



Koboca Data Policy

Version 1.0
16 March 2018

Data Controller and Processors

The data collected by individual schools using the Koboca system is owned by that school and the school is the Data Controller. To allow management, hosting and storage of the data Seamless Software acts as a Data Processor. Seamless Software will ensure that any member of the Seamless Software team with access to personal data is committed to confidentiality and is under contractual or legal obligation to that effect. Data will only be accessed to allow Seamless Software to provide support to schools using the system.

Your obligations as a Data Controller

- To ensure they have the necessary legal basis for processing the data
- To only make written requests to Seamless Software in relation to data processing
- To never ask Seamless Software, or use the Koboca system, to process data in a way which would breach any obligation under the Data Protection Act 1998 (up to and including 24 May 2018, and the GDPR from 25 May 2018)
- To undertake a data protection impact assessment before requesting, or making, changes to data processing

Our obligations as a Data Processor when we process data on your behalf

- To refuse requests relating to data processing unless it is made in writing
- To refuse a request to change data processing where we are aware it would breach any obligation under the Data Protection Act 1998 (up to and including 24 May 2018, and the GDPR from 25 May 2018)
- To provide assistance, where necessary, to allow you as the Data Controller to discharge your duties to allow data subjects to exercise their rights under the Data Protection Act 1998 (up to and including 24 May 2018, and the GDPR from 25 May 2018)
- To notify the Data Controller where we are aware that a requested change to the data processing is likely to impact the risk level of data processing
- From 25 May 2018 - To provide you (as the Data Controller) with information, files and documentation as required to ensure both parties are meeting their GDPR Article 28 obligations. Where necessary to submit information, files and documentation to allow the Data Controller to inspect or audit the data processing

Overview of Data held

Koboca holds data relating to surveys answered by pupils of school age. This includes school name, year group, gender and name - as the system can be configured by each school to include additional questions this data set may be extended. The data is used to populate reports to allow schools to collate pupil's views and test scores and identify target groups to offer support.

Data security

Access to the Koboca system is secured through the use of a secure logon system, and all internet traffic is sent over a securely encrypted TLS/HTTPS connection. We also ensure that all sensitive information is encrypted at rest using AES256 and all our servers are securely hosted in the UK, managed by our technology partner See Green (see Data Sub-processors).

As a user of the system, schools need to ensure they maintain the security of their login details and should notify Seamless Software immediately if they believe their login details may have been compromised.

Registration

Access to data will be provided through the email address given as primary contact on the registration page. Seamless Software recommends for schools to use a school email address for this and must ensure the email account is suitable to receive login details. It is the responsibility of the school to keep these logins safe.

To change the registered email address, an email from the school email account must be sent to enquiries@koboca.co.uk

Other recommendations

Seamless Software recommend schools only access data through their secure school networks. Schools should ensure they log out of Koboca whenever leaving their computer unattended. Seamless Software recommend schools should not print out any names or sensitive data. Login details should be kept safe and any breach of security should be reported to Koboca immediately. Seamless Software advise schools to ensure screenshots, login details or other data taken from the Koboca system to be held in a secure location.

Data retention

Seamless Software work to ensure all data is only kept for the period it is required within the following factors.

- Legal retention period: For data with a legal requirement including accounting, employment and administrative law, this data will be held for the period required under the relevant legislation.
- Contracted period: For data which is processed for the purpose of providing a service within a contracted period, the data will be maintained for the agreed period.

When data is no longer required for the original purpose of processing, the contract period has ended, or the subject has withdrawn consent to processing their data, all personal data will be deleted from our system, except in cases where we are required to retain that information for contractual, accounting or legal reasons. If consent for data processing is withdrawn for data we are unable to delete, due to accounting or legal reasons, the party wishing to withdraw consent will be notified within 5 working days.

Where a contracted processing period has ended we will automatically delete the data inline with our removal procedure, unless we have a prior written request from the Data Controller to return the data to them at the end of the contract. Where a data return is requested we will arrange for a secure data transfer to the Data Controller. Once safe receipt is confirmed the data will be deleted in line with our removal policy. Data deletion will occur on live systems within 10 working days of passing the required retention period, and 90 days on backup systems.

When we receive a data removal request relating to data we are the Data Processor for, we will pass that request to the relevant Data Controller within 24 hours. We will not action any data removal request without the relevant Data Controllers authorisation, except in any instance where we are legally obliged to do so.

Data breach policy

Where Seamless Software is acting as a Data Processor we will notify the relevant Data Controller of any data breach within 24 hours. Where Seamless Software is acting as Data Controller we will notify the UK Information Commissioner's Office within 72 hours. Seamless Software will provide all relevant information to affected customers, and make every reasonable endeavour to mitigate or remedy the effect of the data breach.

Data Sub-processors

The following organisations act on our behalf as data sub-processors.

Organisation	Processing activity
Google Ireland Limited Gordon House, Barrow Street, Dublin 4, Ireland	Website usage analytics. Personal and sensitive information is not shared with this sub-processor.
See Green Media Ltd Turing House, Marsden Park, York, YO30 4WX	Koboca system support. Personal and sensitive information may be shared with this sub-processor under our supervision.
See Green Systems Ltd Turing House, Marsden Park, York, YO30 4WX	Koboca system hosting and security. Personal and sensitive information may be shared with this sub-processor under our supervision.