

PrimarySite Limited General Statement of Conformity

PrimarySite Limited interim statement of GDPR conformity. Full statement of conformity to be released April 2018.

Subject Matter of the processing

Personal Data of a variety of data subjects is transferred to PrimarySite Limited (the Data Processor) in order to fulfil its contractual obligations to the school (the Data Controller) in designing, delivering, maintaining and supporting the delivery of school information, communication systems, and other resources via web-based solutions as specified by the school (the Data Controller) within the contract.

Duration of the processing

The processing of Personal Data under the instruction of the Data Controller will exist for the duration of the contract which commenced on order.

Nature and purposes of the processing

The Nature of the processing activities may vary across the contract depending upon the Purpose for that specific processing activity. Processing operations may include (but not limited to) the collection, storage, transmission, structuring, retrieval, rectification, and disclosure as well as the erasure and destruction of data in accordance with the contract and as instructed by the Data Controller.

The Purposes for processing data are stipulated within the contract with the Data Controller and may include (but under contract variances, not limited to):

- Facilitating the delivery of the contract;
- Ensuring the security of information and Data Subjects Personal Data;
- Responding to any complaints;
- Responding to enquiries, questions and support requests;
- Refining the web solution and improving the experience of it through the use of cookies and other feedback systems.

Type of Personal Data

Data Subjects' Personal Data processed within the contract may include (but not limited to) names, personal address details, contact phone numbers, personal and work email addresses.

Categories of Data Subject

The categories of data processed under the contract may include (but not limited to) Personal Data i.e., employees (school staff) and parents, and Children's Data i.e., pupils.

Plan for return and destruction of the data once the processing is complete UNLESS requirement under law to preserve that kind of data

Personal Data processed by PrimarySite Limited (the Data Processor) ensuing from the contract will be retained in accordance with the instruction indicated in the contract with the school (the Data Controller) and will not be retained for a period longer than is necessary to fulfil the contract, and not retained for a period longer than 6 months after the termination or natural conclusion of the contract unless an overriding legal or further contractual obligation, or vital public interest dictates that the Personal Data must be processed for a longer period.

The period of 6 months after the termination or natural conclusion of the contract is to allow a reasonable period to permit the secure return of all Personal Data to the school as the Data Controller. The means of returning the Personal Data will be agreed at the point of the termination or natural conclusion of the contract and will use a secure technological based and agreed solution.

If required by the school (as the Data Controller) and a Data Subject instruction duly received from the Data Controller or higher legal authority to destroy or erase Personal Data, PrimarySite Limited as the Data Processor will carry out a properly presented and lawful request without undue delay and confirm the destruction or erasure in accordance with the obligations of Article 19.

Other Personal Data not forming part of the contract but processed on a lawful and Legitimate Interest basis, belonging to a limited number of Data Subjects within the school, i.e., decision makers, contract managers, etc., may be held on PrimarySite Limited's CRM (Customer Relationship Management) system for the purpose of delivering goods and services, providing information to the Data Subject and offering goods and services. This Personal Data may be held indefinitely but under regular review in accordance with PrimarySite Limited's 'Retention of Records Procedure'. Data Subjects of course have the Right of Access (Article 15-1) to their Personal Data and to exercise other Rights of which they will be made aware within PrimarySite Limited's Privacy Notice.

Storage and security

For the interest of the school as the Data Controller, PrimarySite Limited's servers are currently located in London and Dublin.