



Compliance with the General Data Protection Regulation

Please find the information below relating to compliance with the General Data Protection Regulation.

Your school may have requested this information, or alternatively we have taken the required steps to supply you with the following information.

As we are sure you're aware, the General Data Protection Regulation (GDPR) comes into force in May 2018. As part of our preparations we are providing due diligence for Inspirar Business Support Ltd, including, where branded as Smart School Websites and any associated services we provide. Within your contract we will share individuals' personal data, and therefore, would like to ensure your organisation that we are compliant.

We have provided the following statements to support you.

What actions do Inspirar Business Support Ltd take to comply with GDPR?

Building on the technical and organisational security measures we already have in place to comply with the terms of the existing Data Protection Act, we have implemented the following measures to meet our obligations under the GDPR May 2018.

- We have reviewed the data we collect and process and are following guidelines from the ICO and the National Cyber Security Centre to ensure appropriate technical and organisational security measures are in place to keep this data secure.
- We have updated customer terms and conditions. This includes a General Data Protection Act clause (Point 14) that will enable us (and you) to comply with the requirements of Article 28 of the GDPR, which governs controller-processor contracts. ("Data Protection Policy" and the Data Sharing Agreement")
- We are working with our subcontractors and suppliers to ensure that appropriate security measures and contractual arrangements are in place with them in advance of the deadline.
- Our other internal procedures relating to personal data ensure that we comply with the GDPR's requirements, including those in respect of: (i) privacy by design and default; (ii) data subject consents; (iii) processing records; (iv) data retention and deletion; (v) data subject rights; (vi) impact assessments and (vii) breach notification.
- We have an appointed team as well as an individual DPO who is separate to the business who are responsible for ensuring we comply with our obligations under the GDPR.

What technical and organisational security measures do Inspirar Business Support Ltd have in place to protect personal data?

Technical

- Following guidelines from the ICO and the National Cyber Security Centre to ensure appropriate technical security measures are in place to keep data secure, all websites and associated applications will be on a Secure Sockets Layer (SSL) Certificate website URL. We have installed a security plugin on all websites, and finally increased the sensitivity of our firewall.

Organisational

We are ensuring our staff are trained in best GDPR day-to-day practice and general knowledge. All staff and sub-contractors are bound by a contract to maintain confidentiality inline with our company's data protection and privacy policy. We will ensure that staff are informed of any special data protection requirements relevant to their work. Those with access to any client personal data, in order to support our clients with the on-going management of their websites, undergo relevant training in data protection, including how to obtain appropriate verification from a data controller, when instructed to act on their behalf.



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What policies and procedures do Inspirar Business Support Ltd have in place to protect personal data?

Following guidelines from the ICO and the National Cyber Security Centre to ensure appropriate technical security measures are in place to keep data secure, we have updated our Data Protection Policy, Privacy Notice and included an appropriate data sharing agreement.

In the unlikely event we detect an actual or suspected data breach, Inspirar Business Support Ltd will comply with our internal response plan and follow the ICO's guidance on notifying, when necessary, the affected data controllers, the affected data subjects, the police, the ICO and/or any other affected parties, within the appropriate timeframes as set out by the GDPR.

How secure are Inspirar Business Support Ltd systems?

The websites and applications provided are hosted by in UK and European data centres. The data centres we use are built to meet the requirements of the most security-sensitive websites.

Our web developers are appropriately trained in Secure Software Programming techniques and our sites are built with the best security in mind. We always use prepared MySQL statements to help prevent injection attacks and we ensure that PHP and other script files can't be uploaded to our system.

Our servers run ModSecurity (an Apache security module) which will automatically block users from carrying out malicious attacks on our sites. We log any attacks and block offending IPs to help prevent future attacks.

We regularly check our servers for anything suspicious. In the unlikely event a vulnerability is found we take immediate appropriate steps to harden whatever is applicable.

No new services are ever introduced without thorough testing and security analysis. We regularly update our server software. Any patches and updates are applied and tested promptly.

• Information management accreditation for Inspirar Business Support Ltd?

Inspirar Business Support Ltd are accredited with / as a:

- SIMS Technical Partner
- Information Commissioner's Office –Registration Number ZA261328

In addition, as Inspirar Business Support Ltd process and store personal data that we share with you, we have created a Data Sharing Agreement as a separate document to set out:

- The subject matter, duration, nature and purpose of the processing
 - The type of personal data being processed
 - The categories of the data subjects
 - Obligations and rights as the data controller
 - That the data processor (Inspirar Business Support Ltd the third party/supplier) processes data only on the documented instructions of the school
 - That the people who process the data are committed to confidentiality
 - That we have taken measures to ensure secure processing
 - That we will not engage another processor without prior written authorisation from the school, and that if we do so, that processor will also be bound by the same data protection conditions as are in your contract with the school.
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- That we help the school comply with requirements regarding the data rights of individuals (e.g. to access, delete or rectify data), secure processing, the reporting and communication of data breaches, and the conducting of impact assessments where relevant
- That we delete or return the personal data to the school at the end of any provision of services
- We will make information available to the school to demonstrate our compliance with the obligations in our contract, and allow the school or a third party instructed by the school to conduct audits and inspections

Yours sincerely,

Dominic Vizzard
Director

David Turpie
Director