

GDPR & Lourdes IT

We have previously stated that we have been working to ensure that our customers can be certain that they are dealing with a compliant GDPR business and software platform. We have carried out a number of assessments and work to ensure this is the case and confirm that we meet these requirements.

The following is a list of statements/information you can use to demonstrate that we – as a supplier of services to you – are compliant with the upcoming GDPR regulations. The information has been provided in response to the many varied questions we have received from schools and collated in one place:

- Company name: Our Lady of Lourdes Catholic Multi Academy Company
- Phone: 01527 359 999
- Email: help@lourdesit.org.uk
- Full address: Our Lady of Lourdes Catholic Multi Academy Company
- Web address: <https://www.lourdesit.org.uk> / <http://www.lourdesmac.org.uk>
- Data Protection Officer (DPO): Luke Payton
- Data Protection Officer (DPO) contact: 01527 525916 (ask for Data Protection Officer) or email dpo@lourdesmac.org.uk
- Data Protection Register registration number: Our Lady of Lourdes Catholic Multi Academy Company ZA078879
- Do you carry out background checks on staff?: Yes, employment checks are carried out upon joining Our Lady of Lourdes Catholic Multi Academy Company, and DBS checking is carried out on all staff.
- Do you have a confidentiality clause included in staff contracts?: Yes, this is covered under the Worcestershire County Council recruitment process
- Do staff have information security/data protection training?: Yes, this is mandatory and part of the induction process
- Is my data held within the EU?: No, but where data is held outside of the EU, it is governed by GDPR.
- Do you have physical and electronic security measures in place to protect data?: Yes, data is held in secured locations protected by a number of security measures including CCTV, intruder alarms, environmental controls and restricted areas
- Do you encrypt sensitive Customer data in transit?: Yes, data is securely encrypted in transit as standard
- Do you backup Customer data, where will it be held and is it secure?: Yes we do, it is kept within the EU in secure locations and encrypted in transit
- Who owns the data?: Lourdes IT process information on behalf of our Customers; the Customer (school) is still the data owner and controller
- How do you deal with Freedom of Information or Subject Access requests on Customer data?: Any requests on these matters will be referred back to the Customer (the Data Controller)

Privacy Notice

Lourdes IT has access to a wide range of data across the schools we support. Our processing of this data is limited by our role as a data processor for the schools we support, and governed by Data Processor Contracts we have with the schools.

- We only process data on behalf of the school when required as part of our support contract with the school.
- The processing is necessary because of a legal obligation that applies to Schools. Schools have a legal obligation to provide students with an education. Lourdes IT are working on behalf of schools to help them provide this.

Lourdes IT are part of the Our Lady of Lourdes Catholic Multi Academy Company. School's contracts are with the Directors of Our Lady of Lourdes Catholic Multi Academy Company, so in this document we refer to the Our Lady of Lourdes Catholic Multi Academy Company – which includes Lourdes IT.

Data Protection Office for Our Lady of Lourdes Catholic Multi Academy Company:

Luke Payton – dpo@lourdesmac.org.uk

Our Lady of Lourdes Catholic Multi Academy are registered with the Information Commissioners Office (ICO) with the reference: ZA078879.

Accessing your data / Your rights

- Individuals can request to see any data we hold on them at any point.
 - You can see the data Lourdes IT holds on you that you have submitted via our ticket system by viewing your profile and previous tickets.
 - To see all data held on you, please make a Subject Access Request to dpo@lourdesmac.org.uk
- Individuals can request for any data we hold to be amended or deleted at any point.
 - Amendments can be made via our Help Desk, in the Edit Profile section after login.
 - To delete your account, please make a request via a support ticket.

Essential information - Our Lady of Lourdes Catholic Multi Academy Company as a Data Processor for Schools This information is specifically in regards to Lourdes IT. The full Multi Academy document is available at www.lourdesmac.org.uk

- Our Lady of Lourdes Catholic Multi Academy Company has access to information stored in IT systems we are given access to by Schools we support in line with our Data Processor Contract with the schools which outline our obligations as a data processor.
- We sometimes need to store this data on our systems:
 - To enable us to provide support and set up services on behalf of the schools.
 - We may store this data in our ticket system, to enable us to provide the contracted support.
 - We may store data on our computer systems, to allow us to provide the contracted support.
 - We delete data when it is no longer required, in line with processing agreements with schools.
- The processing is necessary in relation to a contract schools have entered into with Our Lady of Lourdes Catholic Multi Academy Company and covered by Data Processor Contracts with each school
- The processing of all data relating to a specific school will cease when the contract expires.
- We will only act on the written instructions of the school as defined in this service agreement and related policies (unless required by law to act without such instructions).

- We will ensure that people processing the data are subject to a duty of confidence through vetting, training and enforcement of policies.
- We will take appropriate measures to ensure the security of processing as detailed in our Data Protection and Security Policy.
- We will assist the data controller in providing subject access and allowing data subjects to exercise their rights under the GDPR.
- We will assist the data controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments.
- We will submit to audits and inspections and provide the controller with whatever information it needs to ensure that they are meeting their Article 28 obligations. We will tell the controller immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state.

Essential information - Our Lady of Lourdes Catholic Multi Academy Company as a Data Controller for personal information. This information is specifically in regards to Lourdes IT. The full Multi Academy document is available at www.lourdesmac.org.uk

- We collect and process personal information of individuals via our help desk to provide support to employees and students. This information is collected and processed in line with your Data Processing agreement with Our Lady of Lourdes Catholic Multi Academy Company.
- Information we collect:
 - Email – to allow us to keep users updated with the status of their ticket.
 - Name – to allow us to identify users
 - School user works at or attends – to allow us to allocate tickets to the correct department.
 - This information may be automatically collected as a result of the email address you use to submit a ticket.
 - Users may submit further information that includes personal information within their Help Desk Request. This data is processed in line with the Data Controller’s Data Processor Contract with ourselves.
- Retention of tickets – our system retains tickets for as long as a contract exists between the supported entity and Our Lady of Lourdes Catholic Multi Academy Company to enable us to provide effective support under our contract with schools.

Where we store information

- Our key information is stored on networks within Our Lady of Lourdes Catholic Multi Academy
- Our key information is also stored on the Microsoft Office 365 platform:
 - <https://www.microsoft.com/en-us/TrustCenter/CloudServices/office365/GDPR>
- Where schools have relationships and data processing agreements with other 3rd party services the personal data of our team may also be stored to ensure we can support these services.
- Our Help Desk is provided by FreshDesk – data is stored in line with EU- US Privacy shield certification, and model contractual clauses are in place to ensure our data is stored in a GDPR compliant environment. Further information is available here: <https://www.freshworks.com/privacy/gdpr/>
- We work with Scomis for SIMS support, who can view data to assist us in support, but do not hold a copy of any data.
- Novatech Connect LTD process user data for the purpose of safeguarding when using the internet via our Smoothwall filtering system for Broadband customers. Schools have a direct agreement with Novatech for this.