

Bromcom Computers Plc

GDPR Compliance and Privacy Statement

Objective of this statement

[1] This statement explains how Bromcom Computers Plc (Bromcom) complies with the General Data Protection Regulation (GDPR). The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. Because the GDPR is a regulation, not a directive, it does not require EU national governments to pass any enabling legislation and is directly binding and applicable. Legislation concerning data protection up until 25th May 2018 when GDPR took effect has been centred around the Data Protection Act 1998, an Act which Bromcom has also fully complied with.

[2] This statement also sets out Bromcom's Privacy Policy for users of its Management Information Systems software and its MyChildAtSchool (MCAS) website.

[1] Bromcom's statement of GDPR compliance

Bromcom is committed to high standards of information security, transparency and privacy. We place a high priority on protecting and managing data in accordance with accepted standards. The company complies with the GDPR as it applies to Bromcom. Bromcom continually seeks to ensure the confidentiality, integrity and availability (to authorised persons) of the personal data we store or process. We maintain appropriate technical and organisational security measures to protect personal data against accidental or unlawful destruction or loss, alteration, unauthorised disclosure or access.

Where is your data kept?

Bromcom hosts all of its cloud hosted MIS services on the Microsoft Azure Platform and these services are run exclusively from the UK North and UK South Azure Regions, therefore all data stored on the Bromcom MIS cloud hosted solution remains in the UK only.

Data Controllers and Data Processors

Bromcom is a company that

- keeps its own records about Bromcom staff, suppliers, customers and potential customers
- supplies Management Information System software and services to schools and organisations that oversee schools such as local authorities (LAs) and Multi Academy Trusts (MATs).
- Supplies education based information to parents and guardians of pupils via the MyChildAtSchool website. Also provides an on line payment facility via the MCAS website.

In the view of the GDPR

- Bromcom is a Data Controller when it collects personal data about its staff, suppliers, customers and potential customers;



- Bromcom is a Data Processor when it uses its Management Information System software and MyChildAtSchool website to process the personal data that schools, LAs and MATs collect about their pupils and staff. The schools, LAs and MATs in this situation are the “Data Controllers”. Also when it processes on line payments via the MCAS website.

Data Controller responsibility

In its role as a Data Controller, Bromcom can be contacted via the Company Secretary at the Bromcom registered office address.

Schools as Data Controllers can be of many different types such as local authority maintained primary and secondary schools, academies, free schools, studio schools etc. Aside from the GDPR, schools have a legal right to collect and use personal data relating to their pupils and families in order to meet legal requirements and legitimate interests set out in UK law including the Education Act 1996 and the Education Regulations 2013. Each school will set out its position as a Data Controller, and the rights of parents, pupils and staff in relation to how the school controls that data. If you have questions about personal data collected by a school, please contact the school directly.

Bromcom’s appointment as Data Processor

By the fact that a school, LA or MAT (the Bromcom Customer) or Registered User of the MCAS website has contractually engaged Bromcom to provide Management Information System software and/or other services, Bromcom takes this action of engagement as an unambiguous consent by the school, LA, MAT or Registered User that Bromcom shall process the personal data collected by that Data Controller. Bromcom at the same time reserves the right to appoint Sub Data Processors on the same or similar terms.

Bromcom’s responsibilities under GDPR

[a] As a Data Controller and Data Processor

Bromcom will adhere to the rules and regulations of the GDPR legislation, and further adhere to the guidance and procedures put forward by the Information Commissioner’s Office (ICO), the body that upholds and enforces this legislation in the UK

[b] As a Data Processor

Bromcom will hold and process the data of its customers only for the purposes of education management. Bromcom will only store and process such data as is required to provide a Management Information service to Bromcom Customers.

Bromcom does not store Bromcom Customer data outside of the European Economic Area (EEA) (as required by the Department for Education).

Bromcom does not sell or otherwise transfer Bromcom Customer data to other organisations for the purposes of advertising or marketing. All data provided by the Bromcom Customer for the purposes of processing is the under the ownership of the Bromcom Customer.

As a Data Processor for Registered Users (parents and guardians) using the MCAS website for on line payments, Bromcom will only process data for the purposes of facilitating payments and no payment card data is stored by Bromcom. Some data in this process may be transferred outside of the EEA by Sub Data Processors, although this would be done subject to the safeguarding procedures of the Payment Service Providers.



Our collection and use of your personal information

We collect personal information about you when you access our website, contact us, send us feedback, purchase products or services via our website, post material to our website and complete customer surveys or participate in competitions via our website.

We collect this personal information from you either directly, such as when you *register with us, contact us or purchase products or services via our website* or indirectly, such as your browsing activity while on our website (see 'Cookies' below).

The personal information we collect about you depends on the particular activities carried out through our website. This information includes:

1. your name, address and contact details
2. The organisation you're contacting on behalf of
3. details of any feedback you give us by phone, email, post or via social media
4. information about the services we provide to you
5. your account details, such as username, login details

Our legal basis for processing your personal information

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

1. **consent:** where you have given us clear consent for us to process your personal information for a specific purpose
2. **contract:** where our use of your personal information is necessary for a contract, we have with you, or because you have asked us to take specific steps before entering into a contract
3. **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)

Cookies

We use cookies on <https://www.bromcom.com> for statistical purposes to track how many unique user we have and how often they visit the Bromcom website. Data we collect includes which of our pages are most frequently visited, and we use this information to continually improve our website. The data collected and stored is anonymous and does not contain any personal data or identify you.

We also use targeting/advertising cookies- these cookies are used to deliver ads relevant to you. They also limit the number of times that you see an ad and help us measure the effectiveness of our marketing campaigns.



Necessary cookies: Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Statistic cookies: Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Throughout the Bromcom Computers Plc website we may link to other websites owned and operated by third parties. These other third party websites may also use cookies or similar technologies in accordance with their own separate policies. For privacy information relating to these other third party websites, please consult their policies as appropriate.

Bromcom uses Google Analytics, a web analytics service provided by Google inc. Google Analytics sets the following third-party through this website in order to evaluate your use of the site and compile reports for us on activity:

_utmaGoogle AnalyticsGeneral tracking code

_utmbGoogle AnalyticsGeneral tracking code

_utmcGoogle AnalyticsGeneral tracking code

_utmzGoogle AnalyticsGeneral tracking code

Google stores the information on servers in the USA. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Information on how to reject or delete the Google Analytics cookie can be found at:
<http://www.google.com/intl/en/privacypolicy.html> privacy policy link.

Please note other websites to which this website may be linked, may also make use of their own cookies.

Further information

If you have any further questions about the use of cookies on www.bromcom.com, contact us via legal@bromcom.com.

How do I turn cookies off?

You can disable cookies from your browser and delete all cookies currently stored on your computer. However, this may prevent websites that you visit from working correctly.



[2] Bromcom's Privacy Statement

Bromcom collects and keeps its own records about Bromcom staff, suppliers, customers and potential customers (Company Records).

Bromcom processes personal data provided by Bromcom Customers who are Data Controllers (mostly schools, local authorities or Multi Academy Trusts) in the form of education based management data.

Bromcom takes all reasonable and necessary precautions to ensure that Bromcom Company Records and Bromcom Customer data is secure. In the event of a breach of security or privacy, Bromcom will contact the Data Controller at the Bromcom Customer in the first instance (in the case of processed data) and then inform the ICO if required by law.

Data collected and controlled by Bromcom which are **Company Records** include such information as staff details, supplier names addresses and email addresses and customer and potential customer contact details.

Data that is processed using the **Bromcom Management Information System software** for schools, local authorities or Multi Academy Trusts is processed to provide a very wide selection of timely, critical, strategic and up to date data and management information such as is required to administer a school, or the control of a school of schools by a local authority or Multi Academy Trust. Examples of data processed to produce such information is as follows: - standard lists such as "pupil names by class"; specialist reports such as "attendance monitoring"; specialist lists such as "dinner money list day by day"; specialist reports such as "progress in assessment"; aggregated reports which do not include name references; Department for Education requirements such as "pupil census" etc.

Data that is processed on the **Bromcom MyChildAtSchool.com website**, is for the most part available to parents and guardians of pupils at school (see the privacy statement below). Examples of the personal information presented here are: attendance reports, assessment reports, behaviour reports etc. Please note that as a Data Processor, Bromcom does not independently verify, and does not exert control over, data and information on pages appearing on the MyChildAtSchool website.

Bromcom also processes on line payments via the MCAS website.

Bromcom ensures that all data is held securely. Bromcom always seeks to prevent data corruption and data loss.

Bromcom is ISO 9001 compliant. ISO 9001 is designed to help our organisation ensure we meet the needs of customers and other stakeholders while meeting statutory and regulatory requirements related to the services we offer.

Any data storage uses modern and best practice encryption technology. Any data transfer over the internet is encrypted using modern SSL/TLS protocols. All data at rest is encrypted.

No personal data from Bromcom Customers is transported in an unencrypted format.

Bromcom servers and remote host servers are in secure locations.

Bromcom does not share Bromcom Customer data with third parties (unless required to do so by law) except where the Bromcom Customer has specifically requested that a link be made e.g. to a third party software application such as "Cashless Catering". Such third party links are at the sole discretion of the Data Controller, usually the school.



The Bromcom Help Desk service (if provided) is provided at the behest of the Bromcom Customer. Bromcom Help Desk operatives will only look into “reported problems” when instructed to do so by the Bromcom Customer. Only at this stage will a Bromcom Help Desk Operative potentially be required to examine personal data and only with a view to solving the “reported problem” put forward by the Bromcom Customer. All Bromcom Help Desk calls are logged on Help Desk monitoring software.

Retention of Data

Should a Bromcom Customer reach the end of a contract with Bromcom to provide Management Information services, the data of the Bromcom Customer is made available for download from a secure site or by any other acceptable and secure method. Once downloaded by the Bromcom Customer the data is deleted by Bromcom.

A copy of the Bromcom Customer’s data is available to the Bromcom Customer at any time during its contract with Bromcom, upon request.

Privacy notes for users of the MyChildAtSchool.com (MCAS) website

The MCAS website is for the most part used by parents and guardians of pupils at school.

The following defined terms are used here:

- “**MyChildAtSchool.com**”; “**mychildatschool.com**”; and “**MCAS**” mean the MyChildAtSchool.com Website.
- “**Partner School**” means an educational institution that has made information available to a Registered User of the Website.
- “**Registered User**” means someone who has provided registration details and who has a valid sign-in name and password allowing access to the Website. Usually this will be parents, guardians, teachers and others with a responsibility for the performance and welfare of children.

This MCAS privacy statement covers the process by which Bromcom collects, processes, maintains and discloses information that is presented to Registered Users of the MyChildAtSchool website. This statement also covers when on line payments are processed via the MCAS website.

Specific questions regarding information provided on the MCAS website should be directed to the Partner School (i.e. the Bromcom Customer that the MCAS site is linked to) in the first instance.

Personal identification information

As a Data Processor, Bromcom does not collect or track personal information from MCAS website visitors. As a Registered User (i.e. someone who has provided registration details and who has a valid sign-in name and password allowing access to the website) your Data Controller is the Partner School. Should a Registered User give “Recurring Transaction Authority” then some token payment authority will be retained.

Non-personal identification information

The Company may collect non-personal identification information about Registered Users whenever they interact with the Website. Non-personal identification information may include the browser name, the type of computer and technical information about Registered Users means of connection to the Website, such as the operating system and the Internet service providers utilized and other similar information. Generic information from server logs may be used to track the number of hits to



the MCAS website, and to find out what types of browser software are used by visitors. This information will be used only in aggregate form, and used solely for improving web site design.

Web browser cookies

The MCAS website does not use "cookies".

How the Company protects your information

Bromcom adopts appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of any personal information, username, password, transaction information and data stored on the Website. Our MCAS website is in compliance with PCI vulnerability standards in order to create as secure an environment as possible for Users. The Bromcom on line payment module is PCI DSS compliant.

Sharing your personal Information

As a Data Processor, Bromcom only processes data (except for on line payments) on the MCAS website. Some data is retained but only for the purposes of enabling the on line payments process. Bromcom is not therefore in a position to sell, trade, or rent Registered Users' or other personal identification information to third parties. You are entitled to request details of the personal information that your Partner School holds about you as the Data Controller.

Website use and third parties

At various points throughout the site, you may be offered automatic links to other internet sites relevant to a particular aspect of this site. This does not indicate that Bromcom Computers Plc or affiliates are necessarily associated with any of these other sites or their owners. While it is the intention of Bromcom Computers Plc that you should find these other sites of interest, neither us nor affiliates nor their employees shall have any responsibility or liability of any nature for these other sites or information contained in them.

The Bromcom site gives some areas where you can post or exchange information, ideas and opinions e.g. "Twitter". Such actions are collectively known as "Postings". Please be aware that Bromcom Computers Plc has no obligation to and does not exercise editorial control over information that users post to the site in such areas and such information found on third party sites.

Website use and postings

This section relates to visitors (customers) postings on <https://www.bromcom.com>.

To the fullest extent permitted by applicable law, Bromcom Computers Plc shall in no event have any responsibility or liability for customer postings or for any claims, damages, or losses resulting from their use and/or appearance on the Bromcom Computer Plc site. We reserve the right to monitor all customer postings and to remove any which it considers in its absolute discretion to be offensive or otherwise in breach of this privacy policy. The customer hereby represent and warrant that they have all necessary rights in and to all their postings they provide and all material they contain; that the customer postings shall not infringe any proprietary or other rights of third parties; that the customer postings shall not contain any viruses or other contaminating or destructive devices or features; that the customer postings shall not contain any defamatory, indecent, offensive, tortuous, or otherwise unlawful or immoral material or content; and that the customer postings shall not be used to carry out or solicit any unlawful activity and/or be used to make commercial solicitations. The customer hereby authorises us to use and/or authorise others to use all or part of their postings



in any manner, format, or medium that we or such other parties see fit. The customer shall have no claim or other recourse against Bromcom Computers Plc for infringement of any proprietary right in customer postings.

Bromcom Privacy Policy

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