – GDPR Statement

In the light of the forthcoming GDPR legislation, what assurances can you give that that the Company will be fully compliant with the requirements of the GDPR by May 25, 2018?

We believe many of our processes are already compliant with the GDPR. But we are currently reviewing all our processes to identify any areas where we may need adjust what we do, so we can make any necessary changes.

Our current privacy policy is available on our website at <https://www.exemplar-education.com/privacy-policy/> and we will be updating this as we complete our review and actions. A summary of our current position is as follows:

Data Collection

1. We never buy personal data from any supplier or school for the purposes of marketing. It is always gathered by data enquiry forms - either online or paper - that have been filled in by enquirers in response to advertising and promotional activities we carry out or commission.
2. We collect names and contact details and only the minimum other data required to be able to respond appropriately to their enquiry.
3. When a family purchases our product, we then collect other personal data, but limited to the data we need to provide, support and develop the operational processes to deliver the product and services the customer has purchased and make any related payment arrangements.
4. When a school uses our system, then it only holds the student's name and any results they achieve on the courses. No other personal information is collected or stored.
5. We are creating two Data Processing Agreements, one for Schools and another for Families. They set out for Schools using our systems and for Families who have bought our programmes, what personal data we will collect and the purposes for which we will use this data. These are GDPR compliant and effective from May 2018. They will be found on the privacy policy page of our website

Data Security

6. We have a robust authentication process in place to protect access to personal data and/or user accounts and there are several elements to this
 - a. We use usernames and passwords for access to the personal data

- b. Our systems use a number of the major cloud providers, e.g., Amazon & Microsoft, all of whom have very high-quality security on their hosting systems and are GDPR compliant
 - c. Should customer data be corrupted or lost, our cloud service providers can restore it to a specified previous time point to minimise any losses
- 7. Access to the personal data is limited to those who need it to carry out their duties
- 8. We utilise usernames and password to enable access to our secure administration modules
- 9. We provide a mechanism for anyone to notify us if they believe a data breach has occurred, by email to incident@exemplar-education.com at any time or on 0800 1777 999 during business hours

Data Usage, Processing and Retention

- 10. We act as a Data Controller, as defined by the GDPR, in respect of the personal data we hold.
- 11. We do not allow the sharing of personal data or metadata with third party organisations for the purposes of marketing other than our own, or for any other activities not connected with the provision of our service to our customers.
- 12. We do, however use third-party data processors (who may also be data controllers in some instances) to process personal data, but only connected to the development and operational provision of our product and services. All of these are fully GDPR compliant.
- 13. By May 2018 all contracts with data processors and data controllers will be GDPR compliant, including ensuring that contracts with those not located within the EEA will include the unmodified EU approved *model clauses* in respect of such transfers and therefore fully conform to GDPR standards
 - a. Our learning systems are hosted in the USA by a UK company and operate under the EU-U.S. Privacy Shield. This ensures compliance with GDPR.
 - b. Data transmission is via Amazon Web Services, which is certified under the EU-US Privacy Shield.
 - c. Our customer records systems are provided by Microsoft. They are hosted in the EU and Microsoft have notified us that they will be fully GDPR compliant by 25th May 2018.
- 14. We provide a facility free of charge whereby customers (and other Data Subjects as defined in GDPR), can request a copy of the data we hold on them.
- 15. They can also ask for us to “forget them” as defined in GDPR if they wish, subject only to them agreeing that the impacts on service delivery of deleting data used for service delivery purposes are acceptable to them