

1. Introduction

School Synergy Limited (“we,” “our,” or “us”) provides software services to schools and educational institutions (“Schools”) to facilitate the management and processing of student and administrative data.

This Privacy Policy explains how we process personal data when our software is used. **We do not collect, own, or control this data**—the School is the data controller, and we act solely as a **data processor** under the instructions of the School.

If you have any questions about how your personal data is collected or used, please contact your School directly.

2. Data Controller vs. Data Processor

Under the UK General Data Protection Regulation (UK GDPR), the **School is the data controller**, meaning they determine how and why personal data is processed. **We are the data processor**, meaning we process data only as instructed by the School and do not use it for any other purposes.

3. What Data We Process

As a data processor, we may process the following types of data on behalf of Schools:

- **Student Data:** Names, dates of birth, student IDs, academic records, attendance data
- **Staff Data:** Teacher/staff names, email addresses, work schedules
- **Parent/Guardian Data:** Contact details, emergency contacts
- **Other School-related Data:** Any additional data the School chooses to input

We **do not collect personal data directly from students, parents, or staff**. All data is provided by the School. We do collect browser information, IP address and other internet related information as part of security and audit purposes.

4. How We Use Data

We process personal data only for the purpose of providing our contracted services to the School. This includes:

- Operating and maintaining our software
- Supporting the School with technical assistance
- Storing and backing up data securely
- Improving system performance and security

We do not sell, share, or use this data for any marketing or advertising purposes.

5. Legal Basis for Processing Data

As a data processor, we rely on the **School’s legal basis for processing**. Under the UK GDPR, the School may process personal data based on:

- **Legitimate interests** (e.g., school administration)
- **Legal obligations** (e.g., safeguarding children)
- **Performance of a contract** (e.g., providing educational services)
- **Consent**, where required (e.g., for optional services)

If you have questions about the legal basis for processing your data, please contact your School.

6. Data Sharing and Third Parties

We do not share personal data with third parties unless explicitly directed by the School. However, we may use **sub processors** (e.g., cloud storage providers) to support our services. All sub processors are contractually required to comply with UK GDPR and maintain strict security standards.

A list of our sub processors can be provided upon request.

7. Data Security

We implement robust security measures to protect all data processed through our platform, including:

- **Encryption** of stored and transmitted data
- **Access controls** to limit who can view or process data
- **Regular security audits** to ensure compliance with data protection laws
- **Data backup and disaster recovery** procedures

However, ultimate responsibility for data security and integrity rests with the School as the data controller.

8. Data Retention & Deletion

We retain data only as long as necessary to provide our services, as determined by the School. Once a School no longer requires our services or requests deletion, we securely delete or anonymize all personal data.

If you wish to request deletion or correction of personal data, please contact your School, as they control this process.

9. You Rights Under UK GDPR

Since the School is the data controller, they are responsible for responding to any **data subject rights requests**. Under UK GDPR, you have the right to:

- **Access** your personal data
- **Correct** inaccurate or incomplete data
- **Request deletion** of data (subject to legal requirements)
- **Restrict processing** under certain conditions
- **Object** to certain processing activities
- **Request data portability** in certain circumstances

To exercise these rights, please **contact your School directly**.

10. International Data Transfers

If we transfer personal data outside the UK or EEA, we ensure appropriate safeguards are in place, such as:

- **UK International Data Transfer Agreements (IDTAs)**
- **Standard Contractual Clauses (SCCs)**
- **Other legally approved mechanisms**

For more details, please contact your School.

Project Manager

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Position	Managing Director
Date	21/11/2024
Signature	